



June 12, 2026

Kyle Ferree  
Senior Advisor, Wildfire & Public Safety Strategy & Regulatory Affairs  
Southern California Edison Company  
Kyle.Ferree@sce.com

**Subject: Office of Energy Infrastructure Safety Decision for Southern California Edison Company’s Petition to Amend its 2026-2028 Base Wildfire Mitigation Plan**

Mr. Ferree:

The Office of Energy Infrastructure Safety (Energy Safety) has evaluated Southern California Edison Company’s (SCE) Petition to Amend (PTA), submitted on April 9, 2026, pursuant to Chapter 4 of the WMP Guidelines.<sup>1</sup> The petition seeks to amend SCE’s 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP).

Energy Safety approves the three amendments requested by SCE.

On May 12, 2023, SCE submitted its General Rate Case (GRC) application for 2025 Test Year with the California Public Utilities Commission (CPUC).<sup>2</sup> On September 18, 2025, the CPUC adopted its decision addressing the SCE 2025 Test Year.<sup>3</sup>

On April 9, 2026,<sup>4</sup> SCE submitted a Petition to Amend to Energy Safety requesting amendments to two targets and a removal of one program in its 2026-2028 Base WMP.<sup>5</sup> SCE

---

<sup>1</sup> WMP Guidelines, pages 172-174.

<sup>2</sup> SCE GRC Application.

<sup>3</sup> D.25-09-030.

<sup>4</sup> WMP Guidelines require the submission of a Petition to Amend within 45 days of the relevant GRC decision. (WMP Guidelines, page 172.) Though CPUC adopted its decision addressing the SCE 2025 Test Year on September 18, 2025, the Decision on SCE 2026-2028 Base WMP was published February 23, 2026. A Petition to Amend may only amend an approved WMP (WMP Guidelines, page 172). Energy Safety therefore considers SCE’s Petition to Amend its 2026-2028 Base WMP timely.

<sup>5</sup> SCE PTA.

stated that it must reduce undergrounding targets for 2026, 2027, and 2028 to ensure that its WMP targets stay consistent with the reduced funding authorized in the GRC Decision.<sup>6</sup>

Similarly, SCE stated that it must increase covered conductor targets for 2027 and 2028, and amend the target for 2026, to ensure that its WMP targets stay consistent with the funding authorized and risk reduction expectation established in the GRC Decision.<sup>7</sup>

Finally, SCE asked to remove a program from its WMP that had no associated WMP targets but was disallowed in the GRC Decision.<sup>8</sup>

In its PTA, SCE provided changes to risk reductions in WMP Tables 6-3 and 6-4,<sup>9,10</sup> target adjustments in Table 8-1,<sup>11</sup> and redlined amendments to its requested program removal.<sup>12</sup> SCE also updated Table 3-3 and Figure SCE 3-01.<sup>13</sup> Below, Energy Safety provides a summary of its determination for each of the three requested amendments.

---

<sup>6</sup> SCE PTA, page 2.

<sup>7</sup> SCE PTA, page 4.

<sup>8</sup> SCE PTA, page 5.

<sup>9</sup> SCE PTA, page 9.

<sup>10</sup> SCE PTA, pages 9-14.

<sup>11</sup> SCE PTA, page 15.

<sup>12</sup> SCE PTA, pages 16-20.

<sup>13</sup> SCE PTA, pages 7-8.

Table 1. Determinations for SCE-Requested Amendments

Tracking ID and Title	Amendment Requested	Determination	Rationale
Covered Conductor (SH-1)	<p>SCE proposes to increase its cumulative covered conductor targets for 2026 through 2028 from 440 circuit miles<sup>14</sup> to 775 circuit miles.<sup>15, 16</sup></p> <p>SCE also proposes to amend its WMP annual covered conductor targets from 240 miles, 125 miles, and 75 miles to 200 miles, 280 miles, and 295 miles for 2026, 2027, and 2028, respectively.<sup>17</sup></p>	Approved	The request meets all required criteria of Chapter IV of the WMP Guidelines.
Undergrounding Overhead Conductor in HFRA (SH-2)	SCE proposes to reduce its Targeted Undergrounding (TUG) cumulative target for	Approved	The request meets all required criteria of Chapter IV of the WMP Guidelines.

<sup>14</sup> Table 8-1, SCE Grid Design, Operation, and Maintenance Targets by year, SCE 2026-2028 Base WMP R3, page 219.

<sup>15</sup> 1,481 mile target – 706 circuit miles (circuit miles installed in 2025 as stated by SCE in its PTA) = 775 circuit miles. SCE PTA, page 4.

<sup>16</sup> SCE PTA, page 4.

<sup>17</sup> SCE PTA, page 4.

Tracking ID and Title	Amendment Requested	Determination	Rationale
	<p>2026 through 2028 from 260 miles to 155 circuit miles.<sup>18, 19</sup></p> <p>SCE also proposes to amend its WMP TUG annual targets to 55 miles, 50 miles, and 50 miles for 2026, 2027, and 2028, respectively.<sup>20</sup></p> <p>Finally, SCE proposes changing its undergrounding unit of measurement to <i>underground circuit miles installed</i>.</p>		
Disability Disaster Access Resources (DDAR)	SCE requests to remove all references to the DDAR program because the program is being discontinued and will no longer exist in its 2026-2028 Base WMP or future WMPs. <sup>21</sup>	Approved	The request meets all required criteria of Chapter IV of the WMP Guidelines.

---

<sup>18</sup> SCE PTA, page 2.

<sup>19</sup> 212 mileage target – 57 circuit miles (underground circuit miles installed in 2025 as stated by SCE in its PTA) = 155 circuit miles. SCE PTA, page 2.

<sup>20</sup> SCE PTA, page 2.

<sup>21</sup> SCE PTA, page 5.

In SCE's approved 2026-2028 Base WMP, SCE's three-year covered conductor target is 440 miles, and its three-year undergrounding target is 260 miles.<sup>22, 23</sup> The CPUC adopted its GRC decision on September 18, 2025, which covers a four-year period overlapping with the 2026-2028 Base WMP but also includes the year 2025. The GRC decision authorized funding for 1,653 circuit miles of covered conductor and funding for up to 212 circuit miles of undergrounding to meet a risk reduction percentage specified in the GRC decision.<sup>24, 25, 26</sup>

SCE is requesting to amend its 2026-2028 Base WMP to lower its undergrounding targets and increase its covered conductor targets. The increase in covered conductor is intended to reduce additional wildfire risk in order to offset the decrease in authorized funding for undergrounding.<sup>27</sup>

In its PTA, SCE described how it calculated the annual target adjustments. Because the GRC decision covers the 2025 through 2028 period, SCE's amended targets account for the mileage achieved in 2025. The amended cumulative mileage targets also account for adjustments due to redesigning projects and converting targets and units from underground to covered conductor.<sup>28</sup>

The GRC Decision authorized funding for 1,653 circuit miles of covered conductor over the period of 2025-2028; however, SCE's proposed amendments would result in the installation of 1,481 circuit miles over the GRC period.<sup>29</sup> The proposed amendments result in SCE's 2026-2028 covered conductor target increasing from 440 miles in the approved WMP to 775 circuit miles.<sup>30</sup> Table 2 below demonstrates the proposed changes. While the proposed amendment would result in fewer nominal miles than what was authorized for funding in the GRC

---

<sup>22</sup> Table 8-1, SCE Grid Design, Operation, and Maintenance Targets by year, SCE 2026-2028 Base WMP R3, page 219.

<sup>23</sup> Table 8-1, SCE Grid Design, Operation, and Maintenance Targets by year, SCE 2026-2028 Base WMP R3, page 219.

<sup>24</sup> D.25-09-30, page 386.

<sup>25</sup> SCE PTA, page 2.

<sup>26</sup> SCE PTA, page 4.

<sup>27</sup> SCE PTA, page 4.

<sup>28</sup> SCE PTA, page 4.

<sup>29</sup> SCE PTA, page 4.

<sup>30</sup> 1,481 mile target – 706 circuit miles (circuit miles installed in 2025 as stated by SCE in its PTA) = 775 circuit miles. SCE PTA, page 4.

Decision, SCE’s explanation, which includes contingencies, project re-scoping, and project redesign, is reasonable.<sup>31</sup>

Table 2. Covered Conductor Target Comparison

	WMP Approved Target	Requested Amendment Change	Amended '26- 28 targets
<b>2025</b>	500 <sup>32</sup>	N/A	N/A
<b>2026</b>	240	- 40	200
<b>2027</b>	125	+ 155	280
<b>2028</b>	75	+ 220	295
<b>Total for 2025-2028</b>	940	+335	1481 <sup>33</sup>
<b>Total for 2026-2028</b>	440	+335	775

The GRC Decision authorized funding for 212 circuit miles of undergrounding for 2025-2028, and SCE seeks to amend its target to match that mileage.<sup>34, 35</sup> After accounting for the circuit miles completed in 2025 (47 miles), SCE’s new 2026-2028 undergrounding target would decrease from 260 miles to 155 circuit miles as Table 3 demonstrates below.<sup>36</sup> This decrease matches the miles authorized in the GRC decision.<sup>37</sup>

<sup>31</sup> SCE PTA, pages 4-5.

<sup>32</sup> Table 8-3, Table 8-3 - Grid Design, Operations, and Maintenance Targets by Year, SCE 2023-2025 Base WMP R3.1, page 238.

<sup>33</sup> This includes SCE’s 706 miles of covered conductor installed in 2025 as reported in its PTA. SCE PTA, page 4.

<sup>34</sup> Conclusions of Law number 182, D.25-09-030, page 974.

<sup>35</sup> SCE PTA, page 4.

<sup>36</sup> 212 mile target – 57 circuit miles (circuit miles installed in 2025 as stated by SCE in its PTA) = 155 circuit miles. SCE PTA, page 2.

<sup>37</sup> Conclusions of Law number 182, D.25-09-030, page 974.

Table 3. Targeted undergrounding target comparison

	WMP Approved Target	Requested Amendment Change	Amended '26- 28 targets
<b>2025</b>	30 <sup>38</sup>	N/A	N/A
<b>2026</b>	75	- 20	55
<b>2027</b>	100	- 50	50
<b>2028</b>	85	- 35	50
<b>Total for 2025-2028</b>	290	- 105	212 <sup>39</sup>
<b>Total for 2026-2028</b>	260	-105	155

SCE stated that these system hardening target amendments would lead to an overall increase in anticipated risk reduction, from 2.39 percent in its approved 2026-2028 WMP to 2.61 percent with the amendments.<sup>40, 41</sup>

In addition to amending its covered conductor and TUG targets, SCE also requests to change its undergrounding (SH-2) unit of measurement from number of “de-energized overhead miles” to “undergrounded circuit miles installed.”<sup>42</sup> This change would make SCE’s unit of measurement consistent with how its peer electrical corporations track undergrounding projects, which facilitates cross comparisons.<sup>43</sup>

<sup>38</sup> Table 8-3, Table 8-3 - Grid Design, Operations, and Maintenance Targets by Year, SCE 2023-2025 Base WMP R3.1, page 238.

<sup>39</sup> This includes SCE’s 57 miles of undergrounding installed that it reported in its PTA. SCE PTA, page 2.

<sup>40</sup> Covered Conductor (0.27% for 2026 +0.06 for 2027 +0.13% for 2028) + Undergrounding (0.61% for 2026 +0.92%for 2027 +0.40% for 2028)=2.39%. Table 8-1, SCE 2026-2028 Base WMP R3, page 219.

<sup>41</sup> Covered Conductor (0.28% for 2026 + 0.51 for 2027 + 0.54% for 2028) + Undergrounding (0.55% for 2026 + 0.42% for 2027 + 0.31% for 2028)=2.61%. Table 8-1, SCE PTA, page 15.

<sup>42</sup> SCE PTA, page 2.

<sup>43</sup> SCE PTA, page 3.

Finally, SCE requests to remove references to the Disability Disaster Access Resources (DDAR) Program from its 2026-2028 WMP.<sup>44</sup> This is consistent with the GRC decision which found that the DDAR program is duplicative of other existing SCE programs for Access and Functional Needs (AFN) populations and therefore is unnecessary.<sup>45, 46</sup> While the DDAR program is included in SCE's 2026-2028 Base WMP, the program is absent from any target tables or risk calculations. Therefore, the DDAR program removal is consistent with the GRC decision.

### Summary

Energy Safety approves all three of SCE's amendment requests:

- Covered Conductor (SH-1) target increase to 775 circuit miles
- Undergrounding Overhead Conductor in HFRA (SH-2) decrease to 155 underground circuit miles and change the unit of measurement from "de-energized overhead miles" to "underground circuit miles installed."
- Disability Disaster Access Resources Program removal

### Next Steps

In accordance with the WMP Guidelines, SCE must include only the amendments to the approved targets and program and the associated projected or planned expenditure changes in future submissions to Energy Safety.<sup>47</sup> SCE must revise its data reporting to reflect approved changes to WMP activity and financial targets according to Data Guidelines v4.1.<sup>48</sup>

SCE must revise its last approved 2026-2028 Base WMP version to reflect the approved amendment for 2026-2028, as noted above. SCE must revise *Table 6-3: SCE Risk Impact of Activities*, *Table 6-4: SCE Summary of Risk Reduction for Top-Risk Circuits*, and *Table 8-1: SCE Grid Design, Operation, and Maintenance Targets* for each year to reflect the changes to its targets as identified in its PTA. SCE must submit its amended 2026-2028 Base WMP to the

---

<sup>44</sup> SCE PTA, page 5.

<sup>45</sup> D.25-09-030, page 434.

<sup>46</sup> D.25-09-030, page 434.

<sup>47</sup> Where an electrical corporation deviates from its approved WMP, it may explain or justify such deviations during the performance assessment process.

<sup>48</sup> Energy Safety Data Guidelines.

2026-2028 Wildfire Mitigation Plan docket (#2026-2028-Base-WMPs)<sup>49</sup> no later than June 26, 2026.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole Dunlap". The signature is fluid and cursive, with a prominent initial "N" and a long, sweeping underline.

Nicole Dunlap  
Program Manager | Electrical Safety Policy Division  
Office of Energy Infrastructure Safety

---

<sup>49</sup> Office of Energy Infrastructure Safety, [2026-2028 Electrical Corporations Wildfire Mitigation Plans](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs), Accessed May 27, 2026, URL:(<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026-2028-Base-WMPs>).

# References Table

Citation	Reference
D.25-09-030	California Public Utility Commission, <a href="https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M580/K788/580788967.PDF">Decision on Test Year 2025 General Rate Case for Southern California Edison Company, D.25-09-030</a> , Published September 23, 2025, URL:( <a href="https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M580/K788/580788967.PDF">https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M580/K788/580788967.PDF</a> ).
SCE PTA	Southern California Edison Company, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60543&amp;shareable=true">SCE 2026 WMP Petition to Amend</a> , Published April 9, 2026, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60543&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60543&amp;shareable=true</a> ).
SCE GRC Application	Southern California Edison Company, <a href="https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M508/K571/508571137.PDF">Test year 2025 General Rate Case Application of Southern California Edison Company (U 338 E)</a> , Published May 12, 2023, URL:( <a href="https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M508/K571/508571137.PDF">https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M508/K571/508571137.PDF</a> )
SCE 2026-2028 Base WMP R3	Southern California Edison Company, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60095&amp;shareable=true">SCE 2026-2028 Base WMP R3</a> , Published January 22, 2026, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60095&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60095&amp;shareable=true</a> ).
SCE 2023-2025 Base WMP R3.1	Southern California Edison Company, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57620&amp;docket=2023-2025-WMPs&amp;shareable=true">SCE 2023-2025 Base WMP R3.1</a> , Published November 14, 2024, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57620&amp;docket=2023-2025-WMPs&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57620&amp;docket=2023-2025-WMPs&amp;shareable=true</a> ).
WMP Guidelines	Office of Energy Infrastructure Safety, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&amp;shareable=true">Wildfire Mitigation Plan Guidelines</a> , Published February 24, 2025, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&amp;shareable=true</a> ).
Energy Safety Data Guidelines	Office of Energy Infrastructure Safety, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59967&amp;shareable=true">Energy Safety Data Guidelines v4.1</a> , Published December 22, 2025, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59967&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59967&amp;shareable=true</a> ).