



May 31, 2024

Gary Chen, Director  
Safety & Infrastructure Policy  
Southern California Edison Company  
2244 Walnut Grove Ave  
Rosemead, CA 91770

**SUBJECT: Office of Energy Infrastructure Safety Decision on Southern California Edison Company's Change Order Request in relation to its 2023-2025 Base Wildfire Mitigation Plan**

Mr. Chen:

The Office of Energy Infrastructure Safety (Energy Safety) has evaluated Southern California Edison Company's (SCE's) change order request pertaining to its 2023-2025 Base Wildfire Mitigation Plan (WMP) pursuant to the 2023-2025 WMP Process and Evaluation Guidelines (Dec. 6, 2022).<sup>1</sup> Energy Safety approves in part and rejects in part SCE's change order request.

On October 24, 2023, Energy Safety approved<sup>2</sup> SCE's 2023-2025 Base WMP.<sup>3</sup> SCE submitted a change order request on November 1, 2023,<sup>4</sup> and amended its original request via a response to an Energy Safety data request.<sup>5</sup> No stakeholders commented on SCE's change order request.

Below, Energy Safety provides a summary of its determination for each of the requested changes. Energy Safety evaluated the requested changes pursuant to the criteria set forth in

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<sup>1</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true)  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true>, accessed Jan. 30, 2024).

<sup>2</sup> [Decision on 2023-2025 Wildfire Mitigation Plan Southern California Edison Company \(Oct. 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55857&shareable=true)  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55857&shareable=true>, accessed Jan. 31, 2024).

<sup>3</sup> SCE originally submitted its 2023-2025 WMP on March 27, 2023. As required by Energy Safety, SCE submitted a final version of its 2023-2025 WMP on October 26, 2023, that includes all previously submitted errata  
[2023-2025 Wildfire Mitigation Plan Southern California Edison Company \(Oct. 26, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true)  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>, accessed Feb. 16, 2024).

<sup>4</sup> [2024 WMP Target Updates \(Nov 1, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55891&shareable=true)  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55891&shareable=true>, accessed Jan. 31, 2024).

<sup>5</sup> [Data Request OEIS-P-WMP 2023-SCE-011 Q.01](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56205&shareable=true)  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56205&shareable=true>, accessed Jan. 31, 2024).

Section 12 of the 2023-2025 WMP Process and Evaluation Guidelines. In executing its WMP, should an electrical corporation deviate from its approved plan, it will have the opportunity to explain or justify such deviations during the compliance process.

Table 1. Determinations for SCE’s Requested Changes

SCE Initiative ID and Title	Change Requested	Determination	Rationale
<p><b>SH-17</b>  <b>Rapid Earth Fault Current Limiters (REFCL) (Ground Fault Neutralizer [GFN])</b></p>	<p>SCE proposes adjusting the target of “completing” GFN construction at Banducci substation to “initiate” construction at Banducci.</p>	<p>Rejected</p>	<p>The proposed change does not reduce risk.</p> <p>Additionally, SCE states that it experienced engineering delays and lengthy material procurement lead times. The reason for the requested change is that the initial target is no longer feasible.</p> <p>This is not an allowable reason to request a change in a target.<sup>6</sup></p>
<p><b>IN-9a</b>  <b>Transmission Conductor &amp; Splice Assessment: Spans with LineVue</b></p>	<p>SCE proposes adjusting the target from “Target to be developed based on an engineering analysis to be performed in 2023” to a target of 25.</p>	<p>Approved</p>	<p>The proposed change responds to an updated understanding of risk and is likely to reduce wildfire risk.</p>
<p><b>IN-9b</b>  <b>Transmission Conductor &amp;</b></p>	<p>SCE proposes adjusting the target from “Target to be developed based on an engineering analysis</p>	<p>Approved</p>	<p>The proposed change responds to an updated understanding of risk and is likely to reduce wildfire risk.</p>

<sup>6</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true) 12.2 “Criteria for a Change Order Request” states “Electrical corporations should not request approval for...changes to approach or targets exclusively because full implementation may not be feasible” (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed Jan. 30, 2024).

SCE Initiative ID and Title	Change Requested	Determination	Rationale
<b>Splice Assessment: Splices with X-Ray</b>	to be performed in 2023" to a target of 50.		

### **Summary and Next Steps**

Energy Safety approves two of SCE's three requests, affecting the following initiatives:

- Transmission Conductor & Splice Assessment: Spans with LineVue (WMP IN-9a)
- Transmission Conductor & Splice Assessment: Splices with X-Ray (WMP IN-9b)

In accordance with the 2023-2025 Process and Evaluation Guidelines, SCE must include the approved changes to these targets in future submissions to Energy Safety, including quarterly data reports.

Additionally, SCE must revise its 2023-2025 Base WMP to reflect the approved two changes for 2024 noted above and submit the revised WMP to the 2023-2025 WMP docket no later than June 7, 2024. This revised 2023-2025 Base WMP must represent the WMP approved by Energy Safety on October 24, 2023, with only the two 2024 target changes noted above. It must not include the updates provided in SCE's 2025 WMP Update submitted to Energy Safety on April 2, 2024, or any other changes not approved by this Change Order Decision.

Sincerely,



Suzie Rose  
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Office of Energy Infrastructure Safety