



October 1, 2026

Dear Stakeholders,

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Annual Performance Report regarding Southern California Edison Company's (SCE's) implementation of its 2024 Wildfire Mitigation Plan (WMP).

This Annual Performance Report differs from other 2024 Annual Performance Reports in that it includes information gathered in response to an incident that occurred after the 2024 WMP implementation period. In light of the devastation caused by the Eaton fire, and the initial public reports that suggested SCE's equipment may have caused the fire, Energy Safety proactively requested data from SCE in January and February 2025 on all WMP-related activities that took place near the Eaton fire's ignition location during the 2022-2024 period. SCE's WMP-related activities near the Eaton fire ignition location included asset inspections.

In reviewing the data submitted by SCE, certain WMP-related asset inspection practices came to light that drew Energy Safety's attention. These included the misclassification of aerial inspections as ground inspections, not following up on information missing from inspection reports, and vegetation obscuring the view of asset conditions. These performance issues, and others, are discussed in more detail in Section 6.5.3 of the attached report.

Energy Safety's analysis of the SCE data does not and is not intended to provide a basis for any of the following: determining the cause of the Eaton fire; determining whether SCE violated any laws or orders; determining whether or the extent to which SCE may be liable for any wildfire-related damages. Energy Safety was not and is not a participant in any Eaton Fire investigation led by any other body. Rather, Energy Safety is focused on understanding past performance in order to determine how to improve future performance. If additional information comes to light about the root cause of the Eaton fire as a result of court proceedings, California Public Utilities Commission investigations, or other investigations, Energy Safety will review that information carefully to help shape our oversight activities.

Consistent with Energy Safety's mission to monitor WMP implementation and push electrical corporations to eliminate catastrophic wildfires, Energy Safety's analysis underscores the ongoing need for vigilant, detail-oriented execution and oversight of the fundamental elements of electric system operations. This includes, but is not limited to, effective asset inspection and repair programs, especially in areas of higher wildfire risk. Importantly, as demonstrated by Energy Safety's analysis, both the quantitative volume of asset inspection activity and the quality of those inspections affect the amount of risk reduced.

The 2024 Annual Performance Report for SCE is published as of the date of this letter. SCE may, if it wishes to do so, file a public response to this Annual Performance Report within 14 calendar days of the date of publication. Comments must be submitted to Energy Safety's E-Filing system in the 2024 Annual Performance Report docket.¹

Sincerely,

A handwritten signature in dark ink, appearing to read "Forest Kaser", with a stylized, sweeping flourish at the end.

Forest Kaser
Director
Office of Energy Infrastructure Safety

¹ Submit responses to the [2024-APR](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR) docket via the Office of Energy Infrastructure Safety's E-Filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR>



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

2024 ANNUAL PERFORMANCE

REPORT

SOUTHERN CALIFORNIA EDISON COMPANY

October 2026

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Executive Summary

Energy Safety's primary objective is to ensure that electrical corporations (ECs) reduce wildfire risk and adhere to their approved Wildfire Mitigation Plans (WMPs), which are annually filed pursuant to Public Utilities Code section 8385 *et seq.* Energy Safety's annual performance evaluation of Southern California Edison Company (SCE) is a comprehensive look at the implementation of its 2024 WMP targets and its catastrophic wildfire risk reduction initiatives.

Energy Safety's assessment found that SCE completed 41 of 47 (87%) of its 2024 targets for initiative activities in its 2023-2025 Base WMP and approved Change Order Request. Energy Safety identified several areas for performance improvement:

- Four of the six missed SCE 2024 WMP initiative targets were also not met in implementation year 2023: Covered Conductor, Rapid Earth Fault Current Limiters Ground Fault Neutralizer, Inspection and Maintenance Tools, and Open Work Orders. SCE's continued failure to meet the targets for these initiatives suggest a lack of capacity and urgency to correct issues impacting initiative attainment.
- SCE had numerous issues with data reporting accuracy and completeness for initiative attainment reporting, as well as quality assurance and quality control shortcomings. Accurate and timely data is essential for monitoring and improving performance.
- SCE could improve its estimates of proposed spending and the management of its WMP expenditures.

While SCE met a majority of its WMP targets, the Los Angeles County Fire Department (LACoFD) determined that SCE's equipment caused the catastrophic Eaton wildfire in the month following the 2024 performance period.¹ The specific mechanism of the ignition was not addressed in the LACoFD report and has not been yet disclosed by any other investigative body. Energy Safety was not a formal participant in any Eaton Fire investigation.

In light of the fact that SCE's transmission equipment was identified very early on in public reporting as a potential source of the Eaton fire ignition, Energy Safety's review of a selection of the inspection records of transmission inspections revealed several different performance issues related to the quality of asset inspections. These included misclassifying aerial surveys as ground surveys, not having clear follow-up procedures to determine the condition of assets that could not be effectively inspected, and overgrown vegetation concealing the condition of the bottom of assets. Energy Safety also reviewed SCE WMP distribution inspection records and found that some of the issues that it observed with transmission

¹ Investigation Report, page 4.

inspections appear to affect the quality of distribution inspections as well. SCE should work to remedy these issues as quickly as possible.

Going forward, SCE must show, through consistent action, that it will honor its WMP commitments and thus meaningfully reduce wildfire risk in the manner committed to its customers and the people of California through its WMP. Energy Safety will scrutinize SCE's future WMP performance and continue to report on any failures by SCE to achieve its own objectives to reduce the risk of catastrophic wildfire in California.

1. Introduction

The Office of Energy Infrastructure Safety's (Energy Safety's) primary objective is to ensure that electrical corporations reduce wildfire risk and adhere to their approved Wildfire Mitigation Plans (WMPs).² This requires a multistep process.³ First, electrical corporations submit WMPs to Energy Safety providing plans for wildfire risk reduction. Energy Safety approves or denies WMPs based on criteria such as demonstrated year-over-year progress, forward looking growth, and the inclusion of quantitative and qualitative targets.⁴ Energy Safety inspectors and auditors evaluate the electrical corporation's performance of mitigation activities and strategies in their approved Wildfire Mitigation Plans. Energy Safety can issue non-punitive notices of non-performance when inspectors and auditors find deviations from approved WMPs. Then, on an annual cadence, electrical corporations and independent evaluators review an electrical corporation's WMP performance. Energy Safety then completes its performance review of the electrical corporation's performance for that year, which incorporates information from the electrical corporation and independent evaluator's reports. The performance review is also non-punitive.⁵

This Annual Performance Report (APR) presents Energy Safety's statutorily mandated assessment of Southern California Edison Company's (SCE's) performance relative to its 2024 targets for initiatives and objectives in its 2023-2025 Base Wildfire Mitigation Plan (2023-2025 Base WMP) and approved Change Order Request.⁶ While the 2023-2025 Base WMP considers activities over a three- and 10-year horizon, this report only addresses targets established for initiatives and objectives to be completed in 2024. Therefore, this report uses the term "2024 WMP" to refer to portions of the 2023-2025 Base WMP addressed by this report.

In the sections that follow, Energy Safety describes the statutory and regulatory basis for this report, the 2024 WMP, the information supplied by SCE, the independent evaluation conducted by a third-party independent evaluator that examined SCE's implementation of its 2024 WMP, and an assessment of how SCE implemented its 2024 WMP. Finally, Energy Safety provides its conclusions and recommendations for further actions by SCE.

² Government Code Section 15475.1(a).

³ The process is described in detail in Public Utilities Code Sections 8385-8386.3 and in Government Code Sections 15475-15475.2.

⁴ 2023-2025 WMP Process and Evaluation Guidelines pages 9-10.

⁵ Pursuant to Public Utilities Code section 8386.1, the CPUC "may assess penalties on an electrical corporation that fails to comply with its plan."

⁶ On November 1, 2023, SCE submitted a Change Order Request for ten initiatives. On May 31, 2024, Energy Safety approved two of the changes and denied eight of the remaining requests. Seven requests were rejected based on SCE's justification that full implementation of the initiatives was not feasible.

2. Performance Assessment Process

The statutory objective of electrical corporation wildfire mitigation planning efforts is to ensure that electrical corporations are constructing, maintaining, and operating their infrastructure in a manner that will minimize the risk of catastrophic wildfire.⁷

Government Code section 15475(b)(2) directs Energy Safety to develop performance metrics to achieve maximum feasible risk reduction to be used to develop the wildfire mitigation plan and evaluate an electrical corporation's performance relative to the implementation of that plan.

In this report, Energy Safety considers the totality of all performance assessments completed with respect to SCE's 2024 WMP. This includes all inspection, audit, investigation, and data analysis work performed by Energy Safety, as applicable, as well as separate electrical corporation and independent third-party evaluations of implementation.

The following is an overview of the performance areas assessed by Energy Safety:

1. Energy Safety assessed *2024 WMP attainment performance* by determining whether the electrical corporation met the 2024 WMP targets for initiatives and objectives, looking specifically at whether the electrical corporation funded and performed the work stated for each initiative, and by performing field inspections of WMP work claimed to be completed by SCE;
2. Energy Safety assessed *ignition risk performance* by tracking ignition rates, wire down rates, and unplanned outage rates – all indicators of ignition risk;
3. Energy Safety assessed *Public Safety Power Shutoff (PSPS) performance* by tracking the frequency, scope, duration and impact of PSPS events;
4. Energy Safety assessed *outcome metric performance* by tracking the number of acres burned, number of buildings damaged or destroyed, number of fatalities or injuries, and total value of assets lost due to wildfires ignited by SCE's equipment; and
5. Energy Safety assessed *data accuracy and completeness performance* by crosschecking data from various utility reporting mechanisms, assessing the accuracy of data submitted by SCE of its WMP work, reviewing multiple reports, reviewing a formal quality assurance and quality control evaluation, and identifying issues encountered during the performance assessment process.

⁷ Pub. Util. Code section 8386(a).

3. SCE 2024 Wildfire Mitigation Plan

SCE originally submitted a Base WMP on March 27, 2023, covering a three-year term from 2023 through the end of 2025,^{8,9} as well as a Change Order Request on November 1, 2023.¹⁰

Energy Safety approved SCE's 2023-2025 Base WMP on August 30, 2023,¹¹ and SCE's Change Order Request on May 31, 2024.^{12,13} For the purpose of this report, Energy Safety refers to the Base 2023-2025 WMP, any approved Change Order Requests, as well as the 2024 targets and initiatives, collectively as 2024 WMP.

SCE's 2024 Change Order Request originally proposed changes to 10 targets but was amended to three proposed changes after an Energy Safety data request.¹⁴ The Change Order Request on the Rapid Earth Fault Current Limiters (REFCL) initiative requested changing the target from completing construction to initiating construction.¹⁵ SCE cited engineering delays and lengthy material procurement lead times impacting construction at the Banducci substation.¹⁶ Energy Safety denied the proposed target change, stating that it would not reduce risk.^{17, 18} For the two initiatives Transmission Conductor and Splice Assessment: Spans with LineVue and Transmission Conductor and Splice Assessment: Splices with X-Ray, SCE requested target changes from "pending engineering analysis" to targets of 25 and 50 inspections, respectively.¹⁹ Energy Safety approved these two target revisions from a developing target to a defined target.²⁰

⁸ According to the 2023-2025 WMP Technical Guidelines.

⁹ 2023-2025 Base WMP Decision.

¹⁰ 2024 Change Order Request.

¹¹ 2023-2025 Base WMP Decision.

¹² 2024 Change Order Request Approval.

¹³ 2023-2025 WMP Process and Evaluation Guidelines, page 22. A Change Order Request allows an EC to request approval for a change or update to mitigation initiatives from its approved WMP prior to submission of a subsequent WMP or Update based on an updated understanding of risk.

¹⁴ 2024 Change Order Request Approval, page 1.

¹⁵ 2024 Change Order Request, page 2.

¹⁶ 2024 Change Order Request, page 2.

¹⁷ 2024 Approved Change Order Request, page 3.

¹⁸ The failure of a Change Order Request to lead to greater risk reduction as compared to the approved WMP was the main criterion used by Energy Safety to reject Charge Order Requests during the 2024 performance year, pursuant to the 2023-2025 WMP Process and Evaluation Guidelines in effect at the time.

¹⁹ 2024 Change Order Request, page 3.

²⁰ 2024 Approved Change Order Request, pages 3-4.

SCE's 2024 WMP highlighted past and ongoing efforts to address wildfire risk and reduce the impacts of PSPS events.²¹ The 2024 WMP described 47 initiatives, which are divided up into five categories and with some highlights identified here:

1. Grid Design, Operations, and Maintenance: SCE planned to continue installing covered conductors in High Fire Risk Areas (HFRA) and deploying REFCL and Early Fault Detection (EFD) technologies to further reduce ignition risk.²² The installation of REFCL helps with detecting ground faults and instantly reducing the current on the faulted conductor while boosting the current on the two remaining phases. This allows SCE to maintain service for customers while extinguishing arcs. EFD identifies abnormalities as a means to prevent faults.²³
2. Vegetation Management and Inspections: SCE planned to reduce vegetation contact with energized equipment by maintaining required clearances, mitigating tree fall-in risk, removing dead or dying trees, and clearing vegetation around poles.²⁴ SCE also planned to evaluate technologies such as Light Detection and Ranging (LiDAR) and satellite imagery in their ability to identify vegetation safety issues.²⁵
3. Situational Awareness and Forecasting: SCE planned to continue improving its fire spread modeling, weather modeling, and situational awareness capabilities to better predict fire weather and improve responses to fire and PSPS events.²⁶ SCE also planned to add additional weather stations and high-definition wildfire cameras to improve weather data and expand visibility across its territory.²⁷
4. Emergency Preparedness: SCE planned to continue serving customers during service disruptions by increasing community preparedness outreach, providing a dedicated customer service team, and maintaining an incident management team to coordinate emergency response.²⁸
5. Community Outreach and Engagement: SCE planned to continue coordinating with customers; local and tribal government agencies; fire agencies; community-based organizations; and other utilities for emergency planning, incident management and

²¹ 2023-2025 Base WMP, pages 238-245, 374-444, 449-450, 523-526, and 579-580; and 2024 Approved Change Order Request, pages 3-4.

²² 2024 WMP, page 6.

²³ 2024 WMP, pages 6 and 266.

²⁴ 2024 WMP, page 7.

²⁵ 2024 WMP, page 7.

²⁶ 2024 WMP, page 7.

²⁷ 2024 WMP, page 7.

²⁸ 2024 WMP, pages 7-8.

outreach.²⁹ SCE planned to focus its engagement on vulnerable communities and those heavily impacted by PSPS events to improve on coordination and outreach.³⁰

The 2024 WMP also contained three- and ten-year objectives.

Selected three-year objectives include:

- Continue evaluating emerging technologies to identify candidates for the grid hardening wildfire mitigation portfolio.³¹
- Develop and implement risk-prioritized remediations to reduce asset notifications backlog.³²
- Develop and implement a risk-informed process to minimize vegetation work backlog.³³
- Increase capacity to detect grid damage and degradation ahead of risk events.³⁴

Selected ten-year objectives include:

- Complete all proactive wildfire mitigation grid hardening.³⁵
- Optimize vegetation inspection cycles and prescriptions by location based on risk factors (e.g., species, wind).³⁶
- Continuing to expand engagement with agencies outside of California.³⁷

Of particular importance are the following objectives which have targets or goals for 2024:

- Satellite & Other Imaging Technology (SA-10) that includes installing ten high-definition cameras and addressing spatial data gaps to improve fire confirmation capabilities.³⁸

Descriptions of the activities and objectives of the programs and initiatives contained in SCE's 2024 WMP are listed in the table in Appendix A.

²⁹ 2024 WMP, page 8.

³⁰ 2024 WMP, page 8.

³¹ 2024 WMP, page 231.

³² 2024 WMP, page 232.

³³ 2024 WMP, page 375.

³⁴ 2024 WMP, page 446.

³⁵ 2024 WMP, page 234.

³⁶ 2024 WMP, page 376.

³⁷ 2024 WMP, page 577.

³⁸ 2024 WMP, page 491.

4. SCE Annual Report on Compliance

Public Utilities Code section 8386.3(b)(1) directs electrical corporations to file a self-evaluation report addressing the electrical corporation's implementation of its approved plan during the prior calendar year. This document is known as the Electrical Corporation Annual Report on Compliance (EC ARC).

Energy Safety's Compliance Guidelines outlined the requirements for an EC ARC prepared to address the 2024 calendar year and filed by the electrical corporation in early 2025. The EC ARC was required to detail the electrical corporation's self-assessment of its performance with the 2024 WMP during 2024.³⁹

SCE submitted its EC ARC to Energy Safety on April 1, 2025.⁴⁰ In its EC ARC, SCE listed five initiatives it was unable to complete. SCE stated this was due to environmental challenges, permitting constraints, delays in obtaining easements, long lead times for certain materials, and delays with land acquisition. For many of the missed initiatives, SCE pointed out that ongoing vegetation management, asset inspections, protection settings, and situational awareness activities would help mitigate risk at locations where the initiative was not yet completed.⁴¹

The EC ARC is considered by Energy Safety as well as by the independent evaluator in its assessment of SCE's WMP performance or evaluation of WMP implementation, respectively. For a summary of the EC ARC information on initiative completion and actual spending, see the table in Appendix A.

5. Independent Evaluator ARC for SCE

Energy Safety, in consultation with the Office of the State Fire Marshal, annually publishes a list of entities qualified to serve as independent evaluators of WMP compliance.⁴² Each electrical corporation is then required to hire an independent evaluator (IE) from the list of approved evaluators to perform an annual independent WMP compliance evaluation.⁴³

³⁹ 2024 Compliance Guidelines.

⁴⁰ EC ARC.

⁴¹ EC ARC, page 28.

⁴² Pub. Util. Code Section 8386.3(b)(2)(A).

⁴³ Pub. Util. Code Section 8386.3(b)(2)(B)(i).

The IE reviews and evaluates the electrical corporation's compliance with its approved WMP. As part of its evaluation, the IE must investigate instances of large deviation in actual expenditure greater than 10% as compared to the proposed expenditure amount in the associated WMP.

The 2024 Independent Evaluator Annual Report on Compliance (IE ARC) for SCE was prepared by PA Consulting Group Inc. The IE ARC included a review of the wildfire mitigation initiatives and activities implemented in 2024, and an accounting of whether SCE met its performance targets, deviated from its budget, and followed its quality assurance and quality control processes.

The IE utilized a variety of techniques to evaluate SCE's progress toward meeting its 2024 WMP commitments, such as inspecting a sample of SCE's field-verifiable 2024 WMP initiatives, performing desk reviews of non-field verifiable initiatives, interviewing selected utility staff, and reviewing the 2024 WMP and 2024 EC ARC.⁴⁴ The IE evaluated a total of 39 initiatives with targets.⁴⁵ The IE ARC includes sample verification statistics, an opinion on initiative completions, and actual expenditure estimates for each initiative.⁴⁶

The IE ARC identified 34 of 39 initiatives (86%) as complete. The IE ARC findings are summarized by initiative in Appendix A. The IE concluded that SCE met or exceeded a significant portion of their WMP targets.⁴⁷ However, although a significant portion of the WMP targets were met, several initiatives failed to meet their targets due to incomplete execution, siting of initiative activities in lower-risk areas than planned, or lack of documentation of initiative commissioning.⁴⁸

The IE ARC identified the same initiatives with missed targets as the EC ARC.

As a result of the evaluation conducted, the IE provided observations on SCE's 2024 performance in certain areas, including:⁴⁹

1. During the IE's inspections of SCE's work under its transmission asset inspection initiative, the IE found improper vegetation at many of the inspected sites, which interfered with the ability of the IE to "properly" verify that inspection activities were complete at those locations.⁵⁰

⁴⁴ IE ARC, pages 8-9 and 43.

⁴⁵ IE ARC, page 7.

⁴⁶ IE ARC, pages 21-27.

⁴⁷ IE ARC, page 80.

⁴⁸ IE ARC, page 80.

⁴⁹ IE ARC, page 88.

⁵⁰ 2025 IE AIR, page 34. Note that this observation is related to SCE's 2025 WMP performance and not 2024 WMP performance.

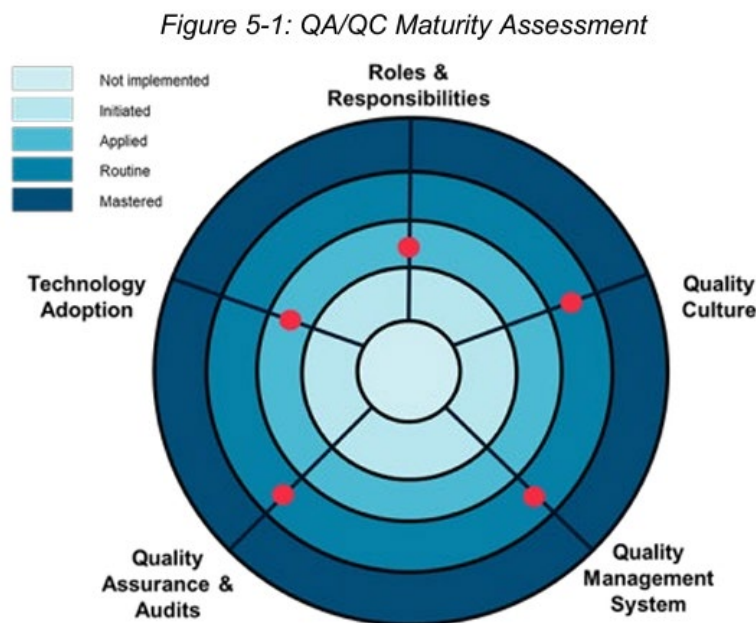
2. Discrepancies were identified in the SCE reporting on the Long Span WMP activity (SH-14).
3. For several field-verifiable initiatives, missing pole IDs, misaligned structure tags, and access constraints prevented observation of scoped assets, increasing sample failures and reducing confidence in completion validation.
4. Documentation quality varied as some initiatives had unit-level records with clear traceability to WMP targets, while others lacked reconciliation among scoped units, field results, and final spend amounts—particularly in vegetation management and grid hardening mitigation activities.
5. Accounting between operation and maintenance expenditures and capital expenditures was applied inconsistently.
6. Several initiative's expense categories were reclassified mid-cycle without timely or clear documentation, complicating funding verification and obscuring performance (including underspending).
7. Mid-year scope changes were not consistently communicated or reflected in updated targets, creating ambiguity for verification, funding, and performance assessment.

Finally, the IE reviewed SCE's QA/QC processes, assigning scores from 0 to 4 for five QA/QC Maturity Model metrics (Figure 1). The IE judged that Roles and Responsibilities as well as Technology Adoption were not strong dimensions of QA/QC maturity for SCE in 2024. For a full description of the QA/QC Maturity Model, see the IE ARC Outline and the IE ARC.^{51, 52}

⁵¹ IE ARC Outline, page 14.

⁵² IE ARC, pages 76-79.

Figure 1. Radar Plot of QA/QC Maturity Model for SCE Reproduced from IE ARC⁵³



In the IE ARC, the IE concluded that SCE had a developed and documented QA/QC process for WMP implementation. The IE reported that SCE's QA/QC culture was actively supported by executive leadership and reinforced through training, program qualification processes, and regular subject matter expert engagement.⁵⁴ Although SCE had a developed QA/QC program, the IE reported that SCE lacked traceability, accountability, and technology integration.⁵⁵ The IE also reported weaknesses in inspection oversight, contractor QA practices, and cross-functional ownership of quality.⁵⁶

In the IE ARC, beyond the observations, the IE further noted recommendations for SCE:⁵⁷

- Strengthen internal QA/QC to ensure tracking systems align with scoped targets and support external review and adoption into normal business practices as the programs have matured.
- Ensure accounting reclassifications between capital expenditures and operational expenditures are documented in real time with supporting rationale and across documentation for traceability.

⁵³ IE ARC, page 78.

⁵⁴ IE ARC, page 79.

⁵⁵ IE ARC, page 80.

⁵⁶ IE ARC, page 80.

⁵⁷ IE ARC, page 88.

- Improve the field readiness of sample documentation, including correct pole identification, global positioning system tags, and work order references whether in data schema alignment, geographic information system asset location fields, or logs.
- Communicate initiative scope changes clearly through addenda, internal memos, or updates to quarterly data reports (QDRs), including impacts to unit counts and budget allocations.
- Strengthen internal QA/QC processes to ensure tracking systems align with scoped targets, support external review, and adoption into normal business practices as the programs mature.

6. WMP Initiative Attainment Performance

Energy Safety's assessment of SCE's performance in 2024 indicates that SCE attained 41 of its 47 targets (87%) for its 2024 WMP initiative activities. The subsections below describe Energy Safety's assessment of SCE's 2024 WMP implementation.

Section 6.1 provides an overview of the 2024 WMP initiatives assessed for attainment by Energy Safety. Section 6.2 describes the vegetation management assessments performed by Energy Safety. Section 6.3 contains a review of any wildfires ignited by SCE's equipment during the assessment year. Section 6.4 provides an overview of Energy Safety's field inspection of both grid hardening and vegetation management activities related to SCE's 2024 WMP work, including inaccuracies in SCE's data regarding completed WMP work. Section 6.5 summarizes the initiatives with missed targets, if any, and provides three perspectives on the impact of SCE's failure to meet some of its 2024 WMP targets: percentage of completion, budget impacts, and risk reduction impacts. Section 6.6 provides an overview of the 2024 WMP proposed expenditures and compares them to the actual expenditures. Finally, Section 6.7 summarizes the findings of Section 6 of this report. Altogether, Section 6 characterizes SCE's performance with respect to its 2024 WMP initiative attainment. Additional performance assessments appear in Sections 7 through 10.

6.1 SCE 2024 WMP Initiative Activities Assessed by Energy Safety

Energy Safety assessed WMP attainment performance on 47 wildfire mitigation initiatives from the 2024 WMP.⁵⁸ The initiatives are grouped into five main categories:

⁵⁸ 2024 WMP, pages 238-245, 374-444, 449-450, 523-526, and 579-580.

1. Grid Design, Operation, and Maintenance with 18 initiatives assessed and an associated proposed expenditure of approximately \$1.15 billion.
2. Vegetation Management and Inspections with 18 initiatives assessed and a proposed expenditure of approximately \$355.8 million. Of the 18 initiatives, 13 initiatives were assessed in the Vegetation Management Audit (VMA) Report and the remaining five were assessed in this APR.⁵⁹
3. Situational Awareness and Forecasting with five initiatives assessed and a proposed expenditure of approximately \$23.8 million.
4. Emergency Preparedness with five initiatives assessed and a proposed expenditure of approximately \$46.2 million.
5. Community Outreach and Engagement with one initiative assessed and a proposed expenditure of \$109,600.

A complete list of initiatives along with expenditure information appears in the table in Appendix A.

The initiative performance assessment process included comparing the actual initiative completion as reported by SCE in its QDR to Energy Safety and in its EC ARC, and as reported by the IE in the IE ARC.⁶⁰ The information from each of these sources is summarized along with the final assessment of performance for each initiative in the table in Appendix A. In some cases, Energy Safety issued data requests to answer specific questions. If data request information is used in the assessment, a citation for the particular instance is provided. Statistics and findings from Energy Safety field audits for 2024 WMP work are also considered. Finally, the Energy Safety VMA Report also contributed to Energy Safety's APR assessment.⁶¹

6.2 Energy Safety Vegetation Management Audit Report

Each performance year, Energy Safety completes an audit of the vegetation management work performed by an electrical corporation as described in its approved WMP - the Vegetation Management Audit (VMA).⁶² In the VMA, Energy Safety assesses completeness of each qualitative commitment and quantitative target associated with each initiative from the electrical corporation's approved WMP. The VMA issues findings on the initiative level, as defined in Appendix A of the 2023-2025 Wildfire Mitigation Plan Technical Guidelines.⁶³

⁵⁹ The 13 initiatives evaluated in the VMA Report map to 18 WMP initiatives listed in Appendix A. A crosswalk of the initiatives appears in Appendix B.

⁶⁰ 2023 Q4 QDR, EC ARC, pages 18-27; and IE ARC, pages 28-75.

⁶¹ VMA Report.

⁶² Pub. Util. Code section 8386.3(b)(5)(A).

⁶³ WMP Technical Guidelines, pages A-24-A-26.

The VMA is sent to the electrical corporation, which then has the opportunity to provide Energy Safety with a corrective action plan (CAP) to address any deficiency identified in the VMA. Energy Safety analyzes the CAP and issues a VMA Report that documents any outstanding deficiencies and describes the electrical corporation's overall program performance for that year.

For performance year 2024, Energy Safety issued its VMA to SCE on September 30, 2025,⁶⁴ received the Corrective Action Plan (CAP) on October 24, 2025,⁶⁵ and issued the 2024 VMA Report on March 27, 2026.⁶⁶

This APR reproduces the VMA Report conclusions. Rather than referencing each vegetation management initiative number it references WMP initiatives by Utility Initiative Tracking ID to allow for consistency throughout the APR. Table 10 of Appendix B provides a crosswalk between the 13 vegetation management initiative numbers included in the VMA Report to the 15 WMP Utility Initiative Tracking IDs included in this APR.

Energy Safety's VMA Report concluded that SCE successfully achieved the objectives for 12 of the 13 (92%) vegetation management initiatives by either completing all work associated with its WMP commitments or by providing a CAP that addressed any deficiencies identified in the VMA. SCE has an outstanding deficiency in one of the 13 vegetation management initiatives: 8.2.6 - Open Work Orders.

Observation

Overall, SCE has demonstrated continued improvement in its vegetation management programs through corrective actions to address deficiencies identified in Energy Safety's 2024 VMA as well as previous audits. Specifically, SCE has implemented corrective actions to improve its procedures and recordkeeping in its wood and slash management and clearance work. However, in the 2024 VMA, Energy Safety found that SCE did not complete all of its Priority 2 work orders within risk-based timeframes, an area that has been identified as a performance issue in previous audit cycles. While SCE has begun to take actions to improve its tracking of completed work through contractor training and penalties, it has not demonstrated that it can complete the work within the necessary timeframes.

The specific findings from Energy Safety's VMA Report are summarized in Appendix B.

6.3 Fire Investigation Report Overview

The Safety Enforcement Division (SED) of the California Public Utilities Commission investigates wildfires that are caused by the equipment of the electrical corporations. This

⁶⁴ VMA Report, Appendix 1.

⁶⁵ VMA Report, Appendix 2.

⁶⁶ VMA Report.

subsection refers to SED wildfire investigation reports that concern wildfires that were caused by SCE's equipment in 2024.

SED documented two self-reported SCE electric incidents: the Paubu Fire and the Mountain Fire. SCE reported that the Paubu Fire occurred on July 12, 2024, burned approximately 101 acres, and was caused by brush ignition affecting the 12 kilovolt Chawa distribution circuit.⁶⁷ SCE reported that the Mountain Fire occurred on November 6, 2024, and that it received a complaint alleging SCE equipment may have ignited the fire, causing property damage exceeding \$50,000.⁶⁸ SCE reported both fires to the California Public Utilities Commission before a cause for each fire had been determined. SED is currently investigating whether the utility violated Commission or state regulations. Formal reports will be drafted upon completion of the investigation.⁶⁹

In addition, Energy Safety reviewed the 2024 inspection records related to equipment that are preliminarily associated with ignitions from 2026, one of which is discussed in section 6.5.3.

6.4 Energy Safety Field Inspection Assessment

Energy Safety performed field audits of the WMP work reported as complete by the electrical corporations in 2024 and early 2025 following an electrical corporation's quarterly reports of the mitigation actions it performed.⁷⁰ Energy Safety's field audits provide empirical verification of the WMP work conducted by the EC. These field audits also act as an audit of the EC's data quality and provide insight as to the extent that the EC can rely upon the information it collects and generates in understanding the effectiveness of its wildfire mitigation activities.

When performing a field audit, Energy Safety conducts two types of inspections: 1) inspections of grid hardening, vegetation management, and other work related to WMP initiatives, and 2) inspections of general wildfire safety (GWS) conditions at an inspection site. Inspections of general wildfire safety conditions are not strictly related to WMP initiatives.⁷¹

Observation

As detailed below, Energy Safety's field inspections determined that SCE's initiative completeness data had inconsistencies in some 2024 WMP initiatives, which represent broader data management issues that SCE must address going forward.

⁶⁷ SCE Paubu Fire.

⁶⁸ SCE Mountain Fire.

⁶⁹ SED Staff Wildfire Investigations Webpage, available at: <https://www.cpuc.ca.gov/industries-and-topics/wildfires/wildfires-staff-investigations>, accessed August 28, 2026.

⁷⁰ Data Guidelines, p.4.

⁷¹ If Energy Safety observes a general wildfire safety concern during an inspection activity, that is recorded as a "Wildfire Safety Concern." Or as it was known prior to 2024, a "defect."

6.4.1 Inspection and Notice Counts

For field audits of 2024 WMP work, inspections that found instances of non-performance on WMP initiative work resulted in a notice of violation or a notice of data inaccuracy.⁷² An overview of the counts of inspections and notices by initiative appears in Table 1.

Table 1. Energy Safety Inspection Counts and Notices by Initiative

2024 WMP Initiative	Number of Inspections	Notices of Violation ⁷³	Notices of Non-Performance	Total
Covered Conductor 8.1.2.1.1 SH-1	1,103	8 (7 Data Accuracy, 1 Completeness)	0	8
Distribution Detailed Inspections and Remediations 8.1.3.1 IN-1.1	1,654	42 (6 Data Accuracy, 36 Completeness)	1 (Completeness)	43
Detailed Inspections on for Expanded Vegetation Clearances from Distribution Lines in HFRA 8.2.3.3.1 VM-7	1,376	4 (all Completeness)	0	4

⁷² If Energy Safety observes non-performance of a WMP initiative during an inspection activity that an electrical corporation claimed to have occurred at a site, then that is recorded as a “deficiency” and may be the subject of a “Notice of Non-Performance” or a “Notice of Data Inaccuracy” sent to the electrical corporation. Prior to the passage of SB 254 (Becker), Energy Safety issued Notices of Violation, which could be issued due to completeness or data accuracy issues.

⁷³ These notices of violation may be found by accessing [Energy Safety’s e-filing docket for 2024 NOV](https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2024%20NOV)s. Available at: <https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2024%20NOV> (accessed July 14, 2026).

2024 WMP Initiative	Number of Inspections	Notices of Violation ⁷³	Notices of Non-Performance	Total
Dead and Dying Tree Removal Program 8.2.3.4.2 VM-4	17	1 (Data Accuracy)	0	1

6.4.2 Data Accuracy and Completeness Issues Observed by Field Audits

As described above, Energy Safety issued 56 notices to SCE upon inspection of its 2024 WMP work. Of those 56 total notices, 14 were related to data accuracy issues and 42 were related to completeness issues observed in the course of field audits.

Data accuracy issues can vary, but generally they are instances in which either: 1) an electrical corporation reported WMP work completed when work did not occur, or 2) work was completed at a location but the nature of the work was different than the EC reported.

Completeness issues are instances where the electrical corporation counted WMP work at a location as complete when the work was done in an incomplete manner.

The existence of data accuracy or completeness issues in the spatial QDR submissions of an electrical corporation calls into question the reliability of the electrical corporation's claimed completion of WMP work. For example, if an electrical corporation claims to have completed 100 units of a type of WMP work, but Energy Safety inspectors discover issues with specific instances of the work reported, then the claim that 100 units were completed is unreliable.

In the case of SCE's 2024 WMP work, Energy Safety's field audits observed data accuracy and completeness issues with the work claimed as completed under the following WMP four initiatives: Covered Conductor (SH-1), Distribution Detailed Inspections and Remediations (IN-1.1), Clearing Detailed Inspections on for Expanded Vegetation Clearances from Distribution Lines in HFRA (VM-7), and Dead and Dying Tree Removal Program (VM-4).

The (Table 2) describes the numbers of points or miles inspected by Energy Safety for the 2024 WMP work reported by SCE as completed for each of the relevant WMP initiatives, and the number of points or miles with data accuracy or completeness or adherence to protocol issues. A percentage of the 2024 WMP work reported by SCE as complete with those issues is also described.

Table 2. Energy Safety Inspection Counts and Data Accuracy and Completeness Issues, with Percentage of Inspections Where Issues were Observed

Initiatives with Data Accuracy and Completeness Issues	Number of Points or Miles Inspected	Total Points or Miles With Issues	Percentage of Points or Miles with Issues
Covered Conductor 8.1.2.1.1 SH-1	1,103 points	8 points	0.7%
Distribution Detailed Inspections and Remediations 8.1.3.1 IN-1.1	1,654 points	43 points	2.5%
Detailed Inspections for Expanded Vegetation Clearances from Distribution Lines in HFRA 8.2.3.3.1 VM-7	1,376 points	4 points	0.2%
Dead and Dying Tree Removal Program 8.2.3.4.2 VM-4	17 points	1 point	5.8%

The electrical corporation must demonstrate that it met its WMP targets. Because Energy Safety's field audit of SCE's 2024 WMP work observed issues with the data reported by SCE on its 2024 WMP initiative work, the actual amount of 2024 WMP work reported as completed by SCE with respect to the above initiatives is somewhat unreliable.

When using the percentage of points or miles with issues as a measure of this unreliability, Energy Safety estimates the impact on the 2024 targets for relevant WMP initiatives (Table 3). However, this unreliability did not ultimately affect Energy Safety's determination that SCE met their 2024 WMP targets with respect to these initiatives.

Table 3. Energy Safety Estimates of Data Accuracy and Completeness Issues and Impacts on Reported WMP Initiative Attainment⁷⁴

Initiatives with Data Accuracy and Completeness Issues	2024 WMP Target	Actual Points or Miles Completed as Reported by SCE	Percentage of Points or Miles with Issues	Reliable Actual Points or Miles
Covered Conductor 8.1.2.1.1 SH-1	1,050 miles	809.4 miles	0.7%	803.7 miles
Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations (Ground and Aerial) 8.1.3.1 IN-1.1	187,000 structures	208,828 structures	2.5%	203,607 structures
Distribution and Transmission Expanded Clearing 8.2.3.3.1 VM-7	770 grids	1,208 circuits	0.2%	1,206 circuits
Dead and Dying Tree Removal Program 8.2.3.4.2 VM-4	485 circuits	581 circuits	5.8%	547 circuits

⁷⁴ Due to Energy Safety inspections being applicable to multiple initiatives concurrently, a reliability assessment on a per-initiative basis is not feasible for 2024.

6.4.3 Special Observations

SCE included in its 2023-2025 Base WMP an initiative focused on addressing increased risk of conductor to conductor contact in high wind conditions: Long Span Initiative (SH-14). The initiative is associated with distribution conductor spans of at least a certain length, spans with mixed conductor, spans that have a sharp angle, or spans that transition between vertical and horizontal configuration.⁷⁵ According to the WMP, SCE would remediate long span issues by deploying three different types of installations: line spacers, covered conductor, or an alternate construction.

During the assessments of SCE's work completed under this initiative, both Energy Safety's field inspections team and the IE's field verification team identified discrepancies between SCE's documented installation types and what was physically observed in the field for this initiative.⁷⁶ These discrepancies were also reflected in SCE's spatial quarterly data. Energy Safety identified several instances when SCE scoped a specific remediation but the data provided by SCE listed a different installed remediation.⁷⁷

On June 11, 2026, Energy Safety issued a data request for additional information from SCE to understand the discrepancies between the work scoped, the work documented, and the work inspectors observed in the field.⁷⁸ Energy Safety sought information about if SCE was accounting for work completed under WMP initiative Covered Conductor (SH-1) or under Long Span (SH-14), which could potentially impact Energy Safety's initiative attainment assessment.

Energy Safety received a data request response from SCE on July 2, 2026.⁷⁹ The response included a list of SCE's long span remediations for the 2023-2025 cycle, as well as additional information on how SCE determines the scope of the long span program, how often it is updated, and the criteria used by SCE to determine which remediation type to deploy.

According to the data request response, in 2024 SCE remediated a long span by installing covered conductor only once, and installed both covered conductor and line spacers only once, out of 1,331 remediations. However, Energy Safety's analysis of the data request response's field notes revealed an additional 65 instances where covered conductor was installed even though a non-covered conductor remediation was scoped. This finding confirms the field findings made by Energy Safety's field inspections team and the IE's field verification team.

Energy Safety's analysis also revealed 204 instances where the long span remediations listed in the SCE response were reported under both Covered Conductor (SH-1) and Long Span

⁷⁵ 2024 WMP, page 263.

⁷⁶ IE ARC, page 43.

⁷⁷ 2024 Q1 spatial QDR; 2024 Q2 spatial QDR; 2024 Q3 QDR; 2024 Q4 spatial QDR.

⁷⁸ DR-118.

⁷⁹ DR-118 Response.

Initiative (SH-14) in the spatial QDRs submitted to Energy Safety. This finding suggests that SCE is reporting the same remediation work under two different initiatives. That exercise also revealed 138 instances in which the 2024 Long Span Initiative (SH-14) remediations listed in the SCE data request response didn't appear in the 2024 QDR spatial data, which might indicate that SCE potentially underreported the number of long span remediations in its 2024 spatial QDR.

However, Energy Safety's analysis found that 78 of the long span remediations listed in SCE's data request response were recorded in SCE spatial QDR exclusively as Covered Conductor (SH-1). This analysis suggests data management issues unrelated to SCE listing the same remediation work under two initiatives.

Observation

SCE reported an attainment of 1,315 remediations in 2024, which is 315 above its 2024 target of 1,000 long span remediations. After discounting the 204 instances reported under both Covered Conductor (SH-1) and Long Span (SH-14) initiatives, SCE exceeded its 2024 target for the Long Span initiative (SH-14). Although the findings from the two-initiative analysis did not impact initiative performance assessment, they do warrant further validation and illuminate issues with how SCE collects, processes, and reports data for the Long Span WMP initiative (SH-14). Of particular interest, are the impacts of initiative double counting on risk reduction achieved as each initiative has an associated risk reduction target. Energy Safety will continue to investigate this issue in the future.

6.5 SCE WMP Objective and Initiative Activity Attainment in 2024

An EC's WMP is assessed on the basis of whether it is feasible, cost efficient, demonstrates continued improvement and forward-looking progress, and reduces wildfire risk.⁸⁰ An EC's ability to complete its initiative activities demonstrates its competence in and commitment to executing on that plan. Therefore, the findings regarding initiative attainment are at the heart of any WMP evaluation, in that they measure the EC's performance in implementing the wildfire risk reduction activities that the EC itself committed to do for the benefit of its customers and the California public.

Energy Safety assessed 47 wildfire mitigation initiatives for 2024 WMP attainment performance and found that SCE missed six initiative activity targets (13%). The six initiative activities where SCE missed its targets are the following:

- Covered Conductor (SH-1),

⁸⁰ 2023-2025 WMP Process and Evaluation Guidelines, page 9.

- Undergrounding Overhead Conductor (SH-2),
- REFCL- Ground Fault Neutralizer (GFN) (SH-17),
- REFCL- Grounding Conversion (SH-18),
- Inspection and Maintenance Tools (IN-8), and
- Vegetation Management Open Work Orders (Section 8.2.6).

Some of the initiative targets that SCE missed were also missed in prior years. SCE missed the Undergrounding Overhead Conductor (SH-2), REFCL – Ground Fault Neutralizer (SH-17), Inspection and Maintenance Tools (IN-8), and Vegetation Management Open Work Orders (Section 8.2.6) in both 2023 and 2024. Energy Safety will continue to monitor SCE’s performance and push SCE to consistently meet its targets in these areas.

Section 6.5.1 elaborates on the financial impact of initiatives with missed targets on proposed expenditures, and Section 6.5.2 on the impacts of initiatives with missed targets on planned risk reduction.

Observation

While SCE met targets for a large majority of its 2024 WMP initiatives, as detailed below some missed targets were related to grid hardening activities that are part of a multi-year trend of missing several different WMP initiatives.

Table 4. SCE WMP Initiatives with Missed Targets⁸¹

Not Attained SCE 2024 WMP Initiative	2024 WMP Initiative Activity Target	Actual Performance
Covered Conductor 8.1.2.1.1 SH-1	1,050 circuit miles of covered conductor installed in HFRA.	796 circuit miles SCE reported that target was not met due to environmental and permitting challenges. ⁸²

⁸¹ Targets are sourced from the 2023-2025 Base WMP, pages 245-252.

⁸² EC ARC, page 27.

Not Attained SCE 2024 WMP Initiative	2024 WMP Initiative Activity Target	Actual Performance
Undergrounding Overhead Conductor 8.1.2.2.1 SH-2	Convert 16 miles of overhead to underground.	12 miles SCE reported challenges with permitting, execution delays, and easement delays as factors that hindered their ability to achieve the target. ⁸³
REFCL- GFN 8.1.2.6.1 SH-17	Complete construction of GFN at one substation.	Zero GFN construction SCE reported that materials with long lead times led to the delay in constructing a GFN at the substation. ⁸⁴
REFCL- Grounding Conversion 8.1.2.6.2 SH-18	Target four locations for grounding conversion.	Two locations were constructed. SCE reported delays in land acquisition. ⁸⁵
Inspection and Maintenance Tools 8.1.5 IN-8	Execute the approved designs and recommendations for incorporating distribution ground and InspectCam capabilities into single digital platform.	Execution of the design was deferred while SCE completed additional cost evaluations and program revisions. ⁸⁶

⁸³ EC ARC, page 27.⁸⁴ EC ARC, page 28.⁸⁵ EC ARC, page 28.⁸⁶ EC ARC, page 28.

Not Attained SCE 2024 WMP Initiative	2024 WMP Initiative Activity Target	Actual Performance
Vegetation Management Open Work Orders 8.2.6	Manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities. ⁸⁷	SCE did not demonstrate that open work orders were appropriately managed and completed within risk-based timeframes in performance year 2024. ⁸⁸

6.5.1 Impact of Initiatives with Missed Targets on Proposed Expenditures

Energy Safety uses the magnitude of funding proposed for a given WMP initiative as one way of gauging the impact of a missed initiative relative to the larger suite of WMP work. This analysis proceeds from the assumption that the greater the proposed expenditure for a WMP initiative, the greater importance that initiative has to the EC’s overall plan for wildfire risk reduction. Note that this financial analysis does not attempt to quantify the risk reduction impact of a WMP initiative.

Energy Safety quantified the financial importance of 2024 WMP initiatives for which SCE missed targets. For this assessment, Energy Safety created three different perspectives of the financial importance:

1. Relative magnitude of proposed expenditures for initiatives with missed targets to the overall 2024 WMP,
2. Percentage of the proposed expenditures for the initiatives with missed targets that was spent, and
3. Of the 10 largest initiatives by proposed expenditures, the number of initiatives that had missed targets.

The total amount budgeted for the six initiative activities with missed targets was \$885 million, or 56.2% of the approximate \$1.58 billion allocated in SCE’s 2024 WMP budget.

Of the \$885.4 million budgeted for the initiatives with missed targets, \$741.7 million was spent (83.8%).

⁸⁷ VMA Report, page A-49.

⁸⁸ VMA Report, page 27.

Energy Safety found that of the 10 largest initiatives by proposed expenditure, three missed their targets and represented a budgeted amount of \$873.9 million, or 59%, of the \$1.48 billion allocated for these 10 initiatives in 2024. These three initiatives and their budgeted amounts were:⁸⁹

- Covered Conductor (SH-1)- \$782.8 million;
- Undergrounding Overhead Conductor (SH-2)- \$60.9 million; and
- REFCL- GFN (SH-17)- \$36.2 million.

Observation

For the six missed initiatives, SCE spent less than proposed by a substantial amount (16%).

For an overview of the entire 2024 WMP proposed expenditures as compared to the actual expenditures, see section 6.6.

6.5.2 Impact of Initiatives with Missed Targets on Risk Reduction

For the 2024 WMP, Energy Safety's WMP Technical Guidelines (as published on December 7, 2022) required an electrical corporation to estimate the relative risk impact of its mitigation activities by subtracting the remaining risk after the mitigation activity is completed from the risk that existed before the mitigation activity occurred.⁹⁰ The electrical corporation is then to divide the risk difference by the risk before the mitigation activity, and finally, multiply by 100.⁹¹

When accounting for the amount of risk targeted for removal by an initiative, SCE's six missed initiatives impacted the planned risk to be removed (Table 5). The 2024 WMP does not define the total risk that applies to the stated percentage risk reduction. For example, the 2024 WMP does not state if the planned risk reduction of 53% due to undergrounding of electric lines would lead to a 53% reduction of total system-wide risk, a 53% reduction of total risk at a given circuit or region, or a 53% reduction of some other form of spatial or temporal risk.

Observation

Energy Safety concludes that SCE's missed 2024 WMP targets led to less risk reduction than SCE committed to its customers and the broader public in its 2024 WMP. This is because three of the six incomplete initiative activities were assigned a risk impact that SCE did not fulfill.

⁸⁹ IE ARC, pages 28-31, 50-52, 62,67-68, and 73.

⁹⁰ WMP Technical Guidelines, page 41.

⁹¹ WMP Technical Guidelines, page 41.

Table 5. 2024 WMP Initiatives with Missed Targets – Impact on Risk Removed

Not Attained SCE 2024 WMP Initiative	% Risk Impact 2024 WMP ⁹²	% of WMP Initiative Complete	% Planned Risk Removed
Covered Conductor 8.1.2.1.1 SH-1	53%	76%	40.3%
Undergrounding Overhead Conductor 8.1.2.2.1 SH-2	98%	75%	73.5%
REFCL- GFN 8.1.2.6.1 SH-17	45%	0%	0%
REFCL- Grounding Conversion 8.1.2.6.2 SH-18	N/A	50%	N/A
Inspection and Maintenance Tools 8.1.5 IN-8	N/A	0%	N/A
Vegetation Management Open Work Orders 8.2.6	N/A	70.2% ⁹³	N/A

⁹² 2024 WMP, pages 238, 241, and 244.⁹³ VMA Report, page A-50.

6.5.3 Impact of WMP Initiative Execution Quality on Expected Risk Reduction

While SCE met most of its 2024 WMP initiative targets, Energy Safety's review of data associated with transmission and distribution inspections raised concerns about the quality of asset inspections completed for WMP initiatives regarding Transmission HFRI Inspections and Remediations (Ground and Aerial) (IN-1.2) and Distribution HFRI Inspections and Remediations (Ground and Aerial) (IN-1.1).

As SCE described in its WMP, its asset inspection programs were designed to identify risky conditions using a variety of methods, and remediate those potential ignition risks. SCE committed in its 2024 WMP to go beyond the regulatory minimums with respect to inspection cycles. It stated that "to identify transmission equipment or structure degradation that occurs between compliance cycles due to natural wear and tear or emergent events such as weather or third party caused damages that could lead to a potential ignition risk, SCE has implemented more frequent and ignition-focused risk inspections on transmission equipment and structures in HFRA ('HFRI inspections')." ⁹⁴ SCE also stated that it saw ground and aerial inspections as complements to each other, implying that it would be insufficient to solely pursue one type of inspection. SCE stated that "aerial [transmission] inspections supplement ground-based inspections. Aerial inspections are typically performed at the same locations as ground inspections and in combination provides a 360-degree view of the assets to detect equipment/structure conditions that are difficult to identify via ground inspections..." ⁹⁵

Asset inspection programs contribute to risk reduction when they identify asset conditions that pose safety risks and those conditions are then remediated through maintenance. Both the quantitative volume of inspection activity and the quality of inspection affect the amount of risk reduced.

Energy Safety began looking further into SCE's 2024 inspection quality after the January 2025 Eaton fire, and before the submission of SCE's 2024 EC ARC. Specifically, Energy Safety further investigated the quality of work done under the initiative Transmission HFRI Inspections and Remediations (Ground and Aerial) (IN-1.2) through data requests. To better understand the extent of any issues identified, Energy Safety also investigated the quality of work done under the initiative Distribution HFRI Inspections and Remediations (Ground and Aerial) (IN-1.1). While SCE met the quantitative targets for these initiatives in 2024, Energy Safety found three areas of concern related to the quality of both transmission and distribution inspections. Below is a summary of each of the three areas of concern, followed by a more detailed explanation of Energy Safety's research and analysis.

⁹⁴ 2024 WMP, page 289.

⁹⁵ 2024 WMP, page 289.

1. **Inspections classified as “ground” inspections did not always involve ground-level inspection techniques.**

Background: Ground-based surveys can uncover details regarding the condition of utility assets that aerial inspections cannot, and vice versa. As SCE stated in its 2024 WMP with respect to its distribution inspection initiative, “[g]round inspections continue to be necessary because they help detect equipment/structure conditions that are difficult to identify via aerial inspections (e.g., the condition of guy anchors are not able to be assessed appropriately via aerial inspections).”⁹⁶

Observation: 13 of the 16 surveys SCE characterized as “ground” surveys were actually done by review of imagery captured aurally.⁹⁷ For example, one tower was subject to six WMP-related inspections between 2022 and 2024 and three were classified as “ground” despite all being inspected using helicopter or drone imagery.

2. **SCE did not always prioritize obtaining information missing from inspection reports.**

Background: Inspections should be designed to capture all asset conditions that pose safety risks. If an inspector is unable to capture all the information required in an inspection, further review or re-inspection before the next regularly scheduled inspection can help prevent risks from being left unaddressed.

Observation: In multiple cases, investigations were marked as complete where vegetation or difficult terrain prevented the investigator from answering all of the inspection questions. For example, in multiple July 2024 inspections by SCE, the inspector was unable to determine if the foundation had a ground to the structure but recorded the inspections as complete anyway. In some cases, the same information was missing in successive regular annual inspections, indicating that SCE did not act to obtain the missing information in between cycles. In an example of that observation, inspectors flagged that they were unable to determine whether a safety-critical component of the transmission tower required repair two years in a row.

⁹⁶ 2024 WMP, page 282.

⁹⁷ Data Request response, not published.

3. Vegetation sometimes obscured inspectors' view of safety-critical components.

Background: Collecting the necessary information during an inspection requires an unobstructed view of all safety-critical components. Trimming or clearing vegetation can reduce barriers to collecting all the information required during an inspection.

Observation: During its review of SCE's 2025 WMP performance, SCE's independent evaluator "found improper vegetation at many of their sites. It is of the opinion of the IE team that the [transmission inspection] site was likely verified [as a completed inspection], but without enhancing future documentation it is nearly impossible to properly verify."⁹⁸

Subsequent to the Eaton fire ignition in January 2025, Energy Safety reviewed WMP-related inspection records from 2022 to 2024 for nine transmission towers in the vicinity of the Eaton fire ignition location. These nine towers were numbered as: 7011969, 7011170, 7030209, 7011967, 7011169, 7030210, 7030208, 7011171, and 7011971. Three of these nine towers were part of SCE's idle Mesa-Sylmar 220kV circuit.

Asset inspections performed by electrical corporations generally collect information in two ways – responses to survey questions and photography. Energy Safety's review of the asset inspection records related to the nine transmission towers in the vicinity of the Eaton fire ignition location primarily involved examining responses to survey questions. In some cases, photos taken during inspections were also reviewed.

SCE provided Energy Safety with spreadsheets that contained responses to survey questions for each WMP-related inspection of each tower during the 2022-2024 period. The spreadsheets also contained other data concerning the inspections, such as the date of the inspection, the date imagery was acquired, whether the inspection was classified as a ground survey or aerial survey, and whether the inspection was recorded as complete. SCE provided Energy Safety with photography taken during inspections for some of the towers, if specifically requested by Energy Safety. Energy Safety's review of this material supports the observations above, for the following reasons.

Energy Safety's first observation regarding the misclassification of aerial inspections as ground inspections occurred for at least one inspection in the 2022-2024 period at all nine transmission towers. Regarding Energy Safety's second observation, most of the towers had at least one inspection during the 2022-2024 period that was marked as "complete" even if indeterminate answers were recorded to survey questions. Inspectors also reported an inability to determine whether maintenance work was required for safety-critical

⁹⁸ 2025 IE AIR, page 34.

components occurred at four different towers – 7011169, 7011170, 7011171, and 7030208 – during the 2022-2024 period. The most common types of safety-critical components involved were Cotter Keys and pins within insulator strings.

The third issue was identified by SCE's independent evaluator as part of their investigation of SCE's 2025 WMP implementation. Energy Safety's review of the photography submitted by SCE confirmed the IE's finding for two of the four towers for which Energy Safety had photography to review. Aerial photographs taken in July 2024 revealed that vegetation had overgrown the concrete footings at the base of the towers, making a visual determination of the condition of the towers' foundation difficult through review of aerial imagery alone. Example photos from the two towers appear below.

Tower 7030210 (July 2024):



Tower 7030208 (July 2024):



Energy Safety also reviewed records of SCE’s 2024 distribution inspections in light of the Eaton fire in January 2025. Some of the same issues observed in transmission inspections were also present in inspections of distribution assets. SCE’s practice was to define distribution inspections as “limited” when an inspector is unable to access or view areas around the base of a distribution asset but could report on questions related to assets above ground level. Per SCE’s procedures, these “limited” inspections were nevertheless deemed “complete,” and SCE did not appear to have a procedure in place to ensure that “limited” distribution inspections would eventually be completed without the limitation.⁹⁹

Observation

Energy Safety’s review of a portion of the inspection records of transmission inspections undertaken pursuant to the Transmission HFRI Inspections and Remediations (Ground and Aerial) initiative (IN-1.2) during the years 2022-2024 revealed several different issues with the execution of these inspections that may have interfered with the ability of the initiative to

⁹⁹ SCE stated that locations with limited distribution inspections would be “risk prioritized” for the next year’s inspections but did not specify whether all the inspections at those locations would be conducted without limitation. Energy Safety is aware of cases where a limited inspection from 2024 was completed without limitation in 2025, but has not been provided information to suggest that SCE has a formal process to ensure that all subsequent inspections overcome previous limitations.

reduce risk on SCE's system. These included misclassifying aerial surveys as ground surveys, not having clear follow-up procedures to determine the condition of assets that could not be effectively inspected, and overgrown vegetation concealing potential foundation-based conditions. These last two issues appeared to interfere with the ability of the Distribution HFRI Inspections and Remediations (Ground and Aerial) (IN-1.1) initiative to meet its risk reduction goals in 2024 as well. SCE must work to address these issues to ensure its transmission and distribution inspection programs continue to reduce risk on SCE's system.

6.6 SCE 2024 WMP Expenditure Assessment

Energy Safety conducted an expenditure assessment to estimate SCE's spending alignment with its 2024 WMP. Unlike the assessment of the missed initiative impacts on proposed expenditures, this assessment considers all 2024 WMP initiatives and focuses on the gap between proposed and actual spending, as stated in the WMP. In addition, Energy Safety's assessment identifies spending deviations exceeding 10%, assessing how they impact SCE's planned spending variance.

This analysis is intended to provide an assessment of the EC's project management capabilities as they relate to financial management, which in turn provides insight into the EC's ability to responsibly utilize ratepayer funds dedicated to the WMP work.¹⁰⁰

According to SCE's Q1 2024 QDR, it budgeted \$1.58 billion for its 47 WMP initiatives for 2024,¹⁰¹ representing 20% of SCE's total budget for wildfire mitigation for the 2023-2025 period. Proposed and actual expenditures may differ across the QDR, EC ARC, IE ARC, and Energy Safety's assessment. The EC ARC reported \$1.44 billion (83%) spent of \$1.73 billion proposed.¹⁰² The IE ARC reported \$1.36 billion (84%) spent of \$1.62 billion proposed.¹⁰³ Energy Safety's assessment of only the initiatives evaluated in the report concluded that \$1.32 billion (84%) was spent of \$1.58 billion proposed.

Observation

Energy Safety assessed SCE's expenditures on individual 2024 WMP initiatives and found that 68% (32 out of 47 initiatives) of the initiatives had actual expenditures that deviated more than 10% from those proposed. In addition, Energy Safety's determination that SCE spent 84% of its proposed budget for 2024 WMP initiatives suggests that SCE did not sufficiently plan for its 2024 WMP work, given that it missed several targets for initiatives with under

¹⁰⁰ See Pub. Util. Code section 8386.3(c)(1), regarding the prohibition of diverting wildfire mitigation funds.

¹⁰¹ Q1 2024 QDR, Table 11

¹⁰² EC ARC, pages 49-55.

¹⁰³ IE ARC, page 15.

expenditure (e.g., undergrounding and covered conductor).¹⁰⁴ See the table in Appendix A for a complete list of initiatives and their proposed and actual expenditures.

6.7 Initiative Performance Observations and Conclusions

Section 6 of this report demonstrates that SCE missed several of its 2024 WMP initiative activity targets, and that this failure resulted in SCE removing less risk from its system in 2024 compared to what it committed to its customers and the California public in its approved 2024 WMP.

Energy Safety made several observations above regarding the impact of SCE's 2024 initiative performance, which are:

- SCE has demonstrated continued improvement in its vegetation management programs through corrective actions to address deficiencies identified in Energy Safety's 2024 VMA as well as previous audits.
- Energy Safety's field inspections determined that SCE's initiative completeness data had inconsistencies in some 2024 WMP initiatives, which represent broader data management issues that SCE must address going forward.
- There were 204 instances reported by SCE under both Covered Conductor (SH-1) and Long Span initiatives (SH-14).
- While SCE met targets for a large majority of its 2024 WMP initiatives, some of those missed targets were related to grid hardening activities that would have otherwise reduced risk on SCEs system in the manner SCE committed to its customers and the broader California public and are part of a multi-year trend of missing several different WMP initiatives.
- SCE spent less than proposed for expenditures on missed initiatives by 16%.
- Energy Safety's review of a selection of the inspection records of transmission inspections revealed several different issues that may have interfered with SCE's ability to reduce risk on its transmission system or execute inspections effectively. These included misclassifying aerial surveys as ground surveys, not having clear follow-up procedures to determine the condition of assets that could not be effectively inspected, and overgrown vegetation concealing the conditions of the bottom of assets.

¹⁰⁴ SCE reported, among other factors, permitting, land acquisition, execution delays, and long-lead materials as factors hindering completion of its WMP activities. These challenges may have been mitigated through earlier planning and proactive management. See Table 4 in Section 6.5 for information on the reasons the initiatives remained incomplete.

- Energy Safety assessed SCE's expenditures on individual 2024 WMP wildfire mitigation initiatives and found that 68% (32 out of 47 initiatives) of the initiatives had actual expenditures that deviated more than 10% from those proposed.

Energy Safety remains committed to an open and collaborative approach to reducing wildfire risk in California. In order to achieve this goal, it is important that SCE effectively implement its own plan for wildfire risk reduction.

7. Ignition Risk Performance

Energy Safety requires electrical corporations to report data, such as ignitions, that help Energy Safety assess whether an electrical corporation is reducing its wildfire risk over time while also reducing its reliance on PSPS events. In order to consistently assess these data between years and between ECs, Energy Safety utilizes a set of quantitative ignition risk performance metrics as follows:¹⁰⁵

- Direct Metric - Ignition Rates: This report defines ignitions as incidents in which electrical corporation infrastructure contributed to an ignition. SCE reports its total number of ignitions to Energy Safety on a quarterly basis.¹⁰⁶
- Proxy Metric - Wire Down Event Rate: This report defines wire down events as incidents in which overhead electrical lines fall to the ground, land on objects, or become disconnected from their moors. SCE reports its total number of wire down events to Energy Safety on a quarterly basis.
- Proxy Metric – Outage Event Rate: This report defines outages as all unplanned outages experienced in SCE's territory. PSPS outages are not included. SCE reports its total amount of outages to Energy Safety on a quarterly basis.

For this report, Energy Safety estimates SCE's ignition risk performance metrics for the calendar years 2017 through 2024. It should be noted that while Energy Safety used SCE's non-spatial data on these metrics for these years, SCE's spatial data for these metrics in 2024 shows substantial differences from the non-spatial data utilized by this report (see Table 7 in Section 10.4 of this report).

¹⁰⁵ Data for all figures in this section utilizes a combination of SCE's response to DR-284 and SCE data from the QDRs. Priority is given to the data request if both are available. Otherwise, 2015-2021 data are sourced from Q3 2022 QDR, 2022-2023 data are sourced from the Q4 2023 QDR, and 2024 data are sourced from the relevant quarter's QDR (e.g., Q1 2024 data sourced from the Q1 2024 submission, Q2 2024 data sourced from the Q2 2024 submission, etc.).

¹⁰⁶ The term "ignition," utilized by Energy Safety, is an ignition that meets all of the following criteria: 1) a self-propagating fire of material other than electrical and/or communication facilities, 2) the resulting fire traveled greater than one linear meter from the ignition point, and 3) the utility has knowledge that the fire occurred.

For direct and proxy performance metrics, Energy Safety converts the metric counts into rates by dividing them by SCE's Overhead Circuit Miles (OCM). These rates for ignition risk events add nuance to the assessment and allow for comparisons across the ECs.

To see the raw counts of all ignition risk events and OCM values for each year used, see Appendix C.

7.1 Ignition Rates

Ignition rates are the most direct measure of wildfire risk performance. There are limitations to only using ignition rates, however, due to the relatively small size of the dataset relative to other indications of risk, such as wires down and unplanned outages. As a result, this assessment of SCE's ignitions should be read in concert with the other metrics to give a full picture of the EC's performance over time.

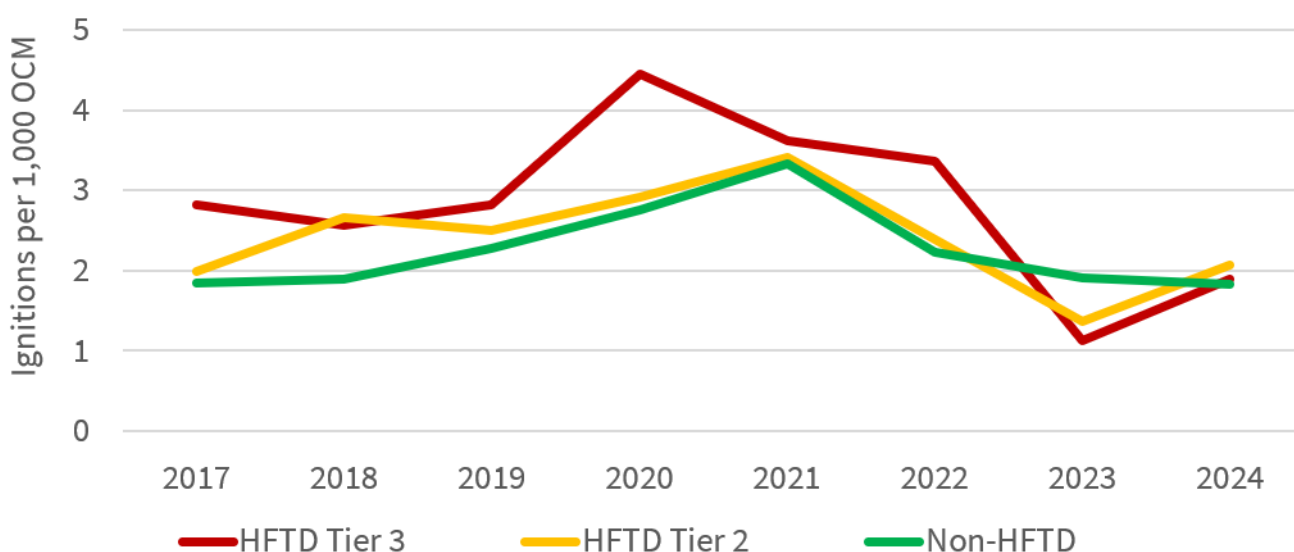
Ignition Rates per Overhead Circuit Mile

To account for concurrent overhead grid expansion within SCE's territory and allow for comparisons with other utilities, ignitions normalized by overhead circuit miles (OCM) are provided as a rate of ignitions per 1,000 miles and delineated by HFTD Tier 3, HFTD Tier 2, and Non-HFTD areas.

Based on information provided by SCE, ignition rates per OCM have generally increased from 2018 to 2020 or 2021 and then decreased after that (Figure 2).

For a plot of ignition event raw counts, see Appendix C.

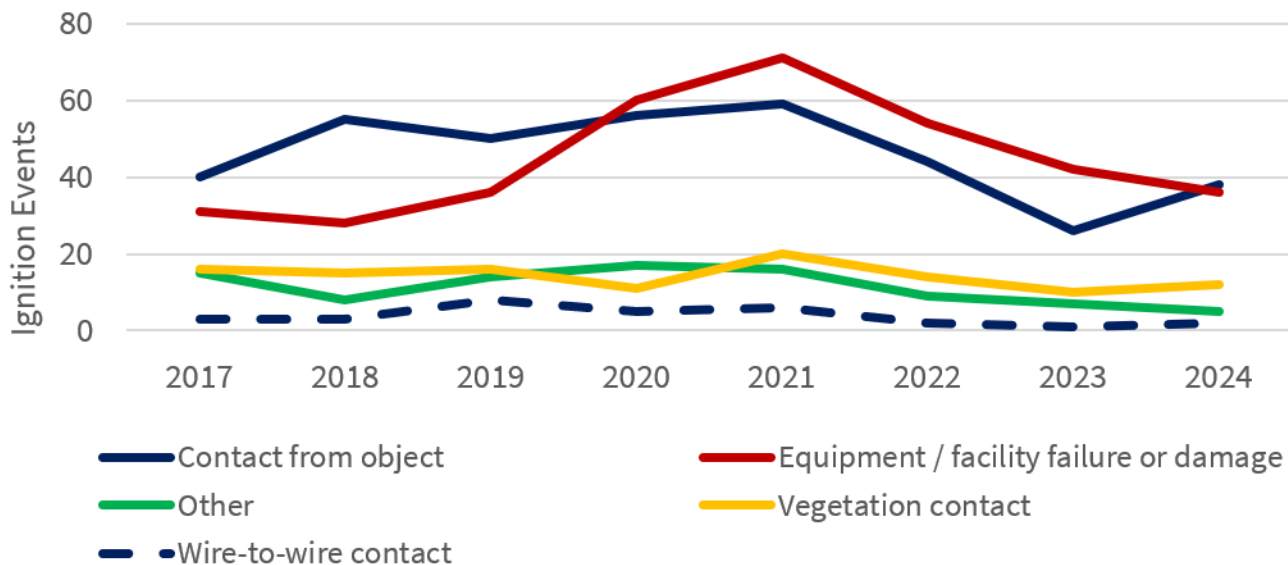
Figure 2. SCE Ignitions per OCM (2017-2024) by HFTD Tier



Raw Ignitions by Risk Driver

To show the most common causes of SCE ignitions, counts are shown delineated by risk drivers from 2017 through 2024 (Figure 3). Based on information provided by SCE, equipment or facility failure and contact from objects are the leading causes of ignitions. Wire to wire contact persists as the least common cause of ignitions.

Figure 3. SCE Ignition Events Delineated by Risk Driver (2017-2024)

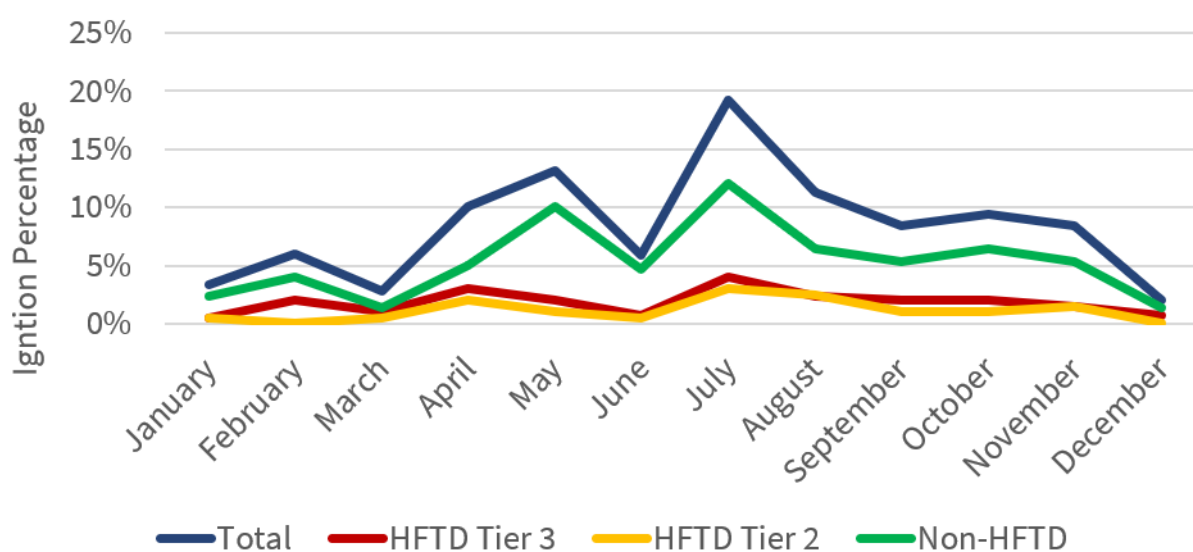


Ignition Events Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, wire down events recently occurred. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month and each HFTD tier by the 3-year average number of all wire down events for the year.

Based on information provided by SCE, most ignitions over the past three years occurred in July, with May a close second (Figure 4). Except for an unusual drop in June, the fewest ignition events are over the winter months.

Figure 4. SCE 3-Year Average (2022-2024) of Monthly Ignition Events by HFTD Tier



7.2 Wire Down Event Rates

Wire down events are wildfire risks where a wire is touching the ground, touching an object, or has become disconnected from its mooring. This type of event poses a risk of ignition or a danger to people if that wire is also energized with electricity and therefore is tracked by Energy Safety in its Annual Performance Reports as a proxy metric for ignition risk.

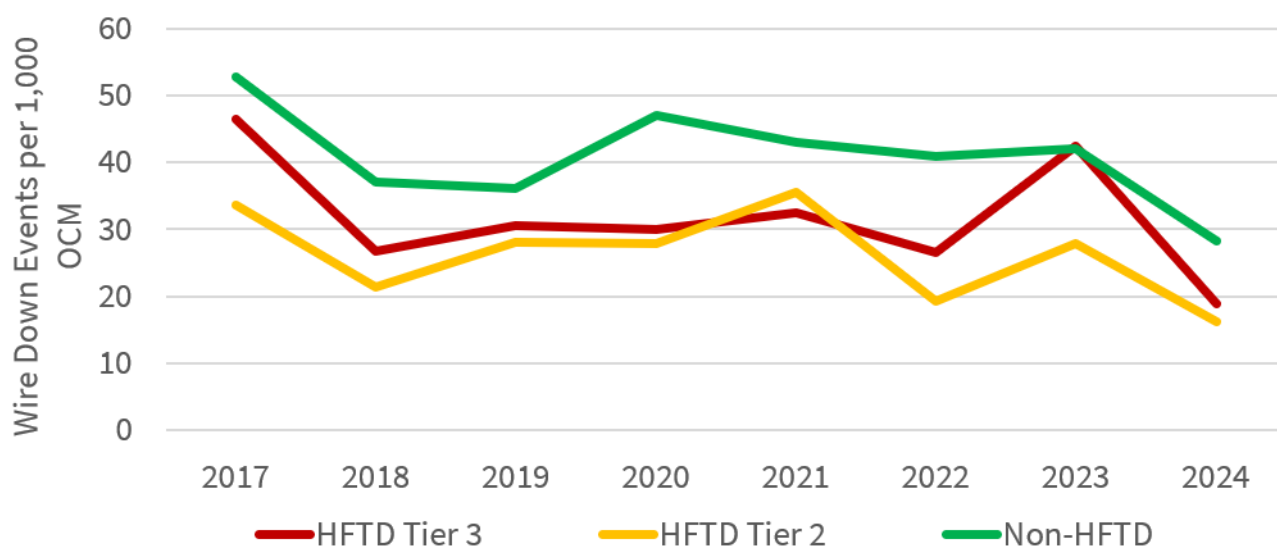
Wire Down Events per Overhead Circuit Mile

To account for concurrent overhead grid expansion within SCE's territory and allow for comparisons with other utilities, wire down events normalized by overhead circuit miles (OCM) are provided as a rate of wire down events per 1,000 miles and delineated by HFTD Tier 3, HFTD Tier 2, and Non-HFTD areas.

Based on information provided by SCE, wire down events per OCM in HFTD Tier 3, HFTD 2, and Non-HFTD areas decreased from 2023 to 2024, supporting the argument of a potential decline over the study period (Figure 5).

For wire down event counts, see Appendix C, Figure 36.

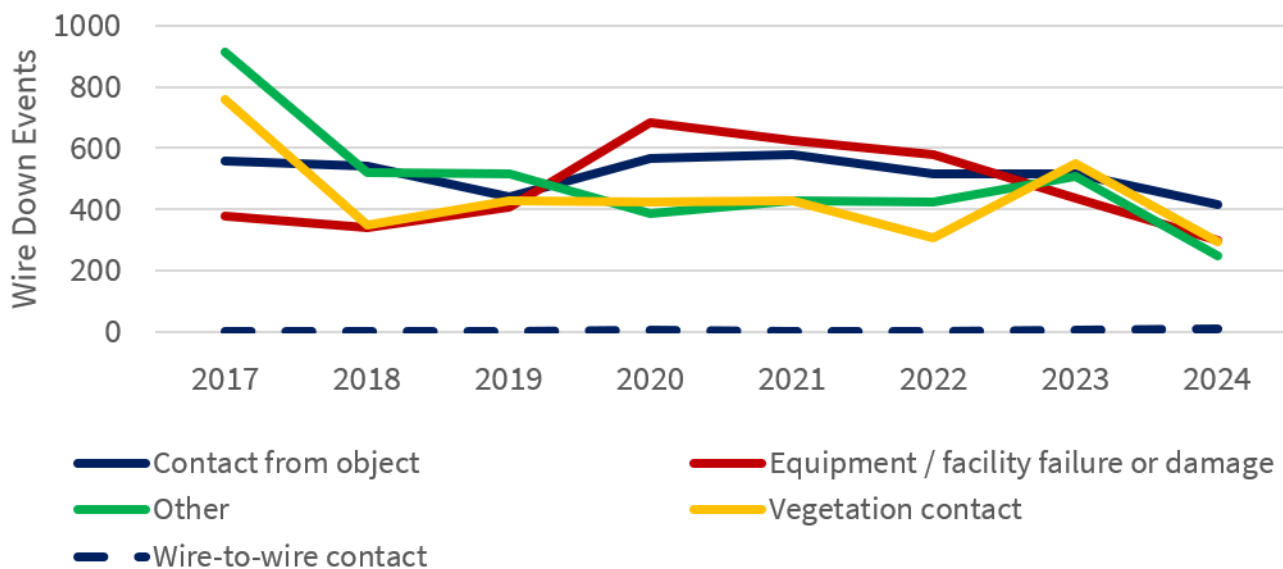
Figure 5. SCE Wire Down Events per OCM (2017-2024) by HFTD Tier



Raw Wire Down Events by Risk Driver

To show the most common causes of SCE wire down events, counts are delineated by risk drivers (Figure 6). Based on information provided by SCE, no one risk driver consistently contributed the most to the total number of SCE wire down events. However, wire to wire contact consistently contributed the least.

Figure 6. SCE Wire Down Events Delineated by Risk Driver (2017-2024)

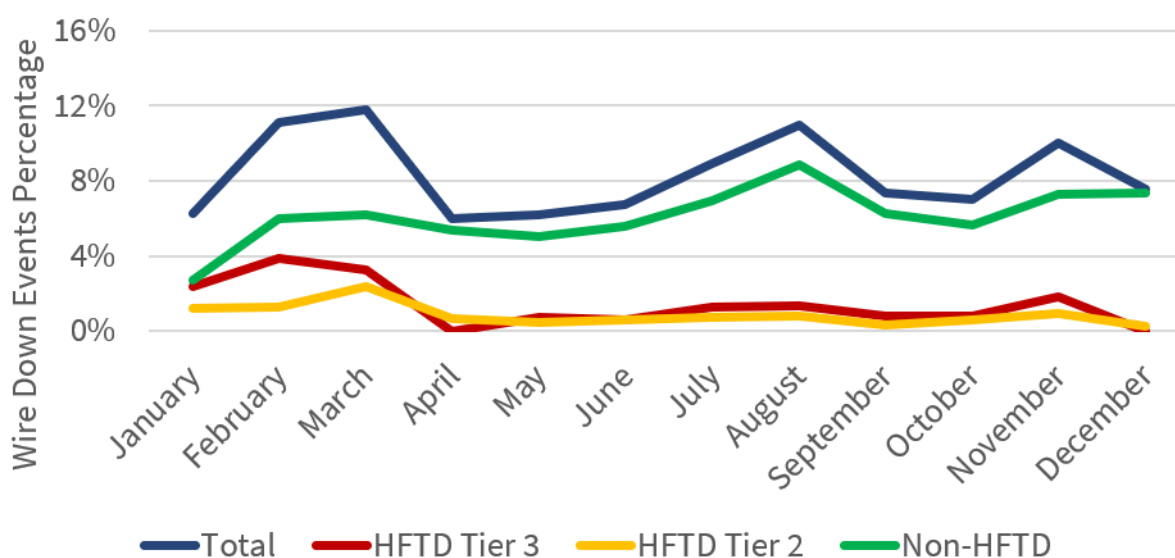


Wire Down Rates Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, wire down events recently occurred. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month and each HFTD tier by the 3-year average number of all wire down events for the year.

Based on information provided by SCE, the three-year monthly average percentage for wire down events generally peaks in March, August, and November (Figure 7). Wire down events happen mostly in Non-HFTD areas with this area driving the overall August and November peaks. Wire down events in HFTD Tier 3 and 2 areas appear to be most common in the winter months.

Figure 7. SCE 3-Year Average (2022-2024) of Monthly Wire Down Events by HFTD Tier



7.3 Outage Event Rates

Power outages (outages) are unplanned power outage events (i.e., do not include PSPS events) tabulated by circuits and not by number of customers impacted. Outage events are tracked as outcomes that may both cause ignitions and impact a customer's quality of life.

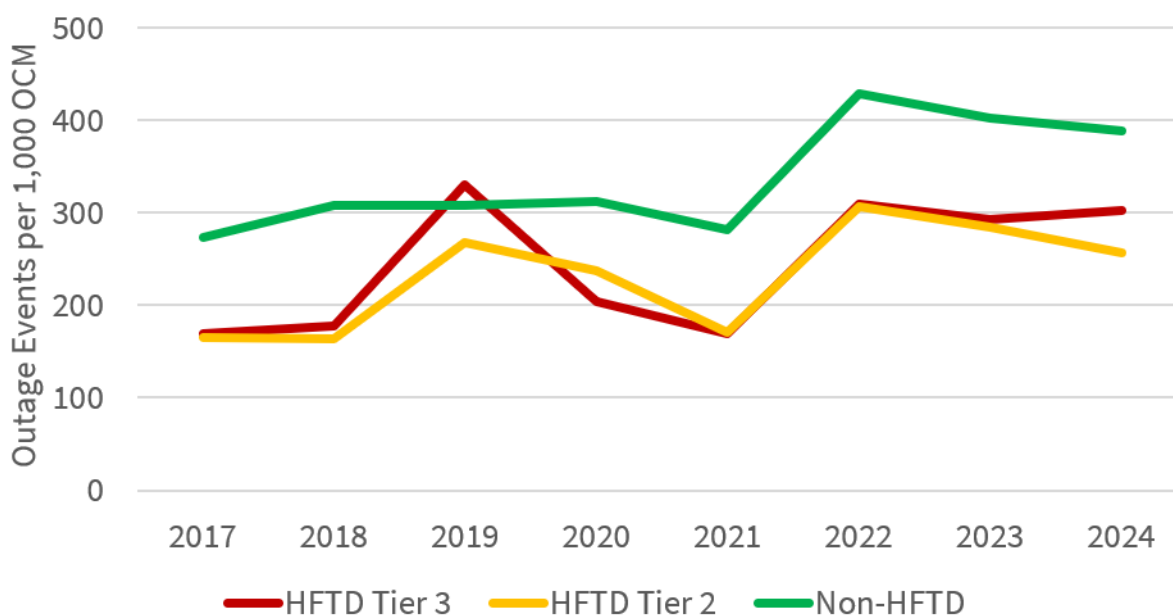
Outage Events per Overhead Circuit Mile

To account for concurrent overhead grid expansion within SCE's territory and allow for comparisons with other utilities, outages normalized by OCM are provided as a rate of outages per 1,000 miles and delineated by HFTD Tier 3, HFTD Tier 2, and Non-HFTD areas.

Based on information provided by SCE, outage events per OCM consistently occur primarily in Non-HFTD areas, appear to peak in 2022, and exhibit potential improvements in later years (Figure 8).

For raw outage event counts, see Appendix C, Figure 23.

Figure 8. SCE Outage Events per OCM (2017-2024) by HFTD Tier¹⁰⁷

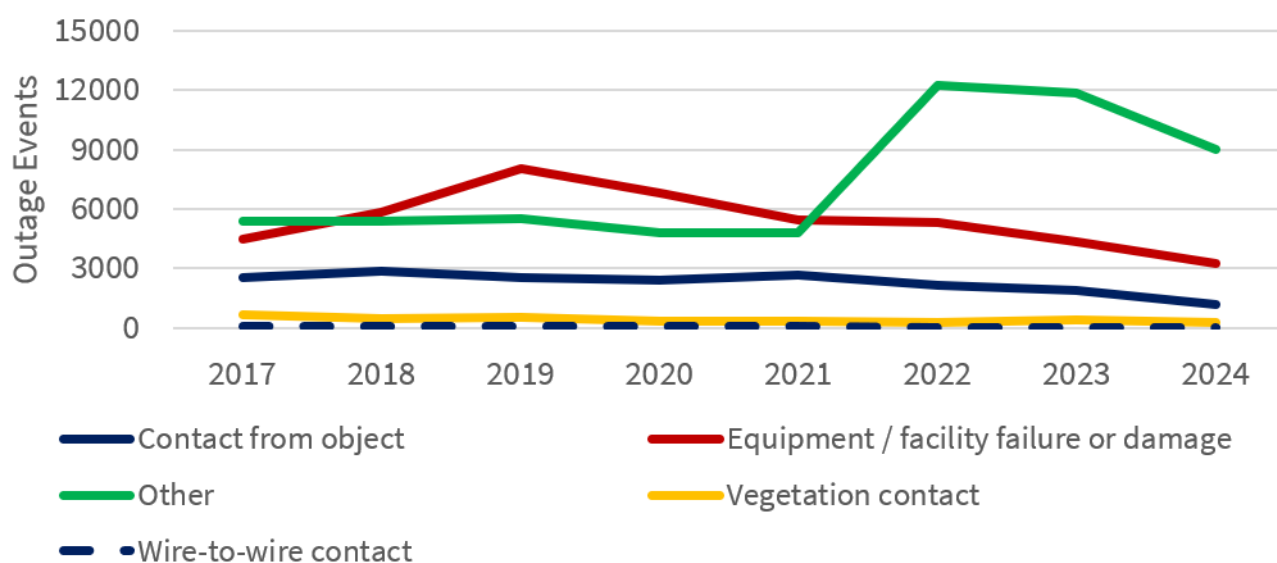


¹⁰⁷ Figure contains values for the years 2022 and 2023 that represent corrections over 2023 ARC.

Raw Outage Events by Risk Driver

To indicate which causes of SCE's unplanned outages are the most common, events are shown delineated by risk drivers (Figure 9). Based on information provided by SCE, all causes of outage events appear to be consistent across the study period with the exception of the category "Other",¹⁰⁸ which doubles in 2022 and remains consistently higher than in earlier years. The doubling of "Other" is from a new sub-category of causes called "Emergency Repairs" that started in 2022 and has continued.

Figure 9. SCE Outage Events Delineated by Risk Driver (2017-2024)



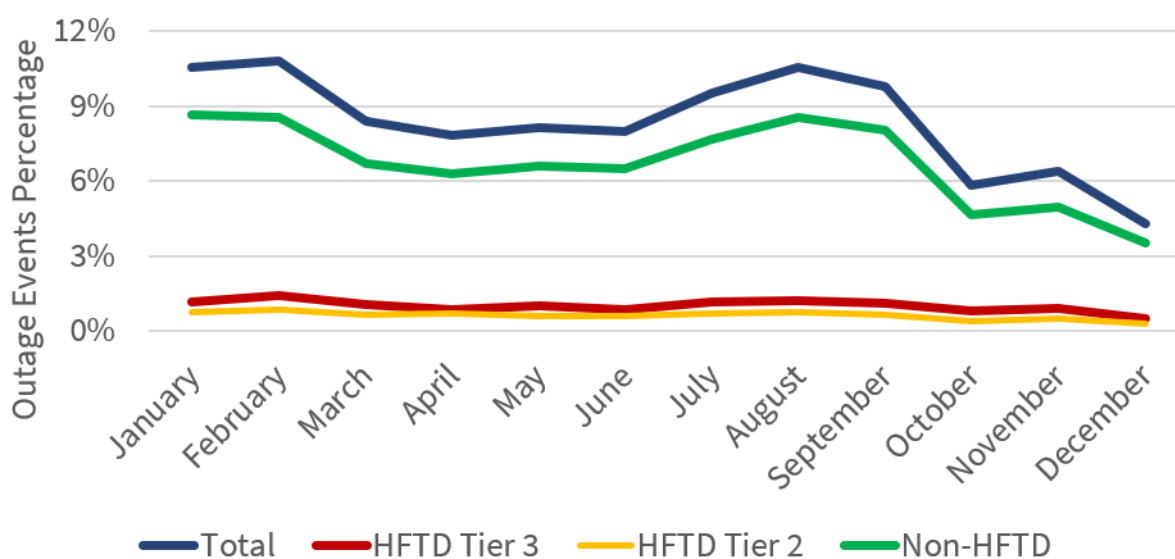
¹⁰⁸ "Other" risk drivers for outages include, but are not limited to, vandalism, theft, lightning, contamination, and emergency repairs. For 2017 through 2021, there are only four sub-categories of "Other" causes: Contamination, Other (Other), Unknown, and Vandalism. Starting in 2022, there are a number of added sub-categories for a total of ten categories.

Outage Events Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, outage events recently occurred. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month within each HFTD tier by the 3-year average number of all events for the year.

According to the assessment conducted,¹⁰⁹ outage events appear at their highest in January before subsequently decreasing through the remainder of the year. (Figure 10). These temporal trends are driven by the Non-HFTD areas as the other HFTD areas don't appear to have any substantial seasonal patterns.

Figure 10. SCE 3-Year Average (2022-2024) of Monthly Outage Events by HFTD Tier



8. Public Safety Power Shutoff Event Performance

PSPS events are planned outages that may be used as a wildfire mitigation tool during extreme fire conditions, particularly hot, dry, and windy days. While useful as a wildfire mitigation measure, PSPS events carry their own risks and adverse impacts on customers – particularly vulnerable customers who rely on electricity. As such, electrical corporations take mitigating actions to reduce the frequency, scope, duration, and impacts of PSPS events.

¹⁰⁹ 2024 Q4 QDR.

Energy Safety collects data from the ECs on their PSPS events and tracks their PSPS performance on a year-over-year basis. The purpose of this assessment is to monitor and publicize the impacts of an EC's PSPS performance. This assessment does not make any judgment about the reasonableness of the decision to employ PSPS.

The following four PSPS event parameters are presented by year and comprise the main components of the PSPS event performance assessment:

- *Scope* is measured as the total number of utility circuits impacted because of PSPS events,
- *Duration - Customer* is measured by the total number of customer-hours because of PSPS events,
- *Duration - Critical Infrastructure* is measured as the total number of critical infrastructure-hours affected by PSPS events,¹¹⁰ and
- *Impact* is measured as the total number of customers affected by PSPS events.

Energy Safety converted the event parameters into rates by dividing them by SCE's PSPS frequency, measured as the count of all PSPS events. These rates for PSPS event parameters measure the performance of EC PSPS event management and account for year-to-year variances in weather. They reflect the performance of the PSPS events once they have occurred.

To estimate when PSPS events typically occur throughout the year, the PSPS events by month for the years (2022 – 2024) have been averaged.

The data source for PSPS event parameters information is the QDRs.¹¹¹

To see the raw counts of all PSPS event parameters and PSPS frequency for each year used, see Appendix C.

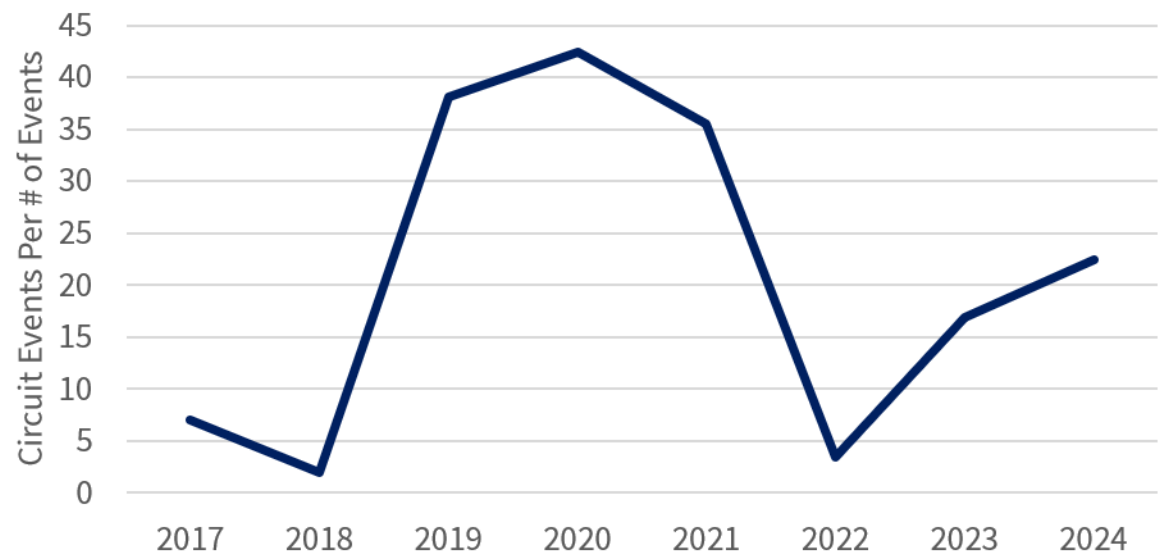
¹¹⁰ The term "critical infrastructure hours" means the total number of hours that critical infrastructure was impacted by PSPS events. Energy Safety's 2024 Compliance Guidelines (which were effective during the 2024 performance period) defines critical infrastructure as structures that are: chemical, communication, educational, emergency services, energy, government facilities, healthcare and public health, public safety answering points, transportation, water and wastewater systems, and other.

¹¹¹ 2022 Q3 QDR, Table 11; 2023 Q4 QDR, Table 10; 2024 Q4 QDR, Table 10.

Scope of PSPS Events

Based on information provided by SCE, the rate of circuits impacted by PSPS events reached its highest point in 2020 followed by a large decrease to 2022 (Figure 11).

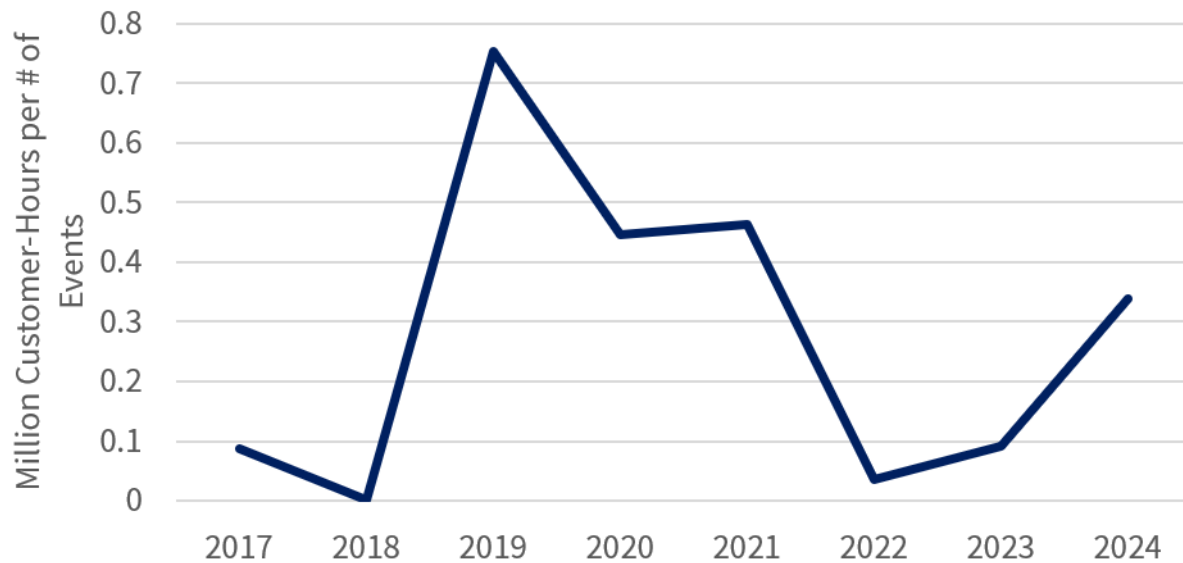
Figure 11. SCE PSPS Event Scope per Event (2017-2024)



Duration-Customers of PSPS Events

Based on information provided by SCE, the rate of customer-hours impacted per event reached its highest point in 2019 followed by a multiple-year decrease to 2022 (Figure 12).

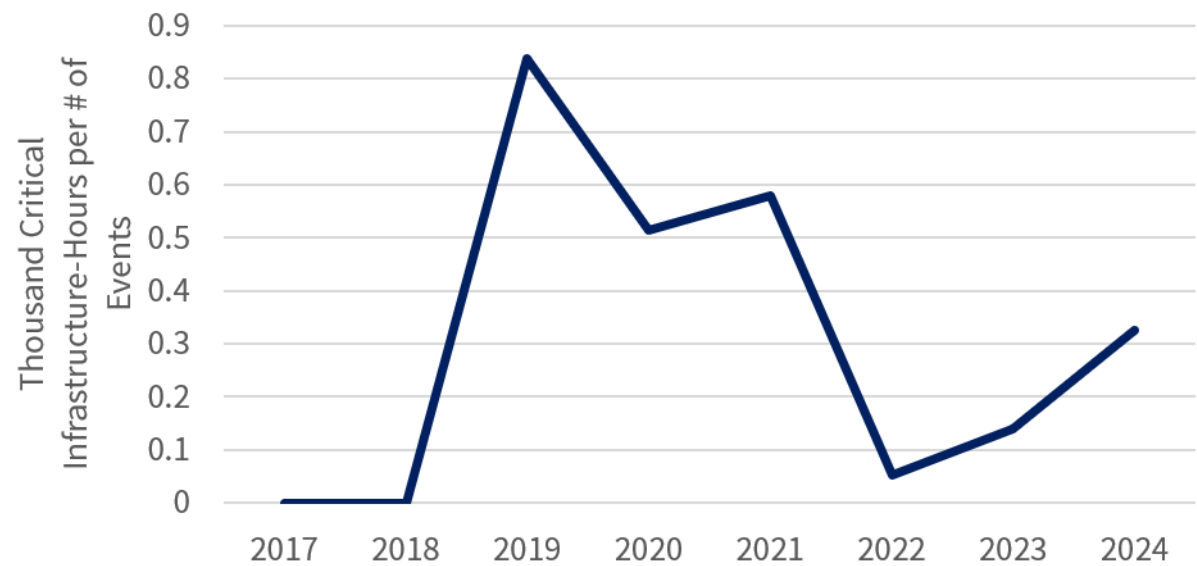
Figure 12. SCE PSPS Event Duration-Customers per Event (2017-2024)



Duration- Critical Infrastructure of PSPS Events

Based on information provided by SCE, the duration of PSPS events on critical infrastructure-hours per event reached their highest value in 2019 followed by a multiple year decrease to 2022 (Figure 13).

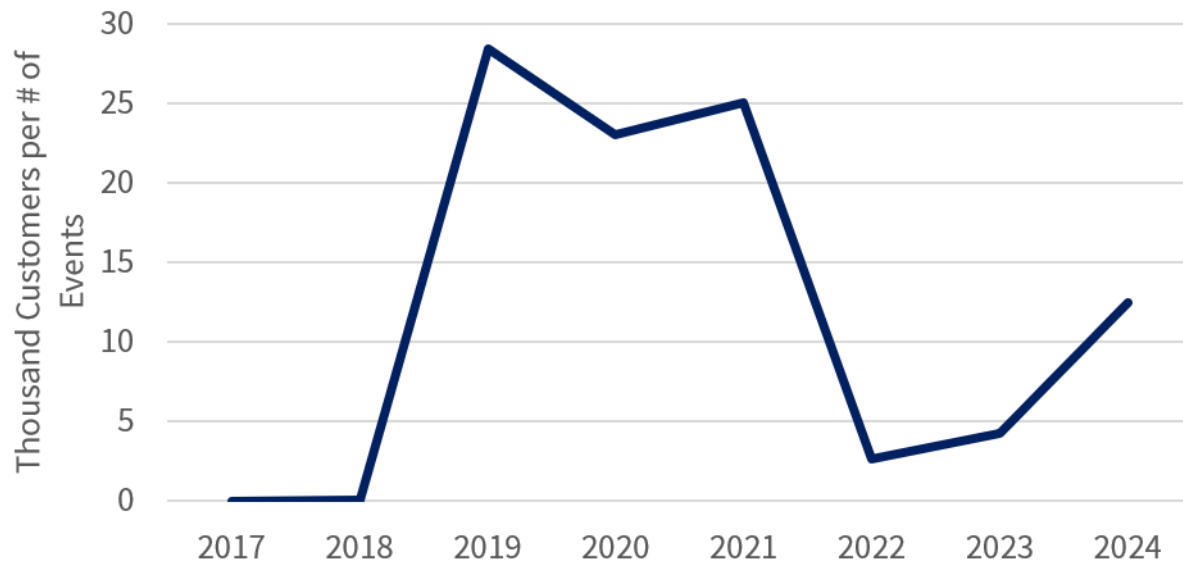
Figure 13. SCE PSPS Event Duration - Critical Infrastructure per Event (2017-2024)



Customers impacted by PSPS Events

Based on information provided by SCE, the rate of customers impacted per event reached its highest value in 2019 followed by a multiple year decrease to 2022 (Figure 14).

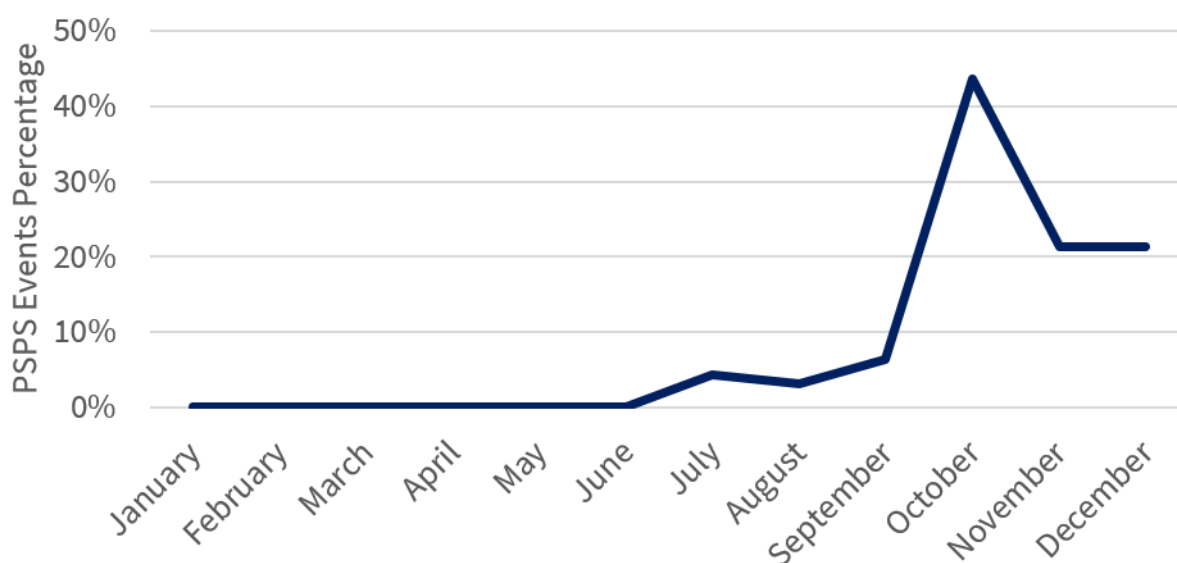
Figure 14. SCE PSPS Event Impacts on Number of Customers per Event (2017-2024)



PSPS Events Organized by Month for the 2022-2024 Period

Energy Safety conducted a separate assessment to identify when PSPS events have occurred during the last 3 years. To do so, Energy Safety estimated SCE's monthly 3-year average count of PSPS event percentages for the 2022-2024 period (Figure 15). Based on information provided by SCE, 86% of SCE's 3-year average for monthly PSPS events occur mostly from October through December with virtually no events through the Winter and Spring (Figure 15).

Figure 15. SCE 3-Year Average (2022-2024) Monthly PSPS Event Percentages



9. Outcome Metric Performance

Energy Safety collects data from the ECs regarding the consequences, or outcomes, of the ignitions caused by their equipment each year. Tracking this data over time allows for year-to-year assessment of the risk presented to the public by ignitions caused by the EC.

This section presents outcome performance metrics on EC-related wildfires including:

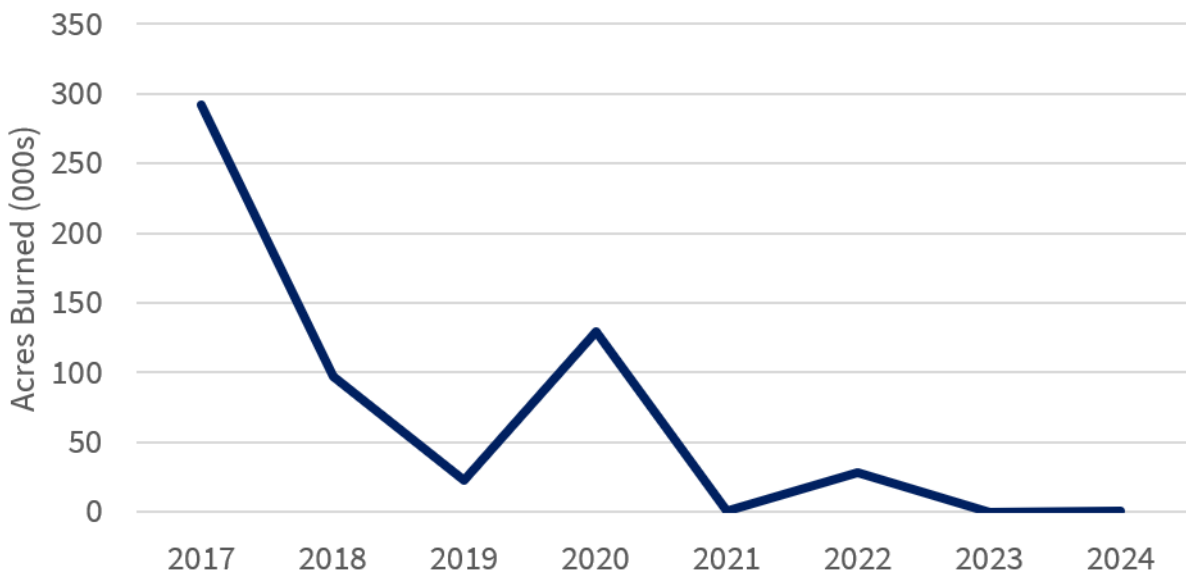
1. *Acres burned* – The total number of acres burned due to electrical corporation caused fires,
2. *Structures damaged/destroyed* - The total number of structures damaged or destroyed due to electrical corporation caused fires,
3. *Injuries/fatalities* - The total number of injuries and fatalities due to electrical corporation caused fires, and
4. *Value of assets destroyed* - The total value of assets destroyed due to electrical corporation caused fires.

The data source for outcomes performance metrics information is the QDRs.¹¹²

Acres Burned

The total number of acres burned associated with SCE-caused ignitions was highest in 2017 and lowest in 2021, 2023, and 2024 (Figure 16).

Figure 16. SCE Total Acres Burned (2017-2024)

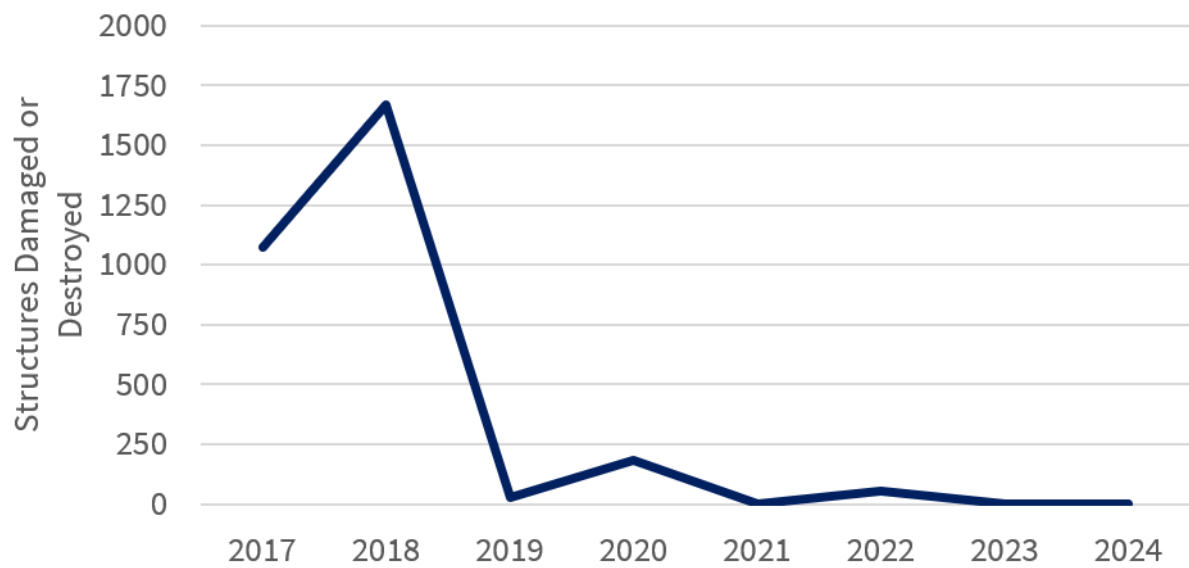


¹¹² 2023 Q3 QDR, Table 2; 2024 Q4 QDR, Table 2.

Structures Damaged or Destroyed

The total number of structures damaged or destroyed by SCE-caused ignitions was highest in 2018 with the appearance of no structures having been damaged or destroyed in 2019, 2021, 2023, and 2024 (Figure 17).

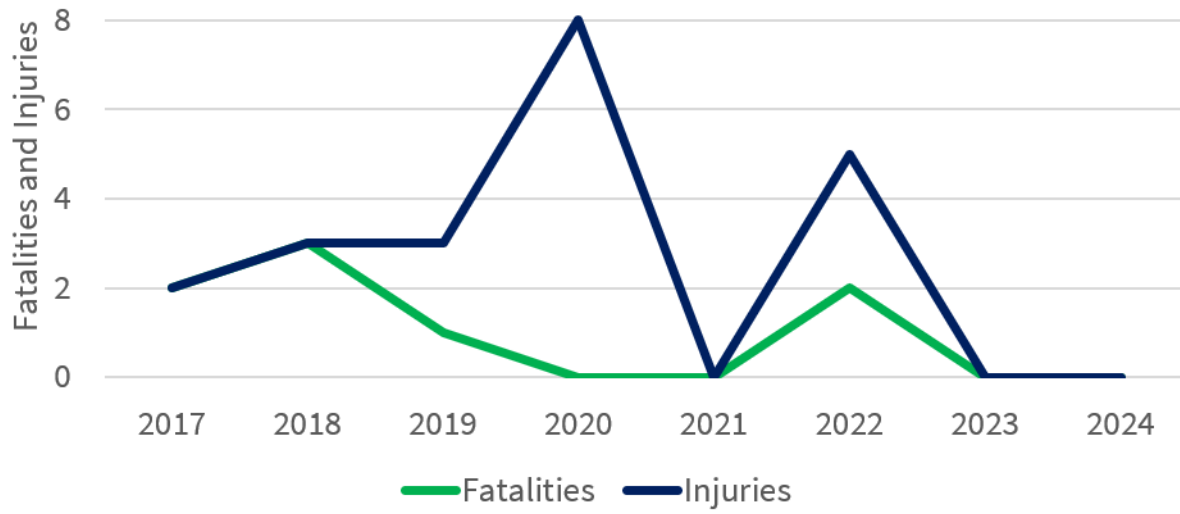
Figure 17. SCE Structures Damaged or Destroyed (2017-2024)



Injuries and Fatalities

Based on the information provided by SCE, the number of fatalities remain at three or below across the study period while the number of injuries fluctuated from 2017 through 2024 with a high value in 2020 (Figure 18).

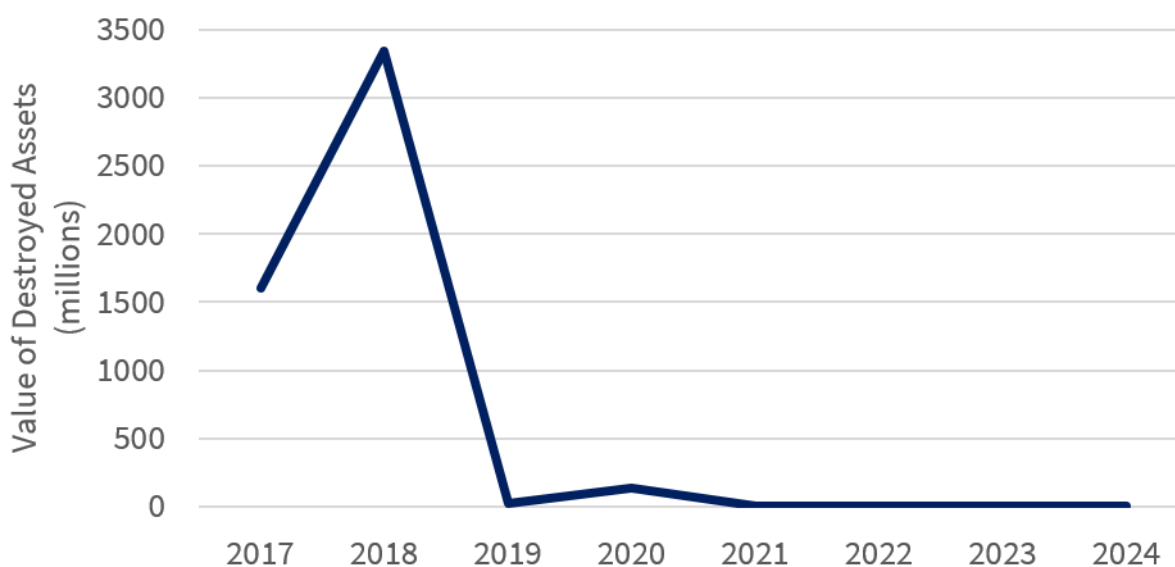
Figure 18. SCE Injuries and Fatalities (2017-2024)



Value of Destroyed Assets

Based on information provided by SCE, the value of destroyed assets was highest in 2018 with a sharp decrease in 2019 (Figure 19). From there, the value of destroyed assets remained at or near zero through 2024.

Figure 19. SCE Value of Destroyed Assets (2017-2024)



10. Reporting Accuracy and Completeness Performance

This section considers SCE's performance related to its documentation of its 2024 WMP implementation. To accomplish this, Energy Safety assessed a wide range of relevant information sources, including inspection field verifications, for signs of systemic weaknesses that may have hindered SCE's ability to understand the true status of its 2024 WMP implementation, and therefore to manage and accurately report on it.

Reporting accuracy and completeness is an important indicator of an electrical corporation's overall performance. For if an electrical corporation cannot accurately track WMP work and report on progress toward its WMP targets, this calls into question 1) the situational awareness of the electrical corporation and therefore its ability to achieve its WMP risk reduction goals through planned wildfire safety mitigation activities, and 2) the validity of reporting WMP progress. This section of the report summarizes Energy Safety's assessment of five sources of reporting accuracy and completeness issues to provide an overall performance assessment. Energy Safety reviewed the following:

1. The consistency of data reporting between the QDR and the EC ARC is assessed for issues beyond routine data value updates,
2. VMA Reports are reviewed for accuracy and completeness issues identified,
3. Findings from the IE ARC QA/QC program maturity model evaluations are summarized along with any other IE ARC data issues observed,
4. Consistency between QDR tabular and QDR spatial reporting is reviewed, and
5. Data accuracy issues identified by the inspections team are reviewed.

Data reporting accuracy is an ongoing issue for SCE that has been identified in previous annual performance reporting. The 2021 EC ARC reported several initiatives combined together rather than individually. In SCE's 2022 EC ARC, it did not report on 16 initiatives. Finally, in SCE's 2023 EC ARC, it reported different information than it did in its QDR regarding attainment of target values for 11 of the 51 WMP initiatives assessed.

10.1 QDR as compared to EC ARC

Energy Safety's assessment found three minor differences between SCE's QDR reporting and its EC ARC submissions.¹¹³ For Covered Conductor (SH-1) initiative, the QDR reported 810 miles completed while the EC ARC reported 796 miles. For the Undergrounding Overhead Conductor (SH-2) initiative, the QDR reported 12.2 miles while the EC ARC reported 11.9 miles. For the Long Span Initiative (SH-14), the QDR reported 1,315 remediations, while the EC ARC reported 1,200. As these differences are relatively small, this indicates that SCE has generally maintained accuracy and alignment in their reported information across both reporting formats.

10.2 Vegetation Management Audit Report Identified Issues

Energy Safety's 2024 VMA Report identified some data accuracy and completeness issues. Energy Safety identified data discrepancies associated with wood and slash management as well as clearance and fall-in mitigation work.¹¹⁴ Firstly, regarding wood and slash management, SCE's contractors did not document that wood and slash was properly managed at all mitigation work sites in 2024. SCE has since implemented improvements into its Arbora software which require contractors to document wood and slash management to address this deficiency in future performance years. Secondly, SCE has acknowledged recordkeeping deficiencies which led to uncertainty in the compliance status of trees following initiative inspection in both its clearance and fall-in mitigation programs. To

¹¹³ 2024 Q4 QDR, EC ARC.

¹¹⁴ VMA Report, pages 5-8.

address this deficiency, SCE has upgraded its Arbora software and implemented new procedures to reduce data input drop-down selection errors which prevent contractors from leaving fields blank and prevent users from inputting incorrect mitigations. Energy Safety will evaluate the success of these corrective actions in future compliance years.

10.3 IE ARC Evaluation

In the IE ARC, the IE identified several issues with SCE reporting accuracy and completeness for its WMP initiatives. In particular, the IE identified reporting issues for the Long Span (SH-14) initiative, citing a lack of consistent identifiers across recordkeeping and data management, a lack of documentation for reclassification of initiatives mid-cycle, then also citing financial accounting inconsistencies and varying documentation quality across initiative categories. For details see Section 5.

According to the IE's QA/QC maturity model evaluation, the two areas where SCE demonstrated the greatest opportunity for advancement were Roles and Responsibilities and the Technology Adoption maturity dimensions, both of which received a score of "Applied."¹¹⁵

SCE's highest-ranked dimensions in the IE's QA/QC maturity model were Quality Culture, Quality Management Systems (QMS), and Quality Inspection and Audits, each earning a score of "Routine."¹¹⁶ According to the IE's evaluation, quality control culture is actively supported by executive leadership and reinforced through training, structured performance qualification systems, and routine engagement from senior subject matter experts. SCE's QMS detailed documentation and procedures, in addition to its inclusion of internal controls and corrective actions further supports the system's maturity. Then also, quality inspections and audits comprise regular, structured inspections, with which vegetation inspections exceeded sampling targets and internal audits and post-verification reviews are documented and often lead to corrective actions.

10.4 Comparison of Spatial and Tabular QDR Data

Pursuant to Energy Safety's Data Guidelines, electrical corporations must submit QDRs in both spatial and non-spatial (i.e., tabular) formats. Each of these quarterly reports must contain accurate information about the progress in meeting WMP targets throughout a compliance period.¹¹⁷

Energy Safety assessed the data submitted by SCE regarding the WMP work it completed in 2024, in both the spatial and tabular QDR submissions. Energy Safety found the following inconsistencies between spatial and tabular QDR submissions, which may call into question SCE's data reporting practices and initiative attainment. Of the 47 2024 WMP initiatives, 17

¹¹⁵ IE ARC, page 78.

¹¹⁶ IE ARC, page 78.

¹¹⁷ Data Guidelines, page 1, pages 47-105, and pages 151-156.

showed deviations between tabular and spatial data reporting (Table 6).¹¹⁸ However, none of the discrepancies were large enough to have implications on initiative attainment performance.

Table 6. Energy Safety Summary of SCE Initiatives with Inconsistent QDR Reporting

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ¹¹⁹	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%) ¹²⁰
Covered Conductor 8.1.2.1.1 SH-1	1,050 circuit miles of covered conductor installed in HFRA	796 miles	22,111 points	N/A Units of measure differ between the Spatial QDR and the Tabular QDR
Undergrounding Overhead Conductor 8.1.2.2.1 SH-2	Convert 16 miles of overhead to underground.	12.18 miles	221 points	N/A Units of measure differ between the Spatial QDR and the Tabular QDR.
Tree Attachment Remediation 8.1.2.3.1 SH-10	Remediate 500 tree attachments in HFRA.	521 remediations	526 points	1.0%

¹¹⁸ For more information regarding the unmet initiatives, see Appendix A.

¹¹⁹ 2024 WMP, pages 238-245, 374-444, 449-450, 523-526, and 579-580.

¹²⁰ When units of measure were comparable, such as with points and poles, Energy Safety proceeded to note the percent deviation between tabular and spatial data. When units of measure were not comparable, such as with miles and points, Energy Safety did not attempt to present a percent deviation.

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ¹¹⁹	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%) ¹²⁰
Long Span Initiative 8.1.2.5.2 SH-14	Remediate 1,000 spans in HFRA.	1,315 remediations	1,177 points	10.5%
Vibration Damper Retrofit 8.1.2.1.2 SH-16	Retrofit vibration dampers on 500 structures where covered conductor is already installed in HFRA.	710 structures	677 points	4.7%
Distribution High Fire Risk Informed (HFRI) Inspections and Remediations (Ground and Aerial) 8.1.3.1 IN-1.1	Inspect 187,000 structures in HFRA.	Ground: 208,828 structures Aerial: 206,903 structures	546,315 ground and aerial points	31.4%
Transmission HFRI Inspections and Remediations (Ground and Aerial) 8.1.3.2 IN-1.2	Inspect 28,000 structures in HFRA.	Ground: 31,711 structures Aerial: 30,735 structures	63,389 ground and aerial points	1.5%

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ¹¹⁹	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%) ¹²⁰
Distribution Infrared Inspections 8.1.3.5 IN-3	Inspect 5,300 distribution overhead circuit miles in HFRA.	5,400 circuit miles	170,112 miles	3,150%
Infrared Inspection, Corona Scanning, and High-Definition Imagery of Energized Overhead Transmission facilitates and Equipment 8.1.3.6 IN-4	Inspect 1,000 transmission overhead circuit miles in HFRA.	1,086 circuit miles	1,116 miles	2.8%
Generation HFRI in HFRA 8.1.3.7 IN-5	Inspect 160 generation related assets in HFRA.	225 inspections	247 points	9.8%
LiDAR Distribution Vegetation Inspections 8.2.2.4.1 VM-9	Inspect 1,020 HFRA circuit miles.	1,131 circuit miles	6,793 miles	501%

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ¹¹⁹	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%) ¹²⁰
Structure Brushing 8.2.3.1.1 VM-2	Inspect and clear 63,700 structures.	116,388 structures	233,444 points	101%
Detailed Inspections on for Expanded Vegetation Clearances from Distribution Lines in HFRA 8.2.3.3.1 VM-7	Inspect 770 grids within distribution system.	778 grids	112,380 points	N/A Units of measure differ between the Spatial QDR and the Tabular QDR
Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Transmission Lines in HFRA 8.2.3.3.1 VM-8	Inspect 416 circuits within transmission system.	430 circuits	6,136 miles	N/A Units of measure differ between the Spatial QDR and the Tabular QDR.
Expanded Clearances for Legacy Facilities 8.2.3.3.2 VM-3	Perform vegetation treatment and maintenance to 50 sites.	70 sites	97 points	38.6%

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ¹¹⁹	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%) ¹²⁰
Hazard Tree Management Program 8.2.3.4.1 VM-1	Inspect 408 grids and circuits to prescribe mitigation for hazardous trees with strike potential within those grids in HFRA	437 grids and circuits	2,125 points	N/A Units of measure differ between the Spatial QDR and the Tabular QDR.
Dead and Dying Tree Removal Program 8.2.3.4.2 VM-4	Inspect 485 grids and circuits to prescribe mitigation for dead and dying trees with strike potential.	581 grids and circuits	5,046 points	N/A Units of measure differ between the Spatial QDR and the Tabular QDR

Energy Safety conducted a similar assessment for SCE's ignition risk events comprising the number of ignitions, wire down events, and unplanned outage events. Energy Safety identified material deviations in reporting of ignition risk events between tabular and spatial formats (Table 7).

Table 7. Energy Safety Summary of Ignition Risk Metrics with Inconsistent QDR Reporting

Risk Metrics with Inconsistent QDR Reporting	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%) ¹²¹
2024 Total Ignitions	186	135	27.4%
2024 Total Wire Down Events	2,534	1,548	38.9%

¹²¹ Deviation percentage is calculated as deviation from the tabular QDR value.

Risk Metrics with Inconsistent QDR Reporting	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%) ¹²¹
2024 Total Unplanned Outage Events	13,729	18,124	32%

10.5 Field Inspection Issues Identified

Energy Safety’s field inspections and the IE inspections of SCE’s 2024 WMP activities identified data accuracy issues regarding its spatial initiative completion data for the Long Span initiative (SH-14), where field-observed remediations differed from those reported. As described in Section 6.4.2, Energy Safety issued 56 notices to SCE upon inspection of its 2024 WMP work. Of those 56 total notices, 14 were related to data accuracy issues and 42 were related to completeness issues observed in the course of field audits.

Although the discrepancies did not impact SCE’s initiative performance assessment, they do warrant further validation and illuminate issues with SCE data collection, processing, and reporting.

10.6 Data Accuracy and Completeness Conclusions

Energy Safety determined that SCE’s data accuracy and completeness for reporting on 2024 WMP targets and actual attainment was inadequate and needs improvement. Energy Safety’s field inspectors identified 14 notice of violations for data accuracy and 42 notice of violations for completeness issues.¹²² Inspectors also identified reporting discrepancies in SCE’s Long Span (SH-14) initiative. Energy Safety’s VMA Report identified initiatives with insufficient reporting of work completion. Further, Energy Safety identified numerous cases of SCE spatial versus tabature QDR reporting with large discrepancies and that SCE planned expenditures deviated from actual spend amounts by more than 10% in 68% of initiatives.

Finally, the IE ARC listed numerous data quality and record keeping issues and provided several recommendations. Also in the IE ARC, the QA/QC maturity model evaluation found two (out of five) areas where SCE needed improvement.

Taken together, this assessment shows that SCE’s must continue to improve the accuracy and completeness of its WMP implementation documentation practices. Energy Safety will

¹²² Section 6.4.2 of this APR.

monitor SCE's reporting and expects improvements regarding the accuracy of SCE's documentation and tracking processes.

11. Conclusion

Energy Safety makes the following observations and recommendations regarding SCE's execution of its WMP initiative activities and the performance of its infrastructure relative to wildfire risk in 2024.

WMP Initiative Attainment Performance

SCE completed 41 of its 47 2024 WMP initiatives (87%), including seven of the ten initiatives with the largest proposed expenditure. However, SCE failed to meet its commitments for six of its WMP initiatives, including three of the 10 initiatives with the largest proposed expenditure. For two notable missed initiatives, Covered Conductor (SH-1) and Undergrounding Overhead Conductor (SH-2), SCE missed targets due to permitting delays.

Energy Safety's review of a selection of the inspection records of transmission inspections revealed several different issues that may have interfered with SCE's ability to reduce risk on its transmission system or execute inspections effectively. These included misclassifying aerial surveys as ground surveys, not having clear follow-up procedures to determine the condition of assets that could not be effectively inspected, and overgrown vegetation concealing the condition of the bottom of assets.

Ignition Risk Performance

Although SCE's ignition rates seemed to increase slightly from 2023 to 2024, the overall pattern is constant if not decreasing. Wire down events decreased in 2024 and potentially also decreased over the study period through the end of 2024.

Public Safety Power Shutoff Performance

Between 2020-2024 all of SCE's PSPS event metrics decreased with the most happening in October or the fall of each year. Energy Safety's assessment of the impacts of SCE's 2024 PSPS performance does not include a judgment about whether the decision by SCE to employ PSPS in a given circumstance was reasonable.

Outcome Metric Performance

SCE identified that while 537 acres burned in 2024, there were zero reports of associated injuries and fatalities, structures damaged or destroyed, or value of asset losses. This reflects a downward pattern in all of the outcome metrics from 2017 to 2024.

Data Reporting Accuracy and Completeness Performance

Energy Safety field inspectors identified 56 notices of violations for 2024 WMP work as well as incomplete vegetation management information. For quarterly data reporting, Energy Safety

found dissonances between spatial and tabular data for 17 (36%) of SCE's 47 assessed initiatives, and inconsistencies with SCE's self-reported EC ARC. Overall, SCE has many fronts on which to improve its data accuracy and completeness.

Conclusion

Given the missed initiative targets and issues with asset inspections noted in this report, going forward SCE must show, through consistent action, that it will honor its WMP commitments and thus meaningfully reduce wildfire risk in the manner committed to its customers and the people of California through its WMP. Energy Safety will continue to monitor SCE's implementation of its ongoing wildfire mitigation activities so that SCE improves its ability to eliminate utility-caused catastrophic wildfires in California.

12. References

The full references for each footnote citation appear in Table 8.

Table 8. References for Citations

Citation	Reference
2022 Q3 QDR	Southern California Edison Company, <u>2022-11-01 SCE-2022-Q3-QDR Metrics R0</u> , Published November 1, 2022. URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53168&docket=2022-QDR&shareable=true).
2023 Q4 QDR	Southern California Edison Company, <u>SCE 2023 Q4 Tables1-15 R0</u> , Published February 2, 2024. URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56271&docket=2023-QDR&shareable=true).
2023-2025 WMP Process and Evaluation Guidelines	Office of Energy Infrastructure Safety, <u>2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines</u> , January 2024. URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true).
2023-2025 Base WMP	Southern California Edison Company, <u>2023-2025 Base Wildfire Mitigation Plan Revision</u> , Published October 26, 2023, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&docket=2023-2025-WMPs&shareable=true).
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2024 Change Order Request	Southern California Edison Company, <u>SCE 2023-2025 WMP Change Order</u> , Published November 1, 2023, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).

Citation	Reference
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2024 Q1 QDR	Southern California Edison Company, <u>SCE 2024 Q1 Tables1-15 R1.xlsx</u> , Published May 7, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56628&docket=2024-QDR&shareable=true).
2024 Q4 QDR	Southern California Edison Company, <u>2025-05-25 SCE 2024 Q4 QDR R1</u> 2025-05-25_SCE_2024_Q4_QD, Published July 16, 20242025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&docket=2024-QDR&shareable=true). https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&docket=2024-QDR&shareable=true).
2024 WMP	Southern California Edison Company, <u>2023-2025 Wildfire Mitigation Plan</u> , June 4, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true).
2025 IE AIR	Bureau Veritas North America, Inc., <u>Southern California Edison 2025 Independent Evaluator Annual Implementation Report (2025 IE AIR)</u> , Published July 9, 2026, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60977&docket=2026-IE&shareable=true).
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EC ARC	Southern California Edison Company, <u>Southern California Edison Company's 2024 Wildfire Mitigation Plan Annual Report on Compliance</u> , Published April 1, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58189&docket=2024-EC_ARC&shareable=true).
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IE ARC Outline	Energy Safety, <u>Independent Evaluator Annual Report on Compliance Outline</u> , Published December 12, 2024, URL: (https://caleprocure.ca.gov/event/3355/0000033680).
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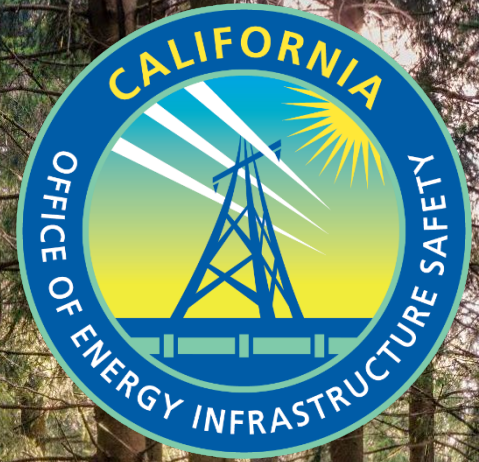
Citation	Reference
SCE Paubu Fire	California Public Utilities Commission, <u>SCE Incident Report for Pauba Fire</u> , Published July 12, 2024, URL: (electric-safety-incident-reported--southern-california-edison-company-incident-no --240712-15913.pdf).
VMA Report	Office of Energy Infrastructure Safety, <u>Southern California Edison 2024 Vegetation Management Audit Report</u> , Published March 27, 2026, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60468&shareable=true).
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DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED

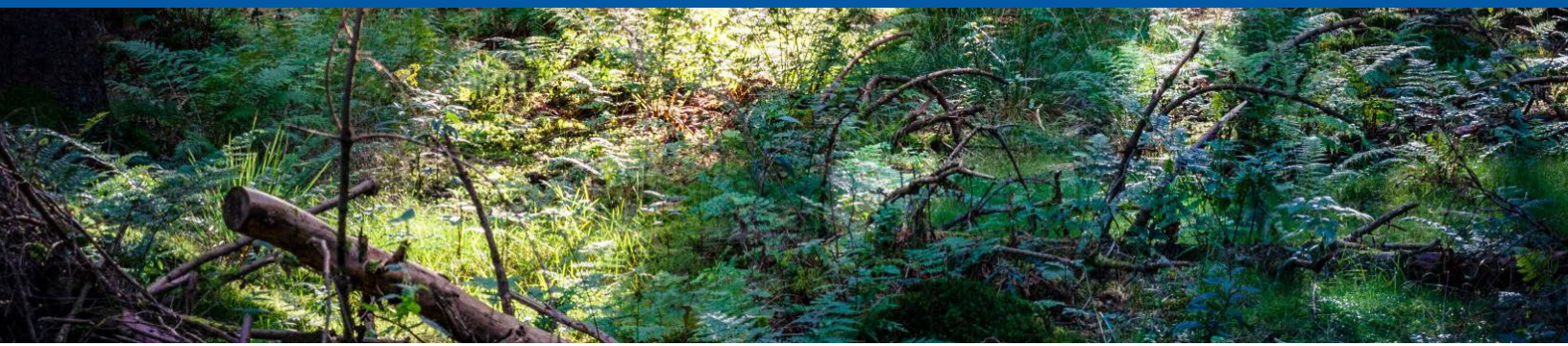


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APPENDICES



13. Appendices

Appendix A: SCE Information on WMP Initiative Activity Attainment

Summarized in Table 9 are each of SCE's 47 initiative activity targets from its 2024 WMP, SCE's self-reporting on performance contained in its QDR and EC ARC, the IE ARC, the VMA report, and SCE's response to DR-284.¹²³

Table 9. WMP Initiative Activity Attainment Information¹²⁴

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Covered Conductor 8.1.2.1.1 SH-1	1,050 circuit miles of covered conductor installed in HFRA.	Not met Target: 1,050 circuit miles Actual: 809.45 circuit miles	Not met Target: 1,050 circuit miles Actual: 796.03 circuit miles	Not met Target: 1,050 circuit miles Actual: 796 circuit miles	Not met ¹²⁵	\$782,799	\$650,636

¹²³ DR-284, EC ARC, IE ARC, and VMA Report

¹²⁴ This table includes all initiative activities that had targets for the 2024 calendar year but does not include initiative activities for which SCE had proposed or actual expenditures and no targets for the 2024 calendar year.

¹²⁵ Energy Safety's audit of SH-1 identified 22,111 points reported in SCE's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Undergrounding Overhead Conductor 8.1.2.2.1 SH-2	Convert 16 miles of overhead to underground.	Not met Target: 16 miles Actual: 12.18 miles	Not met Target: 16 miles Actual: 11.88 miles	Not met Target: 16 miles Actual: 12 miles	Not met ¹²⁶	\$60,897	\$56,752
Installation of System Automation Equipment 8.1.2.8.1 SH-5	Install five sectionalizing devices	Met Target: Five installed and operational Actual: Five installed and operational	Met Target: Five installed and operational Actual: Five installed and operational	Met Target: Five installed and operational Actual: Five installed and operational	Met	\$2,629	\$1,861

¹²⁶ Energy Safety's audit of SH-2 identified 221 points reported in SDG&E's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Circuit Breaker Relay Hardware for Fast Curve 8.1.2.8.2 SH-6	Replace or upgrade 10 circuit breaker relay units with fast curve settings.	Met Target: Ten circuit breakers Actual: 11 circuit breakers	Met Target: Ten circuit breakers Actual: 11 circuit breakers	Met Target: Ten circuit breakers Actual: 11 circuit breakers	Met	\$2,167	\$1,702
Tree Attachment Remediation 8.1.2.3.1 SH-10	Remediate 500 tree attachments in HFRA.	Met Target: 500 tree attachment remediations Actual: 521 tree attachment remediations	Met Target: 500 tree attachment remediations Actual: 521 tree attachment remediations	Met Target: 500 tree attachment remediations Actual: 521 tree attachment remediations	Met ¹²⁷	\$17,483	\$21,122

¹²⁷ Energy Safety's audit of SH-10 identified 667 points reported in SDG&E's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Long Span Initiative 8.1.2.5.2 SH-14	Remediate 1,000 spans in HFRA.	Met Target: 1,000 remediations Actual: 1,315 remediations	Met Target: 1,000 remediations Actual: 1,314 remediations	Met Target: 1,000 remediations Actual: 1,200 remediations	Met ¹²⁸	\$8,347	\$4,380
Vibration Damper Retrofit 8.1.2.1.2 SH-16	Retrofit vibration dampers on 500 structures where covered conductor is already installed in HFRA.	Met Target: 500 structures Actual: 710 structures	Met Target: 500 structures Actual: 710 structures	Met Target: 500 structures Actual: 710 structures	Met	\$170.81	\$1.23 ¹²⁹

¹²⁸ Energy Safety's audit of SH-14 identified 1,177 points reported in SCE's spatial data as shown in Section 10.4.

¹²⁹ IE ARC, page 41 and 49. SCE reported to the IE that due to an accounting issue, most of the costs associated with the initiative were not recorded under accounts related to this initiative, and instead were recorded to SCE's "capital distribution preventative and breakdown maintenance" program, which helps to explain the relatively small amount of actual expenditure for this initiative. The IE reported that it verified expenditures were appropriately tracked and aligned with initiative execution.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
REFCL – GFN 8.1.2.6.1 SH-17	Complete construction of GFN at one substation.	Not Met Target: One GFN construction Actual: Zero GFN construction	Not Met Target: One substation location Actual: Zero GFN construction	Not Met Target: One substation location Actual: Zero GFN construction	Not met	\$30,163	\$22,956
REFCL – Grounding Conversion 8.1.2.6.2 SH-18	Target four locations for grounding conversion.	Not Met Target: Four locations Actual: Two locations	Not Met Target: Four locations Actual: Two locations	Not Met Target: Four locations Actual: Two locations	Not met	\$5,889	\$2,287

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Distribution HFRI Inspections and Remediations (Ground and Aerial) 8.1.3.1 IN-1.1	Inspect 187,000 structures in HFRA.	Met Target: 187,000 structures Actual: Ground: 208,828 structures Aerial: 206,903 structures	Met Target: 187,000 structures Actual: Ground: 208,828 structures Aerial: 206,903 structures	Met Target: 187,000 structures Actual: 208,828 structures	Met ¹³⁰	\$230,238	\$192,207

¹³⁰ Energy Safety's audit of IN-1.1 identified 546,315 points reported in SCE's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Transmission High Fire Risk-Informed (HFRI) Inspections and Remediations (Ground and Aerial) 8.1.3.2 IN-1.2	Inspect 28,000 structures in HFRA.	Met Target: 28,000 structures Actual: Ground: 31,711 structures Aerial: 30,735 structures	Met Target: 28,000 structures Actual: Ground: 31,708 structures Aerial: 30,729 structures	Met Target: 28,000 structures Actual: Ground: 31,708 structures Aerial: 30,729 structures	Met ¹³¹	\$0	\$0
Distribution Infrared Inspections 8.1.3.5 IN-3	Inspect 5,300 distribution overhead circuit miles in HFRA.	Met Target: 5,300 circuit miles Actual: 5,399.97 circuit miles	Met Target: 5,300 circuit miles Actual: 5,399.27 circuit miles	Met Target: 5,300 circuit miles Actual: 5,399 circuit miles	Met ¹³²	\$475	\$475

¹³¹ Energy Safety's audit of IN-1.2 identified 63,389 points reported in SCE's spatial data as shown in Section 10.4.

¹³² Energy Safety's audit of IN-3 identified 170,111.72 miles reported in SCE's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Infrared Inspection, Corona Scanning, and High-Definition Imagery of Energized Overhead Transmission facilitates and Equipment 8.1.3.6 IN-4	Inspect 1,000 transmission overhead circuit miles in HFRA.	Met Target: 1,000 circuit miles Actual: 1,086.2 circuit miles	Met Target: 1,000 circuit miles Actual: 1,086.2 circuit miles	Met Target: 1,000 circuit miles Actual: 1,086 circuit miles	Met ¹³³	\$103	\$188

¹³³ Energy Safety's audit of IN-4 identified 1,116 miles reported in SCE's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Generation HFRI Inspections and Remediations in HFRA 8.1.3.7 IN-5	Inspect 160 generation related assets in HFRA.	Met Target: 160 inspections Actual: 225 inspections	Met Target: 160 inspections Actual: 225 inspections	Met Target: 160 inspections Actual: 225 inspections	Met ¹³⁴	\$280	\$41
Transmission Conductor and Splice Assessment: Spans with LineVue 8.1.3.8 IN-9a	Inspect 25 spans with Line Vue.	Met Target: 25 spans with Line Vue Actual: 33 spans with Line Vue	Met Target 25 spans with Line Vue Actual: 33 spans with Line Vue	Met Target: 25 spans with Line Vue Actual: 33 spans with Line Vue	Met	\$1,759	\$817

¹³⁴ Energy Safety's audit of IN-5 identified 247 points reported in SCE's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Transmission Conductor and Splice Assessment: Splices with X-Ray 8.1.3.8 IN-9b	Inspect 50 splices with X-Ray.	Met Target: 50 splices X-Ray Actual: Line Vue: 33 X-Ray: 70	Met Target: 50 splices X-Ray Actual: Line Vue: 33 X-Ray: 70	Met Target: 50 splices X-Ray Actual: Line Vue: 33 X-Ray: 70	Met	\$0	\$0
Inspection and Maintenance Tools 8.1.5 IN-8	Execute the approved designs and recommendations for incorporating distribution ground and InspectCam capabilities into single digital platform.	Not Met Target: Execute the approved designs and recommendations. Actual: Not executed.	Not Met Target: Execute the approved designs and recommendations. Actual: Not executed.	Met Target: Execute the approved designs and recommendations. Actual: Not executed.	Not met	\$5,679	\$9,044

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Transmission Vegetation Management Plan 8.2.2 UVM-02	Vegetation inspections and maintenance for transmission vegetation management.	Missing	Missing	Missing	Met ¹³⁵	\$0	\$0
Distribution Vegetation Management Plan 8.2.2 UVM-03	Vegetation inspections and maintenance for distribution vegetation management.	Missing	Missing	Missing	Met ¹³⁶	\$0	\$0

¹³⁵ VMA Report, pages A-7. Not all vegetation management initiatives were reported by SCE in QDR, EC ARC, or by IE ARC.

¹³⁶ VMA Report, pages A-7. Not all vegetation management initiatives were reported by SCE in QDR, EC ARC, or by IE ARC.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
LiDAR Distribution Vegetation Inspections 8.2.2.4.1 VM-9	Inspect 1,020 HFRA circuit miles.	Met Target: 1,020 circuit miles Actual: 1,130.64 circuit miles	Met Target: 1,020 circuit miles Actual: 1,130.64 circuit miles	Met Target: 1,020 circuit miles Actual: 1,131 circuit miles	Met ¹³⁷	\$1,497	\$14,088
LiDAR Transmission Vegetation Inspections 8.2.2.4.1 VM-10	Inspect 1,500 HFRA circuit miles.	Met Target: 1,500 circuit miles Actual: 3,180.92 circuit miles	Met Target: 1,500 circuit miles Actual: 3,180.92 circuit miles	Met Target: 1,500 circuit miles Actual: 3,181 circuit miles	Met	\$5,789	\$11,124

¹³⁷ Energy Safety's audit of VM-9 identified 6,793.42 miles reported in SCE's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Structure Brushing 8.2.3.1.1 VM-2	Inspect and clear 63,700 structures.	Met Target: 63,700 structures Actual: 116,388 structures	Met Target: 63,700 structures Actual: 116,388 structures	Met Target: 63,700 structures Actual: 116,388 structures	Met	\$25,915	\$17,102
Wood and Slash Management 8.2.3.2	To manage all downed wood and 'slash' generated from vegetation management activities. ¹³⁸	Missing	Missing	Missing	Met ¹³⁹	\$0	\$0

¹³⁸ VMA Report, page A-21.

¹³⁹ VMA Report, page 9. Not all vegetation management initiatives were reported by SCE in QDR, EC ARC, or by IE ARC.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Detailed Inspections for Expanded Vegetation Clearances from Distribution Lines in HFRA 8.2.3.3.1 VM-7	Inspect 770 grids within distribution system.	Met Target: 770 grids Actual: 778 grids	Met Target: 770 grids Actual: 778 grids	Met Target: 770 grids Actual: 778 grids	Met ¹⁴⁰	\$216,394	\$193,573

¹⁴⁰ Energy Safety's audit of VM-7 identified 112,380 reported in SCE's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Transmission Lines in HFRA 8.2.3.3.1 VM-8	Inspect 416 circuits within transmission system.	Met Target: 416 circuits Actual: 430 circuits	Met Target: 416 circuits Actual: 430 circuits	Met Target: 416 circuits Actual: 430 circuits	Met ¹⁴¹	\$21,120	\$12,691

¹⁴¹ Energy Safety's audit of VM-8 identified 6,135.58 miles reported in SCE's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Expanded Clearances for Legacy Facilities 8.2.3.3.2 VM-3	Perform vegetation treatment and maintenance to 50 sites.	Met Target: 50 sites Actual: 70 sites	Met Target: 50 sites Actual: 70 sites	Met Target: 50 sites Actual: 70 sites	Met ¹⁴²	\$830.00	\$519.45
Hazard Tree Management Program 8.2.3.4.1 VM-1	Inspect 408 grids and circuits to prescribe mitigation for hazardous trees with strike potential within those grids in HFRA.	Met Target: 408 grids and circuits Actual: 437 grids and circuits	Met Target: 408 grids and circuits Actual: 437 grids and circuits	Met Target: 408 grids and circuits Actual: 430 grids and circuits	Met ¹⁴³	\$49,896	\$10,958

¹⁴² Energy Safety's audit of VM-3 identified 97 points reported in SCE's spatial data as shown in Section 10.4.

¹⁴³ Energy Safety's audit of VM-1 identified 2,125 points reported in SCE's spatial data as shown in Section 10.4.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Dead and Dying Tree Removal 8.2.3.4.2 VM-4	Inspect 485 grids and circuits to prescribe mitigation for dead and dying trees with strike potential.	Met Target: 485 grids and circuits Actual: 581 grids and circuits	Met Target: 485 grids and circuits Actual: 581 grids and circuits	Met Target: 485 grids and circuits Actual: 581 grids and circuits	Met ¹⁴⁴	\$27,601	\$15,662
Substation Defensible Space 8.2.3.5	Reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation. ¹⁴⁵	Missing	Missing	Missing	Met ¹⁴⁶	\$0	\$0

¹⁴⁴ Energy Safety's audit of VM-4 identified 5,046 points reported in SCE's spatial data as shown in Section 10.4.

¹⁴⁵ VMA Report, page A-34.

¹⁴⁶ VMA Report, page 6. Not all vegetation management initiatives were reported by SCE in QDR, EC ARC, or by IE ARC.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Vegetation Management Work Management Tool (Arbora) 8.2.4 VM-6	Monitor stabilization of Arbora and develop plan and begin execution of plan to enable additional VM maintenance programs.	Met Target: Monitor stabilization of Arbora and develop plan. Actual: Met	Met Target: Monitor stabilization of Arbora and develop plan. Actual: Met	Met Target: Monitor stabilization of Arbora and develop plan. Actual: Met	Met	\$6,746	\$9,614

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Quality Assurance and Quality Control 8.2.5	Establish and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes. ¹⁴⁷	Missing	Missing	Missing	Met ¹⁴⁸	\$0	\$0

¹⁴⁷ VMA Report, page A-41.

¹⁴⁸ VMA Report, page 20. Not all vegetation management initiatives were reported by SCE in QDR, EC ARC, or by IE ARC.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Open Work Orders 8.2.6	Manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities. ¹⁴⁹	Missing	Missing	Missing	Not met ¹⁵⁰	\$0	\$0

¹⁴⁹ VMA Report, page A-49.

¹⁵⁰ VMA Report, pages 27. Not all vegetation management initiatives were reported by SCE in QDR, EC ARC, or by IE ARC.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Workforce Planning 8.2.7	Ensure that the EC has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work. ¹⁵¹	Missing	Missing	Missing	Met ¹⁵²	\$0	\$0

¹⁵¹ VMA Report, page A-54.

¹⁵² VMA Report, pages 6. Not all vegetation management initiatives were reported by SCE in QDR, EC ARC, or by IE ARC.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Fire Resilient Right-of-Ways 8.2.3.7	Promote vegetation communications that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way. ¹⁵³	Missing	Missing	Missing	Met ¹⁵⁴	\$0	\$0

¹⁵³ VMA Report, page A-35.

¹⁵⁴ VMA Report, pages 6. Not all vegetation management initiatives were reported by SCE in QDR, EC ARC, or by IE ARC.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Emergency Response Vegetation Management 8.2.3.8	Plan and execute vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration. ¹⁵⁵	Missing	Missing	Missing	Met ¹⁵⁶	\$0	\$0

¹⁵⁵ VMA Report, page 37.

¹⁵⁶ VMA Report, page 6. Not all vegetation management initiatives were reported by SCE in QDR, EC ARC, or by IE ARC.

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
SCE Emergency Response Training 8.4.2.2.1 DEP-2	PSPS response teams are fully qualified and requalified annually on July 1 st to maintain readiness.	Met Target: PSPS response teams are fully qualified and requalified annually. Actual: Met	Met Target: PSPS response teams are fully qualified and requalified annually. Actual: Met	Met Target: PSPS response teams are fully qualified and requalified annually. Actual: Met	Met	\$1,124	\$239
Aerial Suppression 8.4.3.3.1 DEP-5	Continue to reassess availability and funding for aerial suppression resources annually to determine ongoing QRF strategy.	Met Target: Reassess availability and funding for aerial suppression resources. Actual: Met	Met Target: Reassess availability and funding for aerial suppression resources. Actual: Met	Met Target: Reassess availability and funding for aerial suppression resources. Actual: Met	Met	\$35,000	\$36,059

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Customer Care Programs - Critical Care Backup Battery Program 8.4.6.2 PSPS-2	Complete 85% of battery deliveries to eligible customers within 30 calendar days of program enrollment.	Met Target: 85% of battery deliveries Actual: 85% of battery deliveries	Met Target: 85% of battery deliveries Actual: 85% of battery deliveries	Met Target: 85% of battery deliveries Actual: 85% of battery deliveries	Met	\$8,507	\$7,699
Customer Care Programs - Portable Power Station and Generator Rebates 8.4.6.3 PSPS-3	Process 85% of all rebate claims within 30 business days of receipt from website vendor.	Met Target: 85% of all rebate claims Actual: 85% of all rebate claims	Met Target: 85% of all rebate claims Actual: 85% of all rebate claims	Met Target: 85% of all rebate claims Actual: 85% of all rebate claims	Met	\$1,521	\$1,044

2024 WMP Initiative Activity	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand)	Actual Expenditure (\$ thousand)
Wildfire Safety Community Meetings 8.5.2.1 DEP-1	Continue or revise determined based on the outcome of 2023.	Met Target: Two meetings Actual: Two meetings	Met Target: Two meetings Actual: Two meetings	Met Target: Two meetings Actual: Two meetings	Met	\$109	\$51
Customer Research and Education 8.5.2.3 DEP-4	Conduct three PSPS-related customer studies.	Met Target: Three studies Actual: Three studies	Met Target: Three studies Actual: Three studies	Met Target: Three studies Actual: Three studies	Met	\$0	\$0

Appendix B: SCE Vegetation Management Audit Report

On March 27, 2026, Energy Safety issued its Vegetation Management Audit (VMA) Report for SCE.¹⁵⁷ The VMA Report concluded that SCE achieved the objectives for 12 of the 13 vegetation management initiatives (92%) described in its 2024 WMP. The VMA Report identified that SCE was deficient in completing the 8.2.6 – Open Work Orders initiative. SCE committed to prioritizing and completing work orders within risk-based timeframes based on observed conditions, but could not demonstrate that Priority 1 and 2 open work orders were appropriately managed within target risk-based timeframes in performance year 2024. While SCE provided corrective actions to ensure timely completion and monitoring of its open work orders in future performance years, it did not demonstrate that open work orders were monitored and completed within risk-based timeframes in performance year 2024. This was particularly true of Priority 2 work orders, which had the highest levels of overdue work and did not exhibit the same trends in timely mitigation as Priority 1 designated trees as a result of the corrective actions. Therefore, Energy Safety found that Initiative 8.2.6 - Open Work Orders had outstanding deficiencies. The findings from Energy Safety’s VMA Report are detailed in Table 10.

A finding of “Completed” indicates that SCE provided documentation to support that all work was completed. A finding of “Achieved Objective” indicates that while Energy Safety identified some deficiencies, the majority of the work was completed and the CAP provided corrective actions that will address any remaining deficiencies. A finding of “Deficient” indicates that SCE did not provide sufficient documentation to demonstrate that all work was completed and did not provide sufficient corrective actions to ensure that work would be completed in the future performance years.

¹⁵⁷ VMA Report.

Table 10. Energy Safety Findings from SCE 2024 VMA Report of WMP Vegetation Management Initiatives

Vegetation Management Initiative	WMP Initiative Tracking ID	VMA Report Finding
8.2.2 - Vegetation Management Inspections	Hazard Tree Management Program (HTMP) (VM-1), Clearing Detailed Inspections for Expanded Vegetation Clearances from Distribution Lines in HFRA (VM-7), Clearing Detailed Inspections for Transmission Vegetation Management Plan (VM-8), LiDAR Distribution Vegetation Inspections (VM-9), LiDAR Transmission Vegetation Inspections (VM-10), Transmission Vegetation Management Plan (UVM-02), and Distribution Vegetation Management Plan (UVM-03)	Complete
8.2.3.1 - Pole Clearing	Structure Brushing (VM-2)	Complete
8.2.3.2 - Wood and Slash Management	N/A	Achieved Objective
8.2.3.3 - Clearance	Expanded Clearances for Generation Legacy Facilities (VM-3), Clearing Detailed Inspections for Expanded Vegetation Clearances from Distribution Lines in HFRA (VM-7), and Clearing Detailed Inspections for Transmission Vegetation Management Plan (VM-8)	Achieved Objective
8.2.3.4 - Fall-In Mitigation	Hazard Tree Management Program (HTMP) (VM-1) and Dead and Dying Tree Removal Program (VM-4)	Achieved Objective
8.2.3.5 - Substation Defensible Space	N/A	Complete

Vegetation Management Initiative	WMP Initiative Tracking ID	VMA Report Finding
8.2.3.6 - High-Risk Species	Hazard Tree Management Program (HTMP) (VM-1), Detailed Inspections for Expanded Vegetation Clearances from Distribution Lines in HFRA (VM-7), and Detailed Inspections for Transmission Vegetation Management Plan (VM-8)	Complete
8.2.3.7 - Fire Resilient Right-of-Ways	N/A	Complete
8.2.3.8 - Emergency Response Vegetation Management	N/A	Complete
8.2.4 - Vegetation Management Enterprise System	Vegetation Management Work Management Tool (Arbora) (VM-6)	Complete
8.2.5 - Quality Assurance and Quality Control	N/A	Complete
8.2.6 - Open Work Orders	N/A	Deficient
8.2.7 - Workforce Planning	N/A	Complete

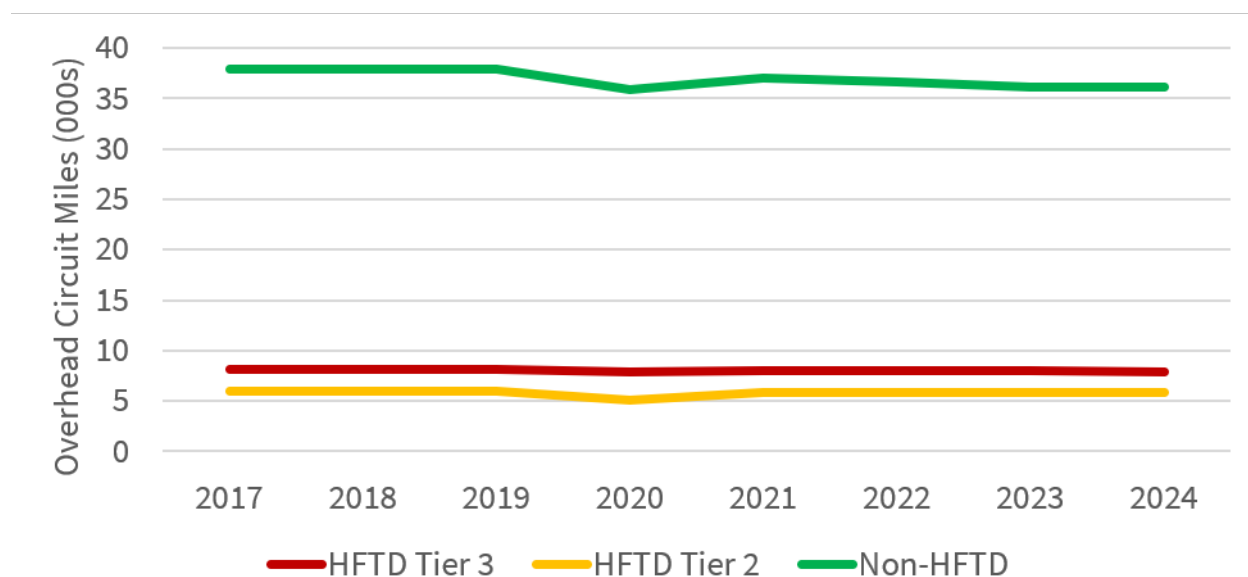
Appendix C: Normalizing Metrics and Raw Count Data

Data for this appendix comes from the QDRs and the DR-284 Response, as reported by SCE.¹⁵⁸ Overhead circuit miles (OCM) are used to estimate rates for ignition risk metrics. Raw counts of ignition risk metrics and PSPS event metrics are also presented in this appendix.

Overhead Circuit Miles

The number of overhead circuit miles (OCM) has remained relatively stable between 2017 and 2024 (Figure 20).

Figure 20. SCE Overhead Circuit Miles (2017-2024) by HFTD Tier

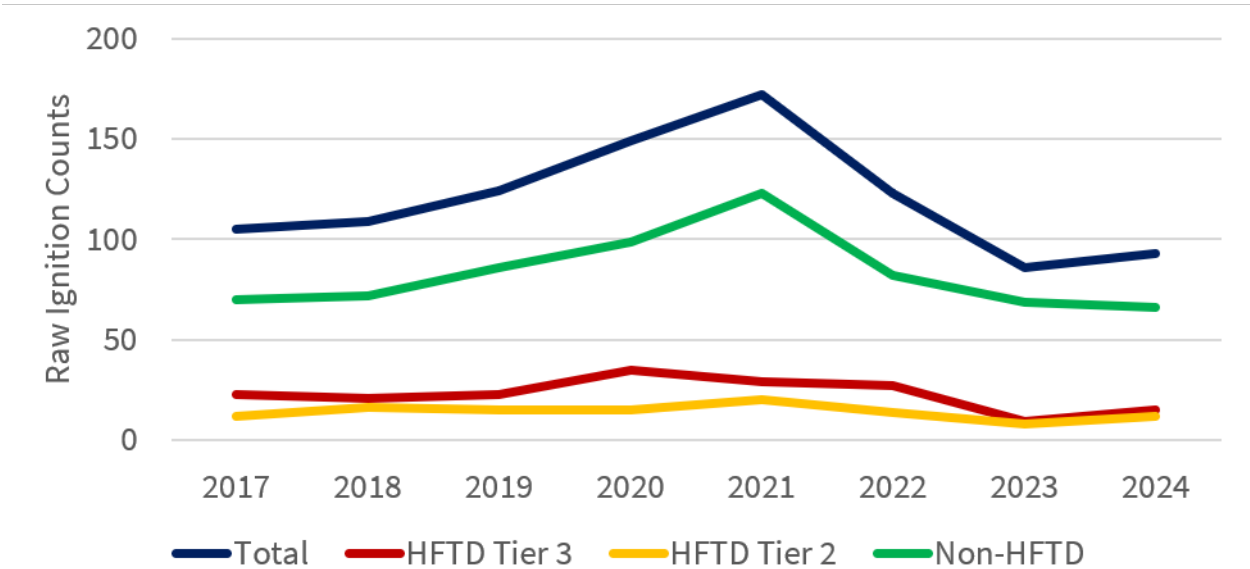


¹⁵⁸2023 Q3 QDR; Table 6, 7.1, 7.2, and 8; 2023 Q4 QDR, Table 4, 5, 6, and 7; and DR-281 Response.

Raw Ignition Event Counts

SCE’s ignition events remained constant in HFTD Tier 3 and HFTD Tier 2 areas between 2017 and 2024, whereas Non-HFTD area events peaked in 2021, and then decreased through 2024 (Figure 21). SCE’s Non-HFTD area ignition events made up most of the total category.

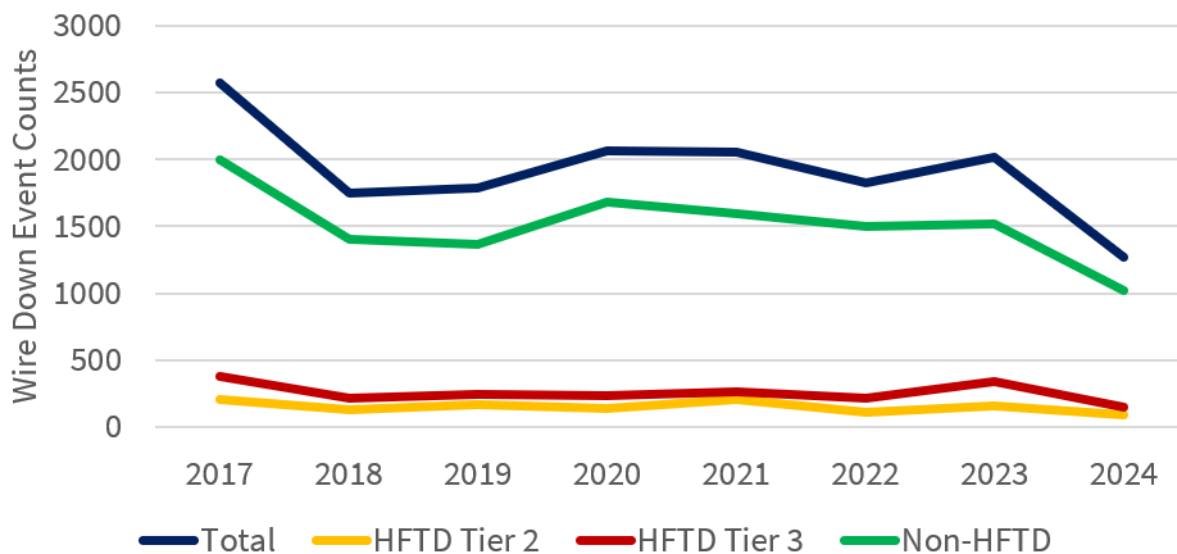
Figure 21. SCE Ignition Event Counts (2017-2024) by HFTD Tier



Raw Wire Down Event Counts

SCE's wire down event counts appear to decrease in Non-HFTD areas between 2017 and 2024 (Figure 22). SCE's Non-HFTD area wire down events made up most of the total category.

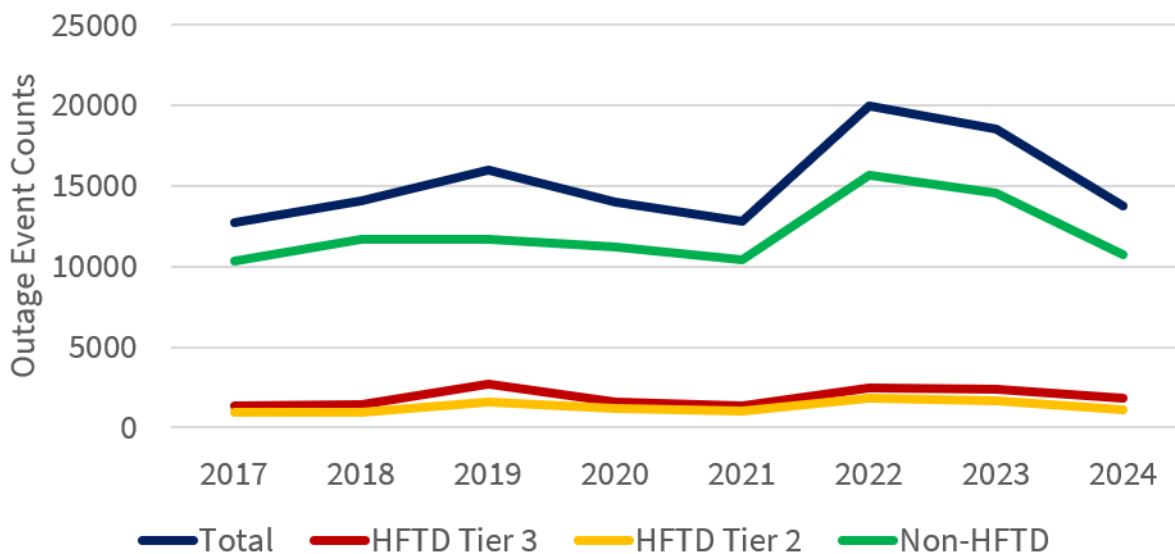
Figure 22. SCE Wire Down Event Counts (2017-2024) by HFTD Tier



Raw Outage Event Counts

SCE's outage event counts remained almost constant for HFTD Tier 2 and HFTD Tier 3 areas between 2017 and 2024, while Non-HFTD areas noticeably increased in 2022 before decreasing through 2024 (Figure 23). SCE's Non-HFTD area outage events made up most of the total category.

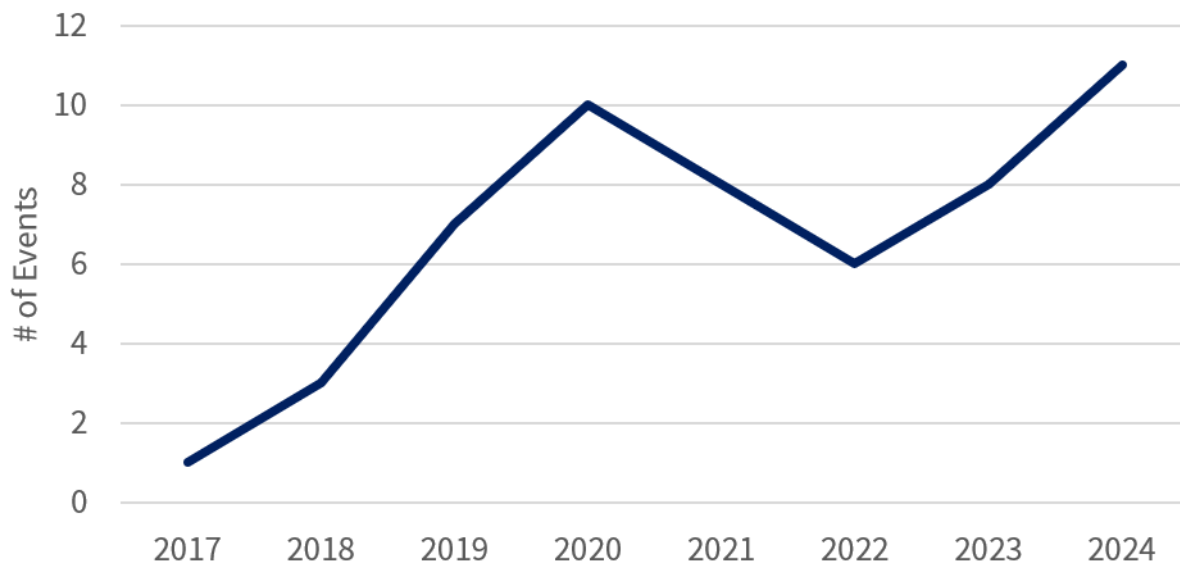
Figure 23. SCE Outage Event Counts (2017-2024) by HFTD Tier



Frequency of PSPS Events

The number of PSPS events on SCE's system shows a general increase from 2017 through 2024 (Figure 24). These events, however, are not adjusted for year-to-year variations in conditions.

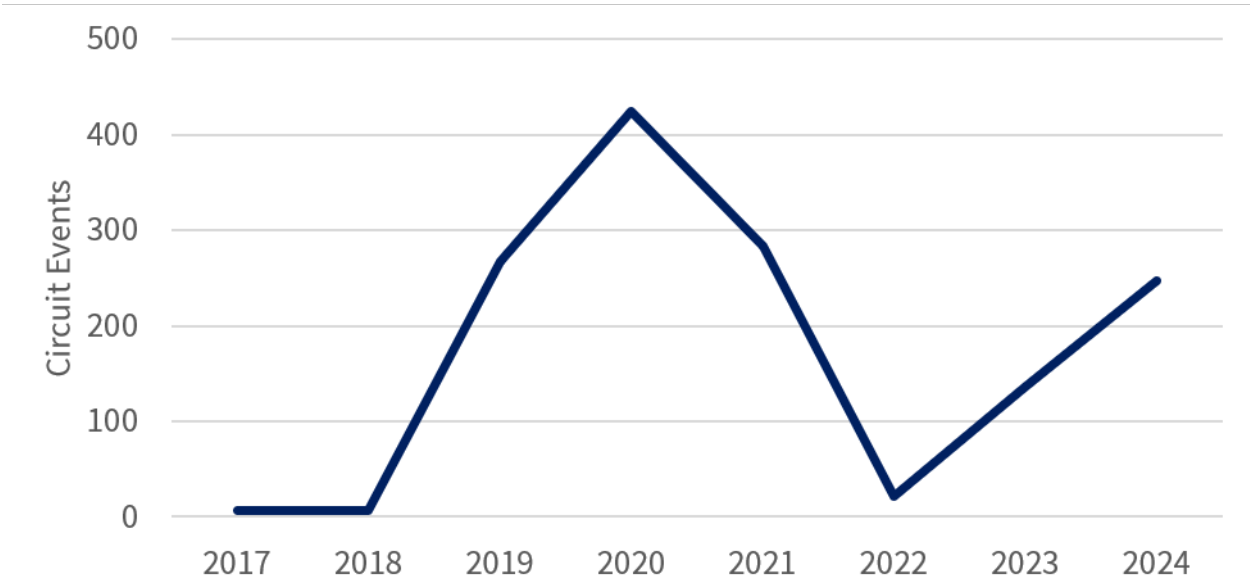
Figure 24. SCE PSPS Event Frequency (2017-2024)



Scope of PSPS Events

The number of utility circuits impacted by PSPS events decreased in 2021 through 2022, except for an observable increase through 2024 (Figure 25). These events, however, are not adjusted for year-to-year variations in conditions.

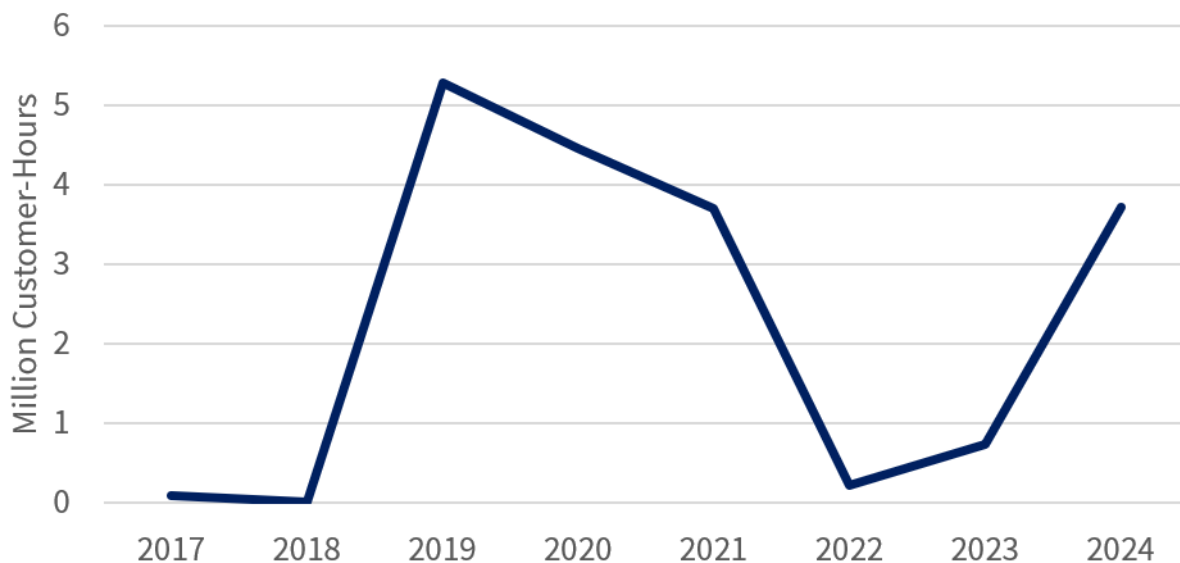
Figure 25. SCE PSPS Event Scope (2017-2024)



Duration - Customers of PSPS Events

The total number of customer-hours from all PSPS events increased to its highest point in 2019, reduced over multiple-years to 2022, with a potential rebound to 2024 (Figure 26). These events, however, are not adjusted for year-to-year variations in conditions.

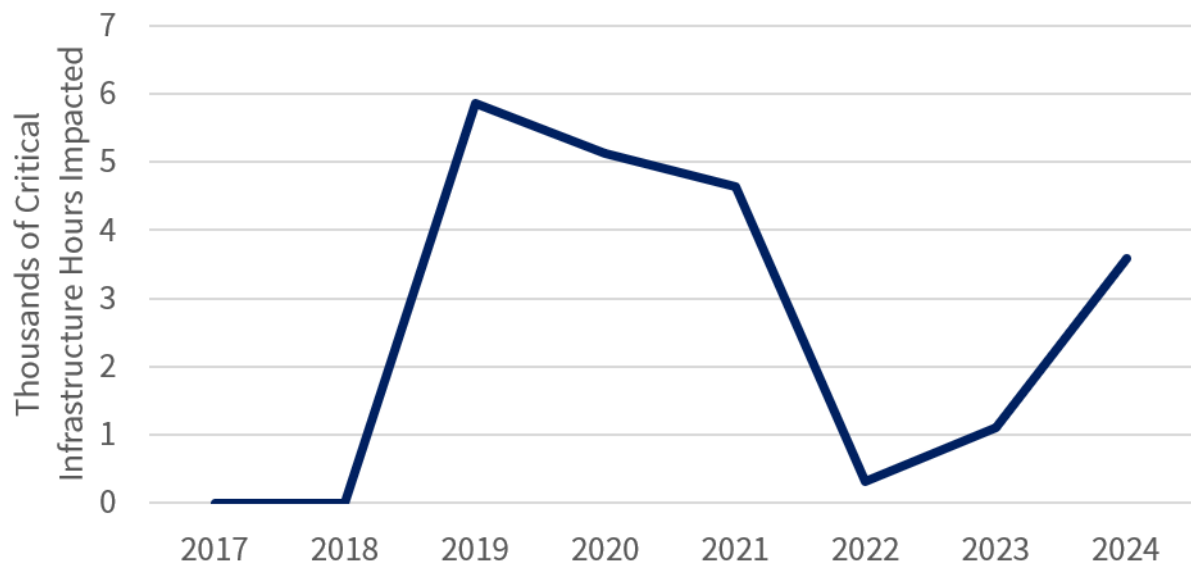
Figure 26. SCE PSPS Event Duration-Customers (2017-2024)



Duration – Critical Infrastructure of PSPS Events

PSPS event impacts on critical infrastructure, similar to PSPS event duration for customers, increased to its highest point in 2019 followed by a multiple year decrease to 2022 (Figure 27). These events, however, are not adjusted for year-to-year variations in conditions.

Figure 27. SCE PSPS Event Duration on Critical Infrastructure (2017-2024)



Impacts of PSPS Events

The impacts of PSPS events on the number of customers reached its peak in 2020 followed by a multiple decrease in 2022 (Figure 28). These events, however, are not adjusted for year-to-year variations in conditions.

Figure 28. SCE PSPS Event Impacts (2017-2024)

