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Docket # WMP-Guidelines

Nicole Dunlap  
Program Manager  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**SUBJECT:** Southern California Edison Company's Comments on the Proposed Wildfire Mitigation Plan Submission Schedule

Dear Program Manager Dunlap:

Southern California Edison Company (SCE) appreciates the opportunity to provide the following comments on the Proposed WMP Plan Submission Schedule (Proposed Schedule) that was issued by the Office of Energy Infrastructure Safety (Energy Safety) on January 26, 2026.

**Cancellation of the 2027 WMP Update**

In its letter issuing the Proposed Schedule, Energy Safety states that it will not be accepting 2027 WMP Updates<sup>1</sup>. SCE recommends that an alternative mechanism be established to provide utilities with an opportunity to submit proposed changes to 2027 WMP targets. For example, utilities were provided an opportunity in the 2025 WMP Update to propose changes to approved targets, objectives, and expenditures if proposed updates were justified by lessons learned, internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety's compliance process, or based on other explanations. The 2025 WMP Update guidelines recognized that wildfire mitigation strategies are not static; rather, wildfire mitigation strategies continue to mature and evolve, new technologies become available over time, and changed circumstances after a base WMP is submitted may warrant modifications to WMP targets. A mechanism for utilities to present proposed changes to WMP targets would help ensure that updated information for 2027 is incorporated into the 2026-2028 WMP.

SCE believes the most effective way to incorporate these proposed changes would be to modify the requirements for the 2027 Petition to Amend to allow updates to WMP targets or inclusion of new pilots that are not directly tied to a General Rate Case (GRC) decision. This would provide an avenue for utilities to present updates and for those updates to be vetted by Energy Safety.

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<sup>1</sup> Proposed Schedule, p. 1.

## **New WMP Base Plan Submission Cycles**

Energy Safety states that the current 2026-2028 WMP cycle overlapping with the forthcoming 2028-2031 WMP cycle is intentional, and that the required components for 2028 will be determined in revised WMP Guidelines.<sup>2</sup> SCE urges that the 2028 aspects of the 2028-2031 WMP should supersede the 2028 plans described in the current 2026-2028 WMP. Under the Proposed Schedule, SCE would submit its 2028-2031 WMP in 2027. At that time, two years will have passed since SCE submitted its 2026-2028 WMP. With the benefits of advancements since 2025 and lessons learned, utilities will be in a better position to refine 2028 targets in 2027.

In addition, Energy Safety acknowledges that a WMP submission for SCE for 2032 is necessary to ensure there is not a gap in WMP coverage between the forthcoming 2028-2031 WMP and 2033-2036 WMP.<sup>3</sup> For 2032, SCE recommends a filing akin to the 2025 WMP Update. This should include narrative descriptions limited to new or discontinued programs and changes to risk modeling. SCE would also expect to provide updated annual targets for all WMP activities presented in the previous base plan.

## **Conclusion**

SCE appreciates the opportunity to provide these comments on the Proposed Schedule. If you have questions, or require additional information, please contact me at [david.leblond@sce.com](mailto:david.leblond@sce.com).

Sincerely,

//s//

David LeBlond

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<sup>2</sup> Proposed Schedule, p. 1.

<sup>3</sup> Proposed Schedule, p. 4.