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Docket# WMP-Guidelines

Tony Marino
Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on the Office of Energy Infrastructure Safety Draft Wildfire Mitigation Plan Guidelines

Dear Deputy Director Marino:

Southern California Edison (SCE) appreciates the opportunity to provide comments on the Office of Energy Infrastructure Safety (Energy Safety) Draft Wildfire Mitigation Plan (WMP) Guidelines (Draft WMP Guidelines), which were published on September 1, 2026 and discussed during Energy Safety's September 24, 2026 workshop. SCE's comments address three main topics: (1) the risk tolerance requirements in Section 8.2.3 of the Draft WMP Guidelines; (2) requirements for circuit-segment-level data tables in Appendix D; and (3) the unit of measure for undergrounding targets.

Risk Tolerance

SCE respectfully recommends that Energy Safety remove or substantially narrow the proposed requirements related to risk tolerance in Section 8.2.3 of the Draft WMP Guidelines.

The California Public Utilities Commission (CPUC or Commission) is currently considering whether and how risk tolerance should be incorporated into utility planning and decision-making as part of Rulemaking (R.) 26-04-016, "Order Instituting Rulemaking to Refine the Risk-Based Decision-Making Framework for Electric and Gas Utilities."¹ In that proceeding, the Commission specifically seeks stakeholder input regarding whether a risk tolerance standard or framework should be adopted, what form such a framework should take, and how it should be incorporated into utility risk management and investment decision-making.

At present, the Commission has not adopted a risk tolerance standard, benchmark, threshold, or framework applicable to utility wildfire risk management. Instead, the Commission has directed Staff to develop a proposal on risk tolerance for further stakeholder review, workshops, comments, and

¹ R.26-04-016, Assigned Commissioner's Scoping Memo and Ruling, July 20, 2026, pp. 5-8.

party proposals. The procedural schedule anticipates continued policy development through 2027, and a proposed decision is not expected until the fourth quarter of 2027.²

SCE believes it is premature to require utilities to demonstrate how risk tolerance informs wildfire mitigation strategy, mitigation selection, residual risk determinations, or other WMP planning elements before the CPUC completes its evaluation of this issue. Requiring such discussions at this stage risks creating inconsistent approaches among utilities and could prejudge policy questions currently under active consideration by the Commission. Additionally, the accompanying WMP discussion implies that utilities should presently apply risk tolerance as a decision-making criterion. The Commission has not made such a determination.

Based on the Commission's established schedule, SCE does not believe a fully developed and Commission-adopted risk tolerance framework will be available in sufficient time to meaningfully support the WMP cycle governed by the Draft WMP Guidelines. Therefore, utilities should not be required to develop utility-specific risk tolerance methodologies in advance of Commission direction on the subject. With this in mind, SCE recommends that Energy Safety:

1. Remove requirements directing utilities to explain how risk tolerance informs wildfire mitigation strategy, residual risk evaluation, or mitigation selection;
2. Defer any substantive risk tolerance reporting requirements until completion of R.26-04-016; and
3. Limit any interim discussion of risk tolerance to informational references that acknowledge the issue remains under consideration by the Commission.

Additional Tables for Grid Design and Operations

SCE recommends that Energy Safety clarify that circuit-segment-level planned hardening data in Table 14-3 (Section 14.4.3) is forecast information, and that target attainment will continue to be measured at the activity level established in Section 9.1 and the Data Guidelines.

Table 14-3 would require 42 data fields for every circuit segment, including current hardening status by High Fire Threat District (HFTD) tier and High Fire Risk Area (HFRA), current Protective Equipment and Devices Settings (PEDS) coverage, and planned covered conductor and undergrounding by year. Section 14.4.4 and Tables 14-4 through 14-11 would require similarly granular work order and equipment failure data. SCE does not track completed mitigation work at the circuit-segment level used for risk modeling. Completed work is recorded at the work order or structure level, and there is often no one-to-one relationship between a completed work order and a modeled circuit segment. Translating completed work back into segment-level forecasts can introduce errors and undercount completed work. Because the Draft Guidelines require WMP data to match data submissions (Chapter II, Section 1.2), such discrepancies could appear as inconsistencies that do not reflect actual performance.

SCE therefore recommends that Energy Safety: (1) state that segment-level planned data in Table 14-3 is a non-binding forecast; (2) confirm that target attainment will be assessed against Section 9.1

² *Id.* at pp. 6-7 (directing Staff to develop a risk tolerance proposal and establishing procedural schedule for stakeholder review and Commission consideration).

targets; (3) define "circuit segment" for transmission assets or limit Table 14-3 to distribution circuits, because the Attachment 1 definition applies only to distribution circuits; and (4) allow electrical corporations to identify fields that cannot be populated from existing systems, with an explanation and timeline for doing so.

Undergrounding Targets

SCE requests that Energy Safety permit utilities to set and report undergrounding targets in underground miles installed, consistent with SCE's 2025 General Rate Case (GRC) authorization and Energy Safety's decision approving SCE's 2026 Petition to Amend. Section 9.1 of the Draft WMP Guidelines requires length-based targets to be based on pre-mitigation miles. For undergrounding, this would require SCE to state targets in overhead miles and apply a conversion factor to estimate underground miles.

Since Energy Safety's decision approving SCE's 2026 Petition to Amend its 2026-2028 WMP, SCE has tracked the planned and completed Targeted Undergrounding (TUG) in underground miles. This unit aligns with SCE's 2025 GRC Decision, which authorizes undergrounding expenditures and units in underground miles installed.³

Relying on an average conversion factor applied to overhead miles to approximate underground miles introduces complexity and potential for mileage discrepancies. Underground miles provide a more accurate picture of in-flight work and allow for higher confidence in forecasting. Because undergrounding projects have multi-year cycle times, SCE often has preliminary designs that include underground circuit mileage for projects in the upcoming WMP cycle.

Using underground miles as the unit of measure also supports the Draft WMP Guidelines' GRC-alignment framework. Section 9.1.1 provides that undergrounding targets may change to conform with GRC-authorized revenue, and Chapter V requires a GRC-to-WMP crosswalk in which each target's unit of measure remains "unchanged from the WMP." If WMP targets are stated in pre-mitigation overhead miles while the GRC authorizes underground miles, a revised WMP will require a conversion that complicates the crosswalk and may invite discrepancies.

Conclusion

SCE appreciates the opportunity to submit these comments on the draft WMP Guidelines. If you have any questions, or require additional information, please contact me at david.leblond@sce.com.

Sincerely,

//s//

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³ See Decision (D.) 25-09-030, Decision on Test Year 2025 General Rate Case for Southern California Edison Company, p. 379.