

Docket #: 2026-IE

August 10, 2026

Patrick Doherty
Program Manager, Performance Assessment Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on the 2025 Wildfire Mitigation Plan Independent Evaluator Annual Implementation Report

Dear Mr. Doherty:

Pursuant to the Office of Energy Infrastructure Safety's ("Energy Safety") July 9, 2026, notice inviting comments on the 2025 Wildfire Mitigation Plan ("2025 WMP") Independent Evaluator ("IE") Annual Implementation Report ("AIR"), Southern California Edison Company ("SCE") submits the following comments on Bureau Veritas' 2025 Annual Implementation Report ("IE Report"), which was published on July 9, 2026.

INTRODUCTION

SCE appreciates the Bureau Veritas team's significant efforts to conduct the extensive IE review of SCE's implementation of its 2025 WMP. Based on its evaluation of SCE's execution of 2025 WMP initiatives, the IE concluded that "SCE demonstrated exceptional performance across multiple wildfire mitigation categories, frequently exceeding established 2025 targets by substantial margins."¹ The IE further noted that "multiple initiatives demonstrated that lower-than-planned costs were achieved while still meeting or surpassing risk reduction goals," and that operational efficiencies frequently contributed to lower than forecast spending without reducing wildfire mitigation effectiveness.² Additionally, the IE recognized SCE's established quality assurance and quality control ("QA/QC") program and concluded that SCE maintains a mature framework that is routinely integrated into wildfire mitigation operations.³

Despite these well-supported conclusions, the IE Report contains certain findings that warrant clarification, additional context, or further explanation. SCE respectfully requests that Energy

¹ IE Report, p. 128.

² IE Report, p. 66.

³ IE Report, pp. 120–128.

Safety consider the comments below when evaluating the IE Report and SCE's implementation of its 2025 WMP.⁴

COMMENTS ON THE IE'S FINDINGS CONCERNING COMPLETION OF 2025 WMP INITIATIVES

SCE's 2025 WMP Annual Implementation Report ("EC AIR") concluded that SCE met or exceeded 33 of 36 WMP targets, whereas the IE Report concluded that SCE met or exceeded 29 of 37 WMP targets in 2025.⁵ As explained below, the final 2025 AIR should be revised to recognize that SCE met or exceeded 33 of 36 WMP targets.

IN-1.1 and IN-1.2 Distribution & Transmission High Fire Risk-Informed (HFRI) Inspections and Remediations

Distribution Detailed Inspections and Remediations ("IN-1.1") and Transmission Detailed Inspections and Remediations ("IN-1.2") are two separate initiatives that involve detailed visual inspections of SCE's distribution assets and transmission assets in high fire risk areas ("HFRA"), respectively. The 2025 WMP target for IN-1.1 was to inspect 187,000 distribution structures, and the 2025 WMP target for IN-1.2 was to inspect 24,500 transmission structures.

The IE verified that SCE exceeded both of the quantitative inspections targets in 2025 by inspecting more than 187,000 distribution structures and more than 24,500 transmission structures.⁶ However, the IE states that it could not validate SCE's completion of the two inspections initiatives because SCE did not provide documents "detailing inspection parameters and alignment with standards outlined in the WMP."⁷ The IE Report acknowledges SCE's "evidence demonstrating that inspections are being performed."⁸ But the IE chose to discount 50% of completed inspections because of a lack of documentation detailing inspection parameters.⁹

The IE's finding that "SCE provided evidence of completed work but did not provide inspection report criteria, defined inspection parameters, or detailed methodologies for IE review" should not preclude Energy Safety from determining that SCE exceeded both the IN-1.1 and IN-1.2 targets in 2025. First, the IE's decision to discount half of all completed inspections under IN-1.1

⁴ SCE has limited its comments to the most significant findings and observations in the IE Report. SCE's decision not to address a particular finding or recommendation in these comments should not be interpreted as acceptance of, or agreement with, such finding or recommendation.

⁵ SCE's EC AIR reflects 36 evaluated initiatives because IN-9a was discontinued through SCE's approved 2025 WMP Update, and SCE did not count IN-9a as one of its 2025 WMP targets. See SCE's 2025 WMP Update R1, p. 33. The IE Report deemed IN-9a "not applicable" but still counted the initiative, resulting in a total of 37 initiatives. IE Report, p. 27.

⁶ IE Report, pp. 21-23.

⁷ IE Report, p. 21.

⁸ IE Report, p. 23.

⁹ IE Report, p. 23, fn. 17.

and IN-1.2 is arbitrary and unsupported. The footnotes indicating that the IE Report discounted half of all completed inspections for these two initiatives do not explain how the IE chose a 50% discount rate and do not support invalidating several thousand completed inspections.

The IE Report states that the IE's inability to confirm completion of the two initiatives "reflects a document deficiency, not a failure to perform inspections."¹⁰ To confirm SCE's completion of the two inspections initiatives, SCE provided inspection documentation from its system of record, consistent with the documentation that independent evaluators in previous review cycles have found sufficient to conclude that SCE exceeded the IN-1.1 and IN-1.2 targets. SCE also submitted inspection quality control procedures and supporting QA/QC program documentation describing SCE's inspection oversight, validation, and quality assurance processes for distribution, transmission, and generation inspections.¹¹ In this review cycle, SCE was not made aware of the IE's perceived document deficiency for the two inspections initiatives and did not have an opportunity to provide additional information to address it. To the extent that Energy Safety requires additional inspections documents or manuals to complete its assessments of IN-1.1 and IN-1.2, SCE requests an opportunity to submit supplemental information to address any perceived documentation gaps prior to Energy Safety's final 2025 AIR.

In addition, the IE Report incorrectly states that SCE claimed completion of 460,222 single-visit 360° distribution inspections under IN-1.1 and 67,457 single-visit 360° transmission inspections under IN-1.2 in 2025.¹² As noted in SCE's 2023-2025 WMP, these two inspections programs are designed for single-visit 360° ground and aerial inspections, but there may be access constraints or other restrictions that prevent both ground and aerial inspections from being completed concurrently.¹³ Thus, in the 2025 EC AIR, SCE reported ground and aerial inspections counts separately for each of the two initiatives based on the dates that each ground and aerial inspection occurred. The IE Report incorrectly assumes that SCE claimed each ground inspection and each aerial inspection as a single-visit 360° inspection. Regardless of this confusion, the IE Report correctly found that SCE exceeded the target numbers of 360° single-visit inspections for both IN-1.1 and IN-1.2.¹⁴

IN-5 Generation High Fire Risk-Informed Inspections and Remediations

Generation High Fire Risk-Informed Inspections and Remediations ("IN-5") is an initiative designed to conduct visual detailed inspections of generation-related assets in HFRA. SCE's

¹⁰ IE Report, p. 23.

¹¹ See SCE's Response to Data Request IE-SCE-2025, Initial Question 2, including QCP-006 Overhead Detailed QC Inspection Process for Distribution Equipment, QCP-014 Transmission Detail QC Inspection Process for Transmission Assets, and 2025 WMP QA/QC Program Summary.

¹² IE Report, pp. 21-22.

¹³ See SCE's 2023-2025 WMP R.3, p. 288, fn. 163.

¹⁴ IE Report, pp. 21-22.

2025 WMP target for IN-5 was to inspect 170 generation-related assets in HFRA. SCE reported that it exceeded the IN-5 target by inspecting 238 generation-related assets in HFRA in 2025.

The IE Report recognizes that SCE completed inspections of 238 generation-related assets in HFRA in 2025.¹⁵ However, the IE does not validate that SCE met the IN-5 target based on its finding that certain inspection records showed that 9 generation assets required maintenance, and SCE did not provide documents to show that the maintenance work for those 9 assets was completed.¹⁶

Energy Safety's final 2025 AIR should conclude that SCE exceeded the IN-5 target because SCE exceeded the required number of inspections. The IN-5 target is based on the number of inspections performed (as opposed to remediations), and the IE Report concurs that SCE performed 238 inspections of generation-related assets in 2025.¹⁷ SCE was not made aware of the IE's perceived document deficiency relating to remediations for 9 assets and did not have an opportunity to provide supplemental information to address this issue. To the extent that Energy Safety requires additional documentation of remediations to complete its assessment of IN-5, SCE requests an opportunity to submit supplemental information prior to Energy Safety's final 2025 AIR.

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

Transmission Conductor & Splice Assessment: Splices with X-Ray ("IN-9b") is an initiative that was originally designed to use X-Ray technology during inspections to identify transmission splice conditions associated with elevated failure risk. The 2025 WMP Update established a target to inspect 50 splices using X-Ray technology.

In 2025, based on the high find rate following X-Ray inspections, SCE began to transition to proactive splice shunting to expedite remediations instead of waiting for X-Ray inspection results before pursuing remediations. Although the IE acknowledged that SCE provided evidence of 117 completed splice shunt installations in 2025, the IE concluded that it could not validate SCE's completion of the initiative because SCE began to forego X-Ray inspections and had not implemented the initiative exactly as described in the 2025 WMP.¹⁸

Energy Safety's final 2025 AIR should conclude that SCE completed the IN-9b initiative because SCE achieved the risk reduction objective of the program through a more proactive and effective mitigation strategy. SCE transitioned from performing additional X-Ray inspections to proactive splice shunting based on engineering analysis and operational experience demonstrating that proactively mitigating potentially vulnerable splices would accelerate risk reduction compared to conducting additional inspections and remediating only after a

¹⁵ IE Report, p. 26.

¹⁶ IE Report, p. 26.

¹⁷ IE Report, p. 19.

¹⁸ IE Report, pp. 28-29.

condition was identified. As the IE Report acknowledges, SCE installed 117 splice shunts under this proactive approach in 2025, thereby reducing splice-related risk proactively rather than delaying mitigation pending the results of additional inspections. While the implementation method differed from the approach originally contemplated in the 2025 WMP, SCE achieved the objective of mitigating transmission splice risk.

Energy Safety has complimented SCE's transition from X-Ray splice inspections to proactive splice shunting. In the 2026-2028 WMP, SCE formally replaced IN-9b with a transmission proactive splice shunting initiative. Energy Safety noted that SCE "updated and improved" its transmission splice mitigation strategy by replacing transmission splice inspections with proactive splice shunting and recognized that SCE's proactive approach accelerated risk reduction.¹⁹ Given Energy Safety's endorsement of the proactive splice shunting strategy and SCE's successful implementation of 117 splice shunts in 2025, the final 2025 AIR should conclude that SCE completed IN-9b notwithstanding the evolution in the method by which the initiative was completed.

VM-9 LiDAR Distribution Vegetation Inspections and VM-10 LiDAR Transmission Vegetation Inspections

LiDAR for Distribution Assets ("VM-9") and LiDAR for Transmission Assets ("VM-10") are initiatives that use Light Detection and Ranging ("LiDAR") technology to create detailed three-dimensional representations of field conditions and help ground inspectors identify potential vegetation encroachments. The 2025 WMP established targets of inspecting 1,020 HFRA circuit miles under VM-9 and 1,750 HFRA circuit miles under VM-10.

The IE verified that SCE exceeded both of the quantitative inspections targets in 2025 by inspecting 4,031.75 HFRA circuit miles under VM-9 and 2,179.17 HFRA circuit miles under VM-10.²⁰ However, the IE states that it could not validate completion of SCE's VM-10 inspection initiative because SCE did not provide documents "detailing inspection parameters and alignment with standards outlined in the WMP," as well as inspection reports, associated photos, and work/repair orders.²¹ The IE Report acknowledges SCE's "evidence demonstrating that inspections are being performed."²² But the IE chose to discount 50% of completed circuit

¹⁹ See Energy Safety's Decision Approving SCE's 2026-2028 WMP (Feb. 23, 2026), p. 46 ("SCE updated and improved its transmission splice shunting activity by replacing its transmission splice inspections with x-ray (IN-9.b) with proactive splice shunting (SH-20). SCE moved forward with transmission splice shunting on a proactive basis by setting targets instead of relying on inspections follow[ed] by remediation. SCE's proactive stance will allow SCE to accelerate risk reduction in its service territory.").

²⁰ IE Report, pp. 78-80.

²¹ IE Report, p. 80.

²² IE Report, p. 79, fn. 28; p. 80, fn. 29.

miles because of a lack of documentation detailing inspection parameters and inspection reports detailing findings, conditions, and remediations.²³

The IE's finding that "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" should not preclude Energy Safety from determining that SCE exceeded both the VM-9 and VM-10 targets in 2025. First, the IE's decision to discount half of all completed circuit miles is arbitrary and unsupported. The IE Report does not explain how the IE chose a 50% discount in calculating the validation rate or why several thousand completed circuit miles should be invalidated.

The IE Report states that the IE's inability to confirm completion of the initiative "reflects a document deficiency, not a failure to perform inspections."²⁴ To confirm SCE's completion of the initiative, SCE provided inspection documentation from its system of record, consistent with the documentation that independent evaluators in previous review cycles have found sufficient to conclude that SCE exceeded the VM-9 and VM-10 targets. As part of its responses to the IE's data requests, SCE also provided vegetation management quality control and oversight procedures describing post-work verification, quality control inspections, sampling methodologies, and quality assurance review processes applicable to vegetation management activities.²⁵

In addition, the primary objective of these initiatives is completion of LiDAR inspections (as opposed to remediations). SCE clarifies that LiDAR data is not maintained in a format that directly translates into inspection reports or actionable vegetation mitigation work. After a LiDAR flight is completed, the raw data must first be processed and analyzed using specialized software and analytical tools to identify potential vegetation-related conditions. The resulting information serves as a screening and prioritization tool to support field inspections. LiDAR outputs do not directly generate vegetation prescriptions or create work orders. Rather, in 2025, data collected from LiDAR inspections was used to guide and inform human ground inspectors, who then performed field validation to assign the appropriate prescription and initiate any resulting work orders. As such, the ultimate work determination and documentation were generated through the ground inspection process rather than from the LiDAR data itself.

In this review cycle, SCE exceeded its VM-9 and VM-10 targets and completed the applicable LiDAR inspections within HFRA. SCE was not made aware of the IE's perceived document deficiency for these inspections initiatives and did not have an opportunity to provide

²³ IE Report, p. 68, fn. 25 & 26; p. 80.

²⁴ IE Report, p. 80.

²⁵ SCE Response to Data Request IE-SCE-2025 Initial Question 02, including UVM-07, Post Work Verification and UVM Program Oversight, Version 9 and Version 10, and SCE's 2025 WMP QA/QC Program Summary.

additional information to address it. To the extent Energy Safety requires additional records associated with inspection findings, notifications, and remediation activities (which occur as part of separate downstream work processes and not the targets being evaluated), SCE can provide additional information as needed.

COMMENTS ON THE IE’S FINDINGS CONCERNING DATA SUBMITTALS

VM-2 Structure Brushing

Structure Brushing (“VM-2”) is a wildfire mitigation initiative that involves inspecting and clearing vegetation around the base of certain poles and structures in HFRA. The 2025 WMP established a target of inspecting and clearing (where clearance is needed) 63,700 structures in 2025, excluding structures subject to customer access or environmental constraints.

The IE observed that certain locations reported under VM-2 were identified as “no access” locations and noted that those locations were included in completion totals despite vegetation management work not being performed at those specific sites.²⁶

SCE notes that these locations represented circumstances where vegetation management activities could not be completed due to factors such as access restrictions, terrain conditions, or other operational constraints. The 2025 WMP reporting approach included attempted vegetation activities within the reported population. Beginning with the 2026 reporting year, SCE has modified the reporting approach and no longer includes attempted activities in the reported total.

VM-7 and VM-8 Vegetation Inspection and Management – Distribution & Transmission

Distribution Vegetation Management Plan (“VM-7”) and Transmission Vegetation Management Plan (“VM-8”) involve inspection activities in HFRA to maintain expanded vegetation clearances around distribution and transmission lines. The 2025 WMP established a VM-7 target of inspecting 770 distribution grids/circuits and a VM-8 target of inspecting 416 transmission circuits.

The IE observed that certain circuits reported as inspected under VM-7 and VM-8 were subsequently identified by the IE as out of service or non-operational at the time of the scheduled inspection.²⁷ The IE also excluded certain inspections from its VM-7 validation analysis that were completed during November and December 2024 and included by SCE within the 2025 implementation cycle.

²⁶ IE Report, p. 71.

²⁷ IE Report, pp. 76-77.

SCE clarifies that circuits identified as out of service or non-operational are typically inspected for vegetation as if they were in service. However, the four VM-7 circuits and five VM-8 circuits identified and disclosed to the IE during the review process had been removed from the master schedule for 2025 and thus were inadvertently included in the reporting totals. SCE still achieved completion of the applicable VM-7 and VM-8 targets after removal of these circuits from the goal count.²⁸

In addition, SCE clarifies that the November and December 2024 inspections were reported consistent with the implementation approach described in SCE's approved 2023-2025 WMP. Table 8-15 of the WMP specifically provides that inspections may occur as early as November 1 of the prior year in order to inform trimming prescriptions and work planned for the applicable January through December implementation year. Consistent with this approach, SCE included the applicable November and December 2024 inspections within its 2025 implementation cycle reporting.

As explained in SCE's responses to the IE's data requests, these November and December 2024 inspections were not previously counted toward 2024 completion targets. Rather, they were counted toward the 2025 completion targets to align inspections and associated mitigation activities for the same implementation cycle. SCE therefore believes these inspections were appropriately reported as part of the 2025 WMP data.²⁹

COMMENTS ON THE IE'S EXPENDITURE VARIANCE OBSERVATIONS

The IE identified variances greater than 10% between forecast and actual expenditures for 31 of 37 evaluated WMP initiatives.³⁰ At the same time, the IE concluded that 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."³¹

SCE agrees with the IE's conclusion that expenditure variances were supported by operational justifications. However, SCE also cautions against reviewing the expenditure variance figures in the IE Report in isolation. For instance, the 10% expenditure variance threshold referenced throughout the IE Report is intended to identify variances that warrant additional explanation and context. A difference between forecasted and actual spending does not, by itself, indicate whether SCE completed the planned work or achieved its intended wildfire risk reduction objectives. Wildfire mitigation forecasts are often developed years in advance of the planned execution of risk mitigation activities and are based on the best information available at the time. Actual spending may differ due to factors such as permitting timelines, contractor

²⁸ SCE Response to Data Request IE02 SCE 2025, Question 16. VM 7; SCE Response to Data Request IE02 SCE 2025, Question 17. VM 8.

²⁹ SCE Response to Data Request IE08-SCE-2025, Question 1

³⁰ IE Report, p. 10.

³¹ IE Report, p. 129.

availability, weather conditions, evolving risk information, project efficiencies, and implementation and scheduling changes. As the IE observed, spending variances often reflected changes in how the work was executed or opportunities to complete work more efficiently rather than a reduction in intended wildfire mitigation outcomes.

Moreover, expenditure variances do not always reflect updates that were subsequently incorporated into approved WMPs. For example, in 2025, SCE transitioned from an X-Ray inspection initiative for splice-related work to a proactive splice shunting initiative. This transition to proactive remediations meant that SCE did not record any expenditures in 2025 for X-Ray inspections under IN-9b, and the IE Report lists a 100% variance between forecast and actual expenditures for this initiative. The large expenditure variance percentage alone lacks important context because as explained above, Energy Safety later described SCE's transition from X-Ray inspections to proactive splice shunting as an improvement to SCE's mitigation strategy.³² Accordingly, expenditure comparisons associated with IN-9b should be considered in the context of the transition to a proactive mitigation strategy that accelerated wildfire risk reduction, as opposed to an initiative that experienced large underspending in 2025.

CONCLUSION

SCE appreciates the opportunity to submit these comments on the IE Report and respectfully requests that Energy Safety consider these comments when assessing SCE's implementation of its 2025 WMP.

Please direct any questions or requests for additional information to Liz Leano (Elizabeth.Leano@sce.com) or Erick Sanchez (erick.g.sanchez@sce.com).

Sincerely,

//s//

Rebecca Furman
Managing Director
State Regulatory Operations
Rebecca.Furman@sce.com

³² See section IN-9B Transmission Conductor & Splice Assessment: Splices with X-Ray, above.