State of California – A Natural Resources Agency
Gavin Newsom, Governor

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August 15, 2025

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Subject: **The Office of Energy Infrastructure Safety Issuance of Revision Notice for the Southern California Edison Company 2026-2028 Base Wildfire Mitigation Plan**

Mr. Ferree:

Enclosed is the Office of Energy Infrastructure Safety's Revision Notice for Southern California Edison Company's (SCE)'s 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP). No later than September 15, 2025, SCE must provide:

- A Revision Notice Response, which includes its response to each critical issue.
- A redlined revised version of its 2026-2028 Base WMP that includes any changes resulting from its Revision Notice Response as well as corrections to non-substantive errors identified in Section 4 of the Revision Notice.

Section 5 of the Revision Notice provides submission instructions. The schedule for SCE's Revision Notice and Draft Decision is as follows:

SCE Revision Notice Response Due	September 15, 2025
Opening Comments Due	September 30, 2025
Reply Comments Due	October 10, 2025
Energy Safety Draft Decision Issued No Later Than	November 26, 2025

Sincerely,

/s/ Tony Marino

Tony Marino
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

REVISION NOTICE

SOUTHERN CALIFORNIA EDISON COMPANY
2026-2028 BASE WILDFIRE MITIGATION PLAN

August 15, 2025

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1. Introduction

The Office of Energy Infrastructure Safety (Energy Safety) may direct an electrical corporation to modify its Wildfire Mitigation Plan (WMP) by issuing a Revision Notice.[1]

Energy Safety identifies herein critical issues in Southern California Edison Company's (SCE)'s 2026-2028 Base WMP (2026-2028 Base WMP). Critical issues are areas of significant concern that an electrical corporation must address prior to the completion of Energy Safety's evaluation. SCE must address the critical issues set forth in this Revision Notice according to the parameters provided herein.

Energy Safety also includes herein non-substantive errors SCE must correct in its resubmitted WMP (Section 4).

The California Public Utilities Commission (CPUC) issued a Proposed Decision on Test Year 2025 for SCE's General Rate Case application on July 28, 2025.[2] SCE may include for Energy Safety's evaluation revisions to its resubmitted 2026-2028 Base WMP based on the Proposed Decision, pursuant to the following:

- Any changes must only impact the 2026-2028 Base WMP
- All changes must be identified in the revised WMP cover letter (or attachment) with:
    - WMP section number
    - WMP page number
    - Section and page number of the CPUC Proposed Decision supporting the change
    - Explanation as to why the change is necessary and how it aligns with the CPUC Proposed Decision

Section 5 provides submission instructions and deadlines for SCE's Revision Notice Response.

[1] Pub. Util. Code § 8386.3(a).

[2] SCE General Rate Case Proposed Decision

2. Summary of Critical Issues

This section outlines issues associated with SCE's 2026-2028 Base WMP that either by itself or in conjunction with other issues listed amount to critical issues. Energy Safety identified 10 such issues, listed below by mitigation category.

Section 3 provides a more detailed explanation of each concern and provides the required remedies. For the purposes of SCE's Revision Notice Response and Energy Safety's continued evaluation, each issue is assigned a tracking code.

General

- **RN-SCE-26-01:** SCE commits to low WMP targets while indicating it can likely achieve much more via the inclusion of what it calls "strive targets."

Risk Methodology

- **RN-SCE-26-02 :** SCE's Severe Risk Area increase lacks explanation.
- **RN-SCE-26-03 :** SCE's risk methodology lacks independent review.

Vegetation Management

- **RN-SCE-26-04:** SCE's Vegetation Management inspection targets and the scope of inspections do not align.
- **RN-SCE-26-05:** SCE's wood and slash management target is not specific or measurable.
- **RN-SCE-26-06:** SCE dilutes its commitments to its quantitative pole clearing targets with qualifying language in the footnotes.
- **RN-SCE-26-07:** SCE also dilutes its commitment to its quantitative pole clearing targets by using equivocating language in Table 9-2 via cross-referencing to another WMP section.
- **RN-SCE-26-08**: SCE failed to disclose two remote sensing pilot programs in its 2026-2028 Base WMP.
- **RN-SCE-26-09**: SCE's transition from ground inspections to remote sensing lacks explanation.

Enterprise Systems

- **RN-SCE-26-10:** SCE's targets in Table 12-1 lack specificity and are not measurable.

3. Critical Issues and Required Remedies

3.1 General

3.1.1 RN-SCE-26-01: SCE commits to low WMP targets while indicating it can likely achieve much more via the inclusion of what it calls “strive targets.”

The WMP Guidelines require the electrical corporation to use targets to set commitments for specific activities in its WMP and to support the reduction of utility-related ignitions and outages.[3] SCE presents mitigation activity targets in two categories within the same table cell, thus having two sets of targets per mitigation activity.[4] SCE does not address the meaning of the target categories until the supporting narrative discussion in Section 8.2.6.4 “Transmission Proactive Splice Shunting,” where it explains the "strive target" is not the same as the "compliance target."[5] The presence of two sets of targets in the table creates ambiguity and a lack of clarity in SCE’s WMP. There is no explanation as to why there are two separate targets in most supporting narratives. Additionally, there is no indication of which target Energy Safety should evaluate as informing the estimate risk reduction percentages in the tables.

For example, in Table 9-2 in its 2026-2028 Base WMP, SCE lists both a target and a strive target in the columns for its 2026, 2027, and 2028 cumulative quarterly targets[6] for one pole clearing activity (VM 2.1).[7] For the target, SCE states that it will “inspect 83,000 structures…” and for the strive target it states, “SCE will strive to inspect 172,000 structures….”[8] In the three-year total column of Table 9-2, these two targets are labeled “249,000 (compliance)/516,000 (strive).”[9]

Additionally, when there is both a strive target and a target, there is only one total per year percentage risk reduction for each plan year with no indication of which target SCE used for the calculation. For example, in Table 9-2 in its 2026-2028 Base WMP, where SCE listed both a

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[3] WMP Guidelines, page 12.

[4] SCE 2026-2028 Base WMP, page 331.

[5] SCE 2026-2028 Base WMP, page 257.

[6] Titled “Cml. Quarterly Target 2026, Q4,” “Cml. Quarterly Target 2027, Q4,” and “Cml. Quarterly Target 2028, Q4.”

[7] “Additional Structure Brushing (VM-2.1)” and “Compliance Structure Brushing (VM-2.2),” respectively.

[8] SCE 2026-2028 Base WMP, page 331.

[9] SCE 2026-2028 Base WMP, page 331.

target and a strive target for VM 2.1 in each plan year, SCE listed only one percentage for each plan year: 4.04% (2026), 4.01% (2027), 3.96% (2028).[10] However, given that there is both a target and a strive target for each of those years, it is unclear which target is associated with the one risk reduction percentage listed.

The difference between the target (83,000) and the "strive target" (172,000) in the example above is 89,000 structures.[11] This difference is striking, and SCE does not explain why there is such a large discrepancy between these numbers in its WMP narrative.

Moreover, based on SCE's historical performance of meeting its targets and occasionally meeting its strive targets, it is unclear how SCE sets its targets and strive targets in each Base WMP. For example, SCE's "Additional Structure Brushing" target (VM-2.1) is currently 83,000 structures.[12] However, Energy Safety's Substantial Vegetation Management (SVM) Audit found that in 2023, SCE completed this mitigation activity for 88,904 structures.[13] In another example, for SCE's covered conductor mitigation activity (SH-1), SCE's current target is 440 miles.[14] However, SCE installed 1217 circuit miles of covered conductor in 2023, exceeding both its target of 1100 circuit miles and strive target of 1200 circuit miles.[15,16] 440 circuit miles is also less than the 809 circuit miles SCE installed in 2024.[17]

Required Remedies

SCE must revise its 2026-2028 Base WMP to provide the following:

- For mitigation activities in which SCE has "strive targets," it must explain why there is a difference between the target and the "strive target," including
    - The factors that prevent SCE from setting the "strive target" as its target.
    - The steps SCE plans to take to reduce the difference between the target and "strive target" in the future.
- SCE must discuss its "strive targets" in the mitigation activity narrative and must remove "strive targets" and associated footnotes from all target tables. With the removal of "strive targets" from the target tables, SCE must update any information impacted by the removal in both the tables and supporting narrative.

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[10] SCE 2026-2028 Base WMP, page 331.

[11] Calculated: 172,000 – 83,000 = 89,000.

[12] SCE 2026-2028 Base WMP, page 331.

[13] 2023 SVM Audit, page A-10.

[14] SCE 2026-2028 Base WMP, page 216.

[15] SCE Quarterly Data Report 2023, Table 1.

[16] SCE's Revised 2023-2025 Base WMP, page 618.

[17] SCE Quarterly Data Report 2024, Table 1.

- For targets that are currently set below any of SCE's historical performance since 2020 and where SCE met or exceeded its targets, SCE must either:
    - Increase its target to better align with SCE's historical performance where SCE met or exceeded its targets, or
    - Explain why it cannot do so. SCE must provide explanations for all sections that currently contain targets and strive targets, including:
        - Situational Awareness,
        - Grid Design, Operations, and Maintenance,
        - Vegetation Management, and
        - Emergency Preparedness.

3.2 Risk Methodology

3.2.1 RN-SCE-26-02: SCE's Severe Risk Area increase lacks explanation.

The WMP Guidelines require the electrical corporation to include an overview of its risk analysis framework, including "key modeling assumptions, input data, and modeling tools used."[18] However, in its 2026-2028 Base WMP, SCE increased its highest risk circuit miles without explaining what changes in assumptions, data, or modeling tools led to this decision.

SCE's Integrated Wildfire Mitigation Strategy (IWMS) Framework is a methodology SCE uses to categorize risk into three categories. [19] The IWMS determines risk categories based on location-specific factors.[20] Of the three categories in the IWMS, Severe Risk Areas (SRAs) are the highest risk category.[21] SRAs are defined as "locations characterized by elevated population risk factors such as egress constrained locations, areas with significant wildfire risk, and/or locations with wind conditions that typically exceed covered conductor thresholds."[22]

Since its 2023-2025 Base WMP, SCE's SRA increased by just under 300 circuit miles.[23] Table 6-04 in SCE's 2023-2025 Base WMP shows the SRA having 2,925 circuit miles.[24] While SCE did not provide the total SRA circuit mileage in its 2026-2028 Base WMP, SCE did provide the total

[18] WMP Guidelines, page 30.

[19] SCE 2026-2028 Base WMP, page 48.

[20] SCE 2026-2028 Base WMP, page 48.

[21] SCE 2026-2028 Base WMP, page 49.

[22] SCE 2026-2028 Base WMP, page 50.

[23] SCE's Revised 2023-2025 Base WMP, page 114.

[24] SCE's Revised 2023-2025 Base WMP, page 114.

circuit mileage in its Response to Data Request 1, Question 1, which shows the SRA having 3,218 circuit miles.[25, 26]

SCE provided circuit mileages in each IWMS category in its 2023-2025 Base WMP, [27] and did not provide this information in its 2026-2028 Base WMP. In addition to changes in overall circuit miles in SCE's SRA, SCE also changed categorization of the circuit miles within its SRAs. While there was a nearly 300-mile net increase overall in the SRAs, approximately 500 circuit miles within the current SRA were previously identified in lower IWMS risk categories, whereas 200 circuit miles that were previously identified as SRA are now categorized in lower IWMS categories.[28] SCE provided no insight into the decision-making that resulted in this reorganization within the SRA.

SCE does not provide a reason for the inclusion of the newly identified circuit miles into the SRA, nor for the recategorization of the circuit miles within its SRAs.

Required Remedies:

SCE must revise its 2026-2028 Base WMP to provide the following:

1. A table showing the breakout of IWMS categories by circuit mileage that SCE is using for its 2026-2028 Base WMP mitigation planning, as SCE provided in its 2023-2025 Base WMP.
2. Explanation for the changed number of circuit miles within its SRA from the 2023-2025 Base WMP to the 2026-2028 Base WMP, include a discussion of what changed since the 2023-2025 Base WMP that lead to the increase in circuit mileage, broken out by each of the four SRA criteria: [29]
    a. Fire Risk Egress Constrained Areas
    b. Significant Fire Consequence
    c. High Winds
    d. Communities of Elevated Fire Concern

3.2.2 RN-SCE-26-03: SCE's risk methodology lacks independent review.

Section 5.6.1 of the WMP Guidelines requires electrical corporations to "…report on its procedures for independent review of data collected (e.g., through sensors or inspections)

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[25] Response to Data Request 1.

[26] 3,218 - 2,925 = 293.

[27] SCE's Revised 2023-2025 Base WMP, page 114.

[28] Response to Data Request 4, Question 13.

[29] SCE 2026-2028 Base WMP, page 50.

and generated (e.g., through risk models and software) to support decision making." [30] Section 5.6.1 also requires the electrical corporation to include independent reviews of data collection and risk modeling approaches, and its "…internal procedures to require when a third-party review is required…" [31] In its 2026-2028 Base WMP, SCE did not include information regarding its procedures for third-party review of its risk models.

SCE contracted an independent review of its risk models in 2022.[32] Since 2022, SCE has not had an external independent review of its risk models and does not currently have procedures for one.[33] In its 2026-2028 Base WMP, SCE stated that "SCE does not currently conduct external third-party independent reviews of data collected and risk models."[34] Given that SCE implemented various changes to its WMP and risk models since 2022, external verification and validation are an important component of quality assurance and quality control of risk models. In comparison with other large electrical corporations, both the PG&E[35] and SDG&E[36] 2026-2028 Base WMP submissions included an independent review procedure, as required by the WMP Guidelines.

There are a number of specific components of SCE's risk modeling and data collection in its 2026-2028 Base WMP that would benefit from independent review due to either changes made since SCE's 2023-2025 Base WMP or differences in risk methodologies compared to other electrical corporations. Those specific components include:

- **Burn Probability:** SCE updated its Fire Weather Day methodology to include an assumed conditional value of "1" for its burn probability.[37] The approach used by SCE for burn probability differs from the definition in the Guidelines and across the industry. An independent third-party review would help verify the applicability of this approach.
- **Fire Weather Days:** SCE made various changes to its Fire Weather Day calculations, including a new selection process to facilitate the "…transition to a quasi-probabilistic model without losing spatial granularity."[38] A third-party review of these changes would help verify that the assumptions made in the quasi-probabilistic model align with best practices in risk assessment. See additional discussion regarding Fire Climate Zones below.

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[30] WMP Guidelines, page 56.

[31] WMP Guidelines, page 56.

[32] SCE 2026-2028 Base WMP, page 138.

[33] SCE 2026-2028 Base WMP, page 138.

[34] SCE 2026-2028 Base WMP, page 138.

[35] PG&E 2026-2028 Base WMP, pages 104-105.

[36] SDG&E 2026-2028 Base WMP, pages 61-66.

[37] SCE 2026-2028 Base WMP, page 84.

[38] SCE 2026-2028 Base WMP, page 86.

- **Fire Climate Zones (FCZs):** SCE's FCZs are "are specific areas of SCE's service territory with similar terrain, fuels, weather, and fire activity."[39] Since its 2023-2025 Base WMP, SCE made various changes to these zones, such as separating the Sierra FCZ into Central Sierra and Tehachapi. In addition, the FCZs are now used as part of the frequency and consequence calculations within the regions. A third-party review of SCE's criteria for defining FCZs and how these zones are used in the risk calculation would verify the new approach.
- **Custom Fuels and Fuel Adjustment Processes:** In its 2026-2028 Base WMP, SCE stated that for the wildland urban interface (WUI) specifically, areas of new and/or rapid development are particularly problematic because there is traditionally a significant lag "between the date the fuels models were created and when buildings, particularly new neighborhoods, are developed."[40] To mitigate this lag, SCE stated it created a new fuel model update method to improve representation of the spread of surface fires spread in urbanized areas. [41] An independent third-party review of SCE's new fuel model update method would help check the accuracy of these adjustments and bring transparency into the associated impact of the adjustments.
- **Incorporation of PEDS Risk:** SCE's Protective Equipment and Device Settings (PEDS) risk is a function of its PEDS Likelihood and PEDS natural unit consequences.[42] PEDS risk incorporation is a new requirement as of the 2026-2028 Base WMP Guidelines,[43] and therefore SCE is using a new methodology. An independent review of PEDS risk incorporation would help verify that the new approach appropriately captures the risk impact.

Required Remedies

SCE must revise its 2026-2028 Base WMP to provide a plan for an independent review of its risk models that must include the following:

1. A description of the scope of the independent review, which must include all data, models, and sub-models used in the risk calculation. In addition to an overall review of SCE's risk models and decision-making frameworks, the scope of the independent review must include a specific discussion of each of the following components:
    a. Burn probability: including, but not limited to, verification of the applicability of the approach, given the difference in its approach from the Guidelines and the industry.

[39] SCE 2026-2028 Base WMP, page 83.

[40] SCE 2026-2028 Base WMP, page 92.

[41] SCE 2026-2028 Base WMP, page 92.

[42] SCE 2026-2028 Base WMP, page 39.

[43] 2026-2028 WMP Guidelines, pages 31-32.

b. Fire weather days: including, but not limited to, verification that the assumptions made in the quasi-probabilistic model align with best practices in risk assessment.
c. Fire climate zones: including, but not limited to, consideration of the criteria for defining FCZs and how these zones are used in the risk calculation.
d. Custom fuels and fuel adjustment processes: including, but not limited to, a check for accuracy of these adjustments and an analysis of the associated impact of the adjustments.
e. Incorporation of PEDS risk: including, but not limited to, verification that the new approach appropriately captures the risk impact.
f. Any other component the independent reviewer deems necessary.

2. The timeline for obtaining an independent reviewer, and the routine or recurrence schedule in which the review is performed.
3. Documentation demonstrating progress towards obtaining an independent reviewer, such as the notice of Request for Proposals (RFP) issuance, or the RFP itself.

3.3 Vegetation Management

3.3.1 RN-SCE-26-04: Vegetation Management inspections targets and the scope of inspections do not align.

The WMP Guidelines state that targets are "commitments for specific activities."[44] Targets track "completion of the activities in [an electrical corporation's] approved WMP"[45] and "must align with the electrical corporation's activities in its WMP."[46] SCE's reported targets in Table 9-2 (rows 3 and 4) of its 2026-2028 Base WMP for its distribution and transmission vegetation inspections do not reflect the reported scope of these activities (tracked as VM-7 and VM-8, respectively).[47]

In Table 9-3 (rows 1 and 2) , SCE stated that its distribution and transmission inspections activities (VM-7 and VM-8) cover 100 percent of its service territory annually, [48] including the HFTD. However, in its response to Data Request 4, Question 1, SCE stated that its distribution inspection targets are only 85 percent of the HFRA.[49] Similarly, in its response to Data Request

[44] WMP Guidelines, page 12.
[45] WMP Guidelines, page 12.
[46] WMP Guidelines, page 12.
[47] SCE 2026-2028 Base WMP, page 331.
[48] SCE 2026-2028 Base WMP, page 332.
[49] Response to Data Request 4.

7, Question 2, SCE stated that its transmission inspections target is only 86 percent of the HFRA.[50,51] As stated in Table 6-3, footnote 3, in SCE's 2026-2028 Base WMP, SCE's HFRA is equivalent to the HFTD in its service territory.[52] There should not be any difference between SCE's statement in the Base WMP and its response to data requests. Yet, SCE's statement in Table 9-3 (rows 1 and 2) is inconsistent with its responses to Data Requests 4 and 7. Given this discrepancy between target percentages, it is unclear what amount of inspection activities SCE will complete.

Required Remedies

SCE must revise its VM-7 and VM-8 targets in *Table 9-2: SCE Vegetation Inspections and Pole-Clearing Targets by Year* of its 2026-2028 Base WMP to cover 100 percent of SCE's HFTD and HFRA, to accurately reflect the described scope of these inspection activities in *Table 9-3: Vegetation Management Inspection Frequency, Method, and Criteria*.

3.3.2 RN-SCE-26-05: SCE's wood and slash management target is not specific or measurable.

The WMP Guidelines require that targets set by the electrical corporation are used to "track the electrical corporation's completion of the activities in its approved WMP."[53] Additionally, the WMP Guidelines define the required qualitative targets as "specific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program."[54] However, SCE does not set a qualitative target that is specific or measurable for its wood and slash management program.

In Table 9-1, SCE's qualitative wood and slash management contractor (VM-11) target is to "[r]eview and identify potential updates to contract terms for debris management, with implementation contingent on contract execution timing."[55] This qualitative target was set in response to Energy Safety's finding that SCE could not demonstrate that its contractors removed debris in accordance with commitments made in SCE's 2023-2025 Base WMP.[56]

This qualitative target is neither specific nor measurable as defined in the WMP Guidelines as it merely discusses an action SCE will take related to contracting instead of the measurable

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[50] Response to Data Request 7, Questions 1 and 2.

[51] Response to Data Request 7, Questions 1 and 2.

[52] SCE 2026-2028 Base WMP, page 196.

[53] WMP Guidelines, page 12.

[54] WMP Guidelines, page A-15.

[55] SCE 2026-2028 Base WMP, page 330.

[56] SCE's 2023 SVM Audit Corrective Action Plan, pages 2-4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true).

objective it intends to meet: ensuring that the contract terms for wood and slash management are performed, documented, and enforced.

Required Remedies

SCE must revise its 2026-2028 Base WMP to include a qualitative target for its wood and slash management program that conforms to the requirements of the WMP Guidelines[57] and ensures that the contract terms for wood and slash management are performed, documented, and enforced.

3.3.3 RN-SCE-26-06: SCE dilutes its commitment to its quantitative pole clearing targets with qualifying language in the footnotes.

The WMP Guidelines define quantitative targets as "a forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP."[58] The WMP Guidelines also require targets to be specific and support reduction of utility related ignitions.[59] In Table 9-2 of its 2026-2028 Base WMP, SCE includes footnotes for its pole clearing targets that use qualifying language. This qualifying language lacks specificity and dilutes SCE's commitment to those targets.

For example, in footnote 4, SCE states that "Attempts where no structures are found, or no clearance is required, are counted towards the target."[60] In footnote 5, SCE also states that attempts where property access was not granted are also counted towards the target, in addition to the conditions stated in footnote 4.[61]

Attempts to inspect are not actual inspections because they do not result in completed work. Interpreting attempts to inspect as actual, completed inspections reduces the specificity of the pole clearing targets and does not support overall risk reduction, both of which are requirements of quantitative targets in the WMP Guidelines.

Required Remedies

SCE must revise its 2026-2028 Base WMP to remove footnotes 4 and 5 of Table 9-2 and must stop equating attempts to inspect with completed inspections when establishing its targets.

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[57] WMP Guidelines, page A-15.

[58] WMP Guidelines Appendix A, page A-16.

[59] WMP Guidelines, page 12.

[60] SCE 2026-2028 Base WMP, page 331.

[61] SCE 2026-2028 Base WMP, page 331.

3.3.4 RN-SCE-26-07: SCE also dilutes its commitment to its quantitative pole clearing targets by using equivocating language in Table 9-2 via cross-referencing to another WMP section.

The WMP Guidelines state that targets are commitments for specific activities in the WMP and support the reduction of utility-related ignitions and outages.[62] In Table 9-2 of its 2026-2028 Base WMP, SCE's targets are conditioned by statements in Section 9.12.1. These statements introduce qualifying language that are counter to the WMP Guidelines definition of targets and introduce inconsistencies between the targets in Table 9-2 and the associated narrative portions of SCE's 2026-2028 Base WMP, undermining the measurability of such targets.

In Table 9-2, SCE attached footnote 1 to the "Activity Timeline Target" column. Footnote 1 states that the activity timelines listed in the column are "subject to constraints such as environmental holds, agency restrictions, customer approval, access or weather-related impacts (refer to Section 9.12.1)."[63] In Section 9.12.1, SCE states that these activity timelines targets are "internal" and "aspirational."[64] In the same section, SCE also states it "…endeavors to remediate all P1 and P2 conditions in accordance with internal timelines (targets)…"[65]

The WMP Guidelines require WMP targets to be specific. SCE's targets lack specificity because of its use of qualifying language. The use of qualifying language also renders SCE's commitments ambiguous. SCE's targets in Table 9-2 do not meet WMP Guidelines requirements.

For years, Energy Safety has criticized the use of equivocating language in WMPs. For example, in Resolution WSD-002 from 2020, the Wildfire Safety Division (now Energy Safety) observed that "[t]he prevalent use of equivocating language results in sparse commitment from utilities for achieving the intended goal of WMPs – reducing the risk of catastrophic wildfire posed by electrical lines and equipment."[66] This language is inappropriate to include in the target tables because the WMP Guidelines seek firm commitments from electrical corporations.

Required Remedies

SCE must revise its 2026-2028 Base WMP to remove footnote 1 and its associated language from Table 9-2. SCE also must remove all equivocating language from the narrative in Section

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[62] WMP Guidelines, page 12.

[63] SCE 2026-2028 Base WMP, page 331.

[64] SCE 2026-2028 Base WMP, page 367.

[65] SCE 2026-2028 Base WMP, page 366.

[66] Resolution WSD-002, page 26.

9.12.1 that dilutes its commitments, including but not limited to references to targets as "internal," "aspirational," and commitments that SCE will "endeavor" to achieve.

3.3.5 RN-SCE-26-08: SCE failed to disclose two remote sensing pilot programs in its 2026-2028 Base WMP.

The WMP Guidelines require electrical corporations to discuss any updates or changes to its inspection activities since its previous 2023-2025 Base WMP.[67] This discussion must include "… known future plans (beyond the current year) and new/novel strategies the electrical corporation may implement in the next five years (e.g., references to and strategies from pilot projects and research)."[68] SCE did not identify or discuss any vegetation management "pilot programs" for remote sensing in its 2026-2028 Base WMP. However, through data requests from CPUC's Safety Policy Division (SPD) and Energy Safety, two remote sensing "pilot programs" were identified.

In its response to SPD-issued Data Request 2 Question 3, SCE characterized its implementation of remote sensing technologies as currently in a pilot phase, stating that the pilot phase will begin near the end of this year.[69] In its 2026-2028 Base WMP, SCE makes no mention of a pilot. SCE further stated to SPD in the same data request response that once the pilot is complete, SCE plans to operationalize remote sensing inspections for all circuit miles across the entire service area.[70]

In its response to Energy Safety-issued Data Request 12, Question 1, SCE clarified that it is currently conducting two remote sensing pilot programs in 2025.[71] One pilot program, "TrimRX," is used to "…auto-define tree prescriptions."[72] The other pilot program, "Crown Association," is used to "…match individual trees with individual crowns for future use with SCE's CanopySense program."[73] SCE stated it plans to finalize the "… scopes of work and process and procedural documents for TrimRx and Crown Association…" prior to full implementation, but as of yet these documents remain formally undefined.[74]

In its 2026-2028 Base WMP, SCE stated it plans to introduce its CanopySense program, a cloud-based LiDAR[75] tool meant "…to aid in performing vegetation management inspection

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[67] WMP Guidelines, page 109.

[68] WMP Guidelines, page 109.

[69] Response to SPD Data Request 2, Question 3.

[70] Response to SPD Data Request 2, Question 3.

[71] Response to Data Request 12, Question 1.

[72] Response to Data Request 12, Question 1.

[73] Response to Data Request 12, Question 1.

[74] Response to Data Request 12, Question 1.

[75] Light Detection and Ranging.

activities around distribution and transmission assets."[76] However, CanopySense was presented in the WMP as a tool and not stand-alone pilot program.

Though SCE discussed at a high level its plans to introduce CanopySense, it provided no further information regarding its planned implementation of this new remote-sensing technology in its 2026-2028 Base WMP, nor did SCE ever characterize CanopySense as a pilot program in its 2026-2028 Base WMP. Finally, SCE did not discuss TrimRx outside of the above data request responses.

Required Remedy

SCE must revise its 2026-2028 WMP to provide details on and discussion of its remote sensing pilot programs and must include:

- All the information about SCE's remote sensing pilots disclosed in SCE's response to Data Request 12.
- A description of which remote sensing technologies SCE is piloting and which remote sensing technologies SCE is considering for future use.
- A description of how SCE is evaluating and will continually evaluate remote sensing for use in its inspections, including a process, criteria, and metrics for determining the success/failure of the pilot and the ongoing effectiveness of remote sensing inspections.

3.3.6 RN-SCE-26-09: SCE's transition from ground inspections to remote sensing lacks explanation.

The WMP Guidelines require electrical corporations to discuss any updates or changes to its inspection activities since its previous 2023-2025 Base WMP.[77] This discussion must include "… known future plans (beyond the current year) and new/novel strategies the electrical corporation may implement in the next five years (e.g., references to and strategies from pilot projects and research)."[78] In its 2026-2028 Base WMP, SCE stated that it plans to combine its remote sensing and ground inspections mitigation activities into one mitigation activity because SCE plans to "augment" its ground patrol inspections with remote sensing technologies.[79, 80] SCE stated that it plans to do these combinations for both its transmission and distribution inspections.[81,82] SCE further stated that these combinations will "facilitate

[76] SCE 2026-2028 Base WMP, page 335.
[77] WMP Guidelines, page 109.
[78] WMP Guidelines, page 109.
[79] SCE 2026-2028 Base WMP, page 335.
[80] SCE 2026-2028 Base WMP, page 335.
[81] SCE 2026-2028 Base WMP, page 335.
[82] SCE 2026-2028 Base WMP, page 335.

the transition from ground-based inspections to more remote sensing methodologies, thus providing valuable data for predictive models."[83] SCE also acknowledged that eventually the model may lead to improvements in SCE's risk informed work prioritization.[84] However, this transition represents a new and novel strategy that SCE provides no further detail on for Energy Safety to evaluate apart from the vague statements mentioned above, nor does SCE discuss how exactly this transition would "provide valuable data for predictive models."[85]

SCE did provide some detail on these transitions in its response to Data Request 12, where SCE stated that it plans to "…begin implementing the new technology on an incremental basis in 2026,"[86] eventually deploying the "…technology across the entire service area…"[87] In the same data request response, SCE stated that it plans to use ground inspections "… in areas where remote sensing is unable to perform quality inventory inspections…."[88]

Transitioning from ground patrol inspections to remote sensing technologies represents a fundamental programmatic change, and it is unclear from the detail provided in the 2026-2028 Base WMP how SCE plans to transition, including questions such as over how long a period this transition will occur, what milestones SCE plans to reach during this transition, and how it plans to augment remote sensing with ground patrol inspections. Yet, according to its response to Data Request 12, SCE is planning to begin implementing remote sensing in 2026.

Required Remedy

SCE must revise its 2026-2028 Base WMP to provide details on and discussion of its plans to transition from ground patrol inspections to remote-sensing technologies, including:

- A description of how SCE plans to phase into remote sensing from ground-based patrol inspections, for years 2026, 2027, and 2028.
    - A timeline, including measurable and auditable milestones, for the transition.
        - The timeline and milestones must be included in Table 9-1 as a qualitative target.
- A description of how and when SCE will perform ground-based patrol inspections in areas that have inconclusive remote sensing results or were not captured by remote sensing.

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[83] SCE 2026-2028 Base WMP, page 335.

[84] SCE 2026-2028 Base WMP, page 335.

[85] SCE 2026-2028 Base WMP, page 335.

[86] Response to Data Request 12, Question 1.

[87] Response to Data Request 12, Question 1.

[88] Response to Data Request 12, Question 1.

- Qualitative targets for mitigation activities the new VM-7 and VM-8 in Table 9-2 and correlating narrative consistent with SCE's response to Data Request 12, Question 1.[89]

3.4 Enterprise Systems

3.4.1 RN-SCE-26-10: SCE's targets in Table 12-1 lack specificity and are not measurable.

The WMP Guidelines define qualitative targets as "[s]pecific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program."[90] However, SCE's Enterprise Systems qualitative targets in Table 12-1 lack specificity and are not measurable, and do not accurately reflect activities described in the associated WMP narrative section.

In Table 12-1, SCE lists qualitative targets associated with various activities in its WMP.[91] SCE states that for targets VM-6 and IN-8 (rows 1 and 2 in Table 12-1), SCE will "[m]onitor utilization of vegetation work management system and make enhancements as needed" for each year of the WMP cycle.[92] However, in Section 12.2 of its 2026-2028 Base WMP, SCE elaborated on the several changes SCE is planning for its data storage and collection systems. For example, SCE stated that it is in the process of updating from its legacy systems to a new system of record for its asset inventory and asset inspections data.[93] None of these changes were captured in the qualitative targets VM-6 and IN-8. Additionally, these targets lack specificity, are not measurable, and therefore do not meet the WMP Guidelines requirements.

Required Remedies

SCE must revise its 2026-2028 Base WMP to provide qualitative targets for its activities listed in Table 12-1 that are "[s]pecific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program."[94] SCE must provide qualitative targets that reflect the changes described in the associated WMP narrative for Energy Safety to verify how SCE plans to monitor its vegetation management system work or make needed upgrades during the 2026-2028 WMP cycle.

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[89] Response to Data Request 12, Question 1.

[90] WMP Guidelines, page A-15.

[91] SCE 2026-2028 Base WMP, page 473.

[92] SCE 2026-2028 Base WMP, page 473.

[93] SCE 2026-2028 Base WMP, page 476.

[94] WMP Guidelines, page A-15.

4. Non-Substantive Errata

Energy Safety identified non-substantive errors for SCE to correct in its revised 2026-2028 Base WMP. SCE must revise its 2026-2028 Base WMP to correct the errors identified *Table 1, Errors in the SCE 2026-2028 Base WMP.*

Table 1. Errors in the SCE 2026-2028 Base WMP

Section	WMP Page Number	Correction or Clarification
8.2.1.1 Covered Conductor	Pages 222-226	SCE's planned completion of its covered conductor program lacks explanation. SCE must revise Section 8.2.1.1 of its 2026-2028 Base WMP to include the explanations provided in its response to Data Request 10.[95]
9.5 Wood and Slash Management	Pages 346-347	SCE lacks clear definitions and plans for wood and slash management. SCE must revise its 2026-2028 Base WMP to define debris and explain how it manages wood over 4 inches in Section 9.5 of its WMP to align with its response to Data Request 7, Question 1.[96]
9.12 Work Orders	Pages 336-370	SCE's priority levels for past due work orders are inconsistent between the narrative description and Table 9-8. SCE must revise Table 9-8 in its 2026-2028 Base WMP to include all five priority levels described in Section 9.12.1, as provided in its response to Data Request 2, Question 2.[97]

[95] Response to Data Request 10, Question 1.

[96] Response to Data Request 7, Question 1.

[97] Response to Data Request 2, Question 2.

5. Conclusion and Next Steps

SCE must submit its Revision Notice Response along with a clean revised 2026-2028 Base WMP and a redlined revised 2026-2028 Base WMP to the 2026-2028 Wildfire Mitigation Plan docket (#2026-2028-Base-WMPs).

For the critical issues identified, Energy Safety sets forth specific remedies that SCE must fully address and respond to within its Revision Notice Response.[98] SCE must also correct the non-substantive errors identified in Section 4.

Stakeholders and members of the public may submit opening and reply comments on SCE's Revision Notice Response in accordance with Section 4 of the Energy Safety Policy Division Process Guidelines,[99] pursuant to the schedule below. Opening and reply comments must be submitted to the 2026-2028 Wildfire Mitigation Plan docket (#2026-2028-Base-WMPs). Reply comments must be limited to issues raised and representations made in the opening comments.

The schedule for SCE's Revision Notice Response and Draft Decision is as follows:

SCE Revision Notice Response and Revised WMP Due	September 15, 2025
Opening Comments Due	September 30, 2025
Reply Comments Due	October 10, 2025
Energy Safety Draft Decision Issued No Later Than	November 26, 2025

[98] WMP Guidelines, pages 9-10.

[99] Policy Division Process Guidelines, pages 2-4.

Appendix A: References Table

Citation	Reference
SCE 2026-2028 Base WMP	Southern California Edison Company, 2026-2028 Base Wildfire Mitigation Plan, Published May 16, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58479&shareable=true).
Policy Division Process Guidelines	Office of Energy Infrastructure Safety, Policy Division Process Guidelines, Published February 24, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58025&shareable=true).
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WSD Resolution 002	California Public Utilities Commission, Resolution WSD-002, Wildfire Safety Division, June 11, 2020, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M340/K859/340859823.PDF) .
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Citation	Reference
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Response to Data Request 2	Southern California Edison Company, Response to OEIS - P - WMP_2025 - SCE – 002 Questions 1-9, published June 13, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58581&shareable=true).
Response to Data Request 1	Southern California Edison Company, Response to OEIS - P - WMP_2025 - SCE – 001 Questions 1-2, published May 27, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58562&shareable=true).
Response to Data Request 12, Question 1	Southern California Edison Company, Response to OEIS-P-WMP_2025-SCE-012, Question 1, published July 22, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58975&shareable=true).
Response to SPD Data Request 2, Question 3	Southern California Edison Company, Response to DATA REQUEST SET SPD-SCE-WMP2026-002, published June 30, 2025, URL: (https://www.edison.com/_gallery/get_file/?file_id=6876e7ef3d633248b702ee88).
SCE General Rate Case Proposed Decision	California Public Utilities Commission, Proposed Decision on Test Year 2025 General Rate Case for Southern California Edison Company (A.2305010), published Jun 28, 2025, URL: (https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M574/K336/574336067.PDF) .
PG&E 2026-2028 Base WMP	Pacific Gas and Electric Company, 2026-2028 Base Wildfire Mitigation Plan, volumes 1 and 2, published April 4, 2025, URL volume 1:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58219&sha

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SDG&E 2026-2028 Base WMP	San Diego Gas and Electric Company, 2026-2028 Base Wildfire Mitigation Plan, published May 2, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58389&shareable=true).
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SCE Quarterly Data Report 2023, Table 1	Office of Energy Infrastructure Safety, Energy Safety Data Guidelines Appendix D, Section 1.2 Wildfire Mitigation Data Tables Template: Tables 1 – 15, published February 2, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56271&shareable=true, Table 1).
SCE Quarterly Data Report 2024, Table 1	Office of Energy Infrastructure Safety, Energy Safety Data Guidelines Appendix D, Section 1.2 Wildfire Mitigation Data Tables Template: Tables 1 – 15, published February 3, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true).

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