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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

SUBJECT: Reply 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) appreciates the opportunity to respond to stakeholders' 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).

Besides SCE, Acton Town Council (Acton-Based NGO) was the only party to submit opening comments on SCE's WMP. Notably, the Acton-Based NGO does not recommend against Energy Safety approval of SCE's WMP. Their comments instead focus on matters of PSPS execution (e.g., *how* SCE decides to de-energize). In addition, similar concerns by the Acton-Based NGO have previously been raised and addressed in the CPUC's now-closed PSPS docket¹.

The Acton-Based NGO raises these points to argue that OEIS, "should not presume that SCE intends to comply with the PSPS procedures enumerated in its 2026-2028 WMP" because SCE has previously de-energized when wind speed or Fire Potential Index (FPI) thresholds were not met. SCE, however, clearly explains in its PSPS Post-Event Reports (PERs) "[i]f actual conditions suggest more risk, such as in complex, large-scale events when many circuits are under consideration for shutoffs and when multiple circuits are approaching de-energization criteria simultaneously, SCE may de-energize circuits prior to meeting criteria if they are expected to meet or exceed criteria."² Thus, SCE's PSPS decision making remains consistent with SCE's PSPS processes and the Acton-Based NGO's assertion is without merit.

Regarding the Acton-Based NGO's claim that they could not find information about SCE's de-energization protocols for transmission lines in the WMP, SCE provided all information required in Energy Safety's guidelines for the 2026-2028 WMP. To the extent the Acton-Based NGO would like

¹ See e.g., SCE Opposition to Acton's Motion to Compel Discovery, filed March 24, 2025 in R.18-12-005 and Administrative Law Judges' Ruling Denying Motion to Compel Discovery, filed April 1, 2025 in R.18-12-005

² SCE PSPS PER January 20, 2025, p. 11.

more information, SCE directs them to SCE’s publicly available PSPS PERs for information about SCE’s de-energization protocols for transmission lines.³

The Acton-Based NGO also alleges that as of September 2025 they were “removed from all SCE PSPS Notification distribution lists” and asserts that SCE is not committed to stakeholder outreach during PSPS events.⁴ This is simply untrue, as SCE’s education and outreach to customers and other stakeholders is documented in multiple publicly available materials, including its PSPS Pre-Season Reports.⁵ SCE also clarifies that the notifications the Acton-Based NGO appears to reference are priority notifications intended for Public Safety Partners, for which the Acton-Based NGO, as a voluntary non-governmental organization, does not qualify⁶. The Acton-Based NGO, however, is eligible to sign up for standard PSPS customer notifications.

For the reasons above, SCE recommends Energy Safety approve SCE’s WMP with the changes recommended in our Opening Comments. 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

³ See e.g., p. 10 in SCE’s PSPS PER for November 9, 2025 De-Energization Event.

⁴ Acton Town Council Opening Comments, p. 12.

⁵ For example, see pp. 15-20 of SCE’s PSPS 2025 Pre-Season Report.

⁶ The CPUC defines Public Safety Partners as “first/emergency responders at the local, state and federal level, water, wastewater and communication service providers, community choice aggregators (CCAs), affected publicly-owned utilities (POUs)/electrical cooperatives, the Commission, CalOES and CAL FIRE” (D.19-05-042, p. 73). The CPUC defines first/emergency responders as “individuals who, in the early stages of an incident, are responsible for the protection and preservation of life, property, evidence, and the environment, including emergency response providers. The term ‘emergency response providers’ includes federal, state, and local governmental and nongovernmental public safety, fire, law enforcement, emergency response, emergency medical services providers (including hospital emergency facilities), and related personnel, agencies and authorities” (D.19-05-042, p. 72). Acton Town Council does not meet this definition because it is not a local government (such as a city council) but is instead a voluntary “non-governmental organization,” with no jurisdiction or authority and no emergency response function. The relevant local government for the community of Acton is Los Angeles County (Fifth Supervisorial District).