

INDEPENDENT EVALUATOR

Annual Implementation Report for Wildfire Mitigation Plan Implementation Year 2025

July 01, 2026



Table of Contents

1. EXECUTIVE SUMMARY	5
2. FOCUS INITIATIVES AND DISCUSSION.....	12
3. SITE AND SAMPLE SELECTION AND DISCUSSION	13
4. REVIEW OF INITIATIVES ACROSS WMP CATEGORIES: IMPLEMENTATION AND FUNDING	16
4.1 GRID DESIGN, OPERATIONS, AND MAINTENANCE	18
4.1.1 Initiative Summary Table	18
4.1.2 Written Detail for Initiatives	21
4.1.2.1 Initiative Review – Findings & Method	21
4.1.2.2 Funding Verification – Findings.....	48
4.1.3 Synthesis of Findings.....	64
4.1.3.1 Initiative Review	64
4.1.3.2 Funding Verification.....	65
4.2 VEGETATION MANAGEMENT AND INSPECTIONS	67
4.2.1 Initiative Summary Table	67
4.2.2 Written Detail for Initiatives	69
4.2.2.1 Initiative Review – Findings & Method	69
4.2.2.2 Funding Verification – Findings.....	80
4.2.3 Synthesis of Findings.....	85
4.2.3.1 Initiative Review	85
4.2.3.2 Funding Verification.....	86
4.3 SITUATIONAL AWARENESS AND FORECASTING	89
4.3.1 Initiative Summary Table	89
4.3.2 Written Detail for Initiatives	90
4.3.2.1 Initiative Review – Findings & Method	90
4.3.2.2 Funding Verification – Findings.....	94
4.3.3 Synthesis of Findings.....	99
4.3.3.1 Initiative Review	99
4.3.3.2 Funding Verification.....	99
4.4 EMERGENCY PREPAREDNESS.....	102

4.4.1	Initiative Summary Table	102
4.4.2	Written Detail for Initiatives	103
4.4.2.1	Initiative Review – Findings & Method	103
4.4.2.2	Funding Verification – Findings.....	107
4.4.3	Synthesis of Findings.....	110
4.4.3.1	Initiative Review	110
4.4.3.2	Funding Verification.....	111
4.5	COMMUNITY OUTREACH AND ENGAGEMENT.....	113
4.5.1	Initiative Summary Table	113
4.5.2	Written Detail for Initiatives	114
4.5.2.1	Initiative Review – Findings & Method	114
4.5.2.2	Funding Verification – Findings.....	116
4.5.3	Synthesis of Findings.....	117
4.5.3.1	Initiative Review	117
4.5.3.2	Funding Verification.....	118
5.	EVALUATION OF QA/QC PROGRAMS	120
6.	CONCLUSION	128
7.	ATTACHMENTS.....	130
7.1	CATALOG OF INITIATIVES	130
7.2	DATA REQUESTS	130
7.3	SME INTERVIEWS.....	130
7.4	PICTURES OF NON-CONFORMANCE	130

DISCLAIMER

This report has been compiled through the process of observation and review of documents provided by the Electrical Corporation named herein. The Office of Energy Infrastructure Safety (“Energy Safety”) instituted the requirement for an independent evaluation of Electric Corporation’s Wildfire Mitigation Plans (“WMP”). Bureau Veritas is not the designer, implementer, or owner of the WMP and is not responsible for its content, implementation and/or any liabilities, obligations or responsibilities arising therefrom.

The report reflects only those conditions and practices which could be ascertained through observation at the time of evaluation. This report is limited to those items specifically identified herein. The report is not intended to validate that dangers, hazards and/or exposures are or are not present. Bureau Veritas shall only be responsible for the performance of the services identified or defined in their specific scope of services.

Bureau Veritas does not assume any responsibility for inaccurate, erroneous or false information, express or implied, that was provided to Bureau Veritas for its evaluation herein. In addition, Bureau Veritas shall have no responsibility to any third party relying on this report. This report is for the sole benefit of Energy Safety and the Electrical Corporation herein.

1. EXECUTIVE SUMMARY

Background

The devastating wildfires of the past and present have taught us valuable lessons about safeguarding California's lands, particularly in areas where electrical infrastructure coexists with wildland environments. In response to these challenges, the California Public Utilities Commission (CPUC) initiated Rulemaking 18-10-007 to provide guidance on Wildfire Mitigation Plans (WMPs) for Investor-Owned Utilities (IOUs), now referred to as Electrical Corporations (ECs). These WMPs are designed to cover a three-year period, with the first cycle of independent evaluations beginning in 2020.

This Independent Evaluator (IE) Annual Implementation Report (AIR) assesses SCE's WMP commitments for implementation year 2025. The IE AIR reviews the WMP initiatives as outlined for 2025 and evaluates SCE's performance in meeting their committed objective targets, verification of QA/QC program implementation, processes, and results, as well as the distribution of funding to mitigation efforts described within the WMP.

Pursuant to Public Utilities Code Section 8386.3(c)(2)(B)(i), (ii), (iii), and (iv), Bureau Veritas North America, Inc. (BVNA), in partnership with Lamar Technical Services, LLC., has been selected as the IE to review and assess SCE's 2025 WMP in its entirety. This IE AIR will present BVNA's findings and results for review. BVNA was included in the Office of Energy Infrastructure and Safety (Energy Safety) Independent Evaluator List for 2025 WMPs, dated December 18, 2025, in accordance with Public Utilities Code section 8386.3(c)(2)(A).

In compliance with Energy Safety's requirements, SCE has contracted BVNA to provide the IE assessment. This assessment includes the IE responsibilities outlined in Public Utilities Code section 8386.3(c)(5)(C), which involve performing the following tasks:

- Task 1: Consult with Energy Safety on implementation assurance auditing that will be performed
- Task 2: Perform implementation assurance auditing, including field inspections
- Task 3: Draft and provide Energy Safety a report on audit findings, including deficiencies of underfunded WMP activities
- Task 4: Draft and provide Energy Safety a report on deficiencies of electrical corporations
- Task 5: Track and report deficiencies of audit findings

The evaluation process began with an Energy Safety kick-off meeting, which served as an introduction between SCE representatives, BVNA staff, and assigned Energy Safety personnel. This introductory meeting established key elements, including communication and documentation protocols, as well as the identification of individuals responsible for receiving requests from the IE. Following this meeting, the IE initiated a review of SCE's 2025 WMP and related publicly available documents, as listed in Section 7. This review aimed to identify SCE's stated goals within the 2025 WMP.

To evaluate activities described in the WMP that were not available in public records, BVNA's team of evaluators submitted data requests and conducted interviews with Subject Matter Experts

(SMEs). These steps helped verify activities stated within the 2023-2025 WMP (see Section 7 for a list of Data Requests/SME Interviews). Detailed analysis and key findings for each respective category are presented in the following sections of this report.

The IE has classified each activity as “Validated,” “Not Validated”, or “Not Applicable.” “Validated” indicates that the EC has clearly demonstrated meeting the stated WMP target for the review year or continues to implement the activity as outlined. “Not Validated” means the EC either failed to provide sufficient documentation to support their claim of implementation or did not meet the WMP target, the individual reviews will elaborate and make the distinction. “Not Applicable” signifies that the EC has determined the activity is not relevant to the current review period.

BVNA’s understanding of collected utility strategies demonstrated throughout the state is summarized below:

1. **Inspection and maintenance of distribution, transmission, and substation** includes a comprehensive approach conducting system patrols and ground inspections using advanced technological tools, managing predictive and electrical preventative maintenance, performing vegetation inspections and management, implementing vulnerability detection methods such as Light Detection and Ranging (LiDAR) inspection, and utilizing geospatial and topography identification along with geographic information system (GIS) mapping data. A key aspect of these programs is the identification and collection of data elements through each initiative. Understanding how this data is used and shared is essential for improving utility practices and enhancing overall wildfire mitigation efforts.
2. **System hardening** includes pole replacement, non-expulsion equipment, advanced fuses, tree attachment removal, less flammable transformer oil, covered wire, and undergrounding where it is supported by a cost benefit analysis.
3. **De-energization** actions are triggered and prioritized based on various fire weather conditions such as forecasted, imminent, and validated extreme fire weather conditions. Plans for re-energization when weather conditions subside to safe levels are implemented. Both manual and automatic capabilities to implement the de-energization and re-energization process exist.
4. **Advanced Technologies** include Distribution Fault Anticipation (DFA) technology, tree growth regulators, pulse control fault interrupters, oblique and hyperspectral imagery, advanced transformer fluids, advanced LiDAR systems, and advanced Supervisory Control and Data Acquisition (SCADA) systems. These technologies help reduce risk of electrical ignition, mitigate power outages, and prevent equipment damage.
5. **Vegetation management**, including routine preventative vegetation maintenance; corrective vegetative management and off-cycle tree work; emergency vegetation clearance, prioritized for portions of the service territory in Tier 2 and 3 HFTD; quality control processes; and resource protection plan, including animal and avian mitigation programs. Enhanced Vegetation Management (EVM) with enhanced inspections, aims to

keep all aspects of trees away from power lines and to prescribe minimum clearances that exceed state standards. EVM conducts supplementary inspections in addition to standard patrol routines to identify and address dead, diseased, or declining trees near power lines, ensuring they are removed or managed before they pose a risk to electrical infrastructure.

6. **Situational Awareness** involves gathering real-time information from various sources to create a comprehensive understanding of current conditions. This includes data from devices and sensors on electrical systems, weather monitoring equipment, and other tools that assess wildfire conductivity conditions. Utilization of programs such as online feeds and websites like the National Fire Danger Rating System (NFDRS) help the EC employ risk-informed, data-supported decision-making processes. The goal of these situational awareness efforts is to achieve a shared understanding of actual conditions amongst all stakeholders, thereby improving collaborative planning and decision-making.
7. **Emergency Preparedness, Outreach, and Response** efforts engage a wide range of key stakeholders, including critical facilities, customers, local government, and essential agencies such as CAL FIRE. Strong communication channels are employed with local law enforcement agencies, first responders, hospitals, local emergency planning committees, other utility providers, and the California Independent System Operator. Coordination agreements such as mutual Aid or Assistance, as well as a community outreach plan is in place to inform and engage the various stakeholders.
8. **Operational practices** include communication protocols, and the execution of specific plans designed to minimize fire danger. A key element of this approach is the strategic deactivation of automatic reclosers during high-risk periods. De-energization decisions are based on a multifaceted risk assessment that consider various factors, including the type of facility, tree and vegetation density, the presence of available dry fuel, and other location specific vulnerabilities to wildfire risk.

Introduction to Southern California Edison

SCE's service area spans approximately 52,270 square miles in southern California, extending from Mono County on the border of California and Nevada, down to San Bernadino County and westward to the Pacific Ocean. The EC serves more than 5.2 million customers (unique accounts) across their entire service area.

SCE's infrastructure includes approximately 86,072 circuit miles of both overhead and underground electric distribution and transmission lines. The company also manages 820 substations and 38 power generation facilities. Approximately 27% of SCE's service territory, comprising 24,968 miles of distribution and transmission assets (OH & UG) and totaling 14,206 square miles, lies within the High Fire Threat District (HFTD) and High Fire Risk Area (HFRA).¹

As detailed in SCE's WMP, the 2023-2025 WMP builds upon the lessons learned from the previous cycle to maintain risk reduction achieved and further reduce the significant wildfire risk

¹ SCE's HFTD Statistics (square miles and percentage of service territory): Non-HFTD – 38,065 sq. mi (73%); HFTD Tier 2 – 9,544 sq. mi. (18%); and HFTD Tier 3 – 4,662 sq. mi. (9%).

and PSPS impacts that remain. SCE aims to do this by implementing three- and 10- year goals, and achieving the initiative targets outlined within this report. SCE's wildfire mitigation strategy focuses on three areas: 1) hardening the distribution system through covered conductors and undergrounding to prevent objects contacting power lines, 2) reducing equipment failures through enhanced asset inspections and new detection technologies, and 3) improving vegetation management and operational efficiency.

Key Findings

Inspection Documentation Deficiency. For Distribution Detailed Inspections (IN-1.1) and Transmission Detailed Inspections (IN-1.2), SCE provided Measuring Documents from SAP confirming when inspections occurred and what equipment was inspected, but failed to provide any documentation of inspection outcomes, findings, or remediation requirements. The Independent Evaluator noted that "the documentation provided to the IE confirmed when the inspection was performed, however, no details on what was inspected and the inspection outcome was provided." This same documentation deficiency was observed in LiDAR Distribution Vegetation Inspections (VM-9) and LiDAR Transmission Vegetation Inspections (VM-10), where sampling data could be verified for evidence of completed work but no inspection report criteria, methodology, or defined inspection parameters were provided for IE review. The IE was unable to confirm whether the submitted inspection documentation was consistent with SCE's established inspection documentation standards or whether the inspections were performed in accordance with defined program requirements resulting in invalidation of the initiatives. While the physical completion of inspections is not in question, the absence of outcome documentation prevents verification that inspections identified deficiencies requiring remediation, that remediation work was tracked and completed, or that the inspection process itself adhered to established quality standards.

Geospatial Data Misalignment with Covered Conductor Program. The Independent Evaluator observed a mismatch between SCE's reporting metrics and its geospatial tracking methodology for the Covered Conductor initiative (SH-1). While the target is measured and reported in continuous "Circuit Miles," SCE exclusively maintains completion data at the individual structure point level based on isolated work orders. This creates inefficiencies in compliance validation, as the IE must develop multi-tiered verification strategies to corroborate continuous mileage totals from point-based data, and limits SCE's ability to leverage completion data for internal wildfire risk modeling and PSPS threshold adjustments. The IE confirmed physical presence of covered conductor at bounding structures of reported segments and performed documentation analysis on a statistically representative sample of engineering as-builts, successfully validating the reported mileage through this process. However, the mismatch between how work is tracked and how performance is measured represents an ongoing operational inefficiency that affects both regulatory compliance verification and SCE's internal risk assessment capabilities. Aligning spatial tracking data directly with the reported mileage metric would streamline future compliance validation efforts and provide SCE with more precise, continuous circuit data for risk modeling purposes.

Data Quality and Recordkeeping Issues. Multiple initiatives demonstrated data quality issues that, while not rising to the level of invalidating the initiatives, indicate systematic recordkeeping

gaps requiring attention. For Structure Brushing (VM-2), 18 of 138 sampled locations (13%) were marked "no access" with no clearance work performed due to private property access restrictions, unsafe terrain conditions, or insect infestation, yet these locations were included in SCE's reported completion totals of 157,665 structures. While SCE's documentation transparently identified these as no-access situations, the inclusion of non-completed work in reported totals represents a potential metrics inflation practice that overstates actual risk reduction achievements. For both Distribution and Transmission Detailed Inspections for Expanded Vegetation Clearances (VM-7 and VM-8), SCE initially reported circuits as inspected that were subsequently identified as out-of-service at the time of scheduled inspection. For VM-7, four of 118 sampled circuits (3.4%) were found to be non-operational; for VM-8, five of 106 sampled circuits (4.7%) were non-operational. SCE committed to implementing "an enhanced verification step to confirm grids/circuits as operational prior to finalizing the WMP year-end evidence file," acknowledging this as a systemic data quality gap rather than isolated errors. For Early Fault Detection (SA-11), when cross-referenced against frontload data, 22 of 83 sampled Job Information Sheets (26.5%) and 10 of 21 sampled work orders (47.6%) showed installation date discrepancies. While the physical installations were verified through documentation, these date inconsistencies suggest recordkeeping issues between field completion records and enterprise data system.

Initiatives Completed Within 5% of the WMP Targets: 29 Total Number of Initiatives (78% of all SCE Initiatives)

Table 1: List of Initiatives that Missed Target or Could Not Be Validated

Initiative Number, WMP Section Number, and Name	Missed Target or Could Not Be Validated
IN-1.1, 8.1.3.1, Distribution High Fire Risk - Informed (HFRI) Inspections & Remediations (Ground & Aerial)	Could Not Be Validated
IN-1.2, 8.1.3.2, Transmission High Fire Risk - Informed (HFRI) Inspections & Remediations (Ground & Aerial)	Could Not Be Validated
IN-8, 8.1.5, Inspection & Maintenance Tools	Missed Target
IN-9b, 8.1.3.8, Transmission Conductor & Splice Assessment: Splices with X-Ray	Could Not Be Validated
SH-10, 8.1.2.3.1, Tree Attachments Remediation	Missed Target
SH-18, 8.1.2.6.1, Rapid Earth Current Limiters (REFCL) – Grounding Conversion	Missed Target
VM-7, 8.2.3.3.1, Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation	Could Not Be Validated
VM-10, 8.2.2.4, LiDAR Transmission Vegetation Inspections	Could Not Be Validated

Table 2: Initiatives with Absolute % Budget Differences > 10%: 31 Total Number of Initiatives (84% of all SCE Initiatives)

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
IN-1.1, 8.1.3.1, Distribution High Fire Risk - Informed (HFRI) Inspections & Remediations (Ground & Aerial)	\$35,256	\$41,818	18.6%
IN-1.2, 8.1.3.2, Transmission High Fire Risk - Informed (HFRI) Inspections & Remediations (Ground & Aerial)	\$16,246	\$12,858	-20.9%
IN-3, 8.1.3.5, Infrared Inspection of Energized Overhead Distribution Facilities & Equipment	\$476	\$606	27.3%
IN-4, 8.1.3.6, Infrared Inspection, Corona Scanning, and High-Definition Imagery of Energized Overhead Transmission Facilities & Equipment	\$105	\$211	101.0%
IN-5, 8.1.3.7, Generation High Fire Risk - Informed Inspections & Remediation	\$280	\$69	-75.4%
IN-8, 8.1.5, Inspection & Maintenance Tools	\$3,130	\$13,181	321.1%
IN-9a, 8.1.3.8, Transmission Conductor & Splice Assessment: Spans with LineVue	\$1,793	\$9	-99.5%
IN-9b, 8.1.3.8, Transmission Conductor & Splice Assessment: Splices with X-Ray	\$543	\$0	-100%
SH-1, 8.1.2.1.1, Covered Conductor	\$490,874	\$598,285	21.9%
SH-2, 8.1.2.2.1, Undergrounding Overhead Conductor	\$317,078	\$127,297	-59.9%
SH-5, 8.1.2.8.1, Remote Controlled Automatic Reclosers Settings Update	\$7,201	\$2,732	-62.1%
SH-8, 8.3.3.1.2.1, Transmission Open Phase Detection	\$0	\$334	100%
SH-10, 8.1.2.3.1, Tree Attachments Remediation	\$10,570	\$1,843	-82.6%
SH-14, 8.1.2.5.2, Long Span Initiative (LSI)	\$8,499	\$2,409	-71.7%
SH-16, 8.1.2.1.2, Vibration Damper Retrofit	\$244	-\$534	-318.9%
SH-17, 8.1.2.6.1, Rapid Earth Current Limiters (REFCL)(Ground Fault Neutralizer [GFN])	\$40,340	\$44,323	9.9%
SH-18, 8.1.2.6.2, Rapid Earth Current Limiters (REFCL) - Grounding Conversion	\$5,956	\$1,283	-78.5%
VM-1, 8.2.3.4.1, Hazard Tree Mitigation Program (HTMP)	\$44,037	\$11,919	-72.9%
VM-4, 8.2.3.4.2, Dead & Dying Tree Removal	\$28,686	\$7,433	-74.1%
VM-6, Vegetation Management Work Management Tools (Arbora)	\$6,637	\$4,507	-32.1%
VM-8, 8.2.3.3.1, Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Transmission Lines in HFRA	\$20,956	\$13,120	-37.4%
VM-9, 8.2.2.4, LiDAR Distribution Vegetation Inspections	\$44,467	\$17,615	-60.4%
VM-10, 8.2.2.4, LiDAR Transmission Vegetation Inspections	\$11,132	\$9,918	-10.9%
SA-1, 8.3.2.1.1, Weather Stations	\$6,398	\$9,670	51.1%

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
SA-3, 8.3.5, Weather & Fuels Modeling	\$8,027	\$13,877	72.9%
SA-8, 8.3.2.1.2, Fire Spread Modeling	\$3,827	\$2,491	-34.9%
SA-10, 8.3.4.1.1, High Definition (HD) Cameras	\$4,665	\$3,618	-22.4%
SA-11, 8.3.3.1.1, Early Fault Detection (EFD)	\$12,644	\$8,619	-31.8%
DEP-2, 8.4.2.2.1, SCE Emergency Response Training	\$1,193	\$68	-94.3%
PSPS-2, 8.4.6.2, Customer Care Program (Critical Care Backup Battery)(CCBB) Program)	\$8,670	\$7,572	-12.7%
PSPS-3, 8.4.6.3, Customer Care Program (Portable Power Station and Generation or Rebates)	\$1,391	\$2,279	63.8%
DEP-1, 8.5.2.1, Wildfire Safety Community Meetings	\$132	\$68	-48.5%
DEP-4, 8.4.2.3, Customer Research & Education	\$4,337	\$2,018	-53.5%

Recommendations

SCE should provide documentation for inspection programs that capture inspection findings, deficiencies, and remediation tracking. Documentation provided for inspection initiatives adequately demonstrated that SCE completed the required inspections, however, no inspection report criteria, methodology, or defined inspection parameters were provided for IE review. As a result, the IE was unable to confirm whether the submitted inspection documentation was consistent with SCE's established inspection documentation standards or whether the inspections were performed in accordance with defined program requirements.

SCE should develop a continuous geospatial line layer for completed SH-1 (Covered Conductor) projects that directly align spatial tracking data with the reported circuit mileage metric. Current point-based structure tracking creates inefficiencies in validation, requiring the IE to develop multi-tiered verification strategies to corroborate continuous mileage totals from individual structure points tied to isolated work orders, and limits SCE's ability to leverage completion data for internal wildfire risk modeling and PSPS threshold adjustments. The continuous line layer should represent actual installed covered conductor spans rather than individual structure points, enabling direct measurement of contiguous circuit miles and facilitating identification of continuous coverage segments for operational decision-making purposes. The geospatial layer should maintain connection to underlying work order data and structure-level installation records to preserve audit trails.

SCE should implement data quality verification processes including pre-submission validation that circuits and assets are operational before including them in completion totals, reconciliation protocols between field completion records and enterprise data systems, clear distinction between "work attempted" versus "work completed" in reporting metrics, and automated date consistency checks across documentation systems. Multiple initiatives showed data quality issues including out-of-service circuits reported as inspected (VM-7, VM-8), no-access locations included in completion totals despite no work performed (VM-2), and date discrepancies between Job Information Sheets and work orders (SA-11). Implementation of enhanced data quality controls would provide improved data accuracy and reliability and reduced metrics inflation and overstatement of risk reduction achievements.

2. FOCUS INITIATIVES AND DISCUSSION

For WMP Implementation Year 2025, Energy Safety instructed the IE to select up to fifteen initiatives for a “focused” more thorough analysis. These “Focus Initiative” were chosen by BVNA based on several key factors.

First, the IE considered the number and nature of “Notice of Violations” (NOVs) and “Notice of Nonperformance” (NONs) received by the EC in 2025, prioritizing initiatives related to these violations to verify implementation efforts. Funding allocation was another crucial consideration, with initiatives receiving the highest planned or actual expenditure being selected. Additionally, initiatives showing significant variance (~20%) between planned and actual spending were generally chosen, especially if target goals were not met. The WMP Risk Impact Percentage was also evaluated to assess each initiative’s potential for fire risk reduction. Historically, grid hardening and vegetation management initiatives have proven most effective in mitigating fire risks and typically comprise the majority of Focus Initiatives. The specific fourteen initiatives selected by BVNA for focused analysis are listed in Table 3 below. This approach to initiative selection ensures a thorough evaluation of the EC’s most critical and impactful wildfire mitigation efforts.

Table 3: List of Focus Initiatives

No.	Initiative Number, WMP Section Number, and Name
1	IN-1.1, 8.1.3.1, Distribution High Fire Risk - Informed (HFRI) Inspections & Remediations (Ground & Aerial)
2	IN-1.2, 8.1.3.2, Transmission High Fire Risk - Informed (HFRI) Inspections & Remediations (Ground & Aerial)
3	IN-8, 8.1.5, Inspection & Maintenance Tools
4	SH-1, 8.1.2.1.1, Covered Conductor
5	SH-2, 8.1.2.2.1, Undergrounding Overhead Conductor
6	SH-10, 8.1.2.3.1, Tree Attachments Remediation
7	SH-14, 8.1.2.5.2, Long Span Initiative (LSI)
8	SA-1, 8.3.2.1.1, Weather Stations
9	SA-11, 8.3.3.1.1, Early Fault Detection (EFD)
10	VM-1, 8.2.3.4.1, Hazard Tree Mitigation Program (HTMP)
11	VM-2, 8.2.3.1.1, Structure Brushing
12	VM-4, 8.2.3.4.2, Dead & Dying Tree Removal
13	VM-7, 8.2.3.3.1, Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Distribution Lines in HFRA
14	VM-8, 8.2.3.3.1, Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Transmission Lines in HFRA

3. SITE AND SAMPLE SELECTION AND DISCUSSION

Table 4: List of Field Verified Initiatives

No.	Initiative Number, WMP Section Number, and Name
1	SH-1, 8.1.2.1.1, Covered Conductor
2	SH-2, 8.1.2.2.1, Undergrounding Overhead Conductor
3	SH-14, 8.1.2.5.2, Long Span Initiative (LSI)
4	SH-16, 8.1.2.1.2, Vibration Damper Retrofit
5	SH-17, 8.1.2.6.1, Rapid Earth Current Limiters (REFCL)(Ground Fault Neutralizer [GFN])
6	SH-18, 8.1.2.6.2, Rapid Earth Current Limiters (REFCL) - Grounding Conversion
7	VM-1, 8.2.3.4.1, Hazard Tree Mitigation Program (HTMP)
8	VM-4, 8.2.3.4.2, Dead & Dying Tree Removal

Sample Location Methodology

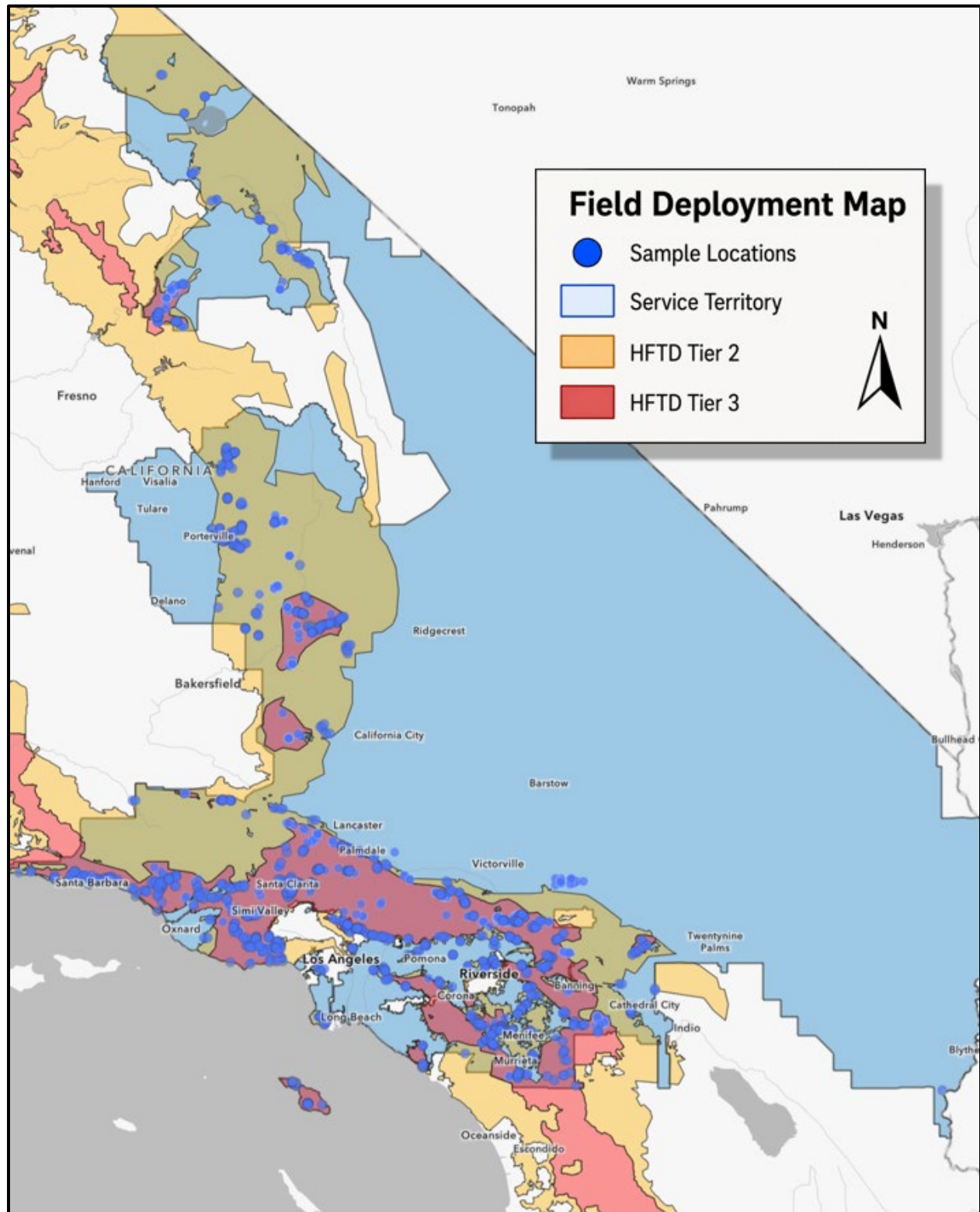
BVNA utilized random sampling for Southern California Edison based upon a simplified version of Cochran's Sample Size Formula. Utilization of this formula helps determine the appropriate sample size required to achieve a desired level of precision and confidence in the results – this ensures that the sample is representative of the larger population. By specifying a confidence level for the EC's individual initiatives based upon historical trends and data, mainly previous year's validation rates, the conclusions drawn from the sample data have a higher degree of statistical confidence. This confidence rate ranged from 85% and 95%, and if the previous year's validation rate fell outside of this range, the low or high end was utilized. For example, if the prior year sample validation rate was 96%, then 95% was used, if the previous year sample validation rate was 84%, then 85% was used. If no information on the prior year's sample validation rate exists, then 90% was used, unless other factors influenced that determination.

Whether or not an initiative was classified as Focus or non-Focus also affected the number of samples required for a given initiative. For Focus Initiatives, the margin of error (MOE) was set at 5% and for non-Focus Initiatives, the MOE was set at 10%. Although there is only a 5% difference between these two MOEs, the difference in sample size produced when utilizing these two MOE values is quite significant. As the margin of error *increases*, the required sample size decreases because a larger margin of error allows for *more* variability in the sample, requiring fewer samples to achieve the desired level of precision. As the margin of error *decreases*, the opposite happens because a smaller margin of error allows for *less* variability in the sample, requiring more samples to achieve the desired level of precision. Therefore, Focus Initiatives require more sampling than non-Focus Initiatives.

Once the total number of samples was calculated for each initiative, the IE determined how many samples should come from non-HFTD, HFTD Tier 2, and HFTD Tier 3 areas. Due to HFTD Tier 3 areas posing the most significant threat to wildfire ignition risk, it was determined that 70% of the sampling would occur in these areas, while 20% of sampling would occur in HFTD Tier 2 areas, and the remaining 10% would occur in non-HFTD areas. If a certain initiative did not reside within a HFTD Tier 3 area, then the sampling number would be drawn from a HFTD Tier 2 area; if an initiative did not reside within either a HFTD Tier 3 or 2 area, then all samples were drawn

from the non-HFTD area. An additional 25% of samples were identified to be used in the case that any of the primary samples were unusable or inaccessible.

Figure 1: Overview of Field Areas Sampled



4. REVIEW OF INITIATIVES ACROSS WMP CATEGORIES: IMPLEMENTATION AND FUNDING

Table 5: WMP Initiative Category Initiative Summary

WMP Initiative Category	No. of Focus and Field Verifiable Initiatives	No. of Focus and Non-Field Verifiable Initiatives	No. of Non-Focus and Field Verifiable Initiatives	No. of Non-Focus and Non-Field Verifiable Initiatives
Grid Design, Operations, and Maintenance	3	4	3	7
Vegetation Management and Inspections	2	3	0	4
Situation Awareness and Forecasting	0	2	0	3
Emergency Preparedness	0	0	0	4
Community Outreach and Engagement	0	0	0	2

Funding Evaluation Methodology

The IE employed a comprehensive approach to evaluate funding compliance for each initiative in the WMP. The funding methodology approach included the following:

Budget Baseline Establishment: The IE established a baseline for planned expenditures by thoroughly reviewing budget information documented in SCE's approved 2025 WMP filing. These planned budget figures were cross verified against SCE's officially reported data, specifically examining the April 2026 AIR Attachment B which took precedence if any discrepancies were noted.

Actual Expenditure Verification: Actual financial expenditures reported by SCE in their April 2026 ARC Attachment B for Expense and Capital were compared against established WMP budget baselines.

Variance Analysis: The IE calculated the absolute percent differences for each initiative by applying the formula as required by Energy Safety guidelines. These calculations were conducted for every initiative, generating detailed variance data for further review and analysis.

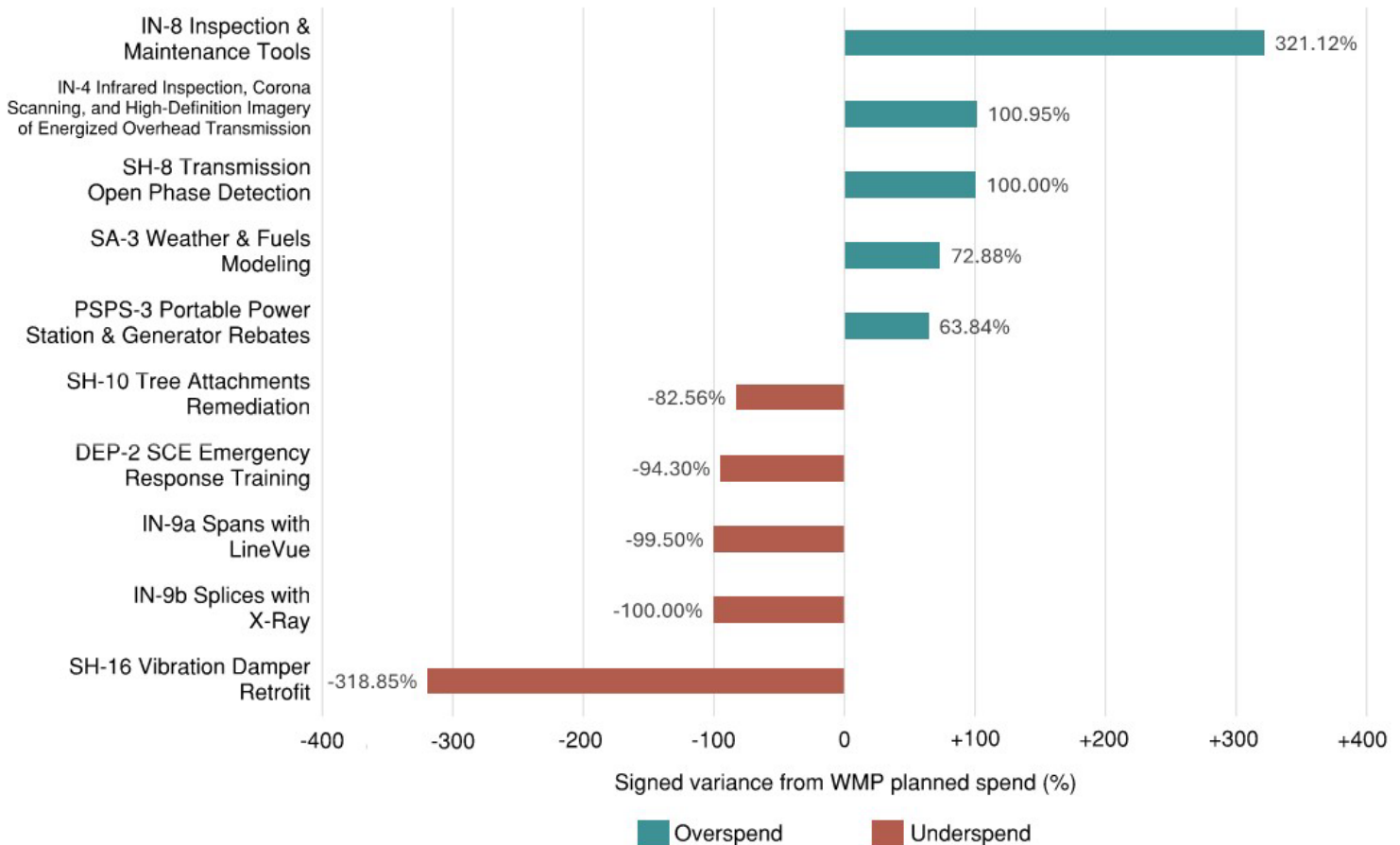
Threshold Application: A predefined threshold of 10% absolute percent difference was applied to systematically identify initiatives that required deeper review.

Supporting Documentation Review: For initiatives exceeding the established 10% variance threshold, the IE requested additional supporting documentation and detailed explanations from SCE. If SCE's rationale provided in the ARC was insufficient or incomplete, the IE explicitly asked for further documentation as necessary to achieve clarity and validate the reasoning behind the variances.

Detailed Analysis and Reporting: The IE documented any funding discrepancies identified during the evaluation, provided accurate corrected values, and analyzed the underlying causes for each variance, as detailed in Section 4 of this report and the top five (5) positive and negative variances as summarized in Figure 2.

Figure 2: Top 5 Positive & Negative Budget Variance by Initiative (%)

Implementation Year 2025 | Signed variance = (actual minus planned) / WMP planned spend



Note: Positive values indicate actual spend above WMP planned spend; negative values indicate actual spend below WMP planned spend. Spend reported in thousands of dollars.

4.1 GRID DESIGN, OPERATIONS, AND MAINTENANCE

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.1.1 Initiative Summary Table

Table 6: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²	Sample Validation Rate (%) ^{3 4}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{5 6}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
IN-1.1, 8.1.3.1, Distribution High Fire Risk - Informed (HFRI) Inspections & Remediations (Ground & Aerial)	187,000 Structures	460,222 Structures	Completed	138 Structures	50%	Distribution Ground & Aerial Inspection List (Frontload Data) SCE Written Response 138 Inspection Records (DR010)	61% ⁷	\$35,256	\$41,818 (18.6%)	No ⁸ (90%) (94% SRA/HC)
IN-1.2, 8.1.3.2, Transmission High Fire Risk - Informed (HFRI) Inspections & Remediations (Ground & Aerial)	24,500 Structures	67,457 Structures	Completed	138 Structures	50%	Transmission Ground & Aerial Inspection List (Frontload Data) SCE Written Response 138 Inspection Records (DR011)	64% ⁹	\$16,246	\$12,858 (-20.9%)	No ¹⁰ (88% Ground & Aerial) (86% SRA/HC)
IN-3, 8.1.3.5, Infrared Inspection of Energized Overhead Distribution Facilities & Equipment	5,300 Circuit Miles	5,636.34 Circuit Miles	Completed	34 Circuit Miles	100%	Distribution Infrared Inspection List (Frontload Data) 34 Circuit Miles of Inspection Records Map Package (.mpk) (DR012)	106%	\$476	\$606 (27.3%)	Yes (60%) (77% SRA/HC)
IN-4, 8.1.3.6, Infrared Inspection, Corona Scanning, and High-Definition Imagery of Energized Overhead Transmission Facilities & Equipment	1,000 Circuit Miles	1,051.70 Circuit Miles	Completed	34 Circuit Miles	100%	Infrared Corona HD Inspection List (Frontload Data) 34 Circuit Miles of Inspection Records (DR013)	105%	\$105	\$211 (101.0%)	Yes (59%) (81% SRA/HC)

² N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

³ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

⁴ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

⁵ The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.

⁶ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.

⁷ Data provided by SCE indicates that inspections were performed on 228,083 structures, not 460,222 as claimed in the 2025 EC AIR, due to the concurrent nature of aerial and ground inspections as described in Section 8.1.3.1 of the WMP. Based on this, the initiative validation rate is 61% ($228,083 \times .50 = 114,041.5 / 187,000 = .6098 \times 100 = 60.98\%$). See Section 4.1.2.1, Initiative Review for IN-1.1.

⁸ In the 2025 EC AIR, SCE stated that they met the risk reduction goal for this initiative. See Section 4.1.2.1, Initiative Review for IN-1.1 for IE determination on Risk Reduction Goal.

⁹ Data provided by SCE indicates that inspections were performed on 31,365 structures, not 67,457 as claimed in the 2025 EC AIR, due to the concurrent nature of aerial and ground inspections as described in Section 8.1.3.2 of the WMP. Based on this, the initiative validation rate is 64% ($31,365 \times .50 = 15,682.5 / 24,500 = .6401 \times 100 = 64.01\%$). See Section 4.1.2.1, Initiative Review for IN-1.2.

¹⁰ In the 2025 EC AIR, SCE stated that they met the risk reduction goal for this initiative. See Section 4.1.2.1, Initiative Review for IN-1.2 for IE determination on Risk Reduction Goal.

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²	Sample Validation Rate (%) ^{3, 4}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{5, 6}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
IN-5, 8.1.3.7, Generation High Fire Risk - Informed Inspections & Remediation	170 Generation Assets	238 Generation Assets	Completed	30 Generation Assets ¹¹	70%	Generation Inspections List (Frontload Data) 30 Inspection Records (DR014)	98% ¹¹	\$280	\$69 (-75.4%)	Yes (14%)
IN-8, 8.1.5, Inspection & Maintenance Tools	Monitor Utilization of Inspection Work Management Tool, and Make Enhancements as Necessary	Target Not Met	Not Completed	N/A	N/A	Inspection & Maintenance Tools Response	0%	\$3,130	\$13,181 (321.1%)	N/A
IN-9a, 8.1.3.8, Transmission Conductor & Splice Assessment: Spans with LineVue	N/A	N/A	N/A	N/A	N/A	2023-2025 WMP 2025 WMP Update	Not Applicable	\$1,793	\$9 (-99.5%)	N/A
IN-9b, 8.1.3.8, Transmission Conductor & Splice Assessment: Splices with X-Ray	TBD Based on Engineering Analysis performed in 2023/2024	SCE's engineering analysis and lessons learned showed that x-rays were leading to a high rate of shunting remediation. Accordingly, SCE started foregoing x-ray inspections and proactively shunting Transmission splices in 2025	Completed	N/A	N/A	Transmission Conductor & Splice Assessment List (Frontload Data)	0% ¹²	\$543	\$0 (-100%)	N/A
SH-1, 8.1.2.1.1, Covered Conductor	500 Circuit Miles	706 Circuit Miles	Completed	116 Asset Points	100%	Field Evaluation As-Builts (DR025/.b)	141% ¹³	\$490,874	\$598,285 (21.9%)	Yes (49.8% / 1.5%) (80% SRA/HC)
SH-2, 8.1.2.2.1, Undergrounding Overhead Conductor	30 Circuit Miles	45 Circuit Miles	Completed	125 Asset Points	100%	Field Evaluation As-Builts (DR031/.b)	150%	\$317,078	\$127,297 (-59.9%)	Yes (98% / 0.9%) (100% SRA/HC)
SH-5, 8.1.2.8.1, Remote Controlled Automatic Reclosers Settings Update	5 RAR/RCS Sectionalizing Devices	13 RAR/RCS Sectionalizing Devices	Completed	13 RAR/RCS Devices	100%	RAR/RCS Sectionalizing Devices Install List (Frontload Data) 13 RAR/RCS Install Records (DR032)	260%	\$7,201	\$2,732 (-62.1%)	Yes (33% / .19%) (95% SRA/HC)

¹¹ SCE’s sampling data failed to demonstrate remediation completion for all 9 assets flagged for action. Of the 30 assets sampled, only 70% met validation criteria (21), resulting in a sample validation rate of 70% and initiative validation rate of 98% (238 * .70 = 166.6 / 170 = 0.98 * 100 = 98%). See Section 4.1.2.1, Initiative Review for IN-5.

¹² Refer to Section 4.1.2.1, Initiative Review for IN-9b for more information on the initiative validation determination.

¹³ Refer to Section 4.1.2.1, Initiative Review for SH-1 for more information on how the initiative was validated.



Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ²	Sample Validation Rate (%) ^{3 4}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{5 6}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
SH-8, 8.3.3.1.2.1, Transmission Open Phase Detection	TBD ¹⁴	Retrofit TOPD at 7 Locations	Completed	7 Retrofit TOPD	100%	Transmission Open Phase Detection Install List (Frontload Data) SCE Written Response TOPD Broken Conductor Data (DR033)	100%	\$0	\$334 (100%)	N/A
SH-10, 8.1.2.3.1, Tree Attachments Remediation	Balance Based on Previous Years Completion 141 Tree Attachments ¹⁵	34 Tree Attachments	Not Completed	27 Tree Attachments	100%	Tree Attachment Remediation List (Frontload Data) 27 Tree Attachment Records (DR026)	24%	\$10,570	\$1,843 (-82.6%)	No (22% / .03%) (52% SRA/HC)
SH-14, 8.1.2.5.2, Long Span Initiative (LSI)	1,000 Spans Remediated	1,102 Spans Remediated	Completed	123 Spans	100%	Field Evaluation Geodatabase File (DR001)	110%	\$8,499	\$2,409 (-71.7%)	Yes (4% / .02%) (98% SRA/HC)
SH-16, 8.1.2.1.2, Vibration Damper Retrofit	Retrofit Vibration Dampers on 600 Structures	Retrofit Vibration Dampers on 725 Structures	Completed	33 Retrofit Vibration Dampers	100%	Field Evaluation Geodatabase File (DR001)	121%	\$244	-\$534 (-318.9%)	Yes (20% / .09%) (100% SRA/HC)
SH-17, 8.1.2.6.1, Rapid Earth Current Limiters (REFCL)(Ground Fault Neutralizer [GFN])	GFN Constructed at 2 Substations	GFN Constructed at 4 Substations	Completed	4 GFN	100%	Field Evaluation Construction Photos (Frontload Data / DR029)	200%	\$40,340	\$44,323 (9.9%)	Yes (49% / 1.8%) (89% SRA/HC)
SH-18, 8.1.2.6.2, Rapid Earth Current Limiters (REFCL) - Grounding Conversion	4 Ground Conversion	3 Ground Conversion	Not Completed	3 Ground Conversion	100%	Field Evaluation Construction Photos (Frontload Data / DR030/.b)	75%	\$5,956	\$1,283 (-78.5%)	N/A

¹⁴ No explicit numerical target was stated in either the WMP or 2025 EC AIR; however, SCE stated in the 2025 EC AIR that “SCE completed the final evaluation report and deployed TOPD logic at 7 locations *consistent with final evaluation.*”

¹⁵ Target provided in the 2025 EC AIR



4.1.2 Written Detail for Initiatives

4.1.2.1 Initiative Review – Findings & Method

IN-1.1 – 8.1.3.1 Distribution Detailed Inspections and Remediations – Focus and Non-Field Verifiable

SCE performs visual detailed inspections of distribution facilities as part of its routine practices throughout its service area in compliance with GO 165. Degradation of equipment and structures as part of wear and tear during normal operations and due to external factors, such as weather or third-party caused damage, increases the probability of in-service malfunction or failures that can have safety and service reliability impacts. SCE performs inspections in high-fire risk areas that go beyond the GO 95 and GO 165 requirements. To identify equipment or structure degradation that occurs between compliance cycles that could lead to a potential ignition risk, SCE conducts more frequent and ignition-focused risk inspections in HFRA.

The WMP set a target of 187,000 structures inspected in 2025. The risk reduction goal provided with this initiative was 90% for 2025. Data provided in the frontload request consists of a spreadsheet with 460,222 individual records. Records included information such as Structure, equipment_number, inspection_date, HFTD Tier, and lat/lon. Section 8.1.3.1 of the WMP details SCE's "360 Inspection" process stating, "from 2023 to 2025, SCE's distribution detailed inspections will include *a single visit* ground and aerial inspection of the structure also known as the '360 inspection' indicating that both ground and aerial inspections are concurrent and are performed at the same time on one structure. With this understanding, when filtering the frontload data by unique structure ID, the IE determined that SCE performed 228,083 '360 inspections' in 2025, not the 460,222 as stated in the 2025 EC AIR.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR010. The reports were to be from each HFTD with 27 from HFTD Tier 2 and 111 HFTD Tier 3. SCE responded by providing a document with screenshots of inspection measuring documents from SCE's system of record SAP. The screenshots included information regarding date and time of inspection, equipment number, and confirmation of completion. Dates in the screenshots were cross-referenced with dates for the same equipment number in the frontload data for consistency. SCE provided a written response indicating that MDOCs document when the inspection was performed, what was inspected, and the inspection outcome. The documentation provided to the IE confirmed when the inspection was performed, however, no details on what was inspected and the inspection outcome was provided.

The sampling data provided by SCE can be verified for evidence of completed work; however, no inspection report criteria, methodology, or defined inspection parameters were provided for IE review.¹⁶ As a result, the IE was unable to confirm whether the submitted inspection documentation was consistent with SCE's established inspection documentation standards or whether the inspections were performed in accordance with defined program requirements.

¹⁶ The IE determined a 50% sample validation rate based on evidence demonstrating that inspections are being performed; however, evidence detailing inspection parameters and alignment with standards outlined in the WMP was not provided.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative and is unable to confirm that SCE has met the stated risk reduction goal due to insufficient data demonstrating inspections met specified standards as outlined in the WMP. This invalidation reflects a document deficiency, not a failure to perform inspections. SCE did not provide the requested documentation: inspection reports, associated photos, and work/repair orders. SCE should submit inspection reports detailing findings, conditions, and remediations, not simply completion records.

Table 7: Distribution Detailed Inspections and Remediations

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR010 Response	Initiative Validation Rate
187,000 Structures Inspected	460,222 Structures Inspected	280,783 Structures Inspected	228,083 Structures Inspected	61%

IN-1.2 – 8.1.3.2 Transmission Detailed Inspections and Remediations – Focus and Non-Field Verifiable

SCE performs detailed inspections of overhead transmission electric system in compliance with regulatory requirements including GO 165, NERC and WECC rules and regulations, and the CAISO Transmission Control Agreement. Degradation of transmission equipment and structures as part of wear and tear during normal operations and due to external factors, such as weather or third-party caused damage, increases the probability of in-service malfunction or failure which can have safety and service reliability impacts. To identify asset conditions that may lead to malfunction or failure, SCE's Transmission Inspection and Maintenance Program performs visual detailed inspections of overhead transmission and sub-transmission assets. These inspections are conducted by qualified inspectors every three years. 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.

The WMP set a target of 24,500 structures inspected in 2025. The risk reduction goal provided with this initiative was 88% for 2025. Data provided in the frontload request consisted of a spreadsheet with 67,457 individual records. Records included information such as structure, equipment_number, inspection date, HFTD Tier, and lat/lon. Section 8.1.3.2 of the WMP details SCE's "360 Inspection" process stating, "from 2023 to 2025, SCE's distribution detailed inspections will include *a single visit* ground and aerial inspection of the structure also known as the '360 inspection' indicating that both ground and aerial inspections are concurrent and are performed at the same time on one structure. With this understanding, when filtering the frontload data by unique structure ID, the IE determined that SCE performed 31,365 '360 inspections' in 2025, not the 67,457 as stated in the 2025 EC AIR.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR011. The reports were to be from each HFTD with 27 from HFTD Tier 2 and 111

from HFTD Tier 3. SCE responded by providing a document with screenshots of inspection measuring documents from SCE's system of record. The screen shots included information regarding date and time of inspection, equipment number, and confirmation of completion. Dates in the screen shots were cross-referenced with dates of the same equipment number in the frontload data for consistency. SCE provided a written response indicating that MDOCs document when the inspection was performed, what was inspected, and the inspection outcome. The documentation provided to the IE confirmed when the inspection was performed, however, no details on what was inspected and the inspection outcome was provided.

The sampling data provided by SCE can be verified for evidence of completed work; however, no inspection report criteria, methodology, or defined inspection parameters were provided for IE review.¹⁷ As a result, the IE was unable to confirm whether the submitted inspection documentation was consistent with SCE's established inspection documentation standards or whether the inspections were performed in accordance with defined program requirements.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative and is unable to confirm that SCE has met the stated risk reduction goal due to insufficient data demonstrating inspections met specified standards as outlined in the WMP. This invalidation reflects a document deficiency, not a failure to perform inspections. SCE did not provide the requested documentation: inspection reports, associated photos, and work/repair orders. SCE should submit inspection reports detailing findings, conditions, and remediations, not simply completion records.

Table 8: Transmission Detailed Inspections and Remediations

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR011 Response	Initiative Validation Rate
24,500 Structures Inspected	67,457 Structures Inspected	33,886 Structures Inspected	31,365 Structures Inspected	64%

IN-3 – 8.1.3.5 Distribution Infrared (IR) Inspections – Non-Focus and Non-Field Verifiable

Infrared (IR) inspections can detect temperature differences between components and identify heat signatures of components called “hot spots”, that may indicate deterioration in structures and equipment not visible to the naked eye. Most inspections have been performed from ground vehicles; however, a small percentage of the inspections require the inspector to hike to the structure or perform the inspection from a helicopter. IR inspections can detect conditions that may indicate a wide range of anomalies, including, but not limited to, failing switch and fuse contacts, poor connections, loose bushings, overloaded/failing transformers, and other issues that can result in component failure.

¹⁷ The IE determined a 50% sample validation rate based on evidence demonstrating that inspections are being performed; however, evidence detailing inspection parameters and alignment with standards outlined in the WMP was not provided.

The WMP set a target of 5,300 circuit miles inspected in 2025. The risk reduction goal provided for this initiative was 60%. Data provided in the frontload request consisted of a spreadsheet with 688 individual records. Records included information such as circuit name, miles inspected, HFTD Tier, and inspection date. The sum of the Inspected Miles column was 5,363.34 miles.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR012. The reports were to be from each HFTD with approximately 4 circuit miles from non-HFTD, approximately six (6) circuit miles from HFTD Tier 2, and approximately 24 circuit miles from HFTD Tier 3. SCE responded by providing a PDF file with a table with information such as region, district, circuit, year, total miles, miles completed, percent complete, and total findings. A PDF with screenshots of maps for each of the circuits in the first PDF was also provided with dialog box showing information embedded in the GIS. GIS DateTime fields aligned with the Date Completed column of the table. Precise mileage per HFTD could not be determined as some circuits in the frontload data occupy more than one HFTD and the delineation of miles per HFTD for these circuits was not provided by SCE. Circuit miles were cross-referenced between the table and the frontload spreadsheet for consistency. The IE identified no issues or discrepancies.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 9: Distribution Infrared (IR) Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR012 Response	Initiative Validation Rate
5,300 Circuit Miles	5,636.34 Circuit Miles	5,636 Circuit Miles	5,363 Circuit Miles	106%

IN-4 – 8.1.3.6 Transmission Infrared (IR) and Corona Scan Inspections – Non-Focus and Non-Field Verifiable

Similar to the distribution infrared inspection protocol, the IR scan detects temperature differences and heat signatures of components, which may indicate problems that could result in component/conductor failure. Corona scanning is a technology that is only being used on transmission circuits in HFRA as certain anomalies (e.g., insulator failure) are not as common on distribution circuits. Corona detection is accomplished by identifying ultraviolet energy, which is generated by electric discharge or “leakage” due to the ionization of air surrounding high voltage electric components. In some cases, the “leakage” is substantial enough that it may result in an arc flash and potential ignition.

The WMP set a target of 1,000 circuit miles inspected in 2025. The risk reduction goal provided with this initiative was 59%. Data provided in the frontload request consisted of 76 individual records that included information such as circuit name, inspected mileage, inspection date, and HFTD Tier. The sum total of miles in the frontload spreadsheet was 1,051.7.

The IE requested inspection reports along with associated photos and work/repair orders where available in DR013. The reports were to be from each HFTD with approximately 10 miles from HFTD Tier 2 and approximately 24 miles from HFTD Tier 3. SCE responded by providing PDF

files including screenshots from video footage documentation of IR and Corona Scan Inspections showing the starting point and GPS location of the flight path. Circuit names and dates of inspection were cross-referenced with the frontload data for consistency. Although mileage was not provided in the DR013 response by cross-referencing the circuits identified in the response with the frontload spreadsheet, the IE confirmed a total of 35 circuit mile inspections with 10 miles of HFTD Tier 2 and 25 miles of HFTD Tier 3.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 10: 8.1.3.6 Transmission Infrared (IR) and Corona Scan

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR013 Response	Initiative Validation Rate
1,000 Circuit Miles Inspected	1,051.7 Circuit Miles	1,052 Circuit Miles	1,051.7 Circuit Miles	105%

IN-5 – 8.1.3.7 Generation High Fire Risk-Informed Inspections and Remediation – Non-Focus and Non-Field Verifiable

IN-5 outlines SCE’s continued inspection program for generation-related assets located within HFRA, including powerhouses, substations, and low-voltage ancillary assets, to identify conditions requiring remediation in order to reduce wildfire ignition risk. Many of SCE’s generation facilities within HFRA are located in or adjacent to heavily forested areas, where ignition events associated with energized infrastructure could result in significant wildfire consequences. Through this initiative, SCE performs inspections intended to identify asset deterioration, equipment deficiencies, or other conditions requiring corrective action. Once identified, remediation activities are implemented to reduce the probability of equipment faults, operational failures, and potential wildfire ignitions associated with SCE’s generation infrastructure within its service territory.

SCE’s 2023–2025 WMP established a 2025 target of inspecting 170 generation related assets in HFRA with a risk reduction goal of 14%. According to SCE’s 2025 EC AIR, a total of 238 generation assets were inspected, exceeding the 2025 target.

In support of IN-5, SCE provided a list of generation high fire risk inspections and remediations completed in 2025. The utility responded by submitting an Excel spreadsheet titled “IN-5 Gen Inspections” which contained 238 records with associated details such as Facility Name, Facility Type, Inspection Type, Inspection Date, Voltage, HFTD Class, and latitude/longitude.

In data request DR014, SCE was asked to provide PDF inspection reports for 30 generation high fire risk inspections and remediations which consisted of 6 from Tier 2-HFTD and 24 from Tier 3-HFTD. The utility provided an Excel spreadsheet titled “05. IN-5_IN-5 Inspection Survey Information 2025 Base Sample_Complete” which contained 30 records with associated details such as Facility Name, Facility Type, Inspection Date, Voltage, latitude/longitude, Inspection Type and various inspection parameters pertaining to each asset. 18 records were labeled as “low

voltage” and therefore inspection questions pertaining to high-voltage facilities did not apply. Record “BC2 vents, drain piping & valves” was marked as non-powered/no ignition source and therefore contained no data in the document. SCE provided a screenshot from the system of record to verify inspection completion for this asset.

Upon review of this data, the IE identified assets that showed casing/conduit damage (MCR 2/3 Gage 810 Forebay AVM & ADCP // Wrigle Reservoir Sump Pump #3), structural/support issues with the base/housing/structure (SAR1 Forebay Power LV Panel // MCR 2/3 Gage 810 Forebay AVM & ADCP), “other” hazards “requiring a notification” (SHLK Shaver Dam HB Valve // MCR 2/3 Gage 810 Forebay AVM & ADCP // LYTL Sandbox), additional vegetation maintenance/thinning recommended in buffer zones (SHLK Shaver Dam HB Valve // SAR1 Forebay Power LV Panel // HUNT Upper 84” Valve Hose// Wrigle Reservoir Sump Pump #3 // LYTL Sandbox // Middle Ranch Well 1A Production // Borel Bodfish Siphon // Portal Alt Station Light & Power Conduit), and removal of trees/foilage required to prevent contact during a wind event (LYTL Sandbox). In total, 9 assets are shown to require maintenance and/or remediation, and although requested, no additional information was provided to confirm that the maintenance/remediation work was completed. The sampling data provided by SCE can be verified as evidence of completed inspections, however, the IE is unable to fully validate the 9 aforementioned assets due to lack of documentation demonstrating successful remediation, resulting in a 70% sample validation rate.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 11: Generation High Fire Risk-Informed Inspections and Remediation

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR014 Response	Summary
170 Generation Related Asset Inspections	238 Generation Related Asset Inspections	238 Generation Related Asset Inspections	238 Generation Related Asset Inspections	98%

IN-8 – 8.1.5 Inspection & Maintenance Tools – Focus and Non-Field Verifiable

SAP is SCE’s enterprise resource planning software that serves as systems of record for asset inventory and asset conditions. As such, software developed specifically for wildfire mitigation receives master data from SAP, updates data with work order status information, and writes the results of work back to the SAP system. No changes were made to SAP with respect to wildfire mitigation due to the WMP.

The WMP set a target of monitoring utilization of inspection work management tool(s) and making enhancements as necessary. No risk reduction goal was provided with this initiative. Data provided in the frontload request consisted of a PDF file with screenshots of the various tools integrated with SAP. This document described the functional and non-functional requirements to support the inspection lifecycle, from identification and planning to execution and closure, ensuring regulatory

compliance, data accuracy, and operational efficiency. Utilization was not monitored in 2025 therefore there is no substantiating data for utilization in 2025.

Based on this analysis and the documentation provided, the IE has not validated this initiative.

Table 12: Inspection & Maintenance Tools

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Monitor utilization of inspection work management tool, and make enhancements as necessary	SCE target not met. SCE continues to optimize execution in support of January go-live date. Monitoring and reporting is anticipated to begin in January through the end of March.	Activity year-end target will not be met due to extended work on system execution plan, system engineering specifications, and additional quality verifications.	N/A	0%

IN-9a – 8.1.3.8 Transmission Conductor and Splice Assessment: Spans with LineVue – Non-Focus and Non-Field Verifiable

IN-9 outlines SCE’s use of transmission conductor and splice assessment methods, including LineVue and X-Ray technologies, within HFRA to supplement existing inspection processes and improve the identification of conductor and splice defects. Transmission conductors and splices may fail due to age-related deterioration, weather impacts, object contact, corrosion, or other conditions that can result in wire-down events and increased wildfire ignition risk. IN-9a focuses on the utilization of LineVue technology which is specifically utilized to assess deterioration of the conductor steel core, identify localized wire breaks, detect corrosion pits, and evaluate loss of the zinc galvanized protective layer.

SCE’s 2023–2025 WMP did not establish a 2025 target nor a risk reduction goal for this initiative. IN-9a was not specifically mentioned in SCE’s 2025 Q4 QDR and the 2025 EC AIR states that there is no standalone splice remediation activity or spend reflected under this program as all splice related work is now captured and accounted for within the Proactive Splice Shunting Program. In the 2025 WMP update, SCE stated that it is discontinuing its Transmission Conductor Span Assessment initiative (IN-9a) due to its zero percent find rate in 2023 and 2024 as well as the cost and complexity of performing these inspections.

Based upon this analysis and the information provided by SCE regarding this initiative, the IE has deemed this initiative not applicable for 2025.

Table 13: Transmission Conductor and Splice Assessment: Spans with LineVue

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
N/A	N/A	N/A	27 Records	Not Applicable

IN-9b – 8.1.3.8 Transmission Conductor and Splice Assessment: Splices with X-Ray – Non-Focus and Non-Field Verifiable

IN-9 outlines SCE’s use of transmission conductor and splice assessment methods, including LineVue and X-Ray technologies, within HFRA to supplement existing inspection processes and improve the identification of conductor and splice defects. Transmission conductors and splices may fail due to age-related deterioration, weather impacts, object contact, corrosion, or other conditions that can result in wire-down events and increased wildfire ignition risk. IN-9b focuses on the utilization of x-ray technology to verify proper installation as well as identifying broken strands or deformities on conductor splices. SCE states that x-ray inspections are more effective than traditional visual inspections in identifying these issues due to the inherent difficulty in visually detecting internal issues or improper termination installations.

SCE’s 2023–2025 WMP states that a 2025 target was to be developed based on an engineering analysis to be performed in 2023 and 2024. SCE did not set a risk reduction goal for this initiative. According to the 2025 EC AIR, SCE’s claims they have met their target and states, “*SCE’s engineering analysis and lessons learned showed that x-rays were leading to a high rate of shunting remediation. Accordingly, SCE started foregoing x-ray inspections and proactively shunting transmission splices in 2025, which meets the spirit and intent of this activity. This shift was also described in the 2026-2028 WMP, filed in March 2025. In 2025, SCE installed 117 shunts.*” SCE’s stated approach represents a significant deviation from the WMP requirement to conduct X-Ray Inspections. Rather than performing X-Ray Inspections as specified in the WMP, SCE substituted a proactive shunting strategy without documented justification that this alternative approach meets the original program objectives. SCE’s claim of 100% target completion is therefore based on redefining the work scope rather than executing the WMP-required inspection methodology. The basis for this deviation and whether the proactive shunting approach adequately addresses the risk mitigation intent of the original X-Ray Inspection requires clarification. Although the IE understands the intent behind SCE proactively shunting these splices and foregoing X-Ray Inspections, due to no documented request and approval from Energy Safety and subsequent WMP target and section update, the IE is unable to validate SCE’s implementation of IN-9b as outlined in the approved WMP.

In support of IN-9b, SCE provided a list of transmission conductor and splice assessment shunts completed during 2025. The utility responded by submitting an Excel spreadsheet titled “IN-9 Transmission Conductor & Splice Assessment_Splice Shunts” which contained 27 records with associated details such as Object ID, Voltage, Circuit Number, Circuit Name, Mile Tower Number, FLOC Number, Transmission Grid, High Fire Tier, City, Number of Shunts Installed, Type of

Shunts Installed, Installation Date, Span Direction From FLOC, Status, SCE Conductor Size, Scope Year, and latitude/longitude. The 27 records equaled the 117 shunts installed as stated in the 2025 AIR.

The data provided by SCE and the statement in the 2025 EC AIR can be verified for evidence of completed shunt installations and documented results of the completed engineering analysis. However, no documentation was provided demonstrating implementation of X-Ray Inspections, an initiative parameter explicitly required by Section 8.1.3.8 of the WMP. Based on this analysis and the documentation provided, the IE has not validated this initiative.

Table 14: Transmission Conductor and Splice Assessment: Splices with X-Ray

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Target to be developed based on an engineering analysis to be performed in 2023 and 2024.	SCE's engineering analysis and lessons learned showed that x-rays were leading to a high rate of shunting remediation. Accordingly, SCE started foregoing x-ray inspections and proactively shunting Transmission splices in 2025	Completed	117 Shunt Installations	0%

SH-1 – 8.1.2.1.1 - Covered Conductor – Focus and Field Verifiable

The installation of covered conductor is a system hardening initiative designed to reduce the probability of ignitions associated with contact-from-object (CFO) and wire-to-wire faults. As established in SCE's risk models, deploying covered conductor in High Fire Risk Areas yields an observed 71% reduction in associated faults and a 90% reduction in Public Safety Power Shutoff (PSPS) activations (WMP Page 252). SCE's 2025 WMP established a baseline target of completing 500 circuit miles of covered conductor. According to the final Annual Implementation Report (AIR), SCE successfully completed 706 circuit miles, significantly exceeding its original target. To validate the accuracy of this reported completion mileage, the Independent Evaluator (IE) selected a statistical sample of 116 locations, supported by a pre-drawn alternate sample pool of 29 locations to mitigate anticipated field access constraints.

The IE utilized SCE-provided completion records, spatial shapefiles, and targeted engineering as-builts for 137 work orders formally requested under DR025.b to conduct the evaluation. Field verification was executed via site visits utilizing vehicle-mounted 360° cameras and geo-referenced photography. During the assessments, the IE verified the physical replacement of existing bare wire with covered conductor, alongside the installation of associated WMP-specified components designed to maintain system resiliency and shorten restoration time. Specifically, the IE verified the presence of fire-resistant poles, composite crossarms, FR3 transformers, wildlife

covers, polymer insulators, and surge arresters (WMP Page 251). Workmanship was strictly evaluated against SCE's stated engineering standards.

Because the spatial data provided by the utility was tied to the structural asset level rather than continuous span layers, the IE developed a multi-tiered verification strategy to confidently tie the 116 field-sampled points to the total claimed mileage. The IE confirmed the physical presence of covered conductor at the bounding structures of reported segments and performed a comprehensive documentation analysis on a statistically representative sub-sample of the requested as-builts. This sub-set, 137 as-builts, was utilized to verify the accuracy of the utility's provided mileage claims against the concurrent field conditions. By confirming that field conditions matched the engineering records and the provided mileage claims for this targeted validation set, the IE corroborated the continuous mileage totals reported across the associated work orders. Field assessments specifically reviewed workmanship quality and accuracy against SCE's initiative description; no workmanship issues or data discrepancies were identified.

The IE observed a structural mismatch between SCE's reporting metrics and its geospatial tracking methodology. While the SH-1 regulatory target is measured and reported in continuous "Circuit Miles," SCE exclusively maintains this completion data at the individual structure (point) level based on isolated work orders.

Recommendation: The IE recommends SCE develop a continuous geospatial line layer for completed SH-1 projects. Aligning the spatial tracking data directly with the reported mileage metric will streamline compliance validation and provide SCE with more precise, contiguous circuit data for internal wildfire risk modeling and PSPS threshold adjustments.

Representative field conditions and verified hardware installations are evidenced in Figure 2: Example Covered Conductor and Figure 3: Example Covered Conductor, Pole Replacement below.

Figure 2: Example Covered Conductor



**Work Order: TD2266377
Pole ID 1492319E**

Close-up verification of covered conductor installation, specifically detailing the required composite crossarm, polymer insulators, and wildlife cover. Pole ID: 1492319E

Figure 3: Example Covered Conductor, Pole Replacement



Work Order: TD2214177. Pole ID: 2207459E.

Upper left: Pre-construction baseline conditions (Google Street View 2024). Upper right and bottom: Post-construction field verification captured April 2026, demonstrating the required installation of a fire-resistant composite pole and covered conductor.

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 15: Covered Conductor

2025 Target	2025 EC AIR	2025 Q4 QDR	DR025/.b Response	Initiative Validation Rate
500 Circuit Miles	706 Circuit Miles	710.42 Circuit Miles	706 Circuit Miles	141%

SH-2 – 8.1.2.2.1 – Undergrounding Overhead Conductor – Focus and Field Verifiable

Targeted Undergrounding (TUG) is a critical system hardening program designed to significantly reduce wildfire and PSPS risk by replacing existing overhead lines with underground infrastructure. This transition nearly eliminates the ignition-causing potential associated with equipment failures and vegetation or object contact.

SCE's 2025 WMP established a baseline target of completing 30 circuit miles. According to the final Annual Implementation Report (AIR), the utility successfully completed 45 circuit miles, exceeding the planned target.

To validate the accuracy of this reported completion mileage, the Independent Evaluator (IE) executed a multi-tiered verification strategy tailored to continuous underground assets. To corroborate the continuous mileage totals claimed across the service territory, the IE cross-referenced physical field observations with a statistically representative sub-sample of 91 as-built engineering drawings formally requested and obtained via Data Request DR031.b.

During the field assessments, the IE verified the permanent de-energization and physical removal of the targeted overhead conductor. Because undergrounding conversions often deviate from legacy overhead paths to avoid private property obstructions like swimming pools and block walls, or topographical challenges like steep terrain, the IE confirmed that new circuit paths were appropriately re-routed to public rights-of-way or curbsides (WMP Page 256).

The IE validated the completion of these realigned circuits by confirming the installation of associated undergrounding surface equipment, including pad-mounted transformers, junction boxes, and protective bollards. Furthermore, evidence of recent civil construction, such as new asphalt trenching, was visually confirmed to align perfectly with the engineered alignments in the provided as-builts. By successfully verifying these surface-level indicators against the approved routing documents, the IE corroborated the continuous mileage totals reported by the utility.

Field assessments specifically reviewed workmanship quality and accuracy against SCE's initiative description. No workmanship issues or data discrepancies were identified during the validation process. Representative field conditions, including the removal of overhead infrastructure and the installation of associated undergrounding surface equipment, are evidenced in both Figure 4: Targeted Underground Example, and Figure 5: Targeted Undergrounding, As-Built Verification below.

Figure 4: Targeted Undergrounding Example



Work Order: TD2044790

Top: Google Street View 2024. Bottom: Post-construction field verification, captured 04/2026, demonstrating the installation of a pad-mounted transformer and protective bollards

Figure 5: Targeted Undergrounding, As-built Verification



Work Order: TD2228009

Top: Excerpt of engineering as-built detailing required subterranean vault and associated vents. Bottom: Post-construction field verification (captured 04/2026) at 34°02'28"N 118°37'10"W) Vault and Civil Construction

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 16: Targeted Undergrounding Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	DR031/b Response	Initiative Validation Rate
30 Circuit Miles	45 Circuit Miles	45.37 Circuit Miles	45 Circuit Miles	150%

SH-5 – 8.1.2.8.1 Remote Controlled Automatic Reclosers Settings Update – Non-Focus and Non-Field Verifiable

SH-5 outlines SCE’s program to install and upgrade Remote Controlled Switches (RCS) and Remote Automatic Recloser (RAR) devices to improve operational flexibility and reduce wildfire risk associated with distribution circuits. SCE states that distribution circuits often span many miles, traverse areas with varying wildfire risk profiles, and are exposed to differing weather conditions depending on specific asset locations. Through the installation of RCS and RAR devices, SCE intends to improve circuit sectionalization capabilities and remotely control the flow of electricity, thereby enabling more targeted de-energization of higher-risk areas while maintaining service to lower-risk portions of the circuit where feasible. This initiative is intended to reduce customer impacts associated with PSPS events while enhancing operational control and wildfire mitigation capabilities within SCE’s service territory.

SCE’s 2023-2025 WMP set a 2025 target to install five RAR/RCS sectionalizing devices and set a 33%/.19% risk reduction goal for this initiative. According to the 2025 EC AIR, SCE installed a total of 13 RAR/RCS sectionalizing devices in HFRA, exceeding the 2025 target.

In support of SH-5, SCE provided a list of all RAR/RCS sectionalizing device installations completed in 2025. The utility responded by submitting an Excel spreadsheet titled “SH-5 Remote Controlled Automatic Reclosers” which contained 13 records with associated details such as Activity Title, Completion Date, Work Order, Structure, Circuit Name, HFTD Class, and latitude/longitude.

In data request DR032, the utility was asked to provide documentation of completion for all 13 sectionalizing device installations completed in 2025. The utility provided a 20-page document that contained two screenshots for each record provided in the frontload data. The first screenshot identified the completion of the work order (contained work order #, structure ID, completion date, and latitude/longitude) and the second screenshot contains installation notes and “Ready for Service” designations. In addition, SCE provided the relevant Work Order map and Field Job Information Sheet (JIS) for 5 of the devices as the “Work Order screenshot may not clearly link the relevant structure number.” The IE was able to cross reference the data from the sampling information to the frontload data received and no discrepancies were noted.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 17: Tree Attachments Remediation

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR032 Response	Initiative Validation Rate
5 RAR/RCS Sectionalizing Devices	13 RAR/RCS Sectionalizing Devices	13 RAR/RCS Sectionalizing Devices	13 RAR/RCS Device Installations/ 13 Work Order Details	260%

SH-8 – 8.3.3.1.2.1 Transmission Open Phase Detection (TOPD) – Non-Focus and Non-Field Verifiable

Transmission Open Phase Detection (TOPD) is designed to facilitate the detection and de-energization of an open phase condition, such as a broken transmission conductor, before the conductor can contact a grounded object and create a fault event with potential wildfire ignition risk. SCE states that TOPD alarms are integrated into monitoring systems utilized by its grid operations personnel, allowing the operations team to evaluate alarm conditions and determine appropriate response actions. Upon receipt of a TOPD alarm, grid operations personnel are responsible for verifying the nature of the event, validating the alarm condition, and determining the appropriate operational response based on system conditions.

SCE's 2023-2025 WMP states a 2025 target is to be determined based on further evaluation. SCE did not set a risk reduction goal for this initiative. According to the 2025 EC AIR, SCE states that they completed the final evaluation report and deployed TOPD logic at seven locations consistent with the final evaluation.

In support of SH-8, SCE provided a list of all transmission open phase detection retrofits completed in 2025. The utility responded by submitting an Excel spreadsheet titled "SH-8 Transmission Open Phase Detection" which contained 17 records (7 circuits) with associated details such as Activity Title, Work Order, Substation Name, Circuit Name, End Date, HFTD Class, latitude/longitude, and Circuit High Fire Area Code.

In data request DR033, the utility was asked to provide documentation of completion for all seven TOPD retrofit installations completed in 2025. The utility provided a 17-page document titled "SH-8 Transmission Open Phase Detection Compliance Evidence 2025" that contained screenshots for the completion of TOPD installations for the following seven transmission lines:

- Goleta-Santa Clara 1 Transmission Line
- Goleta-Santa Clara 2 Transmission Line
- Crater-Malibu-Valdez Transmission Line
- Moorpark-Crater-Malibu Transmission Line
- Goleta-Capitan-Gaviota Transmission Line
- Lugo-Pisgah 1 Transmission Line
- Lugo-Pisgah 2 Transmission Line

Details demonstrating transmission line testing and in-service dates can be found in the database screenshots for all seven circuits. The records show deployment of “Broken Conductor” logic with an enabled date indicating when logic was installed. All dates were confirmed to be in 2025 and all test history indicated pass.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 18: Transmission Open Phase Detection (TOPD)

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload & DR033 Response	Initiative Validation Rate
Target to be determined based on further evaluation. ¹⁸	TOPD logic installed at 7 locations.	TOPD logic installed at 7 locations.	17 Records (7 Circuits)/ Screenshots for 7 Circuits	100%

SH-10 – 8.1.2.3.1 Tree Attachments Remediation – Focus and Non-Field Verifiable

SH-10 outlines SCE’s initiative to remove the electrical equipment attached to trees and install the equipment on new fire-resistant poles to reduce ignition driver risks. Tree attachment remediations address contact-from-object and equipment failure ignition risks and reduce the probability of vegetation contact and the potential ignition caused by a spark close to vegetation.

SCE’s 2023-2025 WMP did not state a 2025 target for this initiative but established a 22%/.03% risk reduction goal. According to the 2025 AIR, SCE confirmed the balance of 141 tree attachments were in the scope for this initiative and 34 were completed in 2025. SCE stated that 107 remediations are scheduled for 2026 or beyond due to various issues such as permitting delays, environmental restrictions, and government lands approvals.

In support of SH-10, SCE provided an Excel spreadsheet titled “SH-10 Tree Attachment Remediation” which shows 34 records with associated details such as Activity Title, Work Order, Structure, Completion Date, Circuit Name, and HFTD Class.

In data request DR026, the utility was asked to provide documentation of completion for all 34 tree attachment remediations completed in 2025. The utility provided a 61-page document that contains details for all 34-tree attachment remediations and includes the work order, map location of remediation, and notes regarding the activities performed.

Based upon this analysis and the documentation reviewed, the IE verifies that SCE completed the 34 tree remediations claimed in the 2025 EC AIR. However, due to the shortfall of 107

¹⁸ No explicit numerical target was stated in either the WMP or 2025 EC AIR; however, SCE stated in the 2025 EC AIR that “SCE completed the final evaluation report and deployed TOPD logic at 7 locations *consistent with final evaluation.*”

remediations and therefore missing the 141 remediation target, the IE has not validated this initiative.

Table 19: Tree Attachments Remediation

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR026 Response	Initiative Validation Rate
Remediate the balance of tree attachments in HFRA (141).	34 Tree Attachments	Delayed	34 Tree Attachment Remediations	24%

SH-14 – 8.1.2.5.2 – Long Span Initiative (LSI) - Focus and Field Verifiable

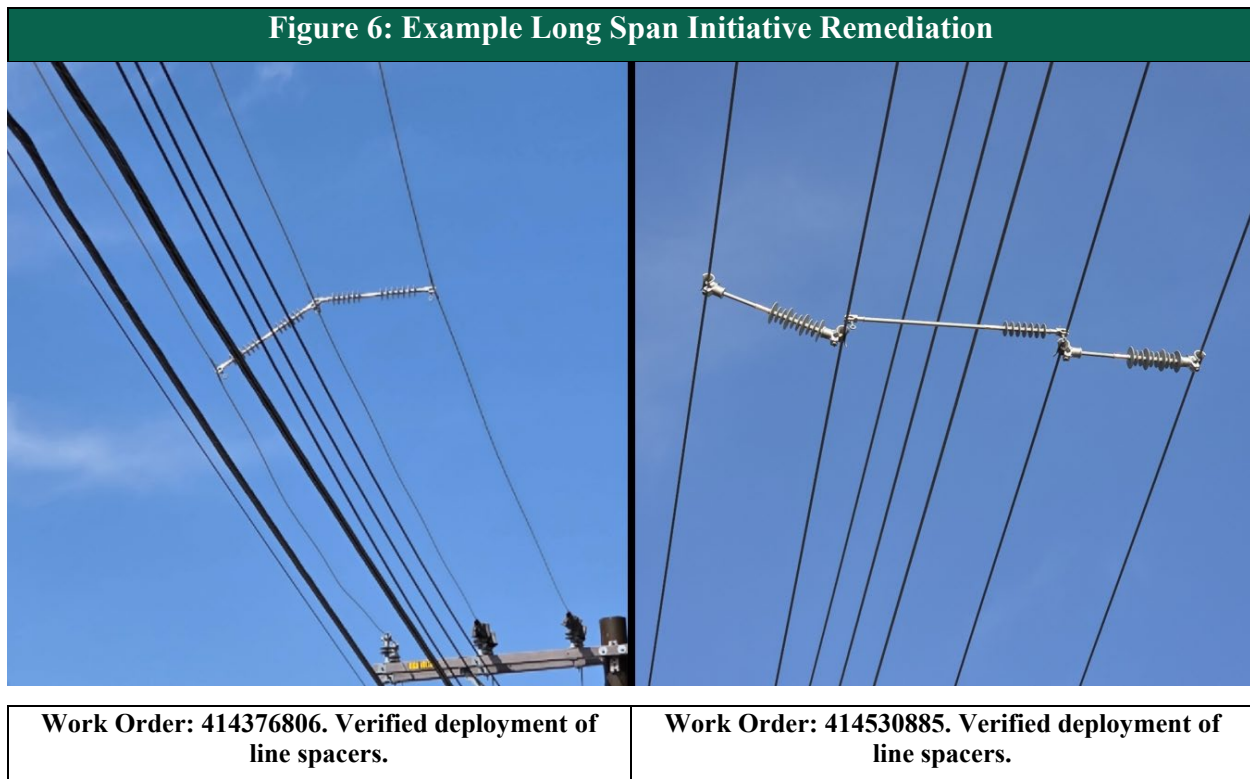
The Long Span Initiative is a targeted program designed to reduce the risk of wire-to-wire contact and conductor clashing in high-wind conditions. SCE prioritizes these remediations using LiDAR measurements and IWMS risk analysis to identify spans with mixed conductors, sharp angles, or vulnerable vertical/horizontal transitions (WMP Page 263). SCE's 2025 WMP established a programmatic baseline target of remediating 1,000 individual spans. According to both the QDR4/T1 planning data and the final Annual Implementation Report (AIR), the utility successfully remediated 1,102 spans, exceeding its original target. To validate the accuracy of this reported completion, the Independent Evaluator (IE) established a statistical sample target of 123 locations, supported by a pre-drawn alternate sample pool of 31 locations.

To conduct the evaluation, the IE utilized spatial shapefiles alongside targeted completion records formally requested under frontload data request DR_001. Field verification was executed via site visits utilizing vehicle-mounted 360° cameras and geo-referenced photography. During the assessments, the IE verified the physical remediation of the targeted spans by confirming the deployment of line spacers, reconductoring to covered conductor, or approved alternate construction methods. Recognizing that covered conductor deployment is concurrently tracked under the SH-1 initiative, the IE evaluated SH-14 independently to establish standalone program compliance. Therefore, field observations and recorded findings for LSI distinctly prioritized the verification of phase-spacers, a hardware remediation unique to SH-14. Workmanship was strictly evaluated against SCE's Remediation Decision Tree (Figure SCE 8-09, WMP Page 265) and the CAL FIRE 2022 Powerline Equipment Identification Guide.

During the assessment period, 19 initially selected locations were deemed inaccessible due to severe terrain and private property access barriers. To maintain the statistical validity of the 123-location sample size, the IE field teams deployed an over-allocation strategy, executing a total of 202 field location reviews. Because the frontloaded data contained a limited number of Non-HFTD samples, the IE deliberately drew replacement samples from Tier 3 to ensure the evaluation heavily weighted the highest-risk mitigation zones. This strategic pivot resulted in a final verified capture pool consisting of 105 locations in HFTD Tier 3, 96 locations in HFTD Tier 2, and 1 location in the Non-HFTD area.

During the verification process, the IE noted that SCE utilized approved alternate construction methods to meet mitigation goals in areas lacking bucket truck accessibility, in strict accordance with the initiative's deployment logic (WMP Page 264). This included the specific deployment of fiberglass composite poles at two (2) locations to support required spans. No workmanship issues or material data discrepancies were identified.

Representative field conditions and verified span remediations are evidenced in Figure 6: Example LSI Remediation below.



Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 20: Long Span Initiative (LSI)

2025 Target	2025 EC AIR	2025 Q4 QDR	DR001 Response	Initiative Validation Rate
1,000 Spans	1,102 Spans	1,102 Spans	1,102 Spans	110%

SH-16 – 8.1.2.1.2 – Vibration Damper Retrofit – Non-Focus and Field Verifiable

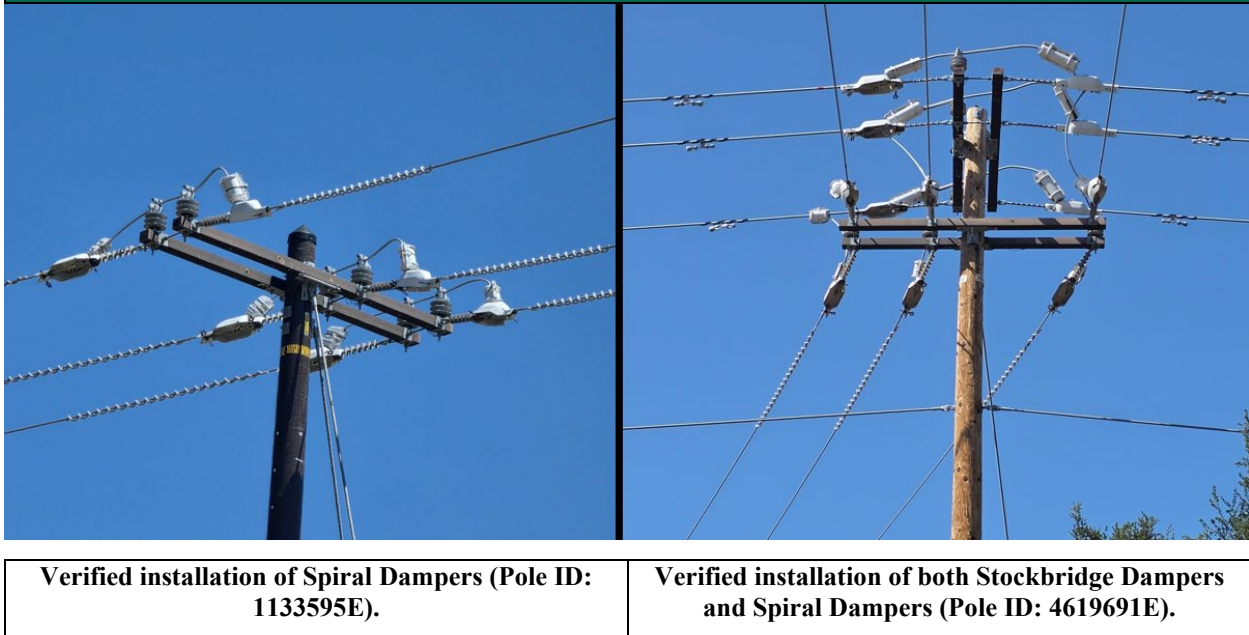
The Vibration Damper Retrofit program is a specialized system hardening initiative aimed at mitigating wind-driven (Aeolian) vibration on overhead lines. Because the smooth, cylindrical profile of covered conductor makes it highly susceptible to this vibration, unmitigated kinetic

energy can lead to severe conductor abrasion or fatigue, potentially reducing the asset's useful life from 45 years to an average of 20 years (WMP Page 254). SCE prioritizes these retrofits on covered conductor installations constructed prior to Q4 2020 in areas with high wind persistence. SCE's 2025 WMP established a baseline target of completing 600 structures. According to the final Annual Implementation Report (AIR), the utility successfully retrofitted 725 structures, significantly exceeding its original target. To validate the accuracy of this reported completion, the Independent Evaluator (IE) established a statistical sample target of 33 locations, supported by a pre-drawn alternate sample pool of 9 locations.

To conduct the evaluation, the IE utilized spatial shapefiles and initial data sets provided under frontload data request. Field verification was executed via site visits utilizing vehicle-mounted 360° cameras and geo-referenced photography. During the assessments, the IE verified the physical installation of vibration mitigation equipment on targeted structures, specifically documenting the presence of WMP-approved Stockbridge Dampers and Spiral Dampers (Figure SCE 8-03, WMP Page 255). Structure locations aligned accurately with the reported GPS coordinates, and installation workmanship was evaluated against industry construction standards utilizing the CAL FIRE 2022 Powerline Equipment Identification Guide.

During the assessment period, 20 initially selected locations were deemed inaccessible due to severe terrain and private property access constraints. To overcome these access barriers and maintain statistical validity, the IE field teams deployed an over-allocation strategy. Because the programmatic sample pool contained zero applicable locations within Non-HFTD areas, the IE was required to draw all replacement and supplemental samples from the highest-risk zones to fulfill the statistical targets. This strategic pivot resulted in a final verified pool consisting of 33 locations in HFTD Tier 3 and 17 locations in HFTD Tier 2. Field assessments specifically reviewed workmanship quality and accuracy against SCE's initiative description; no workmanship issues or data discrepancies were identified.

Representative field conditions and verified hardware installations are evidenced in Figure 7: Example Vibration Damper Installation below.

Figure 7: Example Vibration Damper Installation

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 21: Vibration Damper Retrofit

2025 Target	2025 EC AIR	2025 Q4 QDR	DR001 Response	Initiative Validation Rate
600 Retrofit Vibration Dampers	725 Retrofit Vibration Dampers	731 Retrofit Vibration Dampers	725 Retrofit Vibration Dampers	121%

SH-17 – 8.1.2.6.1 – Rapid Earth Fault Current Limiters / Ground Fault Neutralizer – Non-Focus and Field Verifiable

The Rapid Earth Fault Current Limiter (REFCL) initiative involves deploying Ground Fault Neutralizer technology within large substations to mitigate the risk of ignitions caused by single-phase-to-ground faults. By reducing fault energy by a factor of a thousand or more, this technology can detect ground faults as small as a half ampere, almost instantly reducing voltage on the faulted conductor to extinguish arcs before an ignition can occur (WMP Page 266). SCE's 2025 WMP established a baseline target of completing GFN construction at 2 substations. According to the final Annual Implementation Report (AIR), the utility successfully completed construction at 4 substations, representing a 200% completion rate. To validate the accuracy of this reported

completion, the Independent Evaluator (IE) selected a targeted sample representing the entire reported AIR population of 4 substations.

To conduct the evaluation, the IE utilized documentation formally requested under SCE_DR029. In lieu of raw engineering schematics, SCE provided a comprehensive visual compilation ("2025 WMP IE Year-End Compliance Evidence.zip") detailing the construction progress across the targeted sites. Due to the restricted nature of these high-voltage facilities, the IE conducted on-site field verifications under direct supervision from SCE substation personnel. Facility access and structural orientation were actively coordinated to ensure safe and thorough assessments.

The IE conducted site visits at all four reported locations: Weldon, Monolith, Banducci, and Ritter Ranch. Utilizing the photographic baseline provided in the SCE compliance response, the IE conducted visual and structural orientations to identify the newly installed infrastructure. The IE captured geo-referenced photography to document the presence and operational status of the equipment, specifically verifying the placement of the primary GFN equipment housings (single or dual shipping-container configurations, per Figure SCE 8-10, WMP Page 267). Additionally, the IE verified the installation of integrated control systems within the Mechanical Electrical Equipment Room (MEER) racks, and the presence of associated protection elements, including the Digital Fault Recorder and Neutral Earth Resistor. By cross-referencing the physical presence of these critical components against the utility-provided construction baseline, the IE validated the completion of the substation retrofits. No data discrepancies were identified.

Representative field conditions and verified hardware installations are evidenced in Figure 8: Example GFN Installation below.

Figure 8: Example GFN Installation



Upper left: GFN shipping-container enclosures at Banducci Substation. Upper middle: Digital Fault Recorder installation. Upper right: Neutral Earth Resistor. Bottom: Verified internal control systems and panels within the Ritter Ranch Substation GFN enclosure.

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 22: Rapid Earth Fault Current Limiters (REFCL) – Ground Fault Neutralizer

2025 Target	2025 EC AIR	2025 Q4 QDR	DR029 Response	Initiative Validation Rate
2 GFNs	4 GFNs	4 GFNs	4 GFNs	200%

SH-18 – 8.1.2.6.2 – Rapid Earth Fault Current Limiters (REFCL) - Grounding Conversion – Non-Focus and Field Verifiable

The REFCL Grounding Conversion initiative is a specialized extension of the Ground Fault Neutralizer program, targeting smaller substations or distribution circuit-level applications. This initiative converts existing ungrounded or resonant grounded electric systems to reduce fault currents and mitigate ignition risks associated with single-phase-to-ground faults (WMP Page 268). SCE's 2025 WMP established a baseline target of completing 4 grounding conversions. According to the final Annual Implementation Report (AIR), the utility successfully completed 3 conversions. The AIR identifies the initiative as formally incomplete, noting that the single outstanding conversion remains delayed pending a final administrative assessment by the City of Banning. To validate the accuracy of the reported completed population, the Independent Evaluator (IE) selected a targeted sample representing all 3 finalized locations.

To conduct the evaluation, the IE utilized documentation formally requested under SCE_DR030. In lieu of standard construction as-builts, SCE directed the IE to a visual compilation of construction photos (DR030) alongside targeted work order coordinates (DR030.b) to demonstrate the scope of work. Field verification was executed via site visits utilizing geo-referenced photography and video capture to document the physical presence of the required grounding conversion equipment. Specifically, the IE verified the correct installation of Pole Top Isolation Bank Transformers, as detailed in the utility's programmatic descriptions (Figure SCE 8-12, WMP Page 269).

During the verification process, the IE encountered a significant spatial discrepancy at one location, where the target structure was physically located substantially further down the span than initially indicated by the utility-provided coordinates. To maintain sample integrity and secure the verification, the IE actively coordinated with SCE personnel to consult live circuit maps, successfully locating and evaluating the offset structure. Active access coordination with SCE was also required to successfully navigate to two of the three collection sites. No workmanship issues or material data discrepancies were identified concerning the physical hardware.

Representative field conditions and verified hardware installations are evidenced below in Figure 9: Northbay Example Grounding Conversion, and Figure 10: Rustic Grounding Conversion.

Figure 9: Example Ground Conversion



Work Order: TD2263546. Verified installation of Pole Top Isolation Bank Transformers.

Work Order: TD2263546. Verification of the associated control and protection enclosures supporting the grounding conversion at the same location

Figure 10: Rustic Grounding Conversion Example



Work Order: TD2353452. Upper left: Verification of supporting overhead infrastructure and line equipment

Work Order: TD2353452. Upper right and bottom: Verified installation of the required Pole Top Isolation Bank Transformers

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has not validated this initiative. The data supports SCE's reported completion of the three (3) claimed grounding conversions under the SH-18 initiative, however, falling one short of the 2025 completion goal of four.

Table 23: Rapid Earth Fault Current Limiters – Grounding Conversion

2025 Target	2025 EC AIR	2025 Q4 QDR	DR030 Response	Initiative Validation Rate
4 REFCL	3 REFCL	3 REFCL	3 REFCL	75%

4.1.2.2 Funding Verification – Findings

IN-1.1 – Distribution High Fire Risk-Informed (HFRI) Inspections & Remediations (Ground & Aerial)

Strategic Overview and Risk Mitigation

This initiative involved detailed inspections of distribution facilities in compliance with GO 165. SCE set a target of 187,000 structures inspected, aiming to achieve a 90% risk reduction goal.

Financial Performance Analysis

- Planned CAPEX Budget: \$0
- Actual CAPEX Expenditure: \$692,000
- CAPEX Variance: \$692,000 (100% Overrun)
- Planned O&M Budget: \$35,256,000
- Actual O&M Expenditure: \$41,126,000
- O&M Variance: \$5,870,000 (17% Overrun)
- Initiative Total Planned Budget: \$35,256,000
- Initiative Total Actual Expenditure: \$41,818,000
- Initiative Total Variance: \$6,562,000 (19% Overrun)
- SCE Justification: At the time of the WMP filing in Q1 2023, the 2025 forecast was based on SCE's GRC request covering the 2025-2028 period. Subsequent to the GRC filing, SCE revised the budget to \$44.3M million for O&M. Based on this revised budget, the O&M costs would be an underrun of (\$3.1M). Underruns were primarily driven by reduced EZ scope (energized/joint-use pole) and lower cost per attributed to lower Contractor unit rates. Capital had an overrun of \$0.7M for drone purchases for the purpose of SCE's UAS 360 inspection program. SCE states that their claimed budget revision reflects updates to the wildfire risk models used for inspection scoping which increasingly emphasized circuit-segment grouping rather than individual structures to improve operational efficiency. SCE also states that this update resulted in higher inspection quantities relative to earlier planning assumptions. SCE states that they are "looking into" the question by the IE to approximate the split of the underrun between (a) reduced EZ scope and (b) lower cost due to lower Contractor unit rates.

Operational Impact and Risk Reduction

SCE exceeded the 2025 target by completing 228,083 structure inspections (228,051 unique ground structures/226,389 unique aerial structures) of distribution facilities, thus achieving the stated 90% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative and exceeded operational targets. The reported overrun was based on a 2025 forecasted budget, and following the GRC filing, SCE revised the Operations and Maintenance (O&M) budget associated with the initiative. Based on the documentation reviewed, the increased expenditures did not adversely impact implementation quality or the intended wildfire risk reduction outcomes.

IN-1.2 – Transmission High Fire Risk-Informed (HFRI) Inspections & Remediations (Ground & Aerial)

Strategic Overview and Risk Mitigation

This initiative involved detailed inspections of overhead transmission electric system in compliance with regulatory requirements including GO 165, NERC and WECC rules and regulations, and the CAISO Transmission Control Agreement. SCE set a target of 24,500 structures inspected, aiming to achieve an 88% risk reduction goal.

Financial Performance Analysis

- Planned O&M Budget: \$16,246,000
- Actual O&M Expenditure: \$12,858,000
- O&M Variance: -\$3,388,000 (21% Underrun)
- SCE Justification: At the time of the WMP filing in Q1 2023, the 2025 forecast was based on SCE's GRC request covering the 2025-2028 period. Subsequent to the GRC filing, SCE revised the budget to \$44.3M million for O&M. Based on this revised budget, the O&M costs would be an underrun of (\$3.1M). Underruns were primarily driven by reduced EZ scope (energized/joint-use pole) and lower cost per attributed to lower Contractor unit rates. Capital had an overrun of \$0.7M for drone purchases for the purpose of SCE's UAS 360 inspection program. SCE states that their claimed budget revision reflects updates to the wildfire risk models used for inspection scoping which increasingly emphasized circuit-segment grouping rather than individual structures to improve operational efficiency. SCE also states that this update resulted in higher inspection quantities relative to earlier planning assumptions. When asked to approximate the allocation of the underrun between efficiency gains and increased utilization of T360 inspections, SCE stated that approximately 81% of the underrun was attributable to operational efficiency gains, while the remaining 19% was associated with increased usage of T360 inspections.

Operational Impact and Risk Reduction

SCE exceeded the 2025 target by completing 31,365 structure inspections (31,260 unique ground structures/31,172 unique aerial structures) of transmission facilities, thus achieving the stated 88% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative and exceeded operational targets. SCE stated that approximately 81% of the underrun was attributable to operational efficiency gains, while the remaining 19% was associated with increased usage of T360 inspections, neither of which negatively affected the intended wildfire risk reduction outcomes.

IN-3 – Infrared Inspection of Energized Overhead Distribution Facilities & Equipment

Strategic Overview and Risk Mitigation

This initiative involved evaluating the need for infrared (IR) inspections on distribution circuits to detect conditions that may indicate a wide range of anomalies, including, but not limited to, failing switch and fuse contacts, poor connections, loose bushings, overloaded/failing transformers, and other issues that can result in component failure. SCE set a target of 5,300 circuit miles inspected, aiming to achieve a 60% risk reduction goal.

Financial Performance Analysis

- Planned O&M Budget: \$476,000
- Actual O&M Expenditure: \$606,000
- O&M Variance: \$130,000 (27% Overrun)
- SCE Justification: At the time of the WMP filing in Q1 2023, the 2025 forecast was based on SCE's GRC request covering the 2025-2028 period. Subsequent to the GRC filing, SCE revised the budget for this activity from \$0.476 million to ~\$0.8 million for the year. Based on this revised budget, the costs would be an underrun of (\$0.2M) for the year. This underrun was driven by conservative budgeting assumptions made at the time, as there was uncertainty regarding the timing and availability of a memorandum account for Major Sporting Events (MSE). When the revised budget for this activity was developed, the MSE memo account had not yet been established, and it was unclear when costs could be recorded under that mechanism. As a result, the budget was set slightly higher to account for this uncertainty. SCE was asked to provide specific factors or events that triggered the budget revision from the GRC, and SCE responded that the WMP infrared inspection target was 5,300 miles; however, the released scope is typically set higher to provide operational flexibility and account for unforeseen circumstances. In addition, SCE stated that the budget was revised based on operational considerations and approved in late 2024. SCE was also asked to clarify what portion of the allocated budget was associated with the MSE Memo Account. SCE explained that the MSE Memo Account covered only a limited portion of infrared inspection costs related to specific qualifying activities, while the majority of the program expenditures were funded through base authorized budgets.

Operational Impact and Risk Reduction

SCE exceeded the 2025 target by completing 5,636 circuit miles inspected, thus achieving the stated 60% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, surpassing operation targets. The overrun was primarily driven by conservative budgeting assumptions related to uncertainty surrounding the timing and availability of the Major Sporting Events (MSE) memorandum account when the revised budget was developed. Based on the documentation reviewed, the overrun did not adversely impact implementation quality or the intended wildfire risk reduction outcomes.

IN-4 – Infrared Inspection, Corona Scanning, and High-Definition Imagery of Energized Overhead Transmission Facilities and Equipment

Strategic Overview and Risk Mitigation

This initiative involved the use of specialized infrared and ultraviolet (Corona) imaging technology mounted on helicopters to perform aerial inspections of electrical lines. The inspections focused specifically on identifying potential deficiencies at splices, conductor connection/attachment points, and insulators to support early detection of equipment conditions that could contribute to wildfire ignition risk. SCE set a target of 1,000 circuit miles inspected, aiming to achieve a 59% risk reduction goal.

Financial Performance Analysis

- Planned O&M Budget: \$105,000
- Actual O&M Expenditure: \$211,000
- O&M Variance: \$106,000 (101% Overrun)
- SCE Justification: The 2025 forecast was developed based on historical spend and at a time when the program averaged approximately \$100K per year. Actual 2025 costs were higher primarily due to increased air operations expenses, driven by both a higher number of flight hours and higher variable rates. In addition, more transmission circuits were flown to ensure full coverage of all HFRA circuits. Actual costs also included incremental contract expenses for engineering review services that were not anticipated in the 2023 forecast. SCE was asked to approximate the split of the overrun between the number of flight hours, more transmission circuits flown, and contract expenses for engineering review services. SCE responded that costs related to aircraft operations account for approximately 43%, contract expenses represent approximately 36%, and the remaining portion of the spend is attributable to SCE labor.

Operational Impact and Risk Reduction

SCE exceeded the 2025 target by completing 1,051.70 circuit miles inspected, thus achieving the stated 59% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, surpassing operation targets. The overrun was primarily driven by increased aircraft operation costs, additional transmission circuits flown to ensure full HFRA coverage, and unanticipated engineering review contract expenses without negatively affecting the intended wildfire risk reduction outcomes.

IN-5 – Generation High Fire Risk-Informed Inspections & Remediation

Strategic Overview and Risk Mitigation

This initiative involved inspections for generation-related assets located within HFRA, including powerhouses, substations, and low-voltage ancillary assets, to identify conditions requiring remediation in order to reduce wildfire ignition risk. SCE set a target of inspecting 170 generation related assets in HFRA with a risk reduction goal of 14%.

Financial Performance Analysis

- Planned O&M Budget: \$280,000
- Actual O&M Expenditure: \$69,000
- O&M Variance: -\$211,000 (75% Underrun)
- SCE Justification: These inspections resulted in a higher number of remediations than in prior years. While the forecast included remediation activity, actual costs differed from budget due to optimization in the use of internal resources and vendors, improved scheduling, and more efficient execution as the inspection and remediation program has continued to mature. In addition, inspection costs were lower than expected due to efficiency gains in the inspection process, including increased familiarity of field crews with the assets being inspected. SCE was asked to provide a rationale for a higher number of remediations, yet the initiative was a large underrun. SCE stated that remediation primarily involves vegetation management activities such as tree trimming, removal, and weed clearing to maintain safe clearances around assets. Although inspections identified more notifications in 2025, remediation work follows an established multi-year cadence, with most findings considered lower priority and typically completed within approximately 18 months. The higher remediation volume is not expected to significantly increase costs because the required work is generally less extensive and managed through ongoing program execution. SCE was also asked to approximate the split between inspection costs and remediation costs for this initiative. SCE stated that the approximate split is 15% inspections, 40% remediations, and the remaining 45% is attributable to planning and training.

Operational Impact and Risk Reduction

SCE exceeded the 2025 target by completing 238 generation related asset inspections, thus achieving the stated 14% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, surpassing operation targets. The underrun resulted from the fact that although inspections identified a higher number of remediation notifications, most

findings were lower priority and addressed through an established multi-year remediation cadence, resulting in lower overall costs without negatively affecting the intended wildfire risk reduction outcomes.

IN-8 – Inspection & Maintenance Tools

Strategic Overview and Risk Mitigation

This initiative involved utilizing SAP, an enterprise resource planning software that serves as systems of record for asset inventory and asset conditions. As such, software developed specifically for wildfire mitigation receives master data from SAP, updates data with work order status information, and writes the results of work back to the SAP system. SCE set a target of monitoring utilization of inspection work management tool(s) and making enhancements as necessary. No risk reduction goal was provided with this initiative.

Financial Performance Analysis

- Planned CAPEX Budget: \$2,318,000
- Actual CAPEX Expenditure: \$11,839,000
- CAPEX Variance: \$9,521,000 (411% Overrun)
- Planned O&M Budget: \$812,000
- Actual O&M Expenditure: \$1,342,000
- O&M Variance: \$530,000 (65% Overrun)
- Initiative Total Planned Budget: \$3,130,000
- Initiative Total Actual Expenditure: \$13,181,000
- Initiative Total Variance: \$10,051,000 (321% Overrun)
- SCE Justification: **Capital:** The overrun is attributable to InspectForce and stems from incorporating Distribution Ground, stabilizing and optimizing the Transmission product, adding scope to merge Transmission survey questions into the Distribution survey, and redesigning the survey to address field inspectors' feedback. SCE further clarified that the stabilization and optimization of the Transmission product contributed to 0% of the total overrun but was included for visibility and was spent within the 2025 CAPEX Planned amount. **O&M:** At the time of 2025 GRC forecasting (which is the basis of the 2025 planned budget), InspectApp was planned to sunset by the end of 2024; however, continued operational support was required for the InspectApp application in 2025 while the application transitions to Salesforce Field Service Mobile under InspectForce. Also, InspectForce required continued operational support to ensure quality of the tool. SCE was asked to approximate the split of the CAPEX overrun. SCE stated that the incorporation of Distribution Ground accounts for approximately 80%, adding scope to merge Transmission/Distribution surveys accounts for approximately 10%, and redesigning the survey to address field inspectors' feedback accounts for the remaining 10%. SCE states that InspectApp is currently anticipated to fully sunset by the end of 2029.

Operational Impact and Risk Reduction

Although no risk reduction goal was established for this initiative, SCE did not meet the stated target due to continued work on the system execution plan and engineering specifications. SCE

continues to optimize execution in support of an April go-live date and monitoring and reporting the use of the new inspection platform is anticipated to begin in April through the end of June.

Assessment and Conclusion

The 321% budget overrun reflects both scope expansion and extended implementation timeline rather than a single control failure. The primary driver, incorporation of Distribution Ground (80% of CAPEX overrun), represents a material scope addition beyond the original initiative definition. Additionally, the O&M overrun was driven by an unplanned extension of InspectApp support due to delayed transition to Salesforce Field Service Mobile.

SCE did not meet the target goal for this initiative. The overrun occurred due to expanded InspectForce scope, including integration of Distribution Ground, survey redesigns based on field feedback, and continued operational support for both InspectApp and InspectForce during the transition to Salesforce Field Service Mobile.

IN-9a – Transmission Conductor & Splice Assessment: Spans with LineVue

Strategic Overview and Risk Mitigation

This initiative involved the use of transmission conductor and splice assessment methods, including LineVue and X-Ray technologies, to supplement existing inspection processes and improve the identification of conductor and splice defects. SCE did not establish a 2025 target nor a risk reduction goal for this initiative. The 2025 EC AIR states that there is no standalone splice remediation activity or spend reflected under this program as all splice related work is now captured and accounted for within the Proactive Splice Shunting Program. In the 2025 WMP update, SCE stated that it is discontinuing its Transmission Conductor Span Assessment initiative (IN-9a) due to its zero percent find rate in 2023 and 2024 as well as the cost and complexity of performing these inspections.

Financial Performance Analysis

- Planned O&M Budget: \$1,793,000
- Actual O&M Expenditure: \$9,000
- O&M Variance: -\$1,784,000 (99% Underrun)
- SCE Justification: The 2025 forecast was developed based on 2022 historical spend, and because this was the first year of the program, limited historical data was available to develop refined cost per unit assumptions. Note that there was 0% find rate in 2023 and 2024. As a result, the planned 2025 activities did not occur under this particular program but was instead assessed through the proactive splice remediation program. The limited costs recorded in 2025 are attributable to residual spend carried over from the prior year. SCE communicated to Energy Safety that this assessment program would be discontinued in 2025 and obtained approval to discontinue IN-9 through the 2025 WMP Update. SCE was asked to provide recorded costs associated with the proactive splice remediation program, and SCE stated that \$1.32 million was spent to proactively splice shunt in 2025.

Operational Impact and Risk Reduction

As the reported O & M expenditure relates to residual spend carried over from 2024, there is no operational or risk reduction impact present for this initiative.

Assessment and Conclusion

SCE stated that it is discontinuing its Transmission Conductor Span Assessment initiative (IN-9a) due to its zero percent find rate in 2023 and 2024 as well as the cost and complexity of performing these inspections. SCE obtained approval from Energy Safety to discontinue IN-9 through the 2025 WMP update.

IN-9b – Transmission Conductor & Splice Assessment: Splices with X-Ray

Strategic Overview and Risk Mitigation

This initiative involved the use of transmission conductor and splice assessment methods, including LineVue and X-Ray technologies, to supplement existing inspection processes and improve the identification of conductor and splice defects. SCE's 2023–2025 WMP states that a 2025 target was to be developed based on an engineering analysis to be performed in 2023 and 2024. SCE did not set a risk reduction goal for this initiative. The 2025 EC AIR states that there is no standalone splice remediation activity or spend reflected under this program as all splice related work is now captured and accounted for within the Proactive Splice Shunting Program. In the 2025 WMP update, SCE stated that it is discontinuing its Transmission Conductor Span Assessment initiative (IN-9a) due to its zero percent find rate in 2023 and 2024 as well as the cost and complexity of performing these inspections.

Financial Performance Analysis

- Planned CAPEX Budget: \$543,000
- Actual CAPEX Expenditure: \$0
- CAPEX Variance: \$543,000 (100% Underrun)
- SCE Justification: The 2025 forecast was developed based on 2022 historical spend, and because this was the first year of the program, limited historical data was available to develop refined cost per unit assumptions. Note that there was 0% find rate in 2023 and 2024. As a result, the planned 2025 activities did not occur under this particular program but was instead assessed through the proactive splice remediation program. SCE communicated to Energy Safety that this assessment program would be discontinued in 2025 and obtained approval to discontinue IN-9 through the 2025 WMP Update.

Operational Impact and Risk Reduction

There is no standalone splice remediation activity reflected under this program as all splice related work is now captured and accounted for within the Proactive Splice Shunting Program. Therefore, no operational or risk reduction impact is present for this initiative.

Assessment and Conclusion

SCE stated that it is discontinuing its Transmission Conductor Span Assessment initiative (IN-9) due to its zero percent find rate in 2023 and 2024 as well as the cost and complexity of performing

these inspections. SCE obtained approval from Energy Safety to discontinue IN-9 through the 2025 WMP update.

SH-1 – Covered Conductor

Strategic Overview and Risk Mitigation

This initiative involved installation of covered conductor to maintain, strengthen, and upgrade electrical equipment and infrastructure to reduce the risk of fire ignitions in the HFRA. SCE set a target of installing 500 circuit miles of covered conductor, aiming to achieve a 49.8% risk reduction goal.

Financial Performance Analysis

- Planned CAPEX Budget: \$489,975,000
- Actual CAPEX Expenditure: \$598,280,000
- CAPEX Variance: \$108,305,000 (22% Overrun)
- Planned O&M Budget: \$899,000
- Actual O&M Expenditure: \$5,000
- O&M Variance: -\$894,000 (99% Underrun)
- Initiative Total Planned Budget: \$490,874,000
- Initiative Total Actual Expenditure: \$598,285,000
- Initiative Total Variance: \$107,411,000 (22% Overrun)
- SCE Justification: SCE stated that the approximately \$108 million CAPEX overrun was primarily driven by completing 63 additional circuit miles due to favorable weather conditions, contributing approximately \$44 million in additional costs. Another approximately \$43 million was attributed to increased cost per mile associated with higher helicopter usage, exception-time activities, contractor spending, and related overhead costs, although SCE did not further separate these categories individually. The remaining approximately \$21 million was associated with higher rollover and trailing costs from prior-year work. Regarding the \$5K O&M mischarge, SCE explained that the costs were related to a Class B T&D inventory material and were reallocated through PowerPlant overhead across multiple T&D construction projects rather than assigned to a specific initiative ID. SCE also confirmed that there was no O&M remediation spending in 2025 related to construction standards.

Operational Impact and Risk Reduction

SCE exceeded its operational target, installing 706 circuit miles of covered conductor, thus achieving the stated the 49.8% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The overrun was primarily driven by completion of 63 additional circuit miles due to favorable weather conditions, resulting in approximately \$44 million in additional costs. SCE also reported approximately \$43 million in increased cost per mile associated with higher helicopter usage, exception-time activities, contractor spending, and related overhead costs required to perform work in rugged terrain and

support aerial operations and pole replacements. An additional approximately \$21 million was attributed to rollover and trailing costs from prior-year work. SCE further clarified that the \$5K O&M variance was a procurement mischarge related to T-body devices and not actual 2025 construction standards remediation spending. This overrun had no negative effects on intended wildfire risk reduction outcomes.

SH-2 – Undergrounding Overhead Conductor

Strategic Overview and Risk Mitigation

This initiative involved undergrounding existing overhead power lines to significantly reduce wildfire and PSPS risk by significantly reducing the possibility for objects to contact energized conductor as well as greatly limiting the ignition-causing potential from equipment failures. SCE set a target of converting 30 circuit miles of overhead to underground, aiming to achieve a 98% risk reduction goal.

Financial Performance Analysis

- Planned CAPEX Budget: \$317,078,000
- Actual CAPEX Expenditure: \$127,297,000
- CAPEX Variance: -\$189,781,000 (60% Underrun)
- SCE Justification: The underrun is primarily attributable to the implementation of a cost-efficiency plan and a reduction to the budget following the GRC filing. As part of this effort, SCE refined construction standards for targeted undergrounding, resulting in savings related to design, materials, and other system-hardening efficiencies. In addition, at the time of the WMP filing in Q1 2023, the 2025 forecast was based on SCE's GRC request covering the 2025-2028 period. That forecast included a higher number of planned miles than was ultimately authorized by the CPUC in SCE's 2025 GRC. SCE was asked to provide details on refined Construction Standards (what changed and how did it save costs) and to confirm that the quality of undergrounding has been maintained with the revision of construction standards. SCE stated that it updated its underground design standards in 2025 to improve efficiency, constructability, and execution speed while reducing overall project costs. The revised standards reduced major civil construction cost drivers through streamlined designs, reduced material usage, optimized system configurations, and fewer field changes. SCE also stated that the revised standards maintained existing engineering, safety, and quality requirements, and that there has been no reduction in the quality or integrity of underground installations.

Operational Impact and Risk Reduction

SCE exceeded its operational target, converting 45 circuit miles of overhead to underground, thus achieving the stated 98% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The underrun was primarily driven by implementation of a cost-efficiency plan that refined targeted undergrounding construction standards, resulting in savings related to design, materials, and system-hardening

efficiencies. The underrun was also impacted by the CPUC ultimately authorizing fewer planned miles than originally forecasted in SCE's GRC filing. This underrun had no negative effects on intended wildfire risk reduction outcomes.

SH-5 – Remote Controlled Automatic Reclosers Setting Update

Strategic Overview and Risk Mitigation

This initiative involved installing and upgrading Remote Controlled Switches (RCS) and Remote Automatic Recloser (RAR) devices to improve operational flexibility and reduce wildfire risk associated with distribution circuits. SCE set a target to install five RAR/RCS sectionalizing devices, aiming to achieve a 33% risk reduction goal.

Financial Performance Analysis

- Planned CAPEX Budget: \$7,201,000
- Actual CAPEX Expenditure: \$2,732,000
- CAPEX Variance: -\$4,469,000 (62% Underrun)
- SCE Justification: The 2025 WMP budget for RAR installations was developed in 2022 using historical average assumptions, including prior-year device installation volumes. Because PSPS de-energizes entire circuits or geographic areas under extreme conditions, the scope of RAR installations is influenced by the number of circuits subject to PSPS events. In contrast, RARs allow utilities to isolate only the affected segment of a feeder (i.e., turn off power only where an issue occurs), while keeping the power on for surrounding areas. As a result, actual unit counts and completed work in 2025 were lower than forecasted due to fewer PSPS-impacted circuits than what was originally assumed. The IE noted that the target was 5 RARs and SCE completed 13 in 2025. The explanation in the 2025 EC AIR mentions the budgeted amount being based on a higher estimated RAR count than the target of 5 and/or completion of 13. SCE was asked to provide details on how this budget was determined (was the budget based on the strive target of 17?). SCE stated that the budget was developed using a historical average of approximately 17 RAR installations, which served as the basis for the strive target. SCE explained that actual RAR installation volumes are driven by the number of circuits subject to PSPS events, which can vary year to year, and that the historical activity level was used to estimate expected installations when the budget was established.

Operational Impact and Risk Reduction

SCE exceeded its operational target, installing a total of 13 RAR/RCS sectionalizing devices, thus achieving the stated 33% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The underrun occurred because actual RAR installation volumes in 2025 were lower than forecasted due to fewer PSPS-impacted circuits than originally assumed when the budget was developed using historical installation averages. The underrun had no negative effects on intended wildfire risk reduction outcomes.

SH-8 – Transmission Open Phase Detection

Strategic Overview and Risk Mitigation

This initiative involved Transmission Open Phase Detection (TOPD) which is designed to facilitate the detection and de-energization of an open phase condition, such as a broken transmission conductor, before the conductor can contact a grounded object and create a fault event with potential wildfire ignition risk. SCE states a 2025 target is to be determined based on further evaluation and SCE did not set a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned O&M Budget: \$0
- Actual O&M Expenditure: \$334,000
- O&M Variance: \$334,000 (100% Overrun)
- SCE Justification: The 2025 budget was developed in 2022 to support the filing of the 2023-2025 WMP in Q1 2023. At the time of budget development, SCE anticipated that the software logic for Transmission Open Phase Detection (TOPD) would be deployed and that the program would conclude by the end of 2024; therefore, no budget was included for TOPD activities in 2025. Following the WMP filing and based on further evaluation, SCE determined that enhancements to the software logic were appropriate and is upgrading the logic across TOPD locations in HFRA to deploy a higher-sensitivity algorithm. This updated enhanced sensitivity algorithm improves overall detection performance and minimizes false operations.

Operational Impact and Risk Reduction

SCE states that they completed the final evaluation report and deployed TOPD logic at seven (7) locations consistent with the final evaluation. Upon receipt of a TOPD alarm, grid operations personnel are then responsible for verifying the nature of the event, validating the alarm condition, and determining the appropriate operational response based on system conditions, supporting the overall goal of wildfire mitigation.

Assessment and Conclusion

SCE effectively completed this initiative, achieving improved wildfire mitigation outcomes. The overrun occurred because SCE originally expected the Transmission Open Phase Detection (TOPD) program to conclude by the end of 2024 and therefore did not budget for 2025 activities. Following further evaluation, SCE implemented enhanced higher-sensitivity software logic upgrades across TOPD locations in HFRA to improve detection performance and reduce false operations.

SH-10 – Tree Attachments Remediation

Strategic Overview and Risk Mitigation

This initiative involved removing the electrical equipment attached to trees and install the equipment on new fire-resistant poles to reduce ignition driver risks. SCE did not state a 2025 target for this initiative but aimed to achieve a 22% risk reduction goal.

Financial Performance Analysis

- Planned CAPEX Budget: \$10,570,000
- Actual CAPEX Expenditure: \$1,843,000
- CAPEX Variance: -\$8,727,000 (83% Underrun)
- SCE Justification: Tree Attachment costs were below planned budget due to weather, permitting, and execution constraints. Several projects could not proceed as planned because work is still pending design reviews and approvals from the National Park Service, Caltrans, and the U.S. Forest Service. Seasonal conditions in Sequoia National Park (specifically camping and snow restrictions) also limited access. In addition, the Park's planned housing development in the project area may delay remaining work until after 2026. Caltrans' limited staffing has further slowed application processing.

Operational Impact and Risk Reduction

SCE confirmed the balance of 141 tree attachments were in the scope for this initiative and 34 were completed in 2025. SCE states that 107 remediations are scheduled for 2026 or beyond due to various issues such as permitting delays, environmental restrictions, and government lands approvals, thus the 22% risk reduction goal was not achieved.

Assessment and Conclusion

SCE did not effectively complete this initiative and the underrun occurred because Tree Attachment projects were delayed by weather, permitting, and execution constraints, including pending approvals from the National Park Service, Caltrans, and the U.S. Forest Service, seasonal access restrictions in Sequoia National Park, potential delays related to planned park housing development, and limited Caltrans staffing for application processing. Due to these issues, the underrun had negative effects on intended wildfire risk reduction outcomes.

SH-14 – Long Span Initiative (LSI)**Strategic Overview and Risk Mitigation**

This initiative involved the installation of line spacers on segments that are at heightened risk of wire-to-wire contact. SCE set a target of 1,000 spans remediated, aiming to achieve a 4% risk reduction goal.

Financial Performance Analysis

- Planned CAPEX Budget: \$4,376,000
- Actual CAPEX Expenditure: \$1,739,000
- CAPEX Variance: -\$2,637,000 (60% Underrun)
- Planned O&M Budget: \$4,123,000
- Actual O&M Expenditure: \$670,000
- O&M Variance: -\$3,453,000 (84% Underrun)
- Initiative Total Planned Budget: \$8,499,000
- Initiative Total Actual Expenditure: \$2,409,000
- Initiative Total Variance: -\$6,090,000 (72% Underrun)

- **SCE Justification:** SCE stated that the revised O&M and Capital budgets were driven by anticipated higher volumes of line spacer installations and updated per-unit cost assumptions reflecting expected future costs. The revised budgets were formally approved through SCE's 2025 operating planning process completed in 2024 after the GRC filing. SCE also noted that actual 2025 expenditures were lower than the revised budget due to efficiency gains achieved through bundling work activities and reducing repeat crew dispatches. Regarding the bundled approach, SCE explained that line clashing mitigation is addressed through multiple remediation methods identified through LiDAR analysis and engineering review, including ridge pins, box construction, wider crossarms, interset poles, line spacers, covered conductor installation, pole replacement, and preventative maintenance. SCE identified Covered Conductor (tracking ID SH-1) as one associated program and confirmed that remediation costs are recorded under the specific program or initiative performing the work, with costs accounted for under the appropriate initiative to the best of SCE's knowledge.

Operational Impact and Risk Reduction

SCE successfully completed 1,102 remediated spans, thus achieving the stated 4% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The underrun occurred because actual line spacer installation costs were lower than the revised budget due to efficiency gains from bundling work activities, which reduced repeat crew dispatches. Additional remediation work was also addressed through other programs, such as Covered Conductor installations and preventative maintenance activities. This underrun had no negative effects on intended wildfire risk reduction outcomes.

SH-16 – Vibration Damper Retrofit

Strategic Overview and Risk Mitigation

This initiative involved installing vibration dampers to stop wind-driven vibration (known as Aeolian vibration) that may lead to conductor abrasion or fatigue over time. SCE set a target of retrofitting vibration dampers on 600 structures, aiming to achieve a 20% risk reduction goal.

Financial Performance Analysis

- Planned CAPEX Budget: \$244,000
- Actual CAPEX Expenditure: -\$534,000
- CAPEX Variance: -\$778,000 (319% Underrun)
- **SCE Justification:** The underrun is due to an accounting issue, as approximately \$0.818 million in costs associated with Vibration Dampers were recorded to a different activity under capital distribution preventative and breakdown maintenance. SCE is reviewing these charges to correct the accounting treatment. SCE was asked to provide an initiative ID (if available) where the \$0.818 was captured and to provide an update if this accounting error has been remediated through the proper channels. SCE stated that the costs were

recorded under Distribution capital preventative maintenance (IN-1.1) and were properly accounted for under this initiative. SCE states that with that correction, the result is approximately \$40,000 overspend in capital expenditures.

Operational Impact and Risk Reduction

SCE exceeded its operational target, installing vibration dampers on 725 structures, thus achieving the stated 20% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The underrun was caused by an accounting issue in which approximately \$0.818 million in Vibration Damper costs were recorded under Distribution capital preventative maintenance (IN-1.1) rather than this activity. SCE stated the costs were properly accounted for under IN-1.1. This underrun had no negative effects on intended wildfire risk reduction outcomes.

SH-17 – Rapid Earth Current Limiters (REFCL)(Ground Fault Neutralizer [GFN])

Strategic Overview and Risk Mitigation

This initiative involved deploying Rapid Earth Fault Current Limiter (REFCL) technology to detect ground faults as small as a half ampere on one phase of a three-phase powerline. SCE set a target of completing construction of GFN at two substations, aiming to achieve a 49% risk reduction goal.

Financial Performance Analysis

- Planned CAPEX Budget: \$40,090,000
- Actual CAPEX Expenditure: \$44,319,000
- CAPEX Variance: \$4,229,000 (11% Overrun)
- Planned O&M Budget: \$250,000
- Actual O&M Expenditure: \$4,000
- O&M Variance: -\$246,000 (98% Underrun)
- Initiative Total Planned Budget: \$40,340,000
- Initiative Total Actual Expenditure: \$44,323,000
- Initiative Total Variance: \$3,983,000 (10% Overrun)
- SCE Justification: The capital budget was based on completion of two Ground Fault Neutralizers (GFNs) at substations. The overrun is due to SCE meeting its WMP target for the year and initiating engineering and construction for future GFNs. The O&M budget is for routine maintenance and event investigations. The equipment only saw a few events that required a crew to be dispatched to investigate the event.

Operational Impact and Risk Reduction

SCE exceeded its operational target by completing construction of GFN at four substations, thus achieving the stated 49% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The capital overrun occurred because SCE met its WMP target for completing two Ground Fault Neutralizers and also initiated engineering and construction activities for future GFN installations. O&M costs were lower than expected (underrun) because only a few equipment events required field investigation and crew dispatches. The capital overrun had no negative effects on intended wildfire risk reduction outcomes.

SH-18 – Rapid Earth Current Limiters (REFCL) – Grounding Conversion

Strategic Overview and Risk Mitigation

This initiative involved projects at small substations or applied at the distribution circuit level to convert the existing electric system to operate either ungrounded or resonant grounded without the use of GFN. SCE set a target of identifying four locations for grounding conversion (subject to land availability). No risk reduction goal was established for this initiative.

Financial Performance Analysis

- Planned CAPEX Budget: \$5,706,000
- Actual CAPEX Expenditure: \$1,231,000
- CAPEX Variance: -\$4,475,000 (78% Underrun)
- Planned O&M Budget: \$250,000
- Actual O&M Expenditure: \$52,000
- O&M Variance: -\$198,000 (79% Underrun)
- Initiative Total Planned Budget: \$5,956,000
- Initiative Total Actual Expenditure: \$1,283,000
- Initiative Total Variance: -\$4,673,000 (78% Underrun)
- SCE Justification: Capital grounding conversion costs were below planned budget due to delays in obtaining easements, rights checks, and environmental clearances. Three projects (North Bay, Sophie, and Rustic) were completed in 2025. The Alola project was delayed due to restricted access to easements and is awaiting a field assessment by the City of Banning (COB). In addition, the Converse Flats project is tied to a rebuild effort and is pending Government Lands clearance in Big Bear. O&M planned budget covered routine maintenance and event investigations. SCE maintains funds for event investigations, though these events may or may not occur in a given year. Only a few events required investigation in 2025. As installation volumes continue to grow, SCE anticipates an increase in the number of events over time. Regarding maintenance, most installations are new, so minimal maintenance was required on the equipment.

Operational Impact and Risk Reduction

SCE did not meet the stated target, confirming that three of four grounding conversions were completed, but the outstanding grounding conversion is awaiting a field assessment by the City of Banning.

Assessment and Conclusion

SCE did not complete this initiative; however, it is noted that completion of this initiative lies solely in obtaining a completed field assessment by the local jurisdiction. The underrun occurred because several grounding conversion projects were delayed by easement access issues, rights checks, environmental clearances, and pending government approvals. O&M costs were also below budget because few equipment events required investigation and minimal maintenance was needed for the newly installed equipment.

4.1.3 Synthesis of Findings

4.1.3.1 Initiative Review

The Grid Design, Operations, and Maintenance category demonstrated substantial wildfire risk reduction performance in 2025, with the majority of initiatives exceeding their established targets. Seven of fourteen applicable initiatives surpassed their 2025 targets, including notable overperformance in system hardening programs: Covered Conductor (141% of target), Targeted Undergrounding (150% of target), Vibration Damper Retrofit (121% of target), and Ground Fault Neutralizer installations (200% of target). The primary risk reduction shortfall stems from the incomplete SH-10 program, where only 24% of planned tree attachment remediations were completed, leaving 107 high-risk tree-mounted equipment installations unaddressed in 2025.

SCE failed to meet targets for five initiatives in 2025 within this category. For both IN-1.1 and IN-1.2, SCE provided Measuring Documents from SAP that confirmed when inspections were performed and what equipment was inspected, but failed to provide any documentation of inspection outcomes, findings, or remediation requirements. The IE noted: "The documentation provided to the IE confirmed when the inspection was performed, however, no details on what was inspected and the inspection outcome was provided." No inspection report criteria, methodology, or defined inspection parameters were provided for IE review, preventing verification that inspections were performed according to established program standards.

IN-8 did not achieve its target of monitoring utilization of inspection work management tools, with SCE reporting extended work on system execution plans, engineering specifications, and quality verifications that delayed the anticipated January go-live date. Monitoring and reporting, originally planned for 2025, was pushed to a Q1 2026 timeframe. SH-10 completed only 34 of the 141 targeted tree attachment remediations (24% completion rate), with 107 remediations deferred to 2026 or beyond due to permitting delays, environmental restrictions, and government lands approvals. SH-18 completed 3 of 4 targeted conversions (75% completion rate), with the outstanding conversion delayed pending administrative assessment by the City of Banning.

IN-9b did not match the standards and scope outlined in the WMP. Data provided by SCE and the statement in the 2025 EC AIR can be verified for evidence of completed shunt installations and documented results of the completed engineering analysis. However, no documentation was provided demonstrating implementation of X-Ray Inspections, an initiative parameter explicitly required by Section 8.1.3.8 of the WMP, therefore resulting in a failure to implement WMP requirements.

A recordkeeping issue was identified in SH-1, where SCE's reporting metric (continuous "Circuit Miles") fundamentally misaligns with its tracking methodology (individual structure points tied to isolated work orders). The IE noted this creates inefficiencies in compliance validation and limits SCE's ability to leverage the data for internal wildfire risk modeling and PSPS threshold adjustments.

4.1.3.2 Funding Verification

Budget and Expenditure Summary: The Grid Design, Operations, and Maintenance category had a total CAPEX planned budget of \$878,101,000 with actual expenditures of \$789,438,000, representing a 10.10% variance below budget, and a total O&M planned budget of \$60,490,000 with actual expenditures of \$57,286,000, representing a 5.30% variance below budget. The category's overall expenditure remained within 10% of the planned budget.

Initiatives With Significant Variances: Of the 17 total initiatives in this category, 16 (94%) had absolute percent differences exceeding 10%. Several initiatives substantially exceeded planned budgets due to expanded operational execution or additional scope.

- The most significant overrun occurred under SH-1 Covered Conductor, where CAPEX expenditures exceeded the planned budget by approximately \$108.3 million. This overrun was primarily driven by favorable weather conditions that enabled completion of 63 additional circuit miles, increased helicopter usage, exception-time work, contractor spending, and rollover costs from prior-year activities.
- IN-8 Inspection & Maintenance Tools experienced a substantial overrun due to expanded InspectForce development scope, integration of Distribution Ground functionality, survey redesigns, and continued operational support for both InspectApp and InspectForce during the transition to Salesforce Field Service Mobile.

Several initiatives experienced major underruns associated with improved efficiencies, revised construction standards, delayed project execution, or discontinued programs.

- SH-2 Undergrounding Overhead Conductor experienced a \$189.8 million CAPEX underrun primarily due to implementation of cost-efficiency measures, revised underground construction standards, and the CPUC ultimately authorizing fewer undergrounding miles than originally forecasted.
- Additional significant underruns occurred under SH-10 Tree Attachments Remediation and SH-18 Grounding Conversion due to permitting delays, environmental restrictions, easement issues, and government approval constraints.

Key Trends and Funding Compliance: Several consistent trends emerged throughout the funding verification review.

- Many variances were linked to evolving wildfire mitigation strategies and operational maturity following the original GRC forecasts developed in 2022 and early 2023. SCE repeatedly cited revised planning assumptions, updated wildfire risk models, expanded operational scope, and refined engineering standards as primary drivers of budget

deviations. These changes generally reflected adaptive program management rather than uncontrolled spending.

- Operational efficiencies frequently contributed to underruns without reducing wildfire mitigation effectiveness. Bundled work activities, lower contractor unit rates, improved field familiarity, optimized scheduling, streamlined underground construction standards, and reduced repeat dispatches allowed SCE to complete or exceed operational targets while reducing overall expenditures. Multiple initiatives demonstrated that lower-than-planned costs were achieved while still meeting or surpassing risk reduction goals.
- Several overruns were associated with accelerated or expanded wildfire mitigation execution. Favorable weather conditions enabled increased construction productivity for Covered Conductor installations, while expanded inspections, enhanced software functionality, and additional transmission coverage increased operational costs in other programs. In most cases, these increased expenditures directly supported expanded wildfire mitigation activity and improved operational performance.
- External dependencies significantly impacted several initiatives. Permitting delays, environmental restrictions, easement access limitations, National Park Service approvals, Caltrans staffing constraints, and government land clearances contributed to schedule delays and underruns in multiple infrastructure projects. These constraints were particularly evident within SH-10 Tree Attachments Remediation and SH-18 Grounding Conversion.

SCE frequently provided detailed explanations regarding budget revisions, cost reallocations, accounting mischarges, and initiative restructuring. In several cases, SCE clarified that expenditures were properly captured under alternate initiatives or preventative maintenance programs and confirmed that no reduction in engineering quality, safety standards, or wildfire mitigation effectiveness occurred as a result of budget variances. Overall, the documentation reviewed generally supports that wildfire mitigation expenditures were associated with legitimate operational, engineering, and programmatic needs and that, with limited exceptions, funding variances did not adversely impact intended wildfire risk reduction outcomes.

4.2 VEGETATION MANAGEMENT AND INSPECTIONS

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.2.1 Initiative Summary Table

Table 24: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ¹⁹	Sample Validation Rate (%) ^{20, 21}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{22, 23}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
VM-1, 8.2.3.4.1, Hazard Tree Mitigation Program (HTMP)	440 Grids/Circuits	526 Grids/Circuits	Completed	110 Grids/Circuits	100%	Field Evaluation Geodatabase File (DR001)	120%	\$44,037	\$11,919 (-72.9%)	Yes (63%) (70% SRA/HC)
VM-2, 8.2.3.1.1, Structure Brushing	63,700 Structures	157,665 Structures	Completed	138 Structures	87%	Structure Brushing List (Frontload Data) 138 Brushing Records (DR036)	215%	\$26,197	\$24,437 (-6.7%)	Yes (63%) (84% SRA/HC)
VM-3, 8.2.3.3.2, Expanded Clearances for Generation Legacy Facilities	Vegetation Maintenance at 48 Sites	Vegetation Maintenance at 63 Sites	Completed	23 Sites	100%	Expanded Clearance for Legacy Facilities List (Frontload Data) 23 Site Records (DR037)	131%	\$450	\$414 (-8.0%)	Yes (25%)
VM-4, 8.2.3.4.2, Dead & Dying Tree Removal	536 Grids/Circuits	600 Grids/Circuits	Completed	113 Grids/Circuits	100%	Field Evaluation Geodatabase File (DR001)	112%	\$28,686	\$7,433 (-74.1%)	Yes (100%) (77% SRA/HC)
VM-6, Vegetation Management Work Management Tools (Arbora)	Monitor stabilization of Arbora and continue execution of plan to enable additional VM maintenance programs	SCE met target. Arbora has monitored stabilization and continued execution of plan to enable additional VM maintenance programs.	Completed	N/A	N/A	Arbora Work Management Tool (SAD & SES) (Frontload Data)	100%	\$6,637	\$4,507 (-32.1%)	N/A

¹⁹ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
²⁰ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
²¹ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.
²² The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.
²³ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.



Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ¹⁹	Sample Validation Rate (%) ^{20, 21}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{22, 23}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$) and % from budget)	Satisfied Risk Reduction Goal?
VM-7, 8.2.3.3.1, Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Distribution Lines in HFRA	770 Grids/Circuits	789 Grids/Circuits	Completed	118 Grids/Circuits	100%	Vegetation Detailed Inspections List (Frontload Data) SCE Written Response 118 Inspection Records (DR040)	93% ²⁴	\$224,988	\$204,737 (-9.0%)	Yes (100%) (75% SRA/HC)
VM-8, 8.2.3.3.1, Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Transmission Lines in HFRA	416 Circuits	448 Circuits	Completed	106 Circuits	100%	Vegetation Detailed Inspections List (Frontload Data) SCE Written Response 106 Inspection Records (DR041)	108%	\$20,956	\$13,120 (-37.4%)	Yes (100%) (75% SRA/HC)
VM-9, 8.2.2.4, LiDAR Distribution Vegetation Inspections	1,020 Circuit Miles	4,031.75 Circuit Miles	Completed	34 Circuit Miles	50%	LiDAR Vegetation Inspections List Distribution (Frontload Data) 34 Circuit Miles of Inspection Records (DR042)	198% ²⁵	\$44,467	\$17,615 (-60.4%)	N/A
VM-10, 8.2.2.4, LiDAR Transmission Vegetation Inspections	1,750 Circuit Miles	2,179.17 Circuit Miles	Completed	34 Circuit Miles	50%	LiDAR Vegetation Inspections List Transmission (Frontload Data) 34 Circuit Miles of Inspection Records (DR043)	62% ²⁶	\$11,132	\$9,918 (-10.9%)	N/A

²⁴ Although all sampling data was validated, the data provided by SCE indicates that 70 grid/circuit inspections were conducted in 2024 and therefore not applicable for target implementation for 2025, resulting in a 93% initiative validation rate. (719 * 1 / 770 = .9337 * 100 = 93.37%) See Section 4.2.2.1, Initiative Review for VM-7.

²⁵ SCE’s sampling data failed to demonstrate whether inspections were performed consistent to SCE’s established inspection documentation standards or whether the inspections were performed in accordance with defined program requirements. Due to this, the IE determined a 50% sample validation rate, resulting in an initiative validation rate of 198% (4,031.75 * .50 = 2,015.875 / 1,020 = 1.976 * 100 = 197.6%). See Section 4.2.2.1, Initiative Review for VM-9.

²⁶ SCE’s sampling data failed to demonstrate whether inspections were performed consistent to SCE’s established inspection documentation standards or whether the inspections were performed in accordance with defined program requirements. Due to this, the IE determined a 50% sample validation rate, resulting in an initiative validation rate of 62% (2,179.17 * .50 = 1,089.585 / 1,750 = .6226 * 100 = 62.26%). See Section 4.2.2.1, Initiative Review for VM-10.



4.2.2 Written Detail for Initiatives

4.2.2.1 Initiative Review – Findings & Method

VM-1 – 8.2.3.4.1 – Hazard Tree Mitigation Program (HTMP) – Focus and Field Verifiable

The Hazard Tree Mitigation Program (HTMP) is a specialized vegetation management initiative designed to reduce the risk of fall-in or blow-in strikes to SCE's electrical assets. Unlike routine line clearing, HTMP specifically targets green or live trees located outside of the standard compliance clearance zone that pose a high risk of failure based on structural integrity, site conditions, or tree lean severity (WMP Page 418). SCE's 2025 WMP established a baseline target of inspecting and mitigating 440 grids/circuits. According to both the QDR4/T1 planning data and the EC AIR, the utility successfully completed 526 grids/circuits, exceeding the target by approximately 20 percent. To validate the accuracy of this reported completion, the Independent Evaluator (IE) established a statistical sample target of 110 locations, supported by a pre-drawn alternate sample pool of 28 locations.

To conduct the evaluation, the IE utilized spatial shapefiles alongside the initial population data provided under formal data request DR001. Field verification was executed via site visits utilizing geo-referenced photography to confirm that executed mitigations met the WMP criteria. Specifically, the IE documented visual evidence of tree removals (validated by the presence of identified tree stumps, large logs retained on-site, and recently disturbed earth/backfill) and hazard trimming (validated by visible canopy reductions and targeted branch removal). All mitigations were evaluated against SCE's Utility Vegetation Management procedure UVM-04 ("Hazard Tree Management Plan").

During the assessment period, standard access constraints typical of remote High Fire Threat Districts (HFTD), including locked gates and closed roads, rendered 21 initially selected locations inaccessible. To maintain the statistical validity of the sample size and secure the required verifications, the IE systematically transitioned to the pre-drawn alternate sample pool. Through this over-allocation strategy, the final verified sample composition consisted of 140 total locations: 85 locations in HFTD Tier 3, 42 locations in HFTD Tier 2, and 13 locations in Non-HFTD areas. Field assessments specifically reviewed accuracy against SCE's initiative description; no data discrepancies or adherence issues were identified during the validation process.

Representative field conditions, including stump verification and canopy reduction, are evidenced in Figure 11: Example Hazard Tree Mitigation Program below.

Figure 11: Example Hazard Tree Mitigation Program



Verified hazard trimming and targeted canopy reduction (ID: H08587592001)

Visual evidence of full hazard tree removals, validated by the presence of identified stumps. Top ID: H09542545014. Bottom ID: 4ab27c47-44d1-4902-a4d0-6d80a5ad8bf7

Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 25: VM-1 Hazard Tree Mitigation Program

2025 Target	2025 EC AIR	2025 Q4 QDR	DR001 Response	Initiative Validation Rate
440 Grids/Circuits	526 Grids/Circuits	526 Grids/Circuits	526 Grids/Circuits	120%

VM-2 – 8.2.3.1.1 Structure Brushing – Focus and Non-Field Verifiable

Vegetation at the base of poles and structures can provide the fuel needed to convert a spark from equipment failure into a wildfire. This vegetation can also support fire propagation, especially during dry and windy conditions. VM-2 outlines SCE’s initiative to remove vegetation around all poles and structures subject to PRC 4292 in State Responsibility Areas, while targeting additional distribution poles outside of these areas in HFRA for risk mitigation.

SCE’s 2023–2025 WMP established a 2025 target of inspecting and clearing 63,700 structures under this initiative, with an associated risk reduction goal of 62%. According to SCE’s 2025 AIR, a total of 157,665 structures received structure brushing remediation. This represents a substantial increase over the planned target and indicates that SCE achieved remediation activities at more than double the anticipated volume.

In support of VM-2, SCE provided an Excel spreadsheet titled “VM-2 Structure Brushing” which contains 157,665 records with associated details such as structure ID, longitude/latitude, HFTD Class, Remediation End Date, Circuit ID, and Circuit Name.

In data request DR036, the utility was asked to provide documentation of completion for 138 structure brushing locations/activities which consisted of 5 from non-HFTD, 36 from Tier 2-HFTD and 97 from Tier 3-HFTD. The utility provided “Structure Brushing 2025” reports for all 138 samples requested. Each PDF report contained a vicinity map, environmental information including biological and waters reviews as well as environmental survey results, detailed structure information, photos of the structure facing all directions and of the remediation performed, property information to include if the crews experienced access issues, photos of door hangers if the structure was inaccessible, and property owner information.

Review of the sampling data identified 100 successful clearance work orders, 9 partial clearance, 10 marked as no clearance required, 1 no structure found, and 18 as no access. The 18 identified as no access were due to various factors such as private property access restrictions, overgrown terrain leading to unsafe work conditions, and bug/insect infestation. No clearance work was performed on these 18 poles, and therefore the IE invalidates these samples resulting in an 87% sample validation rate and 215% initiative validation rate due to the large over completion of work.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 26: Structure Brushing

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR036 Response	Initiative Validation Rate
63,700 Structures	157,665 Structures	157,691 Structures	157,665 Structures	215%

VM-3 – 8.2.3.3.2 Projects Expanded Clearances for Legacy Facilities – Non-Focus and Non-Field Verifiable

Legacy facilities comprise SCE’s generation assets located in Tier 2 or Tier 3 HFRA that present a potential ignition risk. These facilities include high-voltage assets such as powerhouses, switchyards, and substations, many of which are located in or near heavily forested areas. Through VM-3, SCE outlines its initiative to reduce the potential for wildfire events associated with these facilities by mitigating vegetation-related ignition risks and reducing the likelihood of faults caused by vegetation contact.

SCE’s 2023–2025 WMP established a 2025 target of inspecting and clearing 48 sites under this initiative, with an associated risk reduction goal of 25%. According to SCE’s 2025 EC AIR, a total of 63 sites were treated and maintained, thus exceeding the 2025 target goal.

In support of VM-3, SCE provided an Excel spreadsheet titled “VM-3 Expanded Clearances for Legacy Facilities” which contained 87 records across 63 unique asset IDs, with associated details such as Asset ID, End Date, HFTD Class, longitude/latitude, Facility Name, Facility Type, and Description of Work.

In data request DR037, the utility was asked to provide documentation of completion for vegetation management for 25 sites which consisted of 2 from non-HFTD, 4 from Tier 2-HFTD and 19 from Tier 3-HFTD. The utility provided an Excel spreadsheet titled “VM-3 Associated Records 2025 Base Sample” which contained a list of 23 records from Tier 2 and 3 HFTD. These records contained granular data to include the Asset ID, End Date, HFTD Class, latitude/longitude, Facility Name, Facility Type, Description of Work, Work Order Number, Inspection Date, Remediation Notes, date scheduled, date completed date of quality control post-treatment inspection, and quality control treatment notes. The IE reviewed this data and found no issues or discrepancies.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 27: Projects Expanded Clearances for Legacy Facilities

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR037 Response	Initiative Validation Rate
48 Sites	63 Sites	63 Sites	63 Sites	131%

VM-4 – 8.2.3.4.2 – Dead and Dying Tree Removal Program – Focus and Field Verifiable

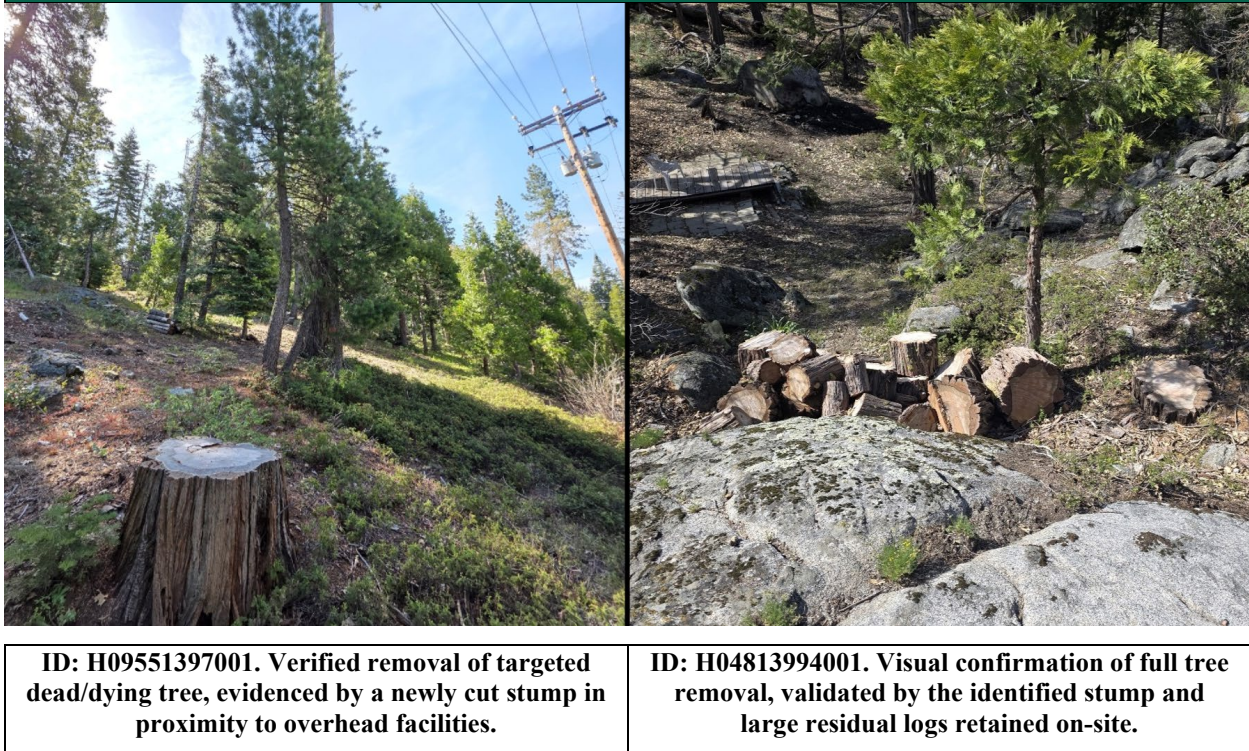
The Dead & Dying Tree Removal program is a critical vegetation management initiative designed to mitigate hazards posed by the epidemic of tree mortality driven by prolonged drought conditions and insect infestation. This program mandates the identification and removal of significantly compromised trees within striking distance of overhead facilities that are either currently dead or expected to die within one year (WMP Page 419). SCE's 2025 WMP established a baseline target of inspecting and mitigating 536 grids/circuits. According to both the QDR4/T1 planning data and the final Annual Implementation Report (AIR), the utility successfully completed 600 grids/circuits, exceeding its target by approximately 12 percent. To validate the accuracy of this reported completion, the Independent Evaluator (IE) established a statistical sample target of 113 locations, supported by a pre-drawn alternate sample pool of 29 locations.

To conduct the evaluation, the IE utilized spatial shapefiles alongside the initial population data provided under formal data request DR_001. Field verification was executed via site visits utilizing geo-referenced photography to cross-reference field conditions against provided spatial coordinates. Because the targeted hazard trees are fully removed during this process, the IE validated completion by documenting specific physical evidence at the sample sites, including newly cut tree stumps aligning with coordinates, large logs, residual vegetative debris, and recently disturbed/backfilled earth indicative of heavy removal operations. All mitigations were verified for spatial proximity to potential strike zones and evaluated against SCE's governing standard, UVM-18 ("Assessment and Removal of Dead and Dying Trees").

During the assessment period, 16 initially selected locations were deemed inaccessible due to standard field constraints. To overcome these access barriers and maintain statistical validity, the IE field teams deployed an aggressive over-allocation strategy, executing a total of 188 field location reviews. By preferentially drawing replacement and supplemental samples from the highest-risk mitigation zones, the IE successfully captured and verified a total of 172 locations, significantly exceeding the 113-location minimum requirement. This strategic transition resulted in a final verified sample composition consisting of 119 locations in HFTD Tier 3, 31 locations in HFTD Tier 2, and 22 locations in Non-HFTD areas. Field assessments specifically reviewed accuracy against SCE's initiative description; no data discrepancies or adherence issues were identified.

Representative field conditions and verified removal evidence are documented in Figure 12: Example Tree Stump and Tree Removal Evidence below.

Figure 12: Example Tree Stump and Tree Removal Evidence



Based on this analysis, the documentation provided, and the field-sample inspections, the IE has validated this initiative.

Table 28: Dead and Dying Tree Removal

2025 Target	2025 EC AIR	2025 Q4 QDR	DR001 Response	Initiative Validation Rate
536 Grids/Circuits	600 Grids/Circuits	600 Grids/Circuits	600 Grids/Circuits	112%

VM-6 – 8.2.4 Vegetation Management Work Management Tool - Arbora – Non-Focus and Non-Field Verifiable

This initiative outlines SCE’s plan to transition legacy work management systems for vegetation management activities to the Arbora system. SCE states that integrating all legacy systems into Arbora will help to optimize day-to-day operations and improve data accuracy.

SCE’s 2023–2025 WMP established a 2025 target to monitor the stabilization of Arbora and to continue the execution of a plan to enable additional VM maintenance programs. SCE did not set a risk reduction goal for this initiative. According to SCE’s 2025 EC AIR, the status of this initiative is complete and SCE monitored Arbora and continued execution of the plan to enable additional VM maintenance programs.

In support of VM-3, SCE provided a 7-page document entitled “VM-6 YE Evidence.” This document contained screenshots from Solution Architecture Definition (SAD) for the Arbora system, version 1.3, dated February 6, 2025. The SAD demonstrates how the systems, software, data, integration, devices, hardware, and security are organized to form a complete solution. A screenshot of the Solution Engineering Specification (SES) for the Arbora system, version .1, dated August 3, 2025 was also provided. The SES is a formal document that defines the technical requirements, design criteria, and performance expectation a system should meet.

Screenshots of the Field Maps Tool, mobile design documents, and a sample of a contractor assigned routine work activity (canopy assignment) within the Arbora system was also demonstrated. The system assigns a job assignment number and there are inspection details, asset details, and unique canopy names that can be selected for inspection.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 29: Vegetation Management Work Management Tool - Arbora

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Response	Initiative Validation Rate
Monitor stabilization of Arbora and continue execution of plan to enable additional VM maintenance programs.	Complete	Complete	VM-6 YE Evidence	100%

VM-7 – 8.2.3.3.1 Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Distribution Lines in HFRA – Focus and Non-Field Verifiable

Expanded line clearances are implemented to mitigate the risk of vegetation contacting energized conductors and associated electrical infrastructure. These clearance activities are intended to reduce both grow-in and fall-in potential, which may create ignition risks to SCE equipment and facilities, particularly within HFRA. SCE utilizes the Grid Resiliency Clearance Distance (GRCD) standard to determine whether expanded vegetation clearances have been achieved. Once GRCD standards have been historically established in a given area, SCE’s vegetation management strategy is to maintain those enhanced clearances on an ongoing basis to support long-term grid resiliency and wildfire risk reduction.

SCE’s 2023–2025 WMP established a 2025 target of inspecting 770 distribution grids/circuits with an associated risk reduction goal of 100%. According to SCE’s 2025 AIR, a total of 789 grids were inspected within their distribution system, exceeding the 2025 target.

In support of VM-7, SCE provided an Excel spreadsheet titled “VM-7 Veg Dist Detailed Inspections” which contained 789 records with associated details such as Activity Title, Inspection End Date, Grid/Circuit ID, and HFTD Class. 70 of the 789 records included an inspection date from 2024, with 19 taking place on November 30, 2024, and 51 taking place on December 31,

2024. In response to DR040.b, SCE stated that the inspection schedule generally operates two months in advance of the mitigation schedule.²⁷ SCE also stated that for WMP reporting purposes, inspections conducted in November and December of the preceding year are included to ensure that inspections and mitigations are accounted for within the same WMP implementation cycle. SCE confirmed that these 70 inspections were not counted toward target completion for 2024. Although this response from SCE is logical, the WMP does not adequately outline this process and therefore the IE is unable to validate inspections that are not performed within the implementation year. SCE should revise both the target and language under section 8.2.3.3.1 to accurately reflect the process described in the response to DR040.b and include a target of both inspections *and remediations*. As the target currently reads, only inspections are part of the target and therefore the justification of these inspections in 2024 occurring to support *remediation* activity in 2025 does not align with the target as currently outlined.

In data request DR040, SCE was asked to provide documentation of completion for 118 detailed inspections which consisted of 12 from non-HFTD, 23 from Tier 2-HFTD and 83 from Tier 3-HFTD. The utility provided a 5-page document that contained screenshots from SCE's Vegetation Work Management System (WMS). These screenshots showed 113 individual inspection records with details such as Job Assignment Number, Veg Circuit Grid ID: Asset Name, Inspection Completion Date and Total Inventory (109,954). SCE also provided a written response detailing that during preparation for the IE's DR, four circuits were identified as being previously reported toward the 2025 VM-7 WMP goal but were out of service at the time of their scheduled inspection and therefore not conducted. SCE indicated that they would implement an enhanced verification step to confirm grids/circuits as operational prior to finalizing the WMP VM-7 year end evidence file. The IE identified no issues or discrepancies with the sampling data.

Based on this analysis and the documentation provided, the IE has not validated this initiative.

Table 30: Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Distribution Lines in HFRA

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR040 Response	Initiative Validation Rate
770 Grids/Circuits	789 Grids/Circuits	789 Grids/Circuits	785 Grids/Circuits	93%

²⁷ For example, mitigations scheduled for January are generally preceded by inspections commencing in November of the prior year, and mitigations for February are generally preceded by inspections commencing in December of the prior year.

VM-8 – 8.2.3.3.1 Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Transmission Lines in HFRA – Focus and Non-Field Verifiable

Expanded line clearances are implemented to mitigate the risk of vegetation contacting energized conductors and associated electrical infrastructure. These clearance activities are intended to reduce both grow-in and fall-in potential, which may create ignition risks to SCE equipment and facilities, particularly within HFRA. SCE utilizes the Grid Resiliency Clearance Distance (GRCD) standard to determine whether expanded vegetation clearances have been achieved. Once GRCD standards have been historically established in a given area, SCE's vegetation management strategy is to maintain those enhanced clearances on an ongoing basis to support long-term grid resiliency and wildfire risk reduction.

SCE's 2023–2025 WMP established a 2025 target of inspecting 416 transmission grids/circuits with an associated risk reduction goal of 100%. According to SCE's 2025 EC AIR, a total of 448 grids were inspected within their transmission system, exceeding the 2025 target.

In support of VM-8, SCE provided an Excel spreadsheet entitled "VM-8 Veg Trans Detailed Inspections" which contained 448 records with associated details such as Activity Title, Inspection End Date, Grid/Circuit ID, and HFTD Class. 32 of the 448 records included an inspection date from 2024, with 11 taking place on November 30, 2024, and 21 taking place on December 31, 2024. In response to DR040.b, SCE stated that for WMP reporting purposes, inspections conducted in November and December of the preceding year are included to ensure that inspections and mitigations are accounted for within the same WMP implementation cycle. SCE confirmed that these 32 inspections were not counted toward target completion for 2024.

In data request DR041, SCE was asked to provide documentation of completion for 106 detailed inspections which consisted of 10 from non-HFTD, 21 from Tier 2-HFTD and 75 from Tier 3-HFTD. The utility provided a 2-page document titled "VM-8_2025 Base Sample_Complete_Redacted" that contained screenshots from SCE's Vegetation Work Management System (WMS). These screenshots showed 111 individual inspection records with details such as Job Assignment Number, FM Circuit Number, Veg Circuit Grid ID: Asset Name, Inspection Completion Date and Total Inventory. SCE also provided a written response detailing that during preparation for the IE's DR, five circuits were identified as being previously reported toward the 2025 VM-8 WMP goal but were out of service at the time of their scheduled inspection and therefore not conducted. SCE indicated that they would implement an enhanced verification step to confirm grids/circuits as operational prior to finalizing the WMP VM-8 year end evidence file. The IE identified no issues or discrepancies with the sampling data.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 31: Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Transmission Lines in HFRA

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR041 Response	Initiative Validation Rate
416 Grids/Circuits	448 Grids/Circuits	448 Grids/Circuits	443 Inspections	108%

VM-9 – 8.2.2.4.1 LiDAR Distribution Vegetation Inspections – Non-Focus and Non-Field Verifiable

LiDAR is a surveying inspection method that measures distance to a target by illuminating the target with pulsed laser light and measuring the reflected pulses with a sensor. Differences in laser return times are then used to make digital three-dimensional representations of field conditions at the time of survey. LiDAR data collection supports accurate vegetation management by identifying vegetation encroachments and facilitating timely mitigation.

SCE's 2023–2025 WMP established a 2025 target of conducting 1,020 circuit miles of distribution LiDAR inspections with a risk reduction goal of 100%. According to SCE's 2025 EC AIR, a total of 4,031.75 circuit miles was completed of their distribution system, exceeding the 2025 target.

In support of VM-9, SCE provided an Excel spreadsheet titled "VM-9 LiDAR Vegetation Inspections_Distribution" which contained 476 records with associated details such as Activity Title, Circuit Name, Completion Date, Completed Mileage, and Circuit HFRA. The total of completed miles shown was 4,031.75, matching what SCE claimed in the 2025 AIR.

In data request DR042, SCE was asked to provide documentation of completion for 34 circuit miles of LiDAR distribution inspections which consisted of 4 from non-HFTD, 6 from Tier 2-HFTD and 24 from Tier 3-HFTD. The utility provided a 5-page document titled "VM-9_2025_Base Sample_Complete" that contained a table with the following circuit names: LESSER, SAWPIT, CRUMNER, PAINTED CAVE, DINELY, PINWHEEL, POSO PARK, ARCTURUS, and GUTIERREZ. This table contained the Circuit Name, Completion Date, Completed Miles, and Circuit HFRA. The total completed miles in this table equaled 35.539 which exceeded the 34 circuit miles requested. This document also contained one screenshot per circuit with circuit information, HFTD Class, completed circuit miles as well as inspection details. The inspection comments for each circuit looked to be identical; however, the entire comment was not visible in the screenshot. *NOTE: SCE stated that the HFRA tier from OEIS' Excel files for the Poso Park circuit differs from the screenshot due to the circuit being taken out of service and that the VM-9 scope was developed while Poso Park was still in service.*

The sampling data provided by SCE can be verified for evidence of completed work; however, no inspection report criteria, methodology, or defined inspection parameters were provided for IE

review.²⁸ As a result, the IE was unable to confirm whether the submitted inspection documentation was consistent with SCE’s established inspection documentation standards or whether the inspections were performed in accordance with defined program requirements.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative. Although SCE failed to provide sufficient sampling data, due to the large over completion of the initiative target, the initiative validation rate is 198%. It should be noted that the data provided reflects a document deficiency issue rather than a failure to perform inspections. SCE did not provide the requested documentation: inspection reports, associated photos, and work/repair orders. SCE should submit inspection reports detailing findings, conditions, and remediations, not simply completion records.

Table 32: LiDAR Distribution Vegetation Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR042 Response	Initiative Validation Rate
1,020 Circuit Miles	4,031.75 Circuit Miles	4,032 Circuit Miles	4,031.75 Circuit Miles	198%

VM-10 – 8.2.2.4.1 LiDAR Transmission Vegetation Inspections – Non-Focus and Non-Field Verifiable

LiDAR is a surveying inspection method that measures distance to a target by illuminating the target with pulsed laser light and measuring the reflected pulses with a sensor. Differences in laser return times are then used to make digital three-dimensional representations of field conditions at the time of survey. LiDAR data collection supports accurate vegetation management by identifying vegetation encroachments and facilitating timely mitigation.

SCE’s 2023–2025 WMP established a 2025 target of conducting 1,750 circuit miles of transmission LiDAR inspections. SCE did not set a risk reduction goal for this initiative. According to SCE’s 2025 EC AIR, a total of 2,179.17 circuit miles was completed of their transmission system, exceeding the 2025 target.

In support of VM-10, SCE provided an Excel spreadsheet titled “VM-10 LiDAR Vegetation Inspections_Transmission” which contained 190 records with associated details such as Activity Title, Circuit Name, Completion Date, Completed Mileage, Circuit HFRA, and Circuit ID. The total of completed miles shown was 2,179.17, matching what SCE claimed in the 2025 AIR.

In data request DR035, SCE was asked to provide documentation of completion for approximately 34 circuit miles of LiDAR transmission inspections which consisted of approximately 10 from Tier 2-HFTD and approximately 24 from Tier 3-HFTD. The utility provided a 4-page document

²⁸ The IE determined a 50% sample validation rate based on evidence demonstrating that inspections are being performed; however, evidence detailing inspection parameters and alignment with standards outlined in the WMP was not provided.

entitled “VM-10_2025_Base Sample_Complete” that contained a table with the following circuit names: BOREL-ISABELLA, NORTH OAKS-SOLEMINT, SANTA CLARA-TAYSHELL, IDLE KERN RIVER 1-MACNEIL, BIG CREEK 3-MAMMOTH, and EAGLE ROCK-PS 197. This table contained the Circuit Name, Completion Date, Completed Miles, Circuit HFRA, and Circuit ID. The total completed miles in this table equaled 35.702 which exceeded the approximately 34 circuit miles requested. This document also contained one screenshot per circuit with circuit information, HFTD Class, completed circuit miles as well as inspection details. There were no inspection comments for any of the circuits provided.

The sampling data provided by SCE can be verified for evidence of completed work; however, no inspection report criteria, methodology, or defined inspection parameters were provided for IE review.²⁹ As a result, the IE was unable to confirm whether the submitted inspection documentation was consistent with SCE’s established inspection documentation standards or whether the inspections were performed in accordance with defined program requirements.

Based on this analysis, the documentation provided, and sampling verification, the IE has not validated this initiative and is unable to confirm that SCE has met the stated risk reduction goal due to insufficient data demonstrating inspections met specified standards as outlined in the WMP. This invalidation reflects a document deficiency, not a failure to perform inspections. SCE did not provide the requested documentation: inspection reports, associated photos, and work/repair orders. SCE should submit inspection reports detailing findings, conditions, and remediations, not simply completion records.

Table 33: LiDAR Transmission Vegetation Inspections

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Response/ DR035	Initiative Validation Rate
1,750 Circuit Miles	2,179.17 Circuit Miles	2,182 Circuit Miles	2,179.17 Circuit Miles	62%

4.2.2.2 Funding Verification – Findings

VM-1 – Hazard Tree Mitigation Program (HTMP)

Strategic Overview and Risk Mitigation

This initiative involved reducing fall-in or blow-in risk to electrical assets posed by green or live trees with specific conditions. SCE’s set a target to inspect 440 grids/circuits and prescribe mitigation for hazardous trees with strike potential, aiming to achieve a 63% risk reduction goal.

²⁹ The IE determined a 50% sample validation rate based on evidence demonstrating that inspections are being performed; however, evidence detailing inspection parameters and alignment with standards outlined in the WMP was not provided.

Financial Performance Analysis

- Planned O&M Budget: \$44,037,000
- Actual O&M Expenditure: \$11,919,000
- O&M Variance: -\$32,118,000 (73% Underrun)
- SCE Justification: The cost underrun was related to the following: (a) HTMP Tree Removal - SCE found fewer hazard tree conditions on the circuits inspected in HFRA than forecasted, hence a lower than expected prescription rate and mitigation volume. (b) HTMP Property Owner Incentives - The program allows property owners to receive utility-friendly trees as an incentive to support the mitigation of hazardous trees. The cost underrun in 2025 is due to lower than forecasted utilization of this program. SCE was asked to approximate the split of the underrun between fewer hazard trees identified and lower prescription rate and mitigation volume and Property Owner Incentives. SCE states that the underrun is almost entirely driven by lower hazard tree identification, prescription rates, and mitigation volume (approximately 99.7%).

Operational Impact and Risk Reduction

SCE exceeded its operational target, inspecting 526 grids/circuits, thus achieving the stated 63% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The underrun was driven by fewer hazard tree conditions identified on inspected HFRA circuits than forecasted, resulting in lower mitigation volumes, as well as lower than anticipated participation in the HTMP Property Owner Incentives program. This underrun had no negative effects on intended wildfire risk reduction outcomes.

VM-2 – Structure Brushing

Strategic Overview and Risk Mitigation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 24.

VM-3 – Expanded Clearances for Generation Legacy Facilities

Strategic Overview and Risk Mitigation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 24.

VM-4 – Dead & Dying Tree Removal

Strategic Overview and Risk Mitigation

This initiative involved conducting patrols in HFRA to identify and remove dead, dying, or diseased trees affected by drought conditions and/or insect infestation. SCE set a target to inspect and clear (where clearance is needed) 536 grids/circuits, aiming to achieve a 62% risk reduction goal.

Financial Performance Analysis

- Planned O&M Budget: \$28,686,000
- Actual O&M Expenditure: \$7,433,000
- O&M Variance: -\$21,253,000 (74% Underrun)
- SCE Justification: With respect to Dead and Dying Tree Removals, SCE found fewer tree conditions on the circuits inspected in HFRA than forecasted, hence a lower than expected prescription rate and removal volume. SCE was asked to provide the number of trees that were identified and remediated in 2025 in HFRA and to provide how many were expected in the forecast. SCE stated that approximately 4,000 trees were identified and remediated in 2025. SCE further stated that the GRC forecast was developed based on historical data trends and assumptions available at the time, including higher market rates and support costs.

Operational Impact and Risk Reduction

SCE exceeded its operational target, inspecting and clearing 600 grids/circuits, thus achieving the stated 62% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The underrun was primarily driven by lower-than-expected tree removal volumes, as approximately 4,000 trees were remediated compared to the forecasted 8,600 trees, resulting in lower overall costs. This overrun had no negative effects on intended wildfire risk reduction outcomes.

VM-6 – Vegetation Management Work Management Tools (Arbora)
Strategic Overview and Risk Mitigation

This initiative involved SCE's plan to transition legacy work management systems for vegetation management activities to the Arbora system. SCE set a target to monitor the stabilization of Arbora and to continue the execution of a plan to enable additional VM maintenance programs. SCE did not set a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned CAPEX Budget: \$2,437,000
- Actual CAPEX Expenditure: \$2,280,000
- CAPEX Variance: -\$157,000 (6% Underrun)
- Planned O&M Budget: \$4,200,000
- Actual O&M Expenditure: \$2,227,000
- O&M Variance: -\$1,973,000 (47% Underrun)
- Initiative Total Planned Budget: \$6,637,000
- Initiative Total Actual Expenditure: \$4,507,000
- Initiative Total Variance: -\$2,130,000 (32% Underrun)
- SCE Justification: Capital variance is within threshold. Arbora's 2025 O&M planned budget initially assumed inclusion of iPad data charges at the time of drafting and submission. Following the regulatory disallowance of iPad costs under the 2022 Wildfire

Mitigation and Vegetation Management (WM/VM) decision, SCE removed iPad related O&M charges from the Arbora project. iPads are now treated as standard enterprise technology tools rather than wildfire specific equipment, and the associated O&M costs were shifted to Enterprise Transformation Services (End User Computing), where companywide devices are funded. This resulted in the reported variance.

Operational Impact and Risk Reduction

SCE met its operational target to monitor Arbora and continued its execution of the plan to enable additional VM maintenance programs to enhance wildfire mitigation efforts in its service territory.

Assessment and Conclusion

SCE effectively completed this initiative, meeting operational targets. The underrun resulted from the removal of iPad-related O&M costs from the Arbora project after those costs were disallowed under the 2022 WM/VM decision. The associated expenses were subsequently shifted to Enterprise Transformation Services as standard enterprise technology costs, reducing reported wildfire program spending.

VM-7 – Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Distribution Lines in HFRA

Strategic Overview and Risk Mitigation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 24.

VM-8 – Detailed Inspections for the Prescription, Where Necessary and Feasible, of Expanded Vegetation Clearances from Transmission Lines in HFRA

Strategic Overview and Risk Mitigation

This initiative involved implementing expanded line clearances to mitigate the risk of vegetation contacting energized conductors and associated electrical infrastructure. These clearance activities are intended to reduce both grow-in and fall-in potential, which may create ignition risks to equipment and facilities, particularly within HFRA. SCE set a target of inspecting 416 transmission grids/circuits, aiming to achieve a 100% risk reduction goal.

Financial Performance Analysis

- Planned O&M Budget: \$20,956,000
- Actual O&M Expenditure: \$13,120,000
- O&M Variance: -\$7,836,000 (37% Underrun)
- SCE Justification: The underrun reflects increased efficiency in executing the work while remaining aligned with the GRC authorized revenue requirement, which resulted in lower Time & Equipment (T&E) spending, such as contractor travel, per diem, lodging, and other reimbursable expenses associated with line clearing activities.

Operational Impact and Risk Reduction

SCE exceeded its operational target, inspecting 448 transmission grids/circuits, thus achieving the stated 100% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The underrun was driven by increased execution efficiency, which reduced Time & Equipment (T&E) costs, including contractor travel, lodging, per diem, and other reimbursable expenses associated with line clearing activities, while remaining aligned with the authorized GRC revenue requirement. This underrun had no negative effects on intended wildfire risk reduction outcomes.

VM-9 – LiDAR Distribution Vegetation Inspections

Strategic Overview and Risk Mitigation

This initiative involved utilizing the LiDAR surveying inspection method to measure distance to a to support accurate vegetation management by identifying vegetation encroachments and facilitating timely mitigation. SCE set a target of conducting 1,020 circuit miles of distribution LiDAR inspections. SCE did not set a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned O&M Budget: \$44,467,000
- Actual O&M Expenditure: \$17,615,000
- O&M Variance: -\$28,852,000 (60% Underrun)
- SCE Justification: SCE met its WMP target for the year. The underrun resulted from reduced scope of work driven by the limited acquisition vendor availability in Q1-Q2 of 2025, as existing vendors were operating at capacity while SCE completed a new RFP, which was finalized in Q3 2025, combined with lower contractor rates implemented in mid-year under new vendor contracts. SCE was asked to confirm that the reduced scope of work did not alter the quality of inspections conducted under VM-9 and to provide a high-level breakdown on the difference in contractor rates from the prior contracts to the new contracts. SCE confirmed that the reduced scope did not impact inspection quality, noting that satellite imagery remains a pilot program while VM-9 inspections in 2025 relied exclusively on LiDAR data with multiple quality control reviews. SCE also explained that expanding from approximately five to eleven LiDAR vendors in Q3 2025 increased availability, improved pricing, and reduced per-circuit-mile costs by enabling access to lower pricing tiers through higher survey volumes.

Operational Impact and Risk Reduction

SCE exceeded its operational target, completing 4,031.75 circuit miles of LiDAR inspections of their distribution system, demonstrating their commitment to ongoing wildfire mitigation efforts.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The underrun was driven by a reduced scope of work due to limited vendor availability during Q1-Q2 2025 while SCE

finalized a new RFP process, along with lower contractor rates implemented under new vendor contracts in mid-2025.

VM-10 – LiDAR Transmission Vegetation Inspections

Strategic Overview and Risk Mitigation

This initiative involved utilizing the LiDAR surveying inspection method to measure distance to a to support accurate vegetation management by identifying vegetation encroachments and facilitating timely mitigation. SCE set a target of conducting 1,750 circuit miles of transmission LiDAR inspections. SCE did not set a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned O&M Budget: \$11,132,000
- Actual O&M Expenditure: \$9,918,000
- O&M Variance: -\$1,214,000 (11% Underrun)
- SCE Justification: SCE met its WMP target for the year. The underrun resulted from reduced scope of work driven by the limited acquisition vendor availability in Q1-Q2 of 2025, as existing vendors were operating at capacity while SCE completed a new RFP, which was finalized in Q3 2025, combined with lower contractor rates implemented in mid-year under new vendor contracts. SCE was asked to confirm that the reduced scope of work did not alter the quality of inspections conducted under VM-10 and to provide a high-level breakdown on the difference in contractor rates from the prior contracts to the new contracts. SCE confirmed that the reduced scope did not impact inspection quality, noting that satellite imagery remains a pilot program while VM-10 inspections in 2025 relied exclusively on LiDAR data with multiple quality control reviews. SCE also explained that expanding from approximately five to eleven LiDAR vendors in Q3 2025 increased availability, improved pricing, and reduced per-circuit-mile costs by enabling access to lower pricing tiers through higher survey volumes.

Operational Impact and Risk Reduction

SCE exceeded its operational target, completing 2,179.17 circuit miles of LiDAR inspections of their transmission system, demonstrating their commitment to ongoing wildfire mitigation efforts.

Assessment and Conclusion

SCE effectively completed this initiative, exceeding operational targets. The underrun was driven by a reduced scope of work due to limited vendor availability during Q1-Q2 2025 while SCE finalized a new RFP process, along with lower contractor rates implemented under new vendor contracts in mid-2025.

4.2.3 Synthesis of Findings

4.2.3.1 Initiative Review

Within the Vegetation Management & Inspections category, SCE met or exceeded all initiative targets in 2025. No initiatives failed to achieve their established completion goals.

The category demonstrated overperformance across seven of the nine applicable initiatives, with completion rates ranging from 102% to 395% of established targets. Notably, VM-2 (Structure Brushing) achieved 248% of its target, and VM-9 (LiDAR Distribution Inspections) reached 198% of target.

During sampling validation for VM-2 (Structure Brushing), 18 of 138 sampled locations (13%) showed "no access" designations where no clearance work was performed due to private property restrictions, unsafe terrain conditions, or insect infestation. These locations were included in SCE's reported completion totals despite not receiving actual vegetation management treatment. Similarly, for both VM-7 and VM-8 (Distribution and Transmission Detailed Inspections), SCE initially reported circuits that were subsequently identified as out-of-service at the time of scheduled inspection, requiring post-discovery corrections to year-end evidence files.

VM-2 sampling revealed that 18 of 138 locations (13%) were marked "no access" with no clearance work performed, yet these locations were included in SCE's 157,665-structure completion total. While SCE's documentation transparently identified these as no-access, the inclusion of non-completed work in reported totals could represent a metrics inflation practice that overstates actual risk reduction.

VM-7 and VM-8 both included circuits reported as inspected that were subsequently identified as out-of-service at the time of scheduled inspection. For VM-7, four of 118 sampled circuits (3.4%) were found to be non-operational; for VM-8, five of 106 sampled circuits (4.7%) were non-operational. SCE committed to implementing "an enhanced verification step to confirm grids/circuits as operational prior to finalizing the WMP year-end evidence file," acknowledging this as a systemic data quality gap rather than isolated errors.

SCE failed to meet the target for two initiatives within this category. The IE was unable to verify target completion for VM-7 due to 70 inspections taking place in 2024 and therefore unable to count toward implementation for 2025. For both VM-9 and VM-10, SCE provided documentation that confirmed when inspections were performed, type of inspection, and how much was inspected, but failed to provide any documentation of inspection outcomes, findings, or remediation requirements. The IE was still able to validate VM-9 due to SCE's large over completion of the initiative target, however, VM-10 was invalidated due to its 62% initiative validation rate.

4.2.3.2 Funding Verification

Budget and Expenditure Summary: The Vegetation Management and Inspections category had a total CAPEX planned budget of \$2,437,000 with actual expenditures of \$2,280,000, representing a 6% variance below budget, and a total O&M planned budget of \$405,113,000 with actual expenditures of \$291,820,000, representing a 27.97% variance below budget. The category's overall expenditure exceeded the 10% variance threshold.

Initiatives With Significant Variances: Of the 9 total initiatives in this category, 6 (67%) had absolute percent differences exceeding 10%. Several initiatives demonstrated significant financial variances.

- VM-1 Hazard Tree Mitigation Program and VM-4 Dead & Dying Tree Removal represented the largest underruns within the vegetation management portfolio. Both initiatives substantially exceeded operational inspection targets while requiring significantly fewer mitigation activities than originally forecasted due to lower-than-anticipated identification of hazardous vegetation conditions. SCE attributed approximately 99.7% of the VM-1 underrun to lower hazard tree identification, prescription rates, and mitigation volume rather than reduced participation in the Property Owner Incentives program.
- VM-9 LiDAR Distribution Vegetation Inspections represented another significant underrun initiative. Although expenditures were substantially below budget, SCE exceeded the operational target by completing more than 4,000 circuit miles of LiDAR inspections compared to the 1,020-mile target. The underrun was primarily linked to limited vendor availability during Q1-Q2 2025 and lower contractor rates negotiated after expanding the LiDAR vendor pool from approximately five to eleven vendors. VM-10 experienced similar trends on the transmission side, though with a smaller overall financial variance.

Importantly, no reviewed vegetation management initiative demonstrated evidence that financial underruns negatively affected operational execution or intended wildfire risk reduction outcomes. Nearly all initiatives exceeded their operational targets despite reduced expenditures.

Key Trends and Funding Compliance: Several clear trends emerged throughout the vegetation management funding verification review.

- Most significant variances were underruns rather than overruns, indicating that actual operational execution costs were frequently lower than originally forecasted during the 2022–2023 GRC planning cycle. Many forecasts were developed using conservative assumptions regarding vegetation volumes, contractor pricing, support costs, or historical mitigation trends that ultimately exceeded actual field conditions encountered in 2025.
- Operational efficiencies consistently contributed to reduced expenditures without reducing wildfire mitigation effectiveness. SCE repeatedly cited improved scheduling, reduced Time & Equipment spending, lower contractor rates, optimized vendor availability, increased field familiarity with inspected assets, and more efficient work execution as primary drivers of cost savings. Several initiatives also benefited from broader operational maturity as programs evolved over multiple years of implementation.
- Vendor market conditions materially affected LiDAR inspection program expenditures. The transition to a larger vendor pool through SCE’s new RFP process increased competition, improved pricing, and reduced per-circuit-mile inspection costs while maintaining quality assurance standards. This trend demonstrates that procurement and vendor management strategies played a substantial role in reducing actual expenditures.
- The review identified multiple examples of funding reallocations and accounting adjustments associated with evolving regulatory guidance. VM-6 Arbora demonstrated that certain technology-related expenditures originally forecasted as wildfire mitigation costs were subsequently reclassified as enterprise technology expenses following the 2022

WM/VM decision. These accounting changes reduced reported wildfire mitigation expenditures without affecting operational implementation.

SCE maintained appropriate funding compliance and continued to achieve intended wildfire mitigation objectives despite substantial financial variances. Most underruns were attributable to legitimate operational conditions, efficiency gains, reduced mitigation volumes, or accounting reallocations rather than reductions in program scope or implementation quality. Across the reviewed vegetation management initiatives, SCE consistently exceeded operational targets and maintained intended wildfire risk reduction outcomes while managing expenditures below originally forecasted levels.

4.3 SITUATIONAL AWARENESS AND FORECASTING

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.3.1 Initiative Summary Table

Table 34: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ³⁰	Sample Validation Rate (%) ^{31, 32}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{33, 34}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
SA-1, 8.3.2.1.1, Weather Stations	15 Weather Stations Installed	202 Weather Stations Installed	Completed	82 Weather Stations	100%	Weather Station Installations List (Frontload Data) SCE Written Response 82 Weather Station Records (DR020)	1347%	\$6,398	\$9,670 (51.1%)	Yes (32% PSPS Risk Only)
SA-3, 8.3.5, Weather & Fuels Modeling	Implement machine learning at remaining weather station locations that meet eligible criteria	SCE met target to implement machine learning at remaining weather station locations.	Completed	N/A	N/A	Weather & Fuels Modeling List (Frontload Data)	100%	\$8,027	\$13,877 (72.9%)	Yes (3% / .03% PSPS Risk Only)
SA-8, 8.3.2.1.2, Fire Spread Modeling	Provide recommendation for how consequence metrics can be used for PSPS decision making	SCE benchmarked consequence metrics against real-time events.	Completed	N/A	N/A	Fire Science Enhancements Recommendation	100%	\$3,287	\$2,491 (-34.9%)	Yes (2% / .02%)
SA-10, 8.3.4.1.1, High Definition (HD) Cameras	None Planned - installs will be based on reassessment in 2024	2 Cameras Relocated	Completed	2 Cameras	100%	HD Cameras Reassessment HD Cameras Relocations (Frontload Data) Operational ScrnShts (DR026)	100%	\$4,665	\$3,618 (-22.4%)	N/A
SA-11, 8.3.3.1.1, Early Fault Detection (EFD)	200 EFDs Installed	200 EFDs Installed	Completed	83 EFDs	100%	Early Fault Detection Install List (Frontload Data) 83 Inspection Records (JIS & GIS) (DR027)	100%	\$12,644	\$8,619 (-31.8%)	Yes (5% / .44%)

³⁰ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

³¹ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

³² N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

³³ The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.

³⁴ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.



4.3.2 Written Detail for Initiatives

4.3.2.1 Initiative Review – Findings & Method

SA-1 – 8.3.2.1.1 Weather Stations – Focus and Non-Field Verifiable

Weather stations are used to provide critical situational awareness for PSPS decision-making and help improve weather models. SCE prioritizes weather station installations on HFRA circuits that are most likely to exceed PSPS wind thresholds. This initiative involves installing weather stations on specific segments of circuits to sectionalize circuits and reduce the scope of PSPS events, where possible, thereby reducing the impact on customers.

SCE's 2023-2025 WMP set a 2025 target to install 15 weather stations and established a 32%/.0001% risk reduction goal (PSPS risk only). According to the 2025 EC AIR, SCE installed 202 weather stations and implemented machine learning at five targeted locations.

In support of SA-1, SCE was asked to provide a list of all weather station installations completed in 2025. The utility responded by submitting an Excel spreadsheet titled "SA-1 Weather Stations" which shows 202 records with associated details such as Activity Title, Station Name, Date Installed, Circuit ID, and Circuit HF Area.

In data request DR020, the utility was asked to provide documentation of completion for 82 weather station installations which consisted of 8 from non-HFTD, 16 from Tier 2-HFTD and 58 from Tier 3-HFTD. The utility provided an Excel spreadsheet titled "08. SA-1_SA-1+2025 Base Sample_Complete" containing 82 items. SCE stated that the data is files from the weather station vendor, API, showing daily data which was first relayed the day after installation. The IE was able to cross reference the data from the sampling information to the frontload data received to verify installation date and no discrepancies were noted.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 35: Weather Stations

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR020 Response	Initiative Validation Rate
15 Weather Stations	202 Weather Stations	202 Weather Stations	202 Weather Stations	1347%

SA-3 –Weather and Fuels Modeling System– Non-Focus and Non-Field Verifiable

SCE's climate change modeling advanced in 2025, as SCE tested the integration of climate data, models, and projections into the Commission's Risk-Based Decision-Making Framework (RDF). This work informed SCE's development of its next wildfire risk model and culminated in the 2026 RAMP Climate Pilot white paper that will be published with SCE's RAMP filing in May 2026.

The WMP set a target of implementing machine learning at remaining weather station locations that meet eligible criteria. The risk reduction goal provided for this initiative was 3%. Data provided in the frontload request consisted of a spreadsheet with 1,795 individual records

including information such as Station Name, implementation date, and lat/lon. Of these, 171 records had an implementation date in 2025.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 36: Weather and Fuels Modeling System

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Implement machine learning at remaining weather station locations that meet eligible criteria	SCE met target to implement machine learning at remaining weather station locations by sending the forecast output daily with other weather model outputs.	SCE met target to operationalize machine learning at selected locations by sending the forecast output daily with other weather model outputs.	Machine Learning Implemented at 171 Weather Station Locations	100%

SA-8 – Fire Spread Modeling – Non-Focus and Non-Field Verifiable

SCE uses two (2) main fire spreading modeling applications from Technosylva to determine consequences associated with wildfire activity. One of these applications, FireSight, uses historical weather events to determine relative risk across the region to help with grid hardening decision. The other application, FireRisk, uses projected weather and fuel moisture conditions to estimate wildfire consequences three days ahead. This latter application is the focus of Fire Science’s recommended use for scoping PSPS events.

Fire Sciences has been actively working with Technosylva for several years to offer insights into how the model could be directly integrated into SCE’s PSPS decision making process. First a strategic plan was created that outlined known model shortcomings, and what steps Technosylva would take to improve the model or to better understand the causes for model error. Second, and as part of the strategic plan, an analysis was performed to examine consequence outputs for circuits that were in scope and/or de-energized during prior PSPS events compared to those that were not. The same analysis was done for a select number of days in which PSPS did not occur. The analysis showed the most de-energized circuits had higher consequence values than those that were not. However, these results were not conclusive enough to suggest the modeling be utilized for PSPS scoping.

The WMP set a target of recommending how consequence metrics can be used for PSPS decision making. Risk reduction goal provided for this initiative was 2%. Data provided in the frontload request consisted of a PDF of Fire Science Enhancements Recommendations.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 37: Fire Spread Modeling

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Provide recommendation for how consequence metrics can be used for PSPS decision making	SCE met target. SCE benchmarked consequence metrics against real-time events. SCE will continue to use model for the In-Event Risk Calculator and be used as an additional data point.	SCE met target. SCE benchmarked consequence metrics against real-time events. SCE will continue to use model for the In-Event Risk Calculator and be used as an additional data point.	Recommendation Provided	100%

SA-10 – 8.3.4.1.1 High Definition (HD) Cameras – Non-Focus and Non-Field Verifiable

SA-10 outlines SCE’s partnership with the University of California, San Diego (UCSD) to install high-definition (HD) cameras on non-SCE infrastructure, such as communications towers, in areas where SCE’s Fire Science Team, Fire Management Team, Incident Management Program (IMP), and partnering fire agencies have identified gaps in spatial fire detection coverage. SCE maintains a network of 182 HD cameras integrated through UCSD’s AlertCalifornia system (formerly AlertWildfire).

SCE’s 2023-2025 WMP 2025 target states that there are no planned installs of HD cameras and that additional installs will be based on reassessment in 2024. There was no risk reduction goal set for this initiative. The 2025 EC AIR states that the reassessment was completed and 2 cameras were relocated in 2025 consistent with the reassessment.

In support of SA-10, SCE provided a 1-page document titled “SA-10 HD Cameras Reassessment” which states that in 2025, two cameras were relocated to address coverage gaps and align with updated wildfire mitigation priorities, after a review determined that the previous location was less effective than expected. The move was driven by new wildfire encroachment policies emphasizing proactive measures like de-energization, with the goal of improving visibility and supporting better operational decision-making. SCE also provided an Excel spreadsheet titled “SA-10 HD Cameras_2 Relocations” which contained two records with associated details such as Activity Title, Camera ID, Install Date, Camera Model, latitude/longitude, and HFTD Class. In response to DR026, SCE provided a screenshot of both cameras live feed from November 29, 2025, verifying operation.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 38: High Definition (HD) Cameras

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR026 Response	Initiative Validation Rate
No planned installs – additional installs will be based on reassessment in 2024.	Reassessment was completed and 2 cameras were relocated in 2025 consistent with the reassessment.	2 HD Cameras	2 Camera Installations	100%

SA-11 – Early Fault Detection (EFD) – Focus and Non-Field Verifiable

Early Fault Detection (EFD) technology detects high frequency radio emission that can occur from arcing or partial discharge conditions on the electric system. These types of conditions can be indicative of an incipient failure, such as severed strands on a conductor, vegetation contact, or deterioration of insulation material. EFD could potentially be used to monitor the overall health of the electric system which may inform operational decision during high-risk conditions.

The WMP set a target of 200 EFDs installed in 2025. The risk reduction goal provided for this initiative was 5%. Data provided in the frontload request consisted of a spreadsheet with 200 individual records including information such as structure, circuit ID, circuit name, work_order, Date Installed, HFTD Tier, and lat/lon. SCE noted that structure 1378081E included the EFD sensor communication date of April 1, 2025, rather than the date of installation which was October 29, 2024. SCE confirmed that this EFD device was not counted toward the 2024 WMP initiative target for SA-11.³⁵ Excluding the aforementioned structure, all remaining records had an implementation date in 2025.

The IE requested documentation of completion for EFD installations in DR022. Installations were to be from each HFTD with eight (8) from non-HFTD, 16 from HFTD Tier 2, and 59 from HFTD Tier 3. SCE responded by providing a PDF of Job Information Sheets (JIS) for the 83 EFD installations as well as 21 work orders where a JIS was not available. In this latter case, an ArcGIS screenshot showing the active equipment location was provided. When cross-referenced by work order number to the frontload data spreadsheet, 22 of the 83 JIS installation dates did not align; 10 of the 21 work orders had similar discrepancies between installation dates. Although the work order documentation verifies that SCE installed the 83 requested samples, the utility should verify that data across documentation matches for enhanced transparency and recordkeeping purposes.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

³⁵ The IE determined that counting the EFD on structure 1378081 for implementation year 2025 is acceptable because commissioning took place on April 1, 2025. SCE is properly capturing implementation from the commissioning (communication) date rather than the installation date. Prior to communication, the EFD is inoperable and does not serve its intended purpose. Counting EFDs toward target completion once the device is commissioned ensures it is operable and accurately reflects the appropriate risk reduction target associated with this initiative.

Table 39: Early Fault Detection

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload & DR022 Response	Initiative Validation Rate
200 EFDs Installed	200 EFDs Installed	204 EFDs Installed	200 EFDs Installed	100%

4.3.2.2 Funding Verification – Findings**SA-1 – Weather Stations****Strategic Overview and Risk Mitigation**

This initiative involved installing weather stations on specific segments of circuits to sectionalize circuits and reduce the scope of PSPS events, where possible, thereby reducing the impact on customers. SCE set a target to install 15 weather stations, aiming to achieve a 32%/.0001% risk reduction goal (PSPS risk only).

Financial Performance Analysis

- Planned CAPEX Budget: \$448,000
- Actual CAPEX Expenditure: \$2,970,000
- CAPEX Variance: \$2,522,000 (563% Overrun)
- Planned O&M Budget: \$5,950,000
- Actual O&M Expenditure: \$6,700,000
- O&M Variance: \$750,000 (13% Overrun)
- Initiative Total Planned Budget: \$6,398,000
- Initiative Total Actual Expenditure: \$9,670,000
- Initiative Total Variance: \$3,272,000 (51% Overrun)
- SCE Justification: The capital overrun was primarily driven by an expansion of SCE's weather station network. This expansion followed the January 2025 fires. The O&M overrun resulted from higher recurring costs (such as vendor services, calibration, and increased support and maintenance) associated with the expanded network of new weather stations. SCE was asked to approximate the split of the underrun between vendor services, calibration, and increased support and maintenance. SCE states that the financial overrun was driven by higher recurring O&M costs associated with SCE's expanded weather station network. The original 2025 forecast assumed installations would be substantially complete, with future costs primarily limited to routine maintenance and calibration. However, following the January 2025 Southern California wildfires, SCE expanded the network beyond the original scope, resulting in increased contractor-related expenses for bundled services including calibration, ongoing support, and maintenance, which exceeded planned budget assumptions (costs are not tracked separately).

Operational Impact and Risk Reduction

SCE successfully installed 202 weather stations and implemented machine learning at five targeted locations, thus achieving the stated a 32%/.0001% risk reduction goal (PSPS risk only).

Assessment and Conclusion

SCE effectively completed this initiative, surpassing operation targets. The overrun resulted from higher recurring costs associated with SCE's expanded weather station network following the January 2025 Southern California wildfires and increased contractor-related expenses for calibration, maintenance, and ongoing support exceeded original forecasts without negatively affecting intended wildfire risk reduction outcomes.

SA-3 – Weather & Fuels Modeling

Strategic Overview and Risk Mitigation

This initiative involved climate change modeling advanced in 2025 through testing the integration of climate data, models, and projections into the Commission's Risk-Based Decision-Making Framework (RDF). SCE set a target of implementing machine learning at remaining weather station locations that meet eligible criteria, aiming to achieve a 3% risk reduction goal.

Financial Performance Analysis

- Planned CAPEX Budget: \$2,500,000
- Actual CAPEX Expenditure: \$6,471,000
- CAPEX Variance: \$3,971,000 (159% Overrun)
- Planned O&M Budget: \$5,527,000
- Actual O&M Expenditure: \$7,406,000
- O&M Variance: \$1,879,000 (34% Overrun)
- Initiative Total Planned Budget: \$8,027,000
- Initiative Total Actual Expenditure: \$13,877,000
- Initiative Total Variance: \$5,850,000 (73% Overrun)
- SCE Justification: Capital costs are related to High-Powered Computer Clusters (HPCC) (formerly Advanced Modeling Computer Hardware) and include set up and configuration of cloud based HPCCs. Actual costs were higher than planned budget due to increased costs for development of the cloud-based solution that enables more accurate forecasting. The forecasting capability was expanded from 3 to 7 days and requires more computational power to deliver data in a timely manner. The improved and more accurate HPCC system is used for wildfire mitigation, PSPS events, customer notifications, temporal and circuit-based scoping, storm preparedness efforts, district planning, and daily energy procurement functions. O&M expenses were higher than the planned budget to account for the Technosylva modeling license and Technosylva support costs to buildout and maintain the HPCC platform.

Operational Impact and Risk Reduction

SCE successfully implemented machine learning at remaining weather station locations by sending the forecast output daily with other weather model outputs, thus achieving the stated the 3% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, meeting operational targets. The overrun was driven by higher-than-planned capital and O&M costs associated with development and support of the cloud-based High-Powered Computer Clusters (HPCC) platform. Expanded forecasting capabilities from 3 to 7 days required additional computational power, increased cloud solution development costs, and higher licensing and support expenses for the Technosylva modeling platform. This overrun had no negative effects on intended wildfire risk reduction outcomes.

SA-8 – Fire Spread Modeling

Strategic Overview and Risk Mitigation

This initiative involved the use of two (2) main fire spreading modeling applications from Technosylva to determine consequences associated with wildfire activity. SCE set a target of recommending how consequence metrics can be used for PSPS decision making, aiming to achieve a 2% risk reduction goal.

Financial Performance Analysis

- Planned O&M Budget: \$3,827,000
- Actual O&M Expenditure: \$2,491,000
- O&M Variance: -\$1,336,000 (35% Underrun)
- SCE Justification: Although actual costs for research partnerships and modeling activities were lower than forecasted, SCE continued to advance its wildfire research objectives through collaborations with universities and industry partners. These efforts included fire science research with San José State University, weather-forecasting technology development with UC Santa Barbara, and Energy Meteorology research with the State University of New York, the University of Connecticut, and private industry partners. The underrun was primarily driven by the deferral of climate change modeling work and the Self-Organizing Maps (SOMS) project from 2025 to 2026 due to project prioritization. The postponed climate modeling effort involved development of a 30-year, high-resolution dataset intended to support long-term climate trend analysis, PSPS planning, and fire potential forecasting enhancements. Additional underrun impacts resulted from lower-than-expected Fuel Sampling Program costs due to fewer sampling locations and reduced labor hours. SCE stated there are no risks associated with the deferred work and noted that O&M expenses remained within the guideline threshold. SCE was asked to provide details on what other project took priority over the Global Climate Models downscaling and were those projects associated with this initiative or others and where were those project costs captured. In addition, SCE was asked if using available data and deferring the model updates leads to no associated risk, what is SCE's rationale for contracting Technosylva for this project? Could the budgeted amount for the project be utilized for projects/programs that have a direct impact on associated risk? SCE stated that, instead of performing the deferred Global Climate Models downscaling work in 2025, it prioritized near-term wildfire risk assessment and modeling activities associated with this initiative. These efforts included use of Cal Adapt data and evaluation of publicly available climate and

vegetation datasets with improved spatial and temporal resolution. Costs associated with these interim research and analysis activities were captured under this initiative rather than the deferred downscaling scope. SCE further stated that, although deferring certain model updates does not create immediate wildfire risk, the modeling activities provide a foundational capability that supports wildfire risk assessment and prioritization of mitigation activities. SCE explained that it continues contracting with Technosylva because the platform provides consistency in modeling assumptions, parameters, and methodologies across its long-term weather and wildfire risk modeling framework, which supports more effective targeting of wildfire mitigation activities.

Operational Impact and Risk Reduction

SCE successfully met its target and benchmarked consequence metrics against real-time events to evaluate model performance and the model will continue to support the In-Event Risk Calculator and serve as an additional data point for operational decision-making, thus achieving the stated 2% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, meeting operational targets. The underrun was primarily driven by the deferral of climate change modeling and the SOMS project from 2025 to 2026, along with lower-than-expected Fuel Sampling Program costs due to fewer sampling locations and reduced labor hours and had no negative effects on intended wildfire risk reduction outcomes.

SA-10 – High Definition (HD) Cameras

Strategic Overview and Risk Mitigation

This initiative involved SCE's partnership with the University of California, San Diego (UCSD) to install high-definition (HD) cameras on non-SCE infrastructure, such as communications towers, in areas where SCE's Fire Science Team, Fire Management Team, Incident Management Program (IMP), and partnering fire agencies have identified gaps in spatial fire detection coverage. SCE maintains a network of 182 HD cameras integrated through UCSD's AlertCalifornia system (formerly AlertWildfire). SCE's 2025 target states that there are no planned installs of HD cameras and that additional installs will be based on reassessment in 2024. There was no risk reduction goal set for this initiative.

Financial Performance Analysis

- Planned O&M Budget: \$4,665,000
- Actual O&M Expenditure: \$3,618,000
- O&M Variance: -\$1,047,000 (22% Underrun)
- SCE Justification: The O&M expenses relate to the maintenance and recurring data service costs associated with HD cameras. The original plan assumed the installation of HD cameras at 10 new locations in 2025, along with the corresponding maintenance and data service costs for those sites. SCE partners with the University of California, San Diego (UCSD) to install cameras on non-SCE infrastructure (such as communication towers). While SCE directed UCSD to proceed with these installations in 2025, administrative

delays on UCSD's end deferred the installation work to 2026. As a result, the related maintenance and recurring data service expenses for these 10 locations did not materialize in 2025, leading to an O&M underrun for the year.

Operational Impact and Risk Reduction

SCE successfully completed the HD camera reassessment and 2 cameras were relocated in 2025 consistent with the reassessment which has remediated identified gaps in spatial fire detection coverage resulting in enhanced detection monitoring.

Assessment and Conclusion

SCE effectively completed this initiative, achieving improved wildfire mitigation outcomes. The overrun resulted from administrative delays by UCSD postponing installation of 10 planned HD camera sites from 2025 to 2026. As a result, the associated maintenance and recurring data service costs for those locations were not incurred in 2025 as originally forecasted. This overrun had no negative effects on intended wildfire risk reduction outcomes.

SA-11 – Early Fault Detection (EFD)

Strategic Overview and Risk Mitigation

This initiative involved the installation of Early Fault Detection (EFD) technology to detect high frequency radio emission that can occur from arcing or partial discharge conditions on the electric system. SCE set a target of 200 EFDs installed, aiming to achieve a 5% risk reduction goal.

Financial Performance Analysis

- Planned CAPEX Budget: \$12,068,000
- Actual CAPEX Expenditure: \$8,301,000
- CAPEX Variance: -\$3,767,000 (31% Underrun)
- Planned O&M Budget: \$576,000
- Actual O&M Expenditure: \$318,000
- O&M Variance: -\$258,000 (45% Underrun)
- Initiative Total Planned Budget: \$12,644,000
- Initiative Total Actual Expenditure: \$8,619,000
- Initiative Total Variance: -\$4,025,000 (32% Underrun)
- SCE Justification: The capital budget was based on the strive target of 300 installs. The compliance WMP target was 200 installs and SCE met this WMP goal. The O&M budget is for routine inspection & maintenance and event investigations. Installed equipment only saw few events that required crews to be dispatched to investigate the sensors, resulting in an O&M underrun.

Operational Impact and Risk Reduction

SCE successfully completed 200 EFD installations, thus achieving the stated 5% risk reduction goal.

Assessment and Conclusion

SCE effectively completed this initiative, meeting operational targets. The underrun occurred because the capital budget was based on a higher installation target of 300 units, while the compliance WMP target was 200 installs, which SCE achieved. Additionally, O&M costs were lower than forecasted because few sensor events required investigation or dispatch of field crews. This underrun had no negative effects on intended wildfire risk reduction outcomes.

4.3.3 Synthesis of Findings

4.3.3.1 Initiative Review

Within the Situational Awareness and Forecasting category, SCE met or exceeded all initiative targets in 2025. No initiatives failed to achieve their established completion goals.

The category demonstrated substantial overperformance in hardware deployment initiatives. SA-1 (Weather Stations) achieved 1,347% of its target, installing 202 weather stations against a 15-station baseline goal. This represents one of the highest completion rates across all WMP categories and suggests either dramatic strategic acceleration of weather monitoring infrastructure or significant underestimation of deployment capacity in the original WMP target-setting process. SA-11 (Early Fault Detection) met its 200-device target precisely (100% completion), demonstrating accurate capacity forecasting and execution discipline.

Analytical and modeling initiatives (SA-3, SA-8) achieved their qualitative targets of implementing machine learning capabilities and providing PSPS decision-making recommendations, though the nature of these deliverables makes quantitative performance assessment more challenging than hardware deployment programs. SA-10 (HD Cameras) completed its reassessment-driven scope by relocating 2 cameras to address coverage gaps, meeting the initiative's adaptive management objectives.

No systemic reasons for missed targets exist in this category, as all initiatives were validated. However, the IE identified data quality concerns that warrant attention despite not rising to the level of invalidating initiatives. For SA-11, 22 of 83 sampled Job Information Sheets (26.5%) and 10 of 21 sampled work orders (47.6%) showed installation date discrepancies when cross-referenced against frontload data. While the physical installations were verified through documentation, these date inconsistencies suggest recordkeeping synchronization issues between field completion records and enterprise data systems.

4.3.3.2 Funding Verification

Budget and Expenditure Summary: The Situational Awareness and Forecasting category had a total CAPEX planned budget of \$15,016,000 with actual expenditures of \$17,742,000, representing an 18.15% variance above budget, and a total O&M planned budget of \$20,545,000 with actual expenditures of \$20,533,000, representing a .06% variance below budget. The category's overall expenditure remained within 10% of the planned budget allocation.

Initiatives With Significant Variances: Of the 5 total initiatives in this category, all 5 (100%) had absolute percent differences exceeding 10%. Several initiatives demonstrated significant financial variances:

- SA-1 Weather Stations represented one of the most significant overruns within the situational awareness portfolio. Following the January 2025 Southern California wildfires, SCE substantially expanded the weather station network beyond the original planned scope, resulting in installation of 202 weather stations compared to the original target of 15. The associated increase in recurring calibration, maintenance, vendor support, and bundled contractor service costs significantly exceeded original budget assumptions. Despite the overrun, SCE substantially exceeded operational targets and achieved the intended PSPS-related risk reduction objectives.
- SA-3 Weather & Fuels Modeling also represented a major overrun initiative due to increased investments in cloud-based forecasting infrastructure and expanded weather modeling capabilities. SCE enhanced forecasting functionality from 3-day to 7-day projections, requiring additional computational power, cloud platform development, and ongoing Technosylva support services. Importantly, SCE demonstrated that the enhanced modeling platform supports multiple operational functions beyond wildfire mitigation, including PSPS decision-making, customer notifications, storm preparedness, and energy procurement activities.
- SA-8 Fire Spread Modeling represented a significant underrun initiative associated with deferred climate modeling work rather than reduced wildfire mitigation execution. SCE postponed Global Climate Models downscaling and SOMS project work into 2026 while continuing near-term wildfire modeling and risk assessment efforts using existing climate datasets and Cal Adapt data. SCE emphasized that the deferred work did not create immediate wildfire risk and that Technosylva modeling capabilities remain foundational to long-term wildfire risk prioritization and mitigation planning.
- SA-11 Early Fault Detection also demonstrated a material underrun; however, the variance was largely attributable to differences between the higher internal “strive” installation assumptions used for budgeting and the official WMP compliance target. SCE fully achieved the compliance target while incurring lower-than-forecasted capital and O&M expenditures due to fewer equipment events requiring field investigations

Key Trends and Funding Compliance: Several key trends emerged throughout the funding verification review of situational awareness and wildfire intelligence initiatives.

- Wildfire events and changing operational risk conditions significantly influenced expenditure levels and implementation priorities. The January 2025 Southern California wildfires directly contributed to expansion of weather station deployments, enhanced forecasting capabilities, and increased investment in operational weather intelligence systems. These changes demonstrate adaptive program management responding to evolving wildfire risk conditions.
- Technology modernization and predictive modeling capabilities continue to represent a growing component of wildfire mitigation spending. Multiple initiatives involved

advanced cloud computing infrastructure, machine learning deployment, LiDAR integration, fire spread modeling, weather prediction expansion, and predictive analytics platforms. These investments increasingly support operational decision-making associated with PSPS events, wildfire forecasting, customer notifications, and mitigation prioritization.

- Several underruns resulted from strategic reprioritization or deferred implementation rather than reductions in wildfire mitigation capability. SA-8 deferred climate modeling work while maintaining near-term risk assessment activities using alternative datasets, and SA-10 delayed HD camera installations due to external administrative issues rather than programmatic deficiencies. In most cases, SCE demonstrated that deferred work did not materially affect current wildfire mitigation outcomes.
- Budgeting methodologies frequently incorporated conservative or expanded planning assumptions that exceeded official compliance targets. SA-11 Early Fault Detection illustrated how internal “strive” targets used for budgeting purposes resulted in planned expenditures significantly above official WMP compliance requirements. Similar trends were observed in several earlier initiatives where operational flexibility and contingency planning contributed to forecasted expenditures exceeding actual implementation needs.

SCE maintained funding compliance and appropriately linked expenditures to operational wildfire mitigation objectives. SCE consistently provided detailed explanations regarding revised operational priorities, technology enhancements, deferred projects, expanded forecasting capabilities, and contractor cost drivers. Across the reviewed initiatives, financial variances were generally supported by operational justification, and most initiatives either met or substantially exceeded their operational and wildfire risk reduction targets despite significant deviations from originally forecasted expenditure levels.

4.4 EMERGENCY PREPAREDNESS

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.4.1 Initiative Summary Table

Table 40: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ³⁶	Sample Validation Rate (%) ^{37 38}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{39 40}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
DEP-2, 8.4.2.2.1, SCE Emergency Response Training	PSPS response teams are fully qualified/requalified by 07/01 annually to maintain readiness	SCE met target. 2025 PSPS Training and Requalification Series is complete.	Completed	N/A	N/A	Emergency Response Training List (Frontload Data)	114%	\$1,193	\$68 (-94.3%)	N/A
DEP-5, 8.4.3.3.1, Aerial Suppression	SCE will continue to reassess availability and funding for aerial suppression resources in SCE's service area annually to determine QRF strategy	SCE met target. Contracts were issued at the end of 2024, and final payment was provided to the agencies in January 2025.	Completed	N/A	N/A	Aerial Suppression Agreements (LA, OC, Ventura) Payments (Frontload Data)	100%	\$35,000	\$36,902 (5.4%)	Yes (2%)
PSPS-2, 8.4.6.2, Customer Care Program (Critical Care Backup Battery)(CCBB) Program)	85% Battery Deliveries Completed Within 30 Days	100% of the eligible customers who enrolled in the CCBB program received their batteries within 30 days.	Completed	34 Battery Deliveries	100%	Critical Care Backup Battery List (Frontload Data) SCE Written Response 34 Battery Records (DR024)	100%	\$8,670	\$7,572 (-12.7%)	Yes (35% / .005% PSPS Risk Only)
PSPS-3, 8.4.6.3, Customer Care Program (Portable Power Station and Generation or Rebates)	85% Rebate Claims Processed Within 30 Days	100% success rate was achieved in paying all claims within the target of 30 days.	Completed	34 Rebate Claims	100%	Portable Power Station & Generator Rebates List (Frontload Data) 34 Rebate Records (DR025)	100%	\$1,391	\$2,279 (63.8%)	Yes (0.11% / .002% PSPS Risk Only)

³⁶ N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

³⁷ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

³⁸ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

³⁹ The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.

⁴⁰ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.



4.4.2 Written Detail for Initiatives

4.4.2.1 Initiative Review – Findings & Method

DEP-2 – 8.4.2.2.1 SCE Emergency Response Training – Non-Focus and Non-Field Verifiable

DEP-2 outlines SCE’s technical training programs designed to prepare employees to perform their job functions safely, maintain compliance with applicable regulatory requirements and laws, support system reliability, and effectively implement emerging technologies. SCE states that it maintains a robust and highly skilled workforce, consisting of both employees and contractors, to support effective emergency response operations and facilitate timely service restoration during and following major events. In addition, SCE provides specialized training for personnel responsible for overseeing and executing de-energization and restoration protocols to ensure operational readiness, procedural consistency, and safe system restoration practices during wildfire-related and other emergency response activities.

SCE’s 2023-2025 WMP set a 2025 target to ensure that PSPS response teams are fully qualified/re-qualified by July 1 annually to maintain readiness. SCE did not set a risk reduction goal for this initiative. According to the 2025 EC AIR, SCE stated that the PSPS training and exercise requalification series was complete.

In support of DEP-2, SCE provided an Excel spreadsheet titled “DEP-2 SCE Emergency Response Training” which contained a list of 159 records with associated details such as employee ID, training received, and completion date.

Section 8.4.2.2.1 of the WMP explicitly states that SCE is tracking training compliance against the core PSPS positions indicated on Table 8.38. Table 41 details the number of training courses completed, extrapolated from the frontload data, with the number of staff detailed per Table 8-38.

Table 41: Trainings Conducted & Roles Required Comparison

<u>SCE Emergency Response Training</u>		<u>WMP Table 8-38</u>	
Item Title	Total Employees 2025	Role	Dedicated Staff
PSPS Incident Commander (IC) Training	16	PSPS Incident Commander	9
2025 PSPS Operations Section Task Force	88	PSPS Operations Section Chief	7
		PSPS Task Force	60
PSPS PIO, LNO, Customer Care & Customer Service Notifications Training	43	Customer Care Branch	217
PSPS Planning Section Training	12	Planning Section Chief	16
Total Trainings	159	Total Roles	309

Although all documented SCE Emergency Response team members received training ahead of the July 1 deadline, the Emergency Response Training List provided with the frontload data demonstrates that only 159 employees received training, compared to the 309 employees that SCE details as being retained for Emergency Preparedness. The IE sent DR007 to obtain clarification on the updated number of identified employees on the DEP-2 target list. SCE responded that by July 1, 2025, there were 159 employees identified, and 20 of these employees were exempted, resulting in total target population of 139 PSPS IMT members required to complete annual requalification training and exercises. This target list is established at the end of January and remains fixed throughout the year. Based on SCE’s response to DR007, the proposed target for DEP-2 is 139 PSPS IMT members.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 42: SCE Emergency Response Training

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
PSPS response teams are fully qualified/re-qualified by 7/1 annually to maintain readiness.	PSPS training and exercise requalification series is complete.	PSPS training and exercise requalification series is complete.	SCE Emergency Response Training (159 Employees)	114%

DEP-5 – 8.4.3.3.1 Aerial Suppression – Non-Focus and Non-Field Verifiable

Due to the limited availability of fire suppression resources available statewide, DEP-5 outlines SCE’s venture to partner with Los Angeles, Ventura, and Orange Counties to support their proposal to fund the stand-by time of aerial suppression resources to reduce wildfire risk to SCE’s system and help protect infrastructure and communities. In SCE’s 2023-2025 WMP Table 8-48 – High-Level Mutual Aid Agreement for Resources During a Wildfire or De-Energization Incident (pages 557 and 558), Los Angeles, Ventura, and Orange County Fire Agencies are listed as a mutual aid partners for aerial suppression resources.

SCE’s 2023-2025 WMP set a 2025 target to continue to reassess availability and funding for aerial suppression resources to determine ongoing QRF strategy and set a 2% risk reduction goal for this initiative. According to the 2025 EC AIR, SCE stated that contracts were issued at the end of 2024, and final payment was provided to the agencies in January 2025.

In support of DEP-5, SCE provided a 3-page document containing screenshots entitled “Ventura County 2025”, “Orange County 2025”, and “Los Angeles County 2025.” Each screenshot contained financial data to include bank details, check information (including check number and payment date), and check recipient information for Ventura County (Ventura County Fire Protection District) and Los Angeles County (Los Angeles County Fire Dept.). For Orange County

(Orange County Fire Authority), the financial data included an invoice amount and a “Clearing” date of January 15, 2025. The total dollar amount displayed in the documentation with Orange, Ventura, and Los Angeles Counties equals the actual expenditure for this initiative as reported by SCE in the 2025 EC AIR. The screenshots provided by SCE show a financial commitment to Ventura, Orange, and Los Angeles Counties to continue funding aerial suppression.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 43: Aerial Suppression

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Continue to reassess availability and funding for aerial suppression resources to determine ongoing QRF strategy.	Contracts were issued at the end of 2024, and final payment was provided to the agencies in January 2025.	Contracts were issued at the end of 2024, and final payment was provided to the agencies in January 2025.	Ventura County, Orange County, Los Angeles County	100%

PSPS-2 – 8.4.6.2 Critical Care Backup Battery (CCBB) Program – Non-Focus and Non-Field Verifiable

PSPS-2 outlines SCE’s Critical Care Backup Battery Program, which is a program that supports all customers enrolled in Medical baseline (MBL) that reside in a HFRA to provide a battery-powered portable backup solution to operate critical medical equipment during power outages due to PSPS events or other emergencies. SCE’s 2023-2025 WMP set a 2025 target to complete 85% of battery deliveries to eligible customers within 30 calendar days of program enrollment. SCE established a 35%/.005% risk reduction goal (PSPS risk only).

According to the 2025 EC AIR, SCE stated that 100% of the eligible customers who enrolled in the CCBB program received their batteries within 30 days.

In support of PSPS-2, SCE provided an Excel spreadsheet titled “PSPS-2 Customer Care Programs_Critical Care Backup Battery” which shows 7,640 assets with associated details such as Unique Customer ID, Date Enrolled, Date Battery Delivered, Within 30 Days, and Total Percentage Within 30 Days. Upon review of this data, the IE confirmed that 7,021 of these assets were shown to be delivered within 30 days, and 619 were shown as “no” in the “Within 30 Days” column. This data confirms that SCE achieved a target of 92% delivery within 30 days of program enrollment, exceeding its 2025 goal.

In DR018, SCE was asked to provide documentation of completion for 34 battery deliveries. SCE provided an Excel spreadsheet titled “06.PSPS-2_PSPS-2_2025 Base Sample Complete” which lists 37 items to include Unique Customer ID, Date Enrolled, Date Battery Delivered, Within 30 Days, and Total Percentage Within 30 Days. Upon review of this data, the IE confirmed that 34 of these assets were shown to be delivered within 30 days, and 3 were shown as “no” in the “Within

30 Days” column. This spreadsheet also contained a tab titled “iEnergy Project Data Export” which contained additional granular data for each unique asset ID installed and was pulled directly from SCE’s iEnergy, the platform used to track CCBB Program participation. The IE identified no issues or discrepancies with the data.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 44: Critical Care Backup Battery (CCBB) Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR024 Response	Initiative Validation Rate
Complete 85% of battery deliveries to eligible customers within 30 calendar days of program enrollment.	100% of the eligible customers who enrolled in the CCBB program received their batteries within 30 days.	100% of the eligible customers who enrolled in the CCBB program received their batteries within 30 days.	7,640 Deliveries (92% Within 30 Days)	100%

PSPS-3 – 8.4.6.3 Portable Power Station Rebate Program and Portable Generator Rebate Program – Non-Focus and Non-Field Verifiable

The Portable Power Station Rebate Program provides \$150 rebates to customers for purchasing a portable power station for their general home or small business resiliency needs. The Portable Power Station Rebate Program is available to all SCE customers residing in an HFRA or served by circuits passing through HFRA that are impacted by PSPS events. The Portable Generator Rebate Program provides a \$200 rebate on the purchase of a qualified portable generator, and \$600 for income-qualified and MBL customers.

SCE’s 2023-2025 WMP set a 2025 target to process 85% of all rebate claims within 30 business days of receipt from website vendor. SCE established a 0.11%/.0002% risk reduction goal (PSPS risk only). According to the 2025 EC AIR, SCE stated that a 100% success rate was achieved in paying all claims within the target of 30 days.

In support of PSPS-3, SCE provided an Excel spreadsheet titled “PSPS-3 Customer Care Programs_Portable Power Station and Generator Rebates” which shows 6,263 records with associated details such as Rebate Customer ID, Date Rebate Received, Date Rebate Processed, and Eligible. All rebate records were processed within 30 days of rebate received date.

In DR019, SCE was asked to provide documentation of completion for 34 rebates processed. SCE provided a 7-page document that contained 34 records that contain Rebate Customer ID, Date Rebate Received, Date Rebate Processed, SAP Document Number, and Proof of Payment details to include a unique document number associated with the rebate as well as the amount paid to the customer. Further, the type of rebate was clearly stated as a Portable Power State Rebate or a Generator Rebate within these records.

Based on this analysis, the documentation provided, and sampling verification, the IE has validated this initiative.

Table 45: Portable Power Station Rebate Program and Portable Generator Rebate Program

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR019 Response	Initiative Validation Rate
Process 85% of all rebate claims within 30 business days of receipt from website vendor.	100% success rate was achieved in paying all claims within the target of 30 days.	100% success rate was achieved in paying all claims within the target of 30 days.	6,263 Rebates (100% Within 30 Days)	100%

4.4.2.2 Funding Verification – Findings

DEP-2 – SCE Emergency Response Training

Strategic Overview and Risk Mitigation

This initiative involved technical training programs designed to prepare employees to perform their job functions safely, maintain compliance with applicable regulatory requirements and laws, support system reliability, and effectively implement emerging technologies. SCE set a target to ensure that PSPS response teams are fully qualified/re-qualified by July 1 annually to maintain readiness. SCE did not set a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned O&M Budget: \$1,193,000
- Actual O&M Expenditure: \$68,000
- O&M Variance: -\$1,125,000 (94% Underrun)
- SCE Justification: The underrun is related to Training & Development and SCE states that the complex PSPS conditions in early 2025, particularly the January events, caused significant disruption to the planned training schedule for the rest of 2025. Certain courses were delayed or deferred due to ongoing emergency response needs and the need to maintain system readiness during heightened wildfire conditions. These training courses, while informative, were not critical to addressing the most pressing risk. As a result, not all planned sessions were delivered within the calendar year, and the associated training expenditures were not incurred, resulting in a year-end underrun.

Operational Impact and Risk Reduction

SCE completed emergency response training for 159 employees in 2025 which accounts for approximately 114% of the total dedicated staff requiring annual qualification/re-qualification training.⁴¹

Assessment and Conclusion

SCE met its annual qualification target for emergency response training at the revised number of 139 employees trained, which contributed to a 94% underrun for the initiative. Complex PSPS conditions and significant emergency response activities during early 2025, particularly the January events, disrupted the planned training schedule and required resources to remain focused on maintaining system readiness during elevated wildfire conditions. As a result, certain non-critical training courses were delayed or deferred, leading to reduced training expenditures and a year-end Underrun.

DEP-5 – Aerial Suppression

Strategic Overview and Risk Mitigation

Since the absolute percent difference between budgeted and actual for this item is less than 10%, please refer to Table 40.

PSPS-2 – Customer Care Program (Critical Care Backup Battery/CCBB Program)

Strategic Overview and Risk Mitigation

This initiative involved a program that supports all customers enrolled in Medical baseline (MBL) that reside in a HFRA to provide a battery-powered portable backup solution to operate critical medical equipment during power outages due to PSPS events or other emergencies. SCE set a target to complete 85% of battery deliveries to eligible customers within 30 calendar days of program enrollment, aiming to achieve a 35%/.005% risk reduction goal (PSPS risk only).

Financial Performance Analysis

- Planned O&M Budget: \$8,670,000
- Actual O&M Expenditure: \$7,572,000
- O&M Variance: -\$1,098,000 (13% Underrun)
- SCE Justification: The year-end actuals for Critical Care Battery Backups (CCBB) exclude a \$872,569 accrual. After recording the accrual, total spend is expected to be \$8.444 million, reflecting a 3% underrun attributable to cost savings from the transition to smaller battery sizes in 2025. SCE was asked to confirm the stated justification for the underrun and provide the date the stated accrual was recorded. SCE stated that an accrual was recorded on December 31, 2025, in the amount of \$1,062,022. The final vendor invoice

⁴¹ In response to DR007, SCE stated that by July 1, 2025 there were 159 employees identified, and 20 of these employees were exempted, resulting in total target population of 139 PSPS IMT members required to complete annual requalification training and exercises. This target list is established at the end of January and remains fixed throughout the year. Based on SCE's response to DR007, the proposed target for DEP-2 is 139 PSPS IMT members.

amount of \$872,569 is confirmed as accurate. Following reconciliation of the recorded accrual to the final invoice, the total recorded spend for this initiative is \$7,382,593.

Reconciliation of Final Spend	
2025 Year-End Total (inclusive of all accruals)	\$7,572,046
Accrual reversal	(\$1,062,022)
Subtotal	\$6,510,024
Actual invoice: \$872,569	\$872,569
Final Total Spend	\$7,382,593

Operational Impact and Risk Reduction

SCE provided documentation confirming that 7,021 assets were shown to be delivered to customers within 30 days which equates to a 92% delivery rate within 30 days of program enrollment, thus achieving the stated 35%/.005% risk reduction goal (PSPS risk only).

Assessment and Conclusion

SCE effectively completed this initiative, surpassing operation targets. The underrun occurred due to cost savings achieved from transitioning to smaller battery sizes in 2025. Following reconciliation of a year-end accrual recorded on December 31, 2025, total recorded spend remained below the planned budget with no negative impacts on intended wildfire risk reduction outcomes.

PSPS-3 – Customer Care Program (Portable Power Station Rebate Program and Portable Generator Rebate Program)

Strategic Overview and Risk Mitigation

This initiative involved the Portable Power Station Rebate Program which provides \$150 rebates to customers for purchasing a portable power station for their general home or small business resiliency needs. The Portable Generator Rebate Program provides a \$200 rebate on the purchase of a qualified portable generator, and \$600 for income-qualified and MBL customers. SCE set a target to process 85% of all rebate claims within 30 business days of receipt from website vendor, aiming to achieve a 0.11%/.0002% risk reduction goal (PSPS risk only).

Financial Performance Analysis

- Planned O&M Budget: \$1,391,000
- Actual O&M Expenditure: \$2,279,000
- O&M Variance: \$888,000 (64% Overrun)
- SCE Justification: For both PSPS-3 rebate programs (Portable Power Station Rebates and Well Water Generator Rebates), expenditures exceeded the 2025 budget due to a significant surge in demand following the January 2025 windstorms, with the typical annual volume of rebates fully claimed within the first two months of the year.

Operational Impact and Risk Reduction

SCE successfully achieved a 100% success rate in paying all claims within the target of 30 days, thus achieving the stated 0.11%/.0002% risk reduction goal (PSPS risk only).

Assessment and Conclusion

SCE effectively completed this initiative, surpassing operation targets. The overrun occurred because demand for both PSPS-3 rebate programs surged following the January 2025 windstorms, resulting in the typical annual rebate volume being fully claimed within the first two months of the year without negatively impacting intended wildfire risk reduction outcomes.

4.4.3 Synthesis of Findings

4.4.3.1 Initiative Review

SCE met all Emergency Preparedness initiative targets in 2025 following clarification of workforce documentation methodology. All four initiatives: DEP-2 (Emergency Response Training), DEP-5 (Aerial Suppression), PSPS-2 (Critical Care Backup Battery Program), and PSPS-3 (Portable Power Station and Generator Rebate Programs) achieved their established completion goals and were validated by the IE.

DEP-2 initially appeared to show a critical training coverage gap, with only 159 documented training completions against 309 stated PSPS response positions in WMP Table 8-38 (51.5% coverage). However, DR007 clarification fundamentally resolved this discrepancy by revealing that SCE's operational target population differs substantially from the WMP-documented staffing table. SCE explained that by July 1, 2025, there were 159 employees identified on the target list, with 20 exempted, resulting in an actual target population of 139 PSPS Incident Management Team (IMT) members required to complete annual requalification training. This target list is established at the end of January and remains fixed throughout the year, representing the operational workforce rather than the broader 309 positions documented in Table 8-38. The initiative was validated following this clarification, though the substantial discrepancy between WMP Table 8-38 (309 positions) and operational target population (139 positions) raises important questions about documentation alignment and workforce planning transparency.

DEP-5 met its qualitative target to "continue to reassess availability and funding for aerial suppression resources," with contracts issued at the end of 2024 and final payments provided to Los Angeles, Ventura, and Orange County fire agencies in January 2025. Financial documentation confirmed commitment execution matching reported expenditures.

PSPS-2 exceeded its 85% delivery target by achieving 92% of battery deliveries within 30 calendar days of program enrollment (7,021 of 7,640 deliveries), while SCE's AIR claimed 100% achievement.

PSPS-3 (Portable Power Station and Generator Rebate Programs) achieved 100% processing within 30 business days against an 85% target, processing all 6,263 rebate claims within the target timeline and demonstrating exceptional administrative execution.

No initiatives missed targets in this category. The successful execution across all four initiatives, particularly following the DEP-2 clarification, suggests that operational readiness and customer support programs benefit from clear success criteria, established processes, and adequate resource allocation. The contrast between the initial appearance of DEP-2 failure (51.5% coverage) and the

clarified reality of DEP-2 success (114% achievement) underscores the critical importance of documentation alignment between WMP planning documents and operational execution tracking.

4.4.3.2 Funding Verification

Budget and Expenditure Summary: The Emergency Preparedness category had a total O&M planned budget of \$46,254,000 with actual expenditures of \$46,821,000, representing a 1.23% variance above budget. The category's overall expenditure remained within 10% of the planned budget allocation.

Initiatives With Significant Variances: Of the 4 total initiatives in this category, 3 (75%) had absolute percent differences exceeding 10%. Several initiatives demonstrated significant financial variances:

- DEP-2 Emergency Response Training represented the most significant underrun within the reviewed initiatives. SCE completed qualification or requalification training for only 159 employees, representing approximately 51.5% of the 309 dedicated staff requiring annual qualification. Unlike many previously reviewed initiatives that exceeded operational targets despite financial variances, DEP-2 did not meet its annual training objective. SCE attributed the shortfall to operational demands associated with heightened PSPS conditions and emergency response activities during early 2025. The initiative demonstrated how active emergency operations can directly affect workforce development schedules and associated funding utilization.
- PSPS-3 Portable Power Station and Generator Rebate Programs represented the largest overrun within this group of initiatives. The variance was directly linked to increased customer participation following severe windstorm activity in January 2025. Demand for resiliency-related rebates significantly exceeded original planning assumptions, causing annual rebate allocations to be rapidly exhausted. Despite the overrun, SCE successfully processed 100% of rebate claims within the required 30-day performance target, demonstrating effective program administration during elevated demand conditions.
- PSPS-2 Critical Care Backup Battery Program demonstrated a more moderate underrun driven primarily by equipment-related cost efficiencies rather than reduced program participation. SCE successfully achieved a 92% delivery rate within 30 days of enrollment, exceeding the stated operational target, while reducing overall costs through transition to smaller battery units. The initiative also demonstrated strong financial reconciliation controls through documentation of accrual adjustments and final invoice reconciliation.

Key Trends and Funding Compliance: Several key trends emerged throughout the funding verification review of emergency preparedness and PSPS customer support initiatives.

- Emergency operational conditions during early 2025 significantly affected both program execution and expenditure patterns. January 2025 wildfire and windstorm events drove increased demand for customer resiliency programs while simultaneously disrupting internal training schedules and operational planning activities. These conditions demonstrate the dynamic relationship between actual emergency events and wildfire mitigation funding utilization.

- Customer resiliency and PSPS preparedness programs experienced strong operational performance despite financial variances. Both PPS-2 and PPS-3 exceeded operational targets related to delivery and processing timelines, indicating that SCE maintained effective customer support capabilities during periods of elevated demand. Financial overruns or underruns in these programs were generally associated with external demand conditions or equipment cost efficiencies rather than implementation deficiencies.
- Multiple initiatives demonstrated that operational priorities shifted toward immediate wildfire response and system readiness during active wildfire conditions. DEP-2 Emergency Response Training illustrated how non-critical training activities were deferred to maintain operational staffing availability during heightened wildfire and PPS conditions. While this resulted in reduced expenditures and incomplete qualification targets, SCE maintained that operational readiness remained the primary organizational priority.
- The review identified evidence of appropriate accounting reconciliation and expenditure tracking. PPS-2 included detailed reconciliation of year-end accruals and vendor invoices, while SCE consistently documented operational causes for funding variances and associated expenditure adjustments. The documentation reviewed generally supports that expenditures were tied to legitimate operational conditions, customer demand fluctuations, or emergency response requirements.

SCE generally maintained funding compliance and continued supporting wildfire mitigation and PPS resiliency objectives despite changing emergency conditions and operational disruptions. Financial variances were largely supported by operational justification, and with the exception of incomplete emergency response training qualifications under DEP-2, most initiatives met or exceeded intended operational performance targets without negatively affecting intended wildfire mitigation or PPS resiliency outcomes.

4.5 COMMUNITY OUTREACH AND ENGAGEMENT

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.5.1 Initiative Summary Table

Table 46: Initiative Summary Table (Spend in Thousand \$)

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size ⁴²	Sample Validation Rate (%) ^{43 44}	Verification Method	IE Finding on Initiative (Initiative Validation Rate) ^{45 46}	WMP – Planned Spend (\$)	EC-Claimed Actual Spend (\$ and % from budget)	Satisfied Risk Reduction Goal?
DEP-1, 8.5.2.1, Wildfire Safety Community Meetings	Continue or revise - determined based on outcome of 2023-2024	14 Meetings	Completed	14 Meetings	100%	Wildfire Safety Community Meetings 14 Meeting Records (incl. materials, agendas, etc.) (Frontload Data)	100% ⁴⁷	\$132	\$68 (-48.5%)	N/A
DEP-4, 8.4.2.3, Customer Research & Education	3 PSPS-Related Customer Studies	3 PSPS-Related Customer Studies	Completed	3 PSPS-Related Customer Studies	100%	Customer Research and Education Study Reports (Frontload Data)	100%	\$4,337	\$2,018 (-53.5%)	N/A

⁴² N/A in the “Sample Size” column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.

⁴³ The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.

⁴⁴ N/A in the “Sample Validation Rate” column indicates that no sampling was reviewed; therefore, no validation rate was applied.

⁴⁵ The Initiative Validation rate is determined by multiplying the EC-Claimed amount (unless otherwise noted) by the Sample Validation Rate (%) then dividing by the WMP Initiative Target.

⁴⁶ Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95% to be considered validated.

⁴⁷ Refer to Section 4.5.2.1, Initiative Review for DEP-1 for more information on how the initiative was validated.



4.5.2 Written Detail for Initiatives

4.5.2.1 Initiative Review – Findings & Method

DEP-1 – 8.5.2.1 Wildfire Safety Community Meetings – Non-Focus and Non-Field Verifiable

SCE conducts wildfire safety community meetings throughout its service territory, with prioritization given to communities located within HFRA. These meetings are intended to provide customers with information regarding SCE’s Wildfire Mitigation Plan, grid hardening activities, Public Safety Power Shutoff (PSPS) protocols, and emergency preparedness measures. In addition, the meetings are designed to educate customers regarding available SCE programs, services, and resources while also providing participants with an opportunity to ask questions, share concerns, and provide feedback directly to SCE staff regarding wildfire safety initiatives. Outreach efforts specifically targeted communities newly designated within HFRA as well as communities frequently impacted by PSPS events. Following significant wildfire events occurring in early 2025, customers expressed a strong desire for additional community-specific engagement meetings. In response, SCE conducted supplemental localized meetings that provided more detailed updates regarding wildfire safety activities, enhanced customer understanding of wildfire preparedness, highlighted SCE’s support and recovery efforts, and further educated customers regarding PSPS protocols and available community resources.

SCE’s 2023-2025 WMP set a 2025 target to continue or revise the target (determined based on the outcome of 2023-2024). SCE did not set a risk reduction goal for this initiative. According to the 2025 EC AIR, SCE stated that a total of 14 wildfire community meetings were held in 2025.

In support of DEP-1, SCE provided a 2-page document titled “DEP-1 Wildfire Safety Community Meetings” which contained a “Meeting Details” table showing 14 community meetings: two in June, one in July, four in August, four in September, and three in October. These meetings were a combination of virtual, in person and in person/livestream. Included in this document were links that provided presentation materials for the 14 meetings in all venues (virtual, in person and in person/livestream). The community-specific meetings held in August, September, and October were for the following communities: Lake Hughes/Lake Elizabeth, Tulare County/Three Rivers, Triunfo/Lobo Canyon, Acton, Santa Barbara, Santa Clarity Valley, Mono/Inyo County, Las Virgenes-Malibu, Inland Empire Counties, Ventura-Fillmore, and Santa Barbara County/Carpinteria.

The IE was able to view all presentation materials which included details such as agendas, emergency preparedness tips for extended power outages, information about PSPS, meteorology and fire science data, fire spread modeling examples, PSPS customer programs and resources available, and wildfire mitigation and grid hardening efforts made by SCE. All presentation material also provided a QR code that could be used by customers to share their feedback about each meeting.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 47: Wildfire Safety Community Meetings

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Continue or revise - determined based on outcome of 2023-2024	14 Community Meetings	14 Community Meetings	14 Community Meetings w/ Presentation Materials	100%

DEP-4 – 8.5.2.3 Customer Research and Education – Non-Focus and Non-Field Verifiable

DEP-4 outlines SCE’s efforts to improve its understanding of methods to reduce the impacts of wildfires, Public Safety Power Shutoff (PSPS) events, and wildfire mitigation activities on customers and affected communities. As part of this initiative, SCE develops and distributes customer surveys at the conclusion of wildfire season utilizing the PSPS Tracker platform to collect customer feedback regarding SCE’s wildfire mitigation programs, with particular emphasis on PSPS-related activities. These surveys are intended to assess and improve SCE’s understanding of customer awareness, experiences, and perceptions associated with PSPS events and broader wildfire mitigation efforts, while also identifying opportunities to enhance customer communication, preparedness, and overall program effectiveness.

SCE’s 2023-2025 WMP set a 2025 target to conduct at least three PSPS-related customer studies. SCE did not set a risk reduction goal for this initiative. According to the 2025 EC AIR, SCE stated that a total of three customer studies were conducted in 2025.

In support of DEP-4, SCE provided a 189-page document titled “DEP-4 Customer Research and Education_4 Study Reports”/In-Language Wildfire Mitigation/Public Safety Power Shutoff Communication and Outreach Effectiveness Survey. This document contained a Business Post-Wave Report and provided information for the following sections: Background & Research Methodology, Executive Summary, Key Findings, and Detailed Findings. In addition, this document contained a Residential Post-Wave Report and provided information for the following sections: Background & Research Methodology, Executive Summary, Key Findings, Detailed Findings, and Appendix. Under the “Background” heading for both reports, it was stated that “SCE administers the pre-and post-season surveys to residential and business customers across its service territory (i.e., systemwide) with a special focus on high fire risk areas (HRFAs).” The document also includes the results from the PSPS Survey, where two different survey types are sent to customers: customers who were de-energized and restored before the event start and end dates and customers who were notified of a potential shut off but were not de-energized between the start and end dates. Samples of all surveys distributed were included in the report.

The IE was able to identify and review detailed survey findings for both residential and business customers within SCE’s service territory associated with the pre-season, post-season customer,

and PSPS surveys. The documentation provided included detailed customer feedback, perceptions, and experiences related to SCE’s PSPS activities and wildfire mitigation efforts.

Based on this analysis and the documentation provided, the IE has validated this initiative.

Table 48: Customer Research and Education

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Conduct at least three PSPS-related customer studies in 2025.	Three Studies	Three Studies	Pre- and Post-Season Survey Results, PSPS Survey Results	100%

4.5.2.2 Funding Verification – Findings

DEP-1 – Wildfire Safety Community Meetings

Strategic Overview and Risk Mitigation

This initiative involved conducting wildfire safety community meetings to provide customers with information regarding SCE’s Wildfire Mitigation Plan, grid hardening activities, Public Safety Power Shutoff (PSPS) protocols, and emergency preparedness measures. SCE set a target to continue or revise the target to host at least four wildfire safety meetings (determined based on the outcome of 2023-2024) and claimed that a total of 14 wildfire community meetings were held in 2025. SCE did not set a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned O&M Budget: \$132,000
- Actual O&M Expenditure: \$68,000
- O&M Variance: -\$64,000 (48% Underrun)
- SCE Justification: The underrun reflects SCE's shift to virtual community town halls and use of in-house resources in lieu of outsourcing. Partnership with local cities to use local facilities also resulted in avoided costs for facility rentals, travel, lodging, refreshments, and external support.

Operational Impact and Risk Reduction

Although SCE did not establish a quantitative target for this initiative, they completed 14 wildfire community meetings in 2025 which directly supports effective long-term wildfire risk mitigation.

Assessment and Conclusion

SCE effectively completed this initiative while achieving notable financial efficiencies. The reported underrun was attributable to strategic cost-saving measures and efficient resource allocation practices. These financial efficiencies did not adversely impact implementation quality, operational performance, or the initiative’s intended wildfire risk reduction objectives.

DEP-4 – Customer Research & Education**Strategic Overview and Risk Mitigation**

This initiative involved efforts to improve SCE’s understanding of methods to reduce the impacts of wildfires, Public Safety Power Shutoff (PSPS) events, and wildfire mitigation activities on customers and affected communities through the development and distribution of customer surveys at the conclusion of wildfire season. SCE set a target to conduct at least three PSPS-related customer studies. SCE did not set a risk reduction goal for this initiative.

Financial Performance Analysis

- Planned O&M Budget: \$4,337,000
- Actual O&M Expenditure: \$2,018,000
- O&M Variance: -\$2,319,000 (53% Underrun)
- SCE Justification: The underrun for Customer Research and Education was driven by research activities involving multi-unit dwelling customers in HFRAs being deferred to 2026, as well as the postponement of user experience research related to PSPS content enhancements on SCE.com.

Operational Impact and Risk Reduction

SCE met the stated target, completing development and deployment of three (3) customer surveys in its service territory.

Assessment and Conclusion

SCE effectively completed this initiative and achieved the intended outcome of improving understanding of customer needs related to PSPS events. The reported underrun was primarily attributable to the deferral of certain research activities and planned PSPS content enhancements into 2026, rather than deficiencies in implementation or program performance.

4.5.3 Synthesis of Findings**4.5.3.1 Initiative Review**

Within the Community Outreach and Engagement category, SCE met all initiative targets in 2025. Both DEP-1 (Wildfire Safety Community Meetings) and DEP-4 (Customer Research and Education) achieved their established completion goals, representing successful execution of customer-facing communication and feedback programs.

DEP-1 completed 14 community meetings in 2025, meeting its qualitative target to "continue or revise" based on 2023-2024 outcomes. The meetings were distributed across the fire season (June through October) and employed multiple engagement formats (virtual, in-person, and hybrid in-person/livestream) to maximize accessibility. The geographic distribution prioritized communities within HFRA and those frequently impacted by PSPS events, with supplemental localized meetings added in response to significant wildfire events occurring in early 2025.

DEP-4 completed three PSPS-related customer studies, precisely meeting its 2025 target. The studies included pre-season surveys, post-season surveys, and event-specific PSPS surveys

administered to both residential and business customers, with particular focus on HFRA. The 189-page documentation demonstrated systematic survey methodology, detailed findings analysis, and actionable insights for program improvement.

4.5.3.2 Funding Verification

Budget and Expenditure Summary: The Community Outreach and Engagement category had a total O&M planned budget of \$4,469,000 with actual expenditures of \$2,086,000, representing a 53.32% variance below budget. The category's overall expenditure exceeded the 10% variance threshold.

Initiatives With Significant Variances: Of the 2 total initiatives in this category, both (100%) had absolute percent differences exceeding 10%.

- DEP-4 Customer Research & Education represented the most significant variance within the reviewed initiatives. The 53% underrun was largely driven by scheduling and prioritization decisions rather than reductions in program execution quality or abandonment of planned customer engagement efforts. SCE deferred portions of the multi-unit dwelling customer research and PSPS-related website user experience studies into 2026 while still successfully conducting the three required PSPS-related customer studies identified within the initiative target. The deferred activities did not materially affect the initiative's overall operational performance or intended customer outreach objectives during the 2025 reporting period.
- DEP-1 Wildfire Safety Community Meetings also demonstrated a substantial underrun, although the variance was associated with operational efficiencies rather than project deferrals. SCE exceeded the originally anticipated meeting volume by conducting 14 wildfire community meetings in 2025 while significantly reducing delivery costs through virtual engagement platforms and utilization of local public facilities. The initiative demonstrated that community outreach and wildfire education objectives can be maintained or expanded while reducing reliance on higher-cost in-person meeting logistics and external vendor support.

Importantly, neither initiative demonstrated evidence that reduced expenditures negatively impacted implementation effectiveness, customer engagement quality, or intended wildfire mitigation support objectives. Both initiatives met or exceeded their operational performance targets despite significant financial underruns.

Key Trends and Funding Compliance: Several key trends emerged throughout the funding verification review of customer outreach and education initiatives.

- Operational efficiencies and modernization of engagement approaches significantly reduced program expenditures without adversely affecting performance outcomes. SCE's increased reliance on virtual meetings, in-house staffing, and local government partnerships substantially reduced traditional outreach-related costs while still maintaining broad customer engagement activities.

- The review identified a trend toward strategic deferral and reprioritization of non-critical customer research activities. DEP-4 demonstrated that certain research initiatives and website enhancement studies were postponed into future reporting periods while SCE continued to prioritize essential customer communication and PSPS awareness efforts during the active wildfire season. These deferrals appear to have been driven primarily by scheduling and operational prioritization considerations rather than funding deficiencies.
- The reviewed initiatives demonstrated strong alignment between expenditures and operational outcomes. Both EP-1 and DEP-4 successfully achieved or exceeded stated targets despite materially lower expenditures than originally forecasted. This suggests that original budget assumptions may have incorporated more resource-intensive implementation approaches than were ultimately required under actual operating conditions.

SCE maintained appropriate funding compliance and continued to support customer-facing wildfire mitigation and PSPS preparedness objectives despite significant financial underruns. Reported variances were adequately supported through documented operational changes, deferred research schedules, or strategic efficiency measures. Overall, the reviewed initiatives indicate that SCE successfully maintained customer outreach, education, and engagement objectives while reducing overall program expenditures through efficient resource utilization and revised implementation approaches.

5. EVALUATION OF QA/QC PROGRAMS

Quality Assurance and Quality Control (QA/QC) are essential in ensuring the thoroughness and reliability of an EC's operations. This section presents a comprehensive assessment of SCE's QA/QC program, utilizing a structured approach based on five key dimensions:

- Roles and Responsibilities
- Quality Culture
- Quality Management System (QMS)
- Quality Inspections and Audits
- QA/QC Technology Adoption

By examining these critical areas, the IE aims to provide a holistic view of the EC's quality practices, highlighting areas of strength, identifying industry-leading best practices, and pinpointing opportunities for enhancement. Each category was scored on a scale ranging from 0-4 and the score demonstrated the EC's maturity in QA/QC implementation: 0 – Not Implemented; 1 – Initiated; 2 – Applied; 3 – Routine; 4 – Mastered. The evaluation framework allows a thorough analysis of how quality is integrated into the EC's structure, culture, systems, and processes.

Roles and Responsibilities – 3 Routine

SCE's Roles and Responsibilities dimension achieves Level 3 – Routine maturity level. The T&D program exhibits highly structured accountability with the Quality Control Senior Manager holding overall responsibility for QC across wildfire mitigation activities, supported by documentation in the Quality Manual (a formal QMS document), QCP-006 (Overhead Detailed Quality Control Inspection Process), QCP-014 (Transmission Detail Inspection QC Inspection Process), and QCP-015 (Generation QC Inspection Process). Roles are reinforced through Personnel Qualification Standards (PQS) that define education, experience, and training requirements for all QC inspection personnel, with annual performance evaluations ensuring ongoing accountability. Communication mechanisms demonstrate integration across organizational levels through corporate-level quality goals tied to performance, monthly quality metrics distributed to all stakeholders including contractors and senior leaders, and weekly-refreshed dashboards accessible to all stakeholders. General Procedure 013 (GP-013) establishes a process for identifying data trends, communicating trends to stakeholders, and identifying required improvement actions, while roadshows conducted by Compliance & Quality provide direct engagement with front-line employees and contractors. Leadership support is evidenced through the corporate goal structure and monthly reporting to senior leaders, indicating QA/QC is embedded in strategic decision-making processes.

The Vegetation Management program similarly demonstrates well-defined accountability with the Senior Manager of the Regulatory & Compliance division holding overall responsibility for QA/QC across five distinct WMP activities (VM-1, VM-2.2, VM-4, VM-7, and VM-8). Responsibilities are formalized through Statement of Work contracts for external vendors, UVM procedures (particularly UVM-07 "Post work verification and UVM program oversight" and

UVM-21 "Internal Controls"), specialized QC Field Guides covering hazard trees, pole brushing, distribution line clearing, and transmission line clearing, and the 2025 Annual QC Plan providing structured planning for oversight activities. Communication mechanisms include monthly performance review meetings with all VM contractors where QC results tracked in PowerBI dashboards are reviewed via scorecards, with performance trending shared monthly with VM Leadership. The VM organization demonstrates proactive leadership engagement through escalation protocols that engage the Director of VM and Senior Manager when performance issues persist, as evidenced by executive-level meetings with all eight tree trimming contractors regarding P1 work point closure issues, which resulted in immediate performance improvement. Training reinforcement occurs through annual 8-hour UVM Core Plans Training with 3-6 month refresher sessions for both internal staff and external partners. The QC contractor workforce (California Forestry Vegetation Management) consists primarily of ISA-certified arborists, and internal QA/QC personnel are supervised directly by senior management, establishing clear reporting lines.

Cross-functional integration is demonstrated through several mechanisms. Both programs utilize PowerBI dashboards for performance tracking and visibility, suggesting shared technology infrastructure and common reporting standards. The T&D program's General Procedure 014 (GP-014) establishes a dispute resolution process engaging personnel with appropriate expertise, diverse perspectives, and Subject Matter Experts, indicating cross-functional collaboration mechanisms. The VM program's internal assessments performed by the Regulatory and Compliance QA team in accordance with UVM-21 quarterly or annually, combined with Audit Services Department (ASD) audits and external audits by OEIS, the Independent Evaluator, and CPUC, demonstrate multiple layers of oversight with clear escalation pathways. Both programs show evidence of optimization through annual review and update cycles for their governing documents. The T&D QMS is reviewed annually with documented and approved updates, while VM procedures and field guides are reviewed annually and revised to address changes.

Quality Culture – 3 Routine

SCE's Quality Culture dimension achieves Level 3 – Routine maturity level. The T&D program exhibits training through the Personnel Qualification Standards (PQS) system, which defines education, experience, and training requirements specific to each QC inspection task. Training combines formal classroom instruction with on-the-job training (OJT), with individual requirements evaluated case-by-case to ensure personnel possess requisite knowledge before qualification. All QC inspection personnel must be qualified to the appropriate PQS prior to performing independent inspections, establishing a clear competency threshold. The annual performance evaluation requirement for all QC personnel ensures ongoing accountability and provides a mechanism for identifying skill gaps or performance concerns. General Procedure 003 (GP-003) establishes guidelines for identifying, delivering, and documenting all training types including OJT, ad hoc training, and procedure-based training, ensuring employees acquire necessary skills. The roadshow approach, where Compliance & Quality personnel engage directly with front-line employees and contractors to discuss quality performance, demonstrates proactive cultural reinforcement beyond formal training channels. Quality expectations are further

embedded through corporate-level quality goals tied to performance, creating organizational alignment from executive leadership through field personnel.

The Vegetation Management program similarly demonstrates structured quality reinforcement through annual UVM Core Plans Training, an 8-hour comprehensive program covering key UVM program requirements and regulations with a dedicated QA/QC section. Refresher training provided 3-6 months after initial training ensures knowledge retention and addresses emerging issues. Monthly performance review meetings with all VM contractors provide regular touchpoints for reinforcing expectations and discussing performance trends. The QC contractor workforce (California Forestry Vegetation Management) consists primarily of ISA-certified arborists, establishing baseline professional competency, while internal VM QA/QC personnel are hired based on qualifications and experience and supervised directly by the Senior Manager of Regulatory and Compliance. Specialized in-person training provided by VM's QC Senior Advisor on LiDAR data usage for inspection demonstrates commitment to technical skill development for emerging technologies. The qualification of internal Operations Senior Specialists to Personnel Qualification Standards for Post Work Verification activities mirrors the T&D approach, creating consistency in competency expectations across programs.

Both programs demonstrate mature corrective action cultures that drive behavioral change rather than simply documenting failures. The T&D program's General Procedure 004 (GP-004) provides guidance for managing findings and opportunities for improvement, with actionable findings tracked from identification to resolution in a database. The General Procedure 014 (GP-014) dispute resolution process engages personnel with appropriate expertise, diverse perspectives, and SMEs to resolve contested findings, demonstrating a culture that values technical accuracy over hierarchy. Monthly quality metrics distributed to all stakeholders including contractors and senior leaders, combined with weekly-refreshed dashboards accessible to all stakeholders, create transparency and shared accountability. The VM program's corrective action approach is similarly sophisticated, with UVM-07 Section 4.11 and UVM-22 defining performance thresholds that trigger corrective actions. When QC inspectors identify failures, rework points are generated in the Work Management System with 30-day completion requirements. Performance scores tracked in PowerBI dashboards are communicated monthly to each contractor via scorecards during performance review meetings, with performance trending shared with VM Leadership. The escalation example involving P1 work point closure demonstrates cultural maturity, when contractors performed field mitigations in a timely manner but failed to close work points promptly in the system, VM leadership (Director and Senior Manager) met individually with all eight tree trimming contractors, discussed potential monetary penalties, and observed immediate performance improvement. This illustrates that quality expectations are taken seriously at all organizational levels and that consequences are real and effective.

Feedback mechanisms demonstrate integration across organizational levels. The T&D program's monthly checkpoint review process involves all QC personnel reviewing non-conforming conditions for accuracy, providing both quality assurance and a learning opportunity for continuous improvement. The annual review and update of Personnel Qualification Standards by QC Program and Field Advisors, with field subject matter experts responsible for technical data,

ensures training content evolves based on lessons learned. The VM program's quarterly or annual internal assessments performed by the Regulatory and Compliance QA team in accordance with UVM-21, combined with external audits by OEIS, the Independent Evaluator, CPUC, and SCE's Audit Services Department, create multiple feedback channels. The QA review of all WMP evidence submissions prior to any submission demonstrates quality consciousness embedded in regulatory compliance processes. Both programs show evidence that lessons learned drive procedural changes, the T&D QMS is reviewed annually with documented and approved updates, while VM procedures and field guides are reviewed annually and revised to address changes.

Quality Management Systems (QMS) – 3 Routine

SCE's Quality Management System (QMS) dimension achieves Level 3 – Routine maturity level. The T&D program operates under a formal Quality Management System documented in the Compliance & Quality Manual, supported by detailed process documents including QCP-006, QCP-014, and QCP-015 establishing comprehensive coverage across all T&D wildfire mitigation activities. General Procedure 004 (GP-004) provides systematic guidance for managing findings with actionable items tracked in a database from identification to resolution. The QMS establishes clear workflows with mandatory checkpoints, monthly program scope is pulled from prior month's work using a risk-based process, assigned to QC inspectors using iPads, with details captured in a database and displayed in an online quality dashboard. Daily and weekly reviews by QC Program and Field Advisors ensure consistency, while monthly checkpoint review processes involving all QC personnel provide learning opportunities. The QMS undergoes annual review and update cycles with all changes documented and approved.

The Vegetation Management program, while not operating under formal QMS certification like ISO 9001, has developed a document suite following QMS principles. The foundational procedure UVM-07 outlines VM's QA/QC approach providing reasonable assurance that VM meets applicable internal, Federal, and State requirements. This is complemented by UVM-21 (Internal Controls), UVM-22 (Corrective Action Program), and program-specific field guides. The VM document suite addresses critical QMS elements including TVMP/DVMP requirements, QA/QC/Oversight, Inspection, Qualification, Training, Threat management, Managing critical business records, Refusal management, Internal controls, and Corrective actions. The 2025 Annual QC Plan provides strategic planning for oversight activities aligned with risk priorities. VM's QC workflow demonstrates clear process definition with inspections scheduled based on the UVM master schedule and percentage of tree work completed, prioritizing highest risk TRI-A HFRA circuits while maintaining monthly oversight cadence across other circuit categories. All VM processes are documented in UVM core documents and applicable job aids/field guides, reviewed annually and maintained on a VM SharePoint site ensuring version control.

Both programs demonstrate sophisticated data management and analytical capabilities. The T&D program utilizes an integrated technology stack including iPads/iPhones for field data collection, SAP as system of record, SQL Server, Power BI dashboards, PowerApps, SharePoint, and ArcGIS/ESRI/AGOL applications. QC findings are tracked from identification to resolution with details displayed in an online quality dashboard refreshed weekly and accessible to all SCE employees and contractors. Monthly quality reports are distributed to all stakeholders including

contractors and senior leaders. General Procedure 013 (GP-013) defines a systematic process to identify data trends, communicate trends to stakeholders, and identify required improvement actions. The VM program employs real-time documentation of QC inspection results in the Work Management System (WMS), which automatically generates resolutions for mitigation when findings are identified. Data is uploaded to PowerBI dashboards for trending analysis, with monthly and year-to-date performance scores tracked for each contractor. Performance trending is performed monthly and shared with VM Leadership, with UVM-07 Section 4.11 specifically addressing "Performance Analysis and Trending."

Quality Inspections and Audits – 3 Routine

SCE's Quality Inspections and Audits dimension achieves Level 3 – Routine maturity level. The T&D program conducts daily QC inspections performed by SCE QC inspectors across all wildfire mitigation activities according to QCP-006 (Overhead Detailed Quality Control Inspection Process), QCP-014 (Transmission Detail Inspection QC Inspection Process), and QCP-015 (Generation QC Inspection Process). Each month's program scope is pulled from work completed in the prior month using a risk-based process and assigned to QC inspectors for field inspections using iPads. QC work is reviewed daily or weekly by QC Program and Field Advisors to ensure consistency and accuracy, with non-conforming conditions reviewed for accuracy during monthly checkpoint review processes involving all QC personnel, providing learning opportunities and continuous improvement. All QC inspections are conducted by internal SCE QC inspectors rather than third-party contractors, ensuring consistency in inspection quality and organizational knowledge retention. General Procedure 004 (GP-004) provides guidance for managing findings identified through QC programs, with actionable findings tracked in a database from identification to resolution and used for performance scoring to measure inspectors' ability to accurately identify and classify potential safety and reliability risks of General Order 95 violations, potential ignition risks, and other safety hazards. The dispute resolution process defined in General Procedure 014 (GP-014) engages personnel with appropriate expertise, diverse perspectives, and SMEs to resolve contested findings, demonstrating that inspection results are subjected to technical scrutiny rather than hierarchical override. SCE's Audit Services Division may also perform audits to ensure quality, providing an additional verification layer.

The VM program demonstrates equally sophisticated inspection frameworks through its three-tiered Defense-in-Depth oversight strategy detailed in UVM-07, which includes Post Work Verification (PWV) performed by internal Operations Senior Specialists who are ISA certified arborists qualified to Personnel Qualification Standards, Quality Control Inspections performed by independent third-party QC contractors (California Forestry Vegetation Management) who are mostly ISA certified arborists, and Quality Assurance Reviews performed by VM's Regulatory and Compliance QA team. QC inspections are performed daily by approximately 45 QC contractors, with inspections scheduled based on the UVM master schedule and percentage of tree work completed. The prioritization demonstrates risk-based targeting, emphasizing highest risk TRI-A HFRA circuits while maintaining monthly oversight cadence across TRI-B, C, D, Non-HFRA, subtransmission, and transmission circuits or grids. During routine inspections, all trees within a grid or adjacent to assigned circuits are inspected for state and federal regulatory

compliance as well as conformance to SCE's UVM programs. VM QC inspection results are documented in real-time in the Work Management System (WMS), which automatically generates resolutions for mitigation when inspection findings are identified, with rework typically performed within 30 days. VM QA assessments are performed quarterly to ensure QC findings are mitigated, documented on QA assessment templates. Internal assessments are conducted quarterly, semi-annually, or annually in accordance with UVM-21 (Internal Controls), with QA review of all WMP evidence submissions performed prior to any submission. External audits are conducted annually by the Office of Energy and Infrastructure Safety (OEIS), the Independent Evaluator, and the CPUC for District Audits, with SCE's internal Audit Services Department also conducting audits.

Both programs demonstrate systematic use of inspection findings to drive continuous improvement. The T&D program's quality programs help drive continuous improvement by identifying non-conformances with SCE standards, determining causes of non-conformance, and driving corrective actions to improve performance, with action plans tracked for identified corrective actions that can include changes to inspection processes, standards, or training. General Procedure 003 (GP-003) establishes guidelines for identifying, delivering, and documenting all training types to ensure employees acquire necessary skills while supporting continuous improvement aligned with QMS requirements. Personnel Qualification Standards are reviewed and updated annually by QC Program and Field Advisors with input from field SMEs responsible for technical data. The VM program's inspection results are reviewed in monthly performance review meetings with all contractors. Trending performance results are discussed and declining performance potentially resulting in corrective action issuance are reviewed. Performance analysis and trending is addressed in UVM-07 Section 4.11 and UVM-22 (Corrective Action Program), with consequences varying between additional QC oversight, additional training/benchmarks, re-assignment or loss of work, or contract termination depending on severity and frequency of performance failures. Results of audits and internal VM QA assessments may also result in corrective action (CA) issuance, with CAs implemented for program and performance deficiencies resulting in process and procedure changes as well as required training.

QA/QC Technology Adoption – 3 Routine

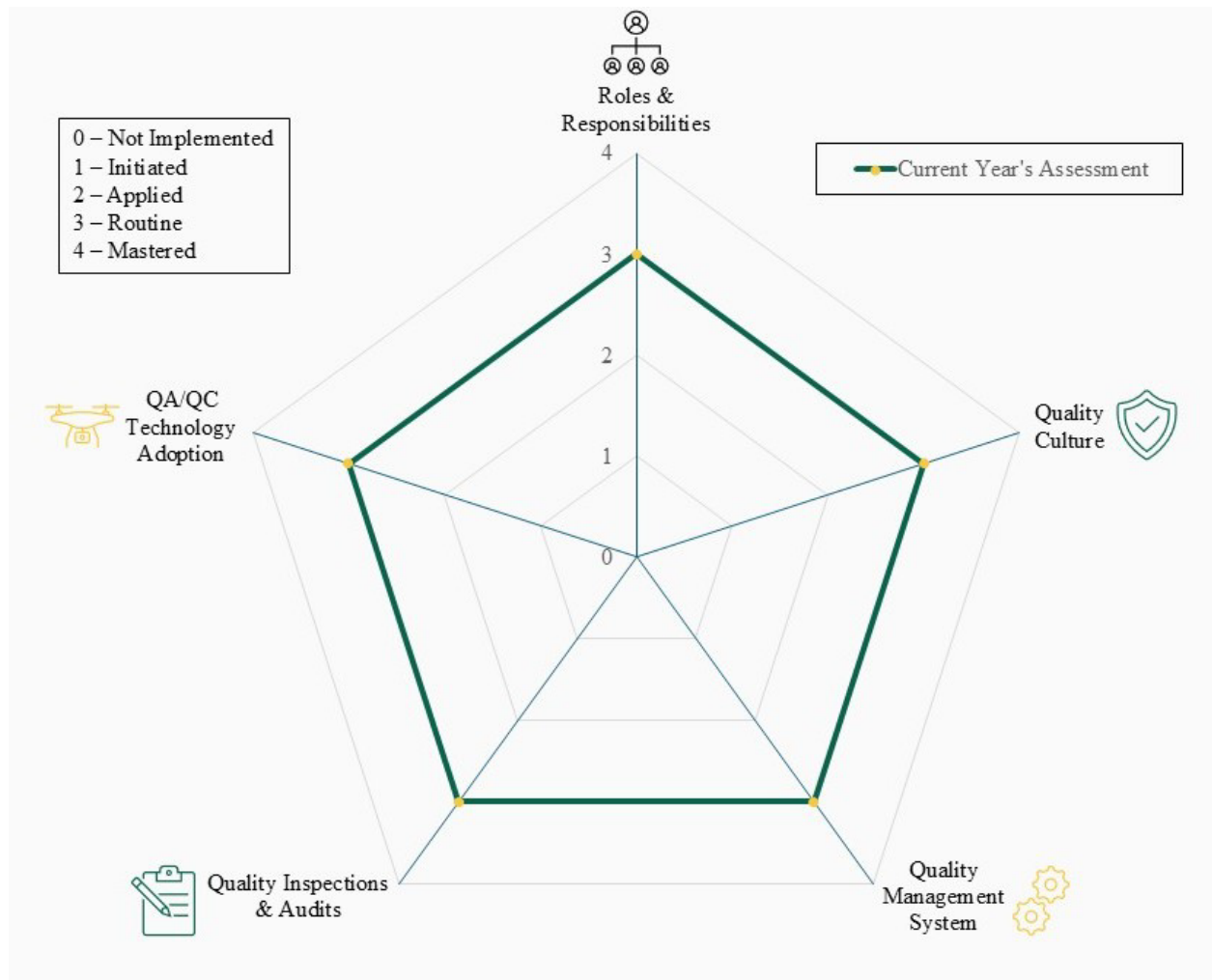
SCE's QA/QC Technology Adoption dimension achieves Level 3 – Routine maturity level. The T&D program operates with technology including iPads and iPhones for field data collection with high-resolution Canon cameras, SAP as the system of record, SQL Server for data management, Power BI dashboards for visualization and performance tracking, PowerApps for workflow automation, SharePoint for document management and collaboration, and ArcGIS/ESRI/AGOL applications for geospatial analysis. The weekly refresh cycle for Power BI dashboards ensures stakeholders have near-real-time visibility into quality performance, while monthly distribution of quality performance results to all stakeholders and contractors demonstrates systematic communication enabled by technology infrastructure. The 2025 pilot implementation of the Holistic Asset Viewer and Explorer (HAVE) platform represents significant innovation, centralizing SCE data within a unified platform providing geospatial asset visibility across historical, operational, and predictive sources. HAVE enables desktop QC inspections to supplement field-based inspections with a focus on increasing inspection coverage in high fire risk

areas, allowing Compliance & Quality to significantly increase the number of QC inspections in high fire risk areas with existing personnel. The planned expansion to incorporate Artificial Intelligence/Machine Learning and LiDAR with HAVE demonstrates forward-looking technology strategy aligned with industry trends.

The VM program similarly demonstrates sophisticated technology adoption with handheld devices (tablets, smartphones) for field data collection, all work tracked to GIS-defined work points, and real-time documentation of QC inspection results in the Work Management System (WMS) which automatically generates resolutions for mitigation when inspection findings are identified. Data uploaded to PowerBI dashboards enables trending analysis with monthly and year-to-date performance scores tracked for each contractor. VM has utilized aerial LiDAR technology for inspections since 2019. The implementation of the CanopySense AI/ML platform represents significant innovation, developing automatic tree prescriptions that factor in tree growth calculations through a phased implementation approach. The intent to use AI/ML to provide more accurate tree prescriptions and potentially reduce ground pre-inspections demonstrates technology-enabled process optimization, though VM acknowledges this will not replace QA/QC but is intended to assist QC in their work. VM's exploration of Ortho-Imagery to supplement LiDAR inspections shows continued technology experimentation.

Both programs demonstrate that technology adoption has solved specific operational problems and delivered measurable value. The T&D program's integrated technology stack has enabled daily and weekly review of QC work by Program and Field Advisors to ensure consistency and accuracy, monthly checkpoint review processes involving all QC personnel, and tracking of actionable findings from identification to resolution in databases. The accessibility of QC findings on Power BI dashboards to all SCE employees and contractors, with weekly refresh cycles, has eliminated data silos and created transparency. The VM program's real-time documentation in WMS with automatic generation of mitigation resolutions has streamlined corrective action workflows, while the 30-day completion requirement for rework points is trackable through the system. The PowerBI dashboards tracking monthly and year-to-date performance for each of eight pre-inspection and eight tree trimming contractors enable data-driven performance management during monthly review meetings.

Figure 13: QA/QC Maturity Sunburst Chart



6. CONCLUSION

Southern California Edison's 2025 Wildfire Mitigation Plan implementation demonstrates substantial progress towards reducing wildfire risk across its service territory. This IE report examined 38 initiatives across five categories: Grid Design, Operations, and Maintenance; Vegetation Management and Inspections; Situational Awareness and Forecasting; Emergency Preparedness; and Community Outreach and Engagement. The evaluation employed a methodology combining documentation review, statistical sampling, field verification, and data request responses to validate SCE's reported performance against established targets.

Of the 37 initiatives evaluated, 29 were validated by the IE, representing a 78% validation rate. Eight initiatives were not validated due to failure to meet established targets or documentation deficiencies, and one initiative was deemed not applicable due to programmatic discontinuation. SCE demonstrated exceptional performance across multiple wildfire mitigation categories, frequently exceeding established 2025 targets by substantial margins. Notable achievements include the installation of 706 circuit miles of covered conductor versus a 500-mile target, completion of 228,083 distribution structure inspections versus a 187,000-structure target, and the expansion of weather station infrastructure with 202 installations versus a 15-station target.

The Inspection and Maintenance Tools initiative (IN-8) did not meet its target as system optimization efforts extended beyond the anticipated timeline and no utilization monitoring was conducted during 2025. The Tree Attachments Remediation initiative (SH-10) completed only 34 of 141 planned remediations, with 107 remaining scheduled for 2026 or beyond due to permitting delays, environmental restrictions, and government lands approvals. The REFCL Grounding Conversion initiative (SH-18) completed 3 of 4 planned conversions, with the outstanding conversion delayed pending administrative assessment by the City of Banning.

Across multiple inspection initiatives (IN-1.1; IN-1.2; VM-9; & VM_10), SCE provided evidence of completed work but did not provide inspection report criteria, defined inspection parameters, or detailed methodologies for IE review. A structural mismatch was observed between SCE's reporting metrics and geospatial tracking methodology for the Covered Conductor initiative, where targets are measured in continuous circuit miles but completion data is maintained only at the individual structure level. Date inconsistencies were identified between frontload data and work order documentation for Early Fault Detection installations, indicating a need for enhanced data management practices. Vegetation management access constraints resulted in 18 of 138 sampled structure brushing locations being documented as "no access" due to private property restrictions, unsafe terrain, and insect infestation.

The IE conducted extensive field verification activities for applicable initiatives, deploying vehicle-mounted 360° cameras and geo-referenced photography to validate physical completion of reported work. Across all field-verified initiatives, the IE found no workmanship deficiencies or material installation issues, with all verified installations meeting or exceeding SCE's stated engineering standards. Structure locations, equipment installations, and remediation sites aligned accurately with reported GPS coordinates in most cases, with isolated spatial discrepancies successfully resolved through active coordination with SCE personnel.

31 of the 37 initiatives experience an expenditure variance greater than 10%. The Grid Design, Operations, and Maintenance category experienced a 10% CAPEX underrun driven by efficiency improvements and permitting delays, while the Covered Conductor initiative exceeded budget by \$108 million due to favorable weather enabling completion of 63 additional circuit miles. Vegetation Management demonstrated a 28% O&M underrun while exceeding operational targets, attributable to lower hazard tree identification rates, expanded vendor competition, and improved execution efficiencies. Situational Awareness investments exceeded planned CAPEX by 18% due to weather station expansion from 15 to 202 installations following January 2025 wildfires. Across all categories, financial variances were supported by documented operational justifications, evolving risk conditions, and external dependencies, with many initiatives meeting or exceeding performance targets regardless of expenditure levels.

Southern California Edison's 2025 Wildfire Mitigation Plan implementation reflects organizational commitment to wildfire safety, with the utility achieving or exceeding targets in 29 of 37 evaluated initiatives. The substantial over-performance in vegetation management programs, expansion of situational awareness infrastructure, and successful deployment of advanced system hardening technologies across High Fire Risk Areas represent meaningful progress in reducing wildfire risk.

7. ATTACHMENTS

- 7.1 CATALOG OF INITIATIVES**
- 7.2 DATA REQUESTS**
- 7.3 SME INTERVIEWS**
- 7.4 PICTURES OF NON-CONFORMANCE**