

*Southern California Edison*  
*2025-WMPs – 2025-WMPs*

**DATA REQUEST SET O E I S - P - W M P \_ 2 0 2 4 - S C E - 0 3**

**To: Energy Safety**  
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**Job Title: Senior Advisor**  
**Received Date: 4/29/2024**

**Response Date: 5/2/2024**

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**Question 01:**

**Regarding Expanded Clearances for Generation Legacy Facilities (VM-3)**

In SCE's 2025 WMP Update, it states that it executed VM-3 at 63 sites in 2023, exceeding its compliance target of 50 sites.<sup>1</sup> Energy Safety attempted to validate the number of sites SCE executed under this program using its quarterly spatial data submissions. There are 106 polygons with "VM-3" in the Utility Initiative Tracking ID field, many of which are clustered in ways that suggest there are multiple polygons per "site." Energy Safety used the attributes "Asset ID" and "Project Location or Address" to delineate "site." Using either of these attributes, there are 60 unique VM-3 sites represented in SCE's Q1-Q4 2023 Vegetation Management Project Polygon features in the QDR spatial data.

- a. How does SCE define "site" for the purposes of executing VM-3?
- b. Can SCE's definition of "site" be mapped to an attribute in its quarterly data spatial submissions? If so, which attribute?
- c. Are SCE's 2023 quarterly spatial submissions of executed VM-3 work complete?
  - a. If so, describe how Energy Safety can delineate unique sites from the submissions.
  - b. If not, provide a feature class of the missing executed VM-3-related work in 2023 in the format prescribed by Section 3.6.3.6.4 "Vegetation Management Project Polygon (Feature Class)" of Energy Safety's Data Guidelines v3.2.

**Response to Question 01:**

The QDR spatial data reflects the current status of *both* inspections and remediations for VM-3, based on when the QDR filing was submitted.

In addition, historically, SCE has provided remediation information. Starting in Q3 2023, SCE began to provide an inspection file for the applicable quarter. As part of the QDR, SCE provides completed inspections and remediations information available at the time of submission, which may or may not include all the site information.

- a. How does SCE define "site" for the purposes of executing VM-3?

For the purposes of executing VM-3, SCE defines "sites" as generation assets such as hydroelectric generating stations (powerhouses), substations, switching yards, and associated low-voltage powered assets that are ancillary assets.

*b. Can SCE's definition of "site" be mapped to an attribute in its quarterly data spatial submissions? If so, which attribute?*

Yes. To identify the site, filter by "Asset ID" and/or "Project Location or Address." SCE clarifies that VM-3 inspection work occurred in Q1 and Q2 2023, but reporting did not occur until Q3 2023.

*c. Are SCE's 2023 quarterly spatial submissions of executed VM-3 work complete?*

Yes. SCE's 2023 quarterly spatial submissions includes completed VM-3 work.

*a. If so, describe how Energy Safety can delineate unique sites from the submissions.*

See part b above.

*b. If not, provide a feature class of the missing executed VM-3-related work in 2023 in the format prescribed by Section 3.6.3.6.4 "Vegetation Management Project Polygon (Feature Class)" of Energy Safety's Data Guidelines v3.2.*

N/A