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Docket# 2026-2028-Base-WMPs

Tony Marino
Deputy Director, Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
715 P Street, 15th Floor
Sacramento, CA 95814

**RE: Opening Comments on the Office of Energy Infrastructure Safety's Draft Decision for
 Southern California Edison Company's 2026-2028 Wildfire Mitigation Plan**

Dear Deputy Director Marino:

Southern California Edison Company (“SCE”) provides the following opening comments on the Office of Energy Infrastructure Safety’s (“Energy Safety”) December 23, 2025 Draft Decision (“Draft Decision”) approving SCE’s 2026-2028 Wildfire Mitigation Plan (“WMP”). SCE appreciates Energy Safety’s comprehensive and thoughtful evaluation of SCE’s WMP and requests that Energy Safety incorporate the modifications explained below into the final decision.

I. OPENING COMMENTS

A. SCE-26B-13. Forward-Looking Pole Replacement Strategy

The Draft Decision explains that “SCE has inspection programs and pole loading programs that will identify and schedule poles for replacement if they are deteriorated,” but notes that both inspection and pole loading programs “prescribe work only after SCE finds degraded conditions on a pole during an inspection.”¹ The Draft Decision concludes that SCE does not have a “forward-looking strategy for its transmission and distribution pole replacements and reinforcements” and sets forth an Area for Continued Improvement (“ACI”) requiring SCE to, among other things, “transition these programs” to a proactive pole replacement strategy with annual pole replacement targets and a pole replacement work order backlog reduction plan.²

The Draft Decision’s requirement that SCE “transition” existing programs to a proactive strategy to replace poles prior to inspection findings of degraded conditions should be modified because it is (1) inconsistent with California Public Utilities Commission (“Commission”) precedent and (2) premature. First, In SCE’s 2015 General Rate Case (“GRC”), SCE proposed what the ACI contemplates—an Aged Pole Replacement Program to proactively replace poles 70 years and older based on a detailed risk analysis. The Commission partially rejected this proposal, disapproving the replacement of 5,500 poles in 2014 (out of 14,500 requested) and disapproving the replacement of all 1,898 poles in 2015.³ Although the Commission supported SCE’s goal of “reducing the risk of an in-service pole failure,” it noted that some poles replaced under the program “could have continued to serve ratepayers for years to come” and cited potential alternatives to proactive pole replacement such as more frequent

¹ Draft Decision, p. 47.

² Draft Decision, pp. 47, A-29.

³ Decision (D.) 15-11-021, pp. 144-45.

inspections.⁴ Similarly, in SCE’s 2018 GRC, the Commission imposed a multi-year disallowance for certain costs associated with pole replacements that the Commission determined to be premature.⁵ While recognizing that “no pole will last forever,” the Commission reasoned that it “was imprudent to replace poles prematurely, and that premature replacement, when the poles continued to be useful, resulted in a loss of value to ratepayers.”⁶

Furthermore, it is premature to conclude that a new anticipatory pole replacement strategy would materially reduce the risk of pole failures leading to outages or ignitions. As noted in the Draft Decision, SCE’s inspections and pole loading programs already identify and schedule poles for replacement if they are deteriorated,⁷ providing a risk-based and cost-effective approach consistent with Commission guidance. Based on a review of certain SCE repair order data involving poles as the root cause equipment, the most frequent type of event leading to repair orders for poles in 2024 and 2025 were contacts from third-party vehicles—i.e., events that are outside of SCE’s control, as opposed to pole degradation. Thus, proactively replacing poles before the end of their service life would not necessarily address the risk of pole failures due to the most frequent risk driver in recent years: contact from third-parties.

This ACI requires SCE to provide a historical trend analysis of pole failure-related outages and ignitions, including drivers of pole failure and a discussion of conditions that can and cannot be identified through inspection programs.⁸ That analysis will inform whether or not transitioning to a “forward-looking” strategy with standalone pole replacement targets would be justified by the pole failure-related data. But it is premature to require a transition strategy and annual pole replacement targets now before SCE has had an opportunity to perform the historical trend analysis and evaluate whether a new pole replacement strategy is warranted. Accordingly, the Draft Decision should be modified to remove statements requiring SCE to transition unspecified, existing inspections and pole loading programs to a “forward-looking” pole replacement strategy with annual pole replacement targets before SCE has had an opportunity to perform the data analysis required by the ACI.⁹

B. Consideration of Egress in Risk Modeling

The Draft Decision includes two inaccurate statements regarding SCE’s incorporation of egress constraints into risk modeling that should be removed from the final WMP decision. First, the Draft Decision states “SCE does not consider egress constraints in its risk modeling analysis.”¹⁰ This statement is inaccurate because SCE does incorporate egress constraints into both the Integrated

⁴ D.15-11-021, pp. 113-14.

⁵ D.19-05-020, p. 340.

⁶ D.19-05-020, p. 340.

⁷ Draft Decision, p. 47.

⁸ Draft Decision, p. A-29.

⁹ In addition to deferring the requirements in the Draft Decision that SCE identify a tracking ID and annual targets for distribution and transmission pole replacements pending the ACI’s required data analysis, SCE proposes that the following statements be removed: Draft Decision, p. 47 (“SCE must develop and implement a forward-looking strategy for transmission and distribution pole replacements and reinforcements”); p. 74 (“Energy Safety requires SCE to transition these programs to a more forward-looking strategy”); pp. 74-75 (“Provide a future replacement prioritization strategies [sic”]); p. A-29 (“Energy Safety requires SCE to transition these programs to a more forward-looking strategy”); *id* (“Provide a future replacement prioritization strategies [sic”]).

¹⁰ Draft Decision, p.14.

Wildfire Mitigation Strategy (“IWMS”) and Multi-Attribute Risk Scores (“MARS”).¹¹ Second, the Draft Decision states “SCE currently incorporates an egress model in its IWMS program, however the model does not impact calculation of risk scores, and SCE instead relies on AFN and subject matter expertise to impact decision-making.”¹² This statement is also inaccurate because egress constraints do impact SCE’s calculation of risk scores.

C. SCE-26B-12. De-energized Transmission Line Assessment and Removal

The Draft Decision states that “SCE maintains 305 miles of de-energized transmission lines that run parallel and within 1,000 feet of energized transmission lines within its HFRA.”¹³ It also states that none of the 305 miles of those de-energized transmission lines are planned for removal in 2026 through 2028.¹⁴

SCE clarifies that the approximately 305 miles of idle transmission lines referenced in the Draft Decision are not continuously parallel to energized transmission lines. Rather, SCE has approximately 305 miles of idle transmission lines that have some portion of their length within 1,000 feet of energized transmission lines 55kV or greater. In addition, after SCE submitted the relevant data request response cited in the Draft Decision, SCE identified approximately thirteen miles of idle transmission lines for removal beginning in 2026. SCE has submitted a supplemental data request response¹⁵ with these clarifications and requests that the final WMP decision also incorporates them.

D. Schedule for Certain Areas for Continued Improvement

The final WMP decision should clarify certain ACIs that have a deadline of “Next WMP Submission.”¹⁶ SCE is unclear if ACIs with a deadline of “Next WMP Submission” should be addressed in the 2027 WMP Update or in the next Base WMP. SCE would appreciate clarity regarding these deadlines to ensure that ACI responses align with Energy Safety’s expectations.

II. CONCLUSION

SCE appreciates the opportunity to provide these opening comments on the Draft Decision and looks forward to continuing to collaborate with Energy Safety and stakeholders to reduce wildfire risk in SCE’s service area. If you have questions, or require additional information, please contact me at david.leblond@sce.com.

Sincerely,
//s//
David LeBlond
Principal Manager, Regulatory Affairs & Compliance

¹¹ See, e.g., SCE 2026-2028 Base WMP, R2, p. 50-54 (egress is incorporated into IWMS); SCE’s response to data request OEIS-WMP-2025-SCE-002, Question 03 Atch Supp Appendix B, pp. 50-51 (Supplemental Appendix B noting that SCE considers egress as a multiplier in SCE’s quantitative risk scores).

¹² Draft Decision, p. 25.

¹³ Draft Decision, pp. 72, A-27.

¹⁴ Draft Decision, pp. 72, A-27.

¹⁵ Please refer to SCE’s supplemental response to data request OEIS-P-WMP_2025-SCE-004, Q11.b-c.

¹⁶ Draft Decision, pp. 42, A-22 (ACI SCE-26B-10); Draft Decision, pp. 120, A-33 (ACI SCE-26B-20).