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April 3, 2023

Melissa Semcer
Deputy Director, Electric Safety Policy Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
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SUBJECT: Comments Regarding Office of Energy Infrastructure Safety's (Energy Safety) Substantive Revision to the 2023 Maturity Survey

Dear Deputy Director Semcer:

On March 3, 2023, the Office of Energy Infrastructure Safety (Energy Safety) issued a Proposed Substantive Revision to the 2023 Maturity Survey that removed 18 questions from the survey. SCE supports the removal of those 18 questions. SCE appreciates Energy Safety's continued openness to modifying the existing survey and is committed to working with Energy Safety to further refine the Maturity Model and review additional survey questions. SCE supports developing a wildfire mitigation capability maturity model that more accurately measures wildfire mitigation capability progress.

ESTABLISHING A COLLABORATIVE PROCESS FOR UPDATES TO THE MATURITY MODEL WILL ALLOW FOR AN IMPROVED ABILITY TO IDENTIFY AND RESOLVE ISSUES WITH THE MODEL

In subsequent sections of these comments and in the accompanying appendix, SCE identifies concerns with the design of the maturity model and with specific questions. A working group approach would be effective due to the range of issues, the need for a robust process to identify and resolve issues with model design and with specific questions, and for the value that would come from a more inclusive process with engaged stakeholders.

This suggestion is consistent with SCE's prior feedback.[1] A collaborative Maturity Model Working Group can help refine or remove problematic questions, improve benchmarking and support for how maturity levels are defined, better balance issues such as cost and risk reduction value, work through scoring concerns, and generally allow for a more inclusive and well-supported model.

THE MATURITY MODEL SHOULD CONSIDER MATURITY IN THE CONTEXT OF ISSUES SUCH AS AFFORDABILITY, RISK REDUCTION POTENTIAL, AND OPERATIONAL FEASIBILITY

SCE supports Energy Safety's objective to incentivize utilities to continue maturing their wildfire mitigation efforts; however, SCE respectfully requests broadening the maturity evaluation to consider factors such as cost and approved funding through CPUC- and FERC-jurisdictional rates, operational feasibility, risk reduction, and opportunity costs. Absent this broader perspective, the Maturity Model paints an unrealistic and inaccurate picture of utility maturity that essentially considers maturity in a vacuum without regard to necessary considerations such as regulatory-approved costs, feasibility, and risk reduction value.

For example, the Maturity Model notes several instances where a higher level of maturity can be gained by performing work with greater frequency. In some cases this may be appropriate, but the survey does not include a corresponding evaluation of necessary considerations such as risk reduction benefits, feasibility, customer impact, cost, or how doing an activity with higher frequency might negatively affect other important objectives.

An example is the blanket assumption that utilities should attempt to remediate all Priority 2 findings in High Fire Risk Areas (HFRA) within two weeks. A strict two-week remediation timeframe for every Priority 2 in HFRA would be impractical, costly, and would negatively affect the utility's ability to achieve other important safety, reliability, and customer-driven objectives. It would also be contradictory with the notion that notifications are classified and prioritized based on severity and risk. Further, to presume such an approach would be considered a "best practice" does not consider the inefficiencies and operational complexities (e.g., permitting) that would be introduced. SCE is not aware of any utility that follows this practice and does not believe it is supported by industry benchmarking.

As another example, SCE questions the value and appropriateness of setting an objective to recalculate Risk Spend Efficiencies (RSEs) monthly, which is considered a "beyond best practice" maturity level. RSEs are a medium and long-term planning tool that are one of many considerations that help inform utility decision-making on wildfire

[1] SCE provided written comments on the Maturity Model on May 6, 2022, "Comments Regarding Workshop on 2023 Wildfire Mitigation Plan Guideline Development", and on October 26, 2022, "Southern California Edison's Comments on the Draft 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey" and has had meetings to discuss these issues with Energy Safety.

mitigation selections; for many mitigations, particularly those that have long planning and construction timelines such as targeted undergrounding or covered conductor, there is little value in recalculating RSEs monthly or any cadence more frequent as currently required by regulatory guidelines.

SCORING BASED ON AVERAGES WILL BE MORE INFORMATIVE, MEANINGFUL, AND COMPARABLE ACROSS UTILITIES

The Maturity Model includes scoring for 37 individual capabilities, with each capability containing subordinate capabilities and scoring schemes. The score for each capability is determined by the lowest score from its subordinate capabilities. SCE appreciates the change that Energy Safety made in the final version of the Maturity Model by creating a distinction between "Capability Maturity" and "Capability Average." While this change was welcome, SCE continues to recommend that maturity should be scored based on the average of their constituent sub-capabilities, as opposed to the minimum. An average scoring approach reflects the balance of strengths and weaknesses within the capability and more accurately represents a utility's actual maturity and anticipated performance.

As stated in SCE's prior comments,[2] the minimum scoring approach significantly affects the accuracy and meaning of the maturity model by obscuring areas where a utility is performing at a higher level. For example, a utility may perform well in many sub-capabilities, but a single 1 score in any sub-capability results in an overall score of 1 for that entire capability. This makes the results less informative, and, in most cases, likely inaccurate.

Additionally, the minimum scoring approach also makes the scores less comparable across utilities. For example, if two utilities have the same score for a capability, one cannot compare this score or conclude the utilities have the same maturity without looking at the individual sub-capability scores. In this sense, the minimum scoring approach contradicts the intention of comparable maturity scores, as it does not accurately reflect the full balance of each utility's strengths and weaknesses, and incorrectly suggests that similar scores at the category and capability level will represent similar maturity. In fact, similar scores will simply indicate commonality in the lowest level of maturity without regard to which area scored the lowest or whether the utility has other areas of higher maturity.

While a minimum scoring rubric may be appropriate in industries or cases in which performance is truly set by the lowest-performing element, such an approach is neither accurate nor appropriate in the context of utility wildfire mitigation, in which performance reflects a large mix of roles, functions, and proficiencies. It is not akin to a linear process in which a defect or weakness in one part of a sequence directly translates into a defective result. Rather, utility wildfire mitigation is an extensive and complex effort

[2] October 26, 2022, "Southern California Edison's Comments on the Draft 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey". See pages 1-2.

drawing on diverse areas from weather forecasting to construction project management, and as such, defining maturity based on a lowest score inaccurately suggests that overall performance of mitigating wildfires is limited by the area with the lowest score.

SCE CONTINUES TO HAVE CONCERNS WITH SPECIFIC QUESTIONS IN THE MATURITY SURVEY

SCE thanks Energy Safety for the proposed removal of 18 questions. SCE has identified a minimum of 308 questions that should be further clarified, modified, or removed. Below is a general overview of our causes for concern associated with these questions:

Number of Questions	Cause for Concern
63	Questions assess something outside of utility responsibility, knowledge, or control.
43	Insufficient clarity on references to “Energy Safety Requirements.”
171	Problematic questions that do not fully consider affordability or feasibility concerns, are overly vague and require IOU interpretation, or present capabilities without apparent value.
31	Other issues such as scores re-used from prior questions multiply the impact, questions disregard likelihood for continuous improvement, or are the 18 questions that Energy Safety has proposed to remove from the survey (so SCE answered with “N/A” to avoid negative scoring impacts).

Please see the appendix for a full list of specific questions along with SCE’s reason for concern for each question.

CONCLUSION

SCE appreciates the opportunity to submit comments related to the substantive revisions made to the maturity survey. The Maturity Model is both complex and important, and working sessions would be valuable to improve the Maturity Model's process and the value to be realized from its results.

If you have questions, or require additional information, please contact me at michael.backstrom@sce.com.

Sincerely,

//s//
Michael A. Backstrom
VP Regulatory Affairs
Southern California Edison

APPENDIX

QUESTIONS TO FURTHER CLARIFY, CHANGE OR REMOVE FROM THE MATURITY SURVEY[3]

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.1.2.Q10	Do electrical corporation models include community-specific vegetation treatment plans throughout the service territory as inputs?	1.1.2.Q10 - Not feasible unless another entity gathers community specific vegetation treatment plans that is easy digestible for utilities. SCE does not have access to community-specific information related to vegetation treatment plans. Additionally, this would be overly burdensome to collect. However, once a community's plan is implemented and the results are evident in the data (e.g., prescribed burns are indicated in remote sensed fuel data), then those impacts would be captured by SCE's models.	Affordability or feasibility concerns
1.1.5.Q7	Does modeling software include a weather-driven seasonal vegetation growth module?	1.1.5.Q7 - SCE does not have a seasoned vegetation growth module per se; however, intra-seasonal growth is assessed internally through area of concern analyses. SCE recommends removing this question.	Affordability or feasibility concerns
1.1.6.Q1	What horizontal resolution is employed for statistical weather and climate models?	1.1.6.Q1 - Recommend re-evaluating scores for tiered response options; unlikely to achieve highest maturity due to affordability and value-add concerns.	Affordability or feasibility concerns
1.1.6.Q2	What horizontal resolution is employed for statistical fire models?	1.1.6.Q2 - Recommend re-evaluating scores for tiered response options; unlikely to achieve highest maturity due to affordability and value-add concerns.	Affordability or feasibility concerns

[3] Appendix includes the 18 questions that are proposed by OEIS to remove. The 18 questions are identified in bold font and have an asterisk after the question number.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.3.2.Q6	Do models of community vulnerability to wildfire and PSPS include legacy building codes as an input?	1.3.2.Q6 - Recommend removing this question since building codes will not affect catastrophic fire-spread. This will also require support from external parties.	Affordability or feasibility concerns
1.3.2.Q7	Do models of community vulnerability to wildfire and PSPS include collaborative community wildfire preparedness initiatives (e.g., Firewise) as an input?	1.3.2.Q7 - Recommend removing this question since building codes will not affect catastrophic fire-spread. This will also require support from external parties.	Affordability or feasibility concerns
2.2.10.Q4	Is the sensitivity of model output predictions to uncertainty in each input parameter known and documented?	2.2.10.Q4 - N/A - Testing every possible WRF configuration is not feasible/possible. Utilities have tested the sensitivity of forecast solutions to the aspects of the forecast likely to have the highest impact - the boundary layer physics, cloud physics, grid resolution, and initial condition source. SCE recommends removing this question.	Affordability or feasibility concerns
3.1.1.Q1	Are asset inspection findings verified through QA/QC process within one day of the inspection?	3.1.1.Q1 - SCE recommends removing this question. The utility will need to hire an exponential amount of inspectors to accomplish this within the desired timeframe; affordability and value add concern.	Affordability or feasibility concerns
3.2.1.Q10	Is the content of each distribution inspection (i.e., checklist or technology being used) determined independently by predictive modeling of equipment failure probability?	3.2.1.Q10 - SCE interprets this to mean if the inspection checklist is programmed to recalibrate and identify new questions based on probability information of the assets on the structure. Currently, SCE uses POI to set the scope of structures that need to be inspected and conditional logic depending on the assets on the structure. Please note that SCE will likely not be able to	Affordability or feasibility concerns

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		increase in maturity for many years until enough data is collected to feed AI models.	
3.3.2.Q4	How quickly are level 2 findings (as defined in GO-95 rule 18) within HFTD Tier 3 addressed?	3.3.2.Q4 - Recommend removing because many factors for remediation are outside utility control (e.g.; permits), and because of affordability concerns. Highest maturity will never be reached without other agencies' cooperation.	Affordability or feasibility concerns
3.3.2.Q5	How quickly are level 2 findings (as defined in GO-95 rule 18) within HFTD Tier 2 addressed?	3.3.2.Q5 - Recommend removing because many factors for remediation are outside utility control (e.g.; permits), and because of affordability concerns. Highest maturity will never be reached without other agencies' cooperation.	Affordability or feasibility concerns
3.3.2.Q6	How quickly are level 2 findings (as defined in GO-95 rule 18) outside the HFTD addressed?	3.3.2.Q6 - Recommend removing because many factors for remediation are outside utility control (e.g.; permits), and because of affordability concerns. Highest maturity will never be reached without other agencies' cooperation.	Affordability or feasibility concerns
3.4.6.Q8	Are all design decisions assessed in collaboration with the research community?	3.4.6.Q8 - SCE will do this when the technology is new that isn't commercially available, but not for established technology. SCE will work with national labs. SCE recommends changing "all" to "major".	Affordability or feasibility concerns
4.1.2.Q8	Does the vegetation database inform about up-to-date tree health and moisture content to determine risk of ignition and propagation?	4.1.2.Q8 - N/A - SCE captures information about up-to-date tree health through hazard tree assessments, but moisture content is not feasible to track or update regularly.	Affordability or feasibility concerns

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
4.3.2.Q3	How quickly does the electrical corporation respond to findings from inspections (e.g., routine treatment versus dying tree which is likely to fall on a line)?	4.3.2.Q3 - SCE interprets this question to be in reference to the timeline for routine trimming, not P1 emergency conditions. SCE interprets respond to mean remediation begins.	Affordability or feasibility concerns
5.2.1.Q1	Does the electrical corporation use predictive modeling to shorten the expected life of equipment based on documented grid operating history?	5.2.1.Q1 - Please note that utilities will not be able to increase in maturity for many years until enough data is collected to feed AI models.	Affordability or feasibility concerns
5.3.1.Q8	Does the electrical corporation notify at least 99% of affected customers of an upcoming PSPS event?	5.3.1.Q8 - Due to the inherent challenge of missing or inaccurate customer contact information, SCE does not believe that perfect or near-perfect notification performance is currently feasible.	Affordability or feasibility concerns
5.3.1.Q9	Does the electrical corporation notify at least 99.9% of affected medical baseline customers of an upcoming PSPS event?	5.3.1.Q9 - Due to the inherent challenge of missing or inaccurate customer contact information, SCE does not believe that perfect or near-perfect notification performance is currently feasible.	Affordability or feasibility concerns
5.3.1.Q11	Does the electrical corporation notify at least 99.9% of affected customers of an upcoming PSPS event?	5.3.1.Q11 - Due to the inherent challenge of missing or inaccurate customer contact information, SCE does not believe that perfect or near-perfect notification performance is currently feasible.	Affordability or feasibility concerns
5.3.1.Q12	Does the electrical corporation notify 100% of affected medical baseline customers of an upcoming PSPS event?	5.3.1.Q12 - Due to the inherent challenge of missing or inaccurate customer contact information, SCE does not believe that perfect or near-perfect notification performance is currently feasible.	Affordability or feasibility concerns

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
5.3.3.Q9	Are PSPS events conducted such that de-energized circuits have sufficient redundancy to avoid disruption in energy supply to customers?	5.3.3.Q9 - SCE does not believe this is a reasonable expectation, as providing this level of redundancy would be prohibitively expensive. Therefore, this question should be deleted.	Affordability or feasibility concerns
1.1.2.Q2	Do fire weather conditions meet the minimum design scenarios established by Energy Safety requirements?	1.1.2.Q2 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 49 - 58 & pages 263 - 264. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.1.3.Q1	Does electrical corporation database management meet the minimum Energy Safety requirements?	1.1.3.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.1.7.Q1	Are assumptions and limitations of the model(s) known and documented in accordance with Energy Safety requirements?	1.1.7.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 51 - 52, section 6.2.3. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.1.8.Q1	Does the electrical corporation share data and methods in a manner than meets the minimum Energy Safety reporting requirements?	1.1.8.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE request clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.1.9.Q1	Is the statistical uncertainty in model inputs and parameters (aleatory) known and documented in accordance with Energy Safety requirements?	1.1.9.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE request clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.1.9.Q2	Is the statistical uncertainty in modeling assumptions, limitations, and parameterizations (epistemic) known and documented in accordance with Energy Safety requirements?	1.1.9.Q2 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE request clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.1.10.Q1	Is model substantiation provided in accordance with Energy Safety requirements?	1.1.10.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 259-263. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.2.6.Q1	Are assumptions and limitations of the model(s) known and documented in accordance with Energy Safety requirements?	1.2.6.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 51 - 52, section 6.2.3. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.2.7.Q1	Does the electrical corporation share data and methods in a manner than meets the minimum Energy Safety reporting requirements?	1.2.7.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.2.8.Q1	Is model substantiation provided in accordance with Energy Safety requirements?	1.2.8.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 259 - 263. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.3.6.Q1	Are assumptions and limitations of the model(s) known and documented in accordance with Energy Safety requirements?	1.3.6.Q1 - Found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 51 - 52, section 6.2.3. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.3.7.Q1	Does the electrical corporation share data and methods in a manner than meets the minimum reporting requirements of Energy Safety requirements?	1.3.7.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.3.8.Q1	Is model substantiation provided in accordance with Energy Safety requirements?	1.3.8.Q1 - SCE interprets these requirements found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 259 - 263. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.4.2.Q1	Does the electrical corporation calculate each risk and risk component in accordance with Energy Safety requirements including each design scenario?	1.4.2.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" page 263+. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.4.7.Q1	Are assumptions and limitations of the model(s) known and documented in accordance with Energy Safety requirements?	1.4.7.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 51 - 52, section 6.2.3 Assumptions and limitations for risk and risk components are known; however, SCE is maturing its documentation for these capabilities. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.4.8.Q1	Does the electrical corporation share data and methods in a manner than meets the minimum Energy Safety reporting requirements?	1.4.8.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 254 - 272, Appendix B. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.4.9.Q1	Is the statistical uncertainty in model inputs and parameters (aleatory) known and documented in accordance with Energy Safety requirements?	1.4.9.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 259 - 263. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.4.9.Q2	Is the statistical uncertainty in modeling assumptions, limitations, and parameterizations (epistemic) known and documented in accordance with Energy Safety requirements?	1.4.9.Q2 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.4.10.Q1	Is model substantiation provided in accordance with Energy Safety requirements?	1.4.10.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 259 - 263. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.5.2.Q1	Are risk events tracked in accordance with Energy Safety requirements?	1.5.2.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.6.7.Q1	Are assumptions and limitations of the model(s) known and documented in accordance with Energy Safety requirements?	1.6.7.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 51 - 52, section 6.2.3. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.6.8.Q1	Is model substantiation provided in accordance with Energy Safety requirements?	1.6.8.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 259 - 263. SCE requests clarification/location of Energy	Energy Safety requirements unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		Safety requirements to allow for accurate response.	
2.1.2.Q1	Does the electrical corporation ignition likelihood estimation consider each type of equipment operation/failure, vegetation contact, and object contact specified in Energy Safety requirements?	2.1.2.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" page 267. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.1.3.Q1	Does electrical corporation database management meet the minimum Energy Safety requirements?	2.1.3.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.1.7.Q1	Are assumptions and limitations of the model(s) known and documented in accordance with Energy Safety requirements?	2.1.7.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 51 - 52, section 6.2.3. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.1.8.Q1	Does the electrical corporation share data and methods in a manner that meets the minimum Energy Safety reporting requirements?	2.1.8.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.1.9.Q1	Is the statistical uncertainty in model outputs known and documented in accordance with Energy Safety requirements?	2.1.9.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
2.1.10.Q1	Is model substantiation provided in accordance with Energy Safety requirements?	2.1.10.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 259 - 263. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.2.2.Q1	Do electrical corporation medium-term weather forecasts align with the minimum Energy Safety requirements?	2.2.2.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.2.4.Q1	Does electrical corporation database management meet the minimum Energy Safety requirements?	2.2.4.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.2.8.Q1	Are assumptions and limitations of the model(s) known and documented in accordance with Energy Safety requirements?	2.2.8.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 51 - 52, section 6.2.3	Energy Safety requirements unclear
2.2.9.Q1	Does the electrical corporation meet the minimum data and method Energy Safety reporting requirements?	2.2.9.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.2.10.Q1	Is the statistical uncertainty in model outputs known and documented in accordance with Energy Safety requirements?	2.2.10.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
2.2.11.Q1	Is model substantiation provided in accordance with Energy Safety requirements?	2.2.11.Q1 - N/A - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 259 - 263. This is not the authority, knowledge or control of the utility to substantiate government models. SCE recommends removing this question.	Energy Safety requirements unclear
2.3.1.Q5	Is wildfire spread forecasting conducted in accordance with Energy Safety requirements?	2.3.1.Q5 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.3.1.Q6	Is a Fire potential Index (FPI) calculated in accordance with Energy Safety requirements?	2.3.1.Q6 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" page 61 & pages 141 - 144. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.3.2.Q1	Does the electrical corporation forecast wildfire spread in accordance with Energy Safety requirements?	2.3.2.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.3.7.Q1	Does the electrical corporation share model data and methods in accordance with Energy Safety requirements?	2.3.7.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.3.8.Q1	Is the statistical uncertainty in model outputs known and documented in accordance with Energy Safety requirements?	2.3.8.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
2.3.9.Q1	Is model substantiation provided in accordance with Energy Safety requirements?	2.3.9.Q1 - N/A - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" pages 259 - 263. This is not the authority, knowledge or control of the utility to substantiate vendor models. SCE recommends removing this question.	Energy Safety requirements unclear
2.4.6.Q1	Does the electrical corporation meet the Energy Safety minimum data and method reporting requirements?	2.4.6.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
2.4.7.Q1	Is the statistical uncertainty in data collection known and documented in accordance with Energy Safety requirements?	2.4.7.Q1 - N/A - Unable to determine Energy Safety Requirements in Technical Guidelines. SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
7.2.1.Q1	Does the electrical corporation provide public engagement or participatory activities as part of its wildfire mitigation planning process, which informs Energy Safety's annual WMP/WMP Update submission and evaluation process in accordance with Public Utilities Code section 8386 and Energy Safety requirements?	7.2.1.Q1 - SCE interprets these requirements to be found in "Final_20232025_WMP_Technical_Guidelines.pdf" PU Code section 8386SCE requests clarification/location of Energy Safety requirements to allow for accurate response.	Energy Safety requirements unclear
1.1.4.Q2	Does the electrical corporation have a clearly defined process to track and adjudicate comments from stakeholders on modeling efforts which are recorded and shared in a consistent format?	1.1.4.Q2 - SCE interprets stakeholders to mean internal to the company. This is tracked as well as lessons learned from other utilities and take that information back to the model during the model refresh. Sometimes new features are created and sometimes we make changes to existing features.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.1.10.Q2	Are model verification and validation suites automated?	1.1.10.Q2 - SCE interprets automation as utilizing code-based scripts instead of manual calculation; therefore, model verification and validation is automated. Model verification embedded in the code and automatically performed when the model runs. Each version is documented (all models, code snippet). Please rephrase question to identify degree of automation (e.g., no human intervention at all, majority of items automated with little human intervention).	Interpretation required
1.1.10.Q6	Are model verification and validation suites (data plus code) provided to regulators for third-party review?	1.1.10.Q6 - SCE interprets this question to mean the regulator is the third party reviewer. SCE would provide this information at the regulator's request, with appropriate confidentiality designations as necessary.	Interpretation required
1.2.1.Q1	Are wildfire risk intensity and exposure automatically calculated?	1.2.1.Q1 - SCE models for all High Fire Risk Areas (HFRA) plus an additional 20 miles and includes intensity metrics (e.g.; flame length). Please rephrase question to identify degree of automation (e.g., no human intervention at all, majority of items automated with little human intervention)	Interpretation required
1.2.1.Q2	Is PSPS exposure automatically calculated?	1.2.1.Q2 - SCE calculates consequences to Public Safety Power Shutoff (PSPS) for all circuits in High Fire Risk Areas (HFRA). Please rephrase question to identify degree of automation (e.g., no human intervention at all, majority of items automated with little human intervention)	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.2.1.Q3	Are discrepancies between forecasts and observations of wildfire and PSPS risk exposure automatically identified, documented, and sent to subject matter experts for review?	1.2.1.Q3 - Technosylva data is trained on CalFire data. Please rephrase question to identify degree of automation (e.g., no human intervention at all, majority of items automated with little human intervention)	Interpretation required
1.2.1.Q4	Are discrepancies between forecasts and observations of wildfire and PSPS risk exposure automatically integrated into the predictive model to improve future performance?	1.2.1.Q4 - SCE uses PSPS and wildfire inputs from the previous year to train and develop the next year's model. Please rephrase question to identify degree of automation (e.g., no human intervention at all, majority of items automated with little human intervention).	Interpretation required
1.2.2.Q10	Do models of wildfire and PSPS risk exposure potential include customer hours of PSPS as an output?	1.2.2.Q10 - SCE interprets this question to mean that Customer Minutes of Interruption (CMI). Yes, SCE's wildfire and Public Safety Power Shutoff (PSPS) risk exposure include customer impact (i.e., CMI) as an output.	Interpretation required
1.2.8.Q2	Are model verification and validation suites automated?	1.2.8.Q2 - SCE interprets automation as utilizing code-based scripts instead of manual calculation; therefore, SCE's model verification and validation is automated for wildfire and Public Safety Power Shutoff (PSPS) consequence models.	Interpretation required
1.2.8.Q6	Is annual blind model validation accomplished by analyzing model performance for the previous year based on the data available and assumptions made at the time of WMP submission?	1.2.8.Q6 - SCE interprets "blind model validation" to be an annual verification report Technosylva integrates CalFire historical data (i.e., observations) to improve its model performance (i.e., forecasts) and address discrepancies related to wildfire risk exposure. PSPS exposure data is stored in SCE's corporate database and once available is automatically	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		updated for use in SCE's models.	
1.2.8.Q8	Model performance on each key metric demonstrates a systematic bias of what level?	1.2.8.Q8 - N/A - A systematic bias calculation would require a significant volume of observed worst weather conditions and fire data to validate and is impractical. SCE recommends removing this question.	Interpretation required
1.2.8.Q9	Model performance on each key metric demonstrates a standard deviation in error of what level?	1.2.8.Q9 - N/A - A standard deviation calculation would require a significant volume of observed worst weather conditions and fire data to validate and is impractical. SCE recommends removing this question.	Interpretation required
1.3.1.Q3	Are discrepancies between forecasts and observations of community vulnerability to wildfire and PSPS automatically identified, documented, and sent to subject matter experts for review?	1.3.1.Q3 - N/A - SCE uses an AFN (Access and Functional Needs)/NRCI (non-residential critical infrastructure) multiplier in its models. This is automatically updated during model refresh and discrepancies are addressed through that process/ refresh.	Interpretation required
1.3.1.Q4	Are discrepancies between forecasts and observations of community vulnerability to wildfire and PSPS automatically integrated into the predictive model to improve future performance?	1.3.1.Q4 - N/A - SCE uses an AFN (Access and Functional Needs)/NRCI (non-residential critical infrastructure) multiplier in its models. This is automatically updated during model refresh and discrepancies are addressed through that process/ refresh to improve future performance.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.3.7.Q2	Is a statistical summary of data and model performance provided to the public?	1.3.7.Q2 - N/A - SCE uses actual data for AFN customers and therefore model performance is not applicable.	Interpretation required
1.3.7.Q6	Are model software source code and data for verification and validation available to the public?	1.3.7.Q6 - N/A - SCE uses actual data for AFN customers and therefore model performance is not applicable. SCE provides non-confidential data to the public, as available, upon request.	Interpretation required
1.3.8.Q2	Are model verification and validation suites automated?	1.3.8.Q2 - SCE interprets automation as utilizing code-based scripts instead of manual calculation; therefore, model verification and validation suites are automated. SCE describes the process for this in Chapter 6 of the Wildfire Mitigation Plan (WMP). AFN (Access and Functional Needs)/NRCI (non-residential critical infrastructure) is a relative ranking of circuit vulnerability.	Interpretation required
1.3.8.Q6	Is annual blind model validation accomplished by analyzing model performance for the previous year based on the data available and assumptions made at the time of WMP submission?	1.3.8.Q6 - N/A - SCE uses actual data for AFN customers and therefore model performance is not applicable.	Interpretation required
1.3.8.Q7	Are model verification and validation suites (data plus code) provided to the regulator for third-party review?	1.3.8.Q7 - N/A - SCE uses actual data for AFN customers and therefore model performance is not applicable. SCE provides data to its regulator, as available, upon request.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.3.8.Q9	Model performance on each key metric demonstrates a systematic bias of what level?	1.3.8.Q8 - N/A - SCE uses actual data for AFN customers; therefore, systematic bias cannot be calculated is not applicable. SCE recommends removing this question.	Interpretation required
1.3.8.Q10	Model performance on each key metric demonstrates a standard deviation in error of what level?	1.3.8.Q9 - N/A - SCE uses actual data for AFN customers; therefore, standard deviation cannot be calculated is not applicable. SCE recommends removing this question.	Interpretation required
1.4.1.Q2	Does the electrical corporation consider the impacts of climate change on increasing temperature affecting the duration and severity of the fire season?	1.4.1.Q2 - SCE interprets this to refer to our Multi-Attribute Value Function (MAVF) and we weight safety at 50% of that score.	Interpretation required
1.4.1.Q3	Does the electrical corporation consider the impacts of climate change on the intensity and frequency of precipitation affecting seasonal moisture and vegetation growth?	1.4.1.Q3 - SCE interprets this to refer to our Multi-Attribute Value Function (MAVF) and we weight safety at 50% of that score.	Interpretation required
1.4.1.Q4	Does the electrical corporation consider the impacts of climate change on long-term changes in predominant vegetative species?	1.4.1.Q4 - SCE interprets this to refer to Risk Spend Efficiency (RSE).	Interpretation required
1.4.2.Q2	Does the combination of risks and risk components include evaluation of the relative importance of Life Safety?	1.4.2.Q2 - SCE interprets this to refer to the Multi-Attribute Value Function (MAVF). SCE includes life safety (measured as serious injury and/ or fatalities) with a weight of 50% of the score in its risk model.	Interpretation required
1.4.2.Q3	Does the combination of risks and risk components include evaluation of the relative importance of Reliability?	1.4.2.Q3 - SCE interprets this to refer to the Multi-Attribute Value Function (MAVF). SCE includes reliability (measured as customer minutes of interruption (CMI)) with a weight of 25% of the score in its risk model.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.4.2.Q5	Does the combination of risks and risk components include evaluation of the relative importance of Property Protection?	1.4.2.Q5 - Technosylva considers fire suppression activity and impacts in a limited manner and will be enhancing the inputs available in SCE's future models. SCE will aim to implement these changes in 2024 and expects this to be discussed at future Energy Safety Risk Modeling Workshops. Additionally, SCE notes that it calculates a Risk Spend Efficiency (RSE) for aerial suppression as a mitigation initiative.	Interpretation required
1.4.2.Q6	Does the combination of risks and risk components include evaluation of the relative importance of Resiliency?	1.4.2.Q6 - SCE interprets this to mean that resiliency is synonymous with reliability. SCE includes reliability as a component in its Multi-Functional Value Framework (MAVF).	Interpretation required
1.4.2.Q8	Does the combination of risks and risk components include evaluation of the relative importance of Long-Term Health Impacts?	1.4.2.Q8 - SCE is exploring this issue along with other stakeholders in the context of OEIS (Office of Energy Infrastructure) workshops.	Interpretation required
1.4.2.Q9	Does the combination of risks and risk components include evaluation of the relative importance of Public Perception?	1.4.2.Q9 - SCE does not consider this to be relevant in the context of safety, reliability, and financial risk.	Interpretation required
1.4.4.Q2	Does the electrical corporation have a clearly defined process to track and adjudicate comments from stakeholders on modeling efforts which are recorded and shared in a consistent format?	1.4.4.Q2 - SCE interprets this question to mean that it has a formal process to track comments through regular proceedings.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.4.5.Q9	Does modeling software include a wildfire spread likelihood module?	1.4.5.Q9 - Yes, SCE's modeling includes a wildfire spread likelihood module. SCE interprets this to be synonymous with wildfire ignition risk as SCE does not differentiate between ignition likelihood and wildfire likelihood. Probability of Ignition (POI) is the sum of the ignition component probabilities at that location (i.e., Equipment Ignition Likelihood (FRC1), Contact from Vegetation Ignition (FRC2), and Contact by Object Ignition Likelihood (FRC3)). POI is used to assess overall utility wildfire risk at a given locations.	Interpretation required
1.4.10.Q2	Are model verification and validation suites automated?	1.4.10.Q2 - SCE interprets automation as utilizing code-based scripts instead of manual calculation; therefore, model verification and validation is automated. Model verification is embedded in the code and automatically performed when the model runs. Additionally, subject matter experts provide another layer of review.	Interpretation required
1.4.10.Q6	Is annual blind model validation accomplished by analyzing model performance for the previous year based on the data available and assumptions made at the time of WMP submission?	1.4.10.Q6 - SCE interprets "blind model validation" to be an annual verification report	Interpretation required
1.6.1.Q1	Is the risk reduction impact of mitigation initiatives automated for weather forecast models?	1.6.1.Q1 - SCE does not have weather forecast models that automatically inform the risk reduction calculation for mitigation initiatives; however, SCE's wildfire consequence models use historic 30-year weather data (i.e., 440 worst	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		weather days) to inform the risk reduction calculation.	
2.2.6.Q6	Does the electrical corporation modeling software include a module for impact(s) of climate change on weather?	2.2.6.Q6 - SCE interprets this as retraining machine learning models on recent observations that can have new extreme events possibly attributed to climate change.	Interpretation required
2.2.6.Q10	Is the accuracy of weather forecasting assessed in near-real-time through regular comparison of weather forecasts with available data?	2.2.6.Q10 - SCE interprets near real-time to mean 1 week, when the information is available to compare to a full forecast cycle. SCE also monitors the weather conditions in real time with iPEMS and uses that to adjust from forecasts as necessary. Qualitative assessments are done in real-time and quantitative assessments are performed after the fact.	Interpretation required
2.2.11.Q9	Model performance on each key metric demonstrates a systematic bias of what level?	2.2.11.Q9 - SCE has concerns about weather variability influences from year to year on possible scores and additionally the lack of detail on how these percentages are being calculated. Mean percentage error is one method but is flawed because it is undefined in cases where observations of 0 are possible. Mass balance is another approach. Need clarity on formula.	Interpretation required
2.3.1.Q12	Are discrepancies automatically integrated into the predictive model to improve future performance?	2.3.1.Q12 - SCE interprets automatically to mean "without human intervention". SCE adjusts their models but this is not done "automatically".	Interpretation required
2.3.5.Q14	Are wildfire spread forecasts assessed through subject matter expert review at least daily during fire season?	2.3.5.Q13 - SCE interprets this to mean "high and low pressure systems" This	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		information is indirectly incorporated into the modeling.	
2.4.1.Q1	Is weather data collected automatically integrated into relevant models and/or decision-making tools?	2.4.1.Q1 - SCE interprets "automatically" to mean done through a pre-designed process. Weather data collected is integrated into machine learning models and iPEMS	Interpretation required
2.4.1.Q2	Is grid performance data collected automatically integrated into relevant models and/or decision-making tools?	2.4.1.Q2 - SCE interprets "automatically" to mean done through a pre-designed process.	Interpretation required
2.4.1.Q3	Is vegetative fuel data collected automatically integrated into relevant models and/or decision-making tools?	2.4.1.Q3 - SCE interprets "automatically" to mean done through a pre-designed process. Weather data collected is integrated into machine learning models and iPEMS	Interpretation required
2.4.1.Q4	Is equipment condition data collected automatically integrated into relevant models and/or decision-making tools?	2.4.1.Q4 - SCE interprets "automatically" to mean done through a pre-designed process.	Interpretation required
2.4.1.Q6	Are collected data linked to ensemble weather forecasts and resulting probabilistic real-time risk model?	2.4.1.Q6 - SCE interprets "real time" to mean timing when new forecasts are received. Machine learning probabilistic calibration is based off data collected at weather stations.	Interpretation required
2.4.3.Q1	Does the electrical corporation have a clearly defined operational process in place to track discrepancies between current data collections and historic observations?	2.4.3.Q1 - SCE interprets a clearly defined process to indicate a quality control process deployed by our vendor to flag and QC discrepant data based on acceptable ranges.	Interpretation required
2.6.5.Q2	Does the electrical corporation share facility guidelines with the public and accept recommendations for revisions?	2.6.5.Q2 - IOUs share relevant non-confidential facility guidelines including decision-making, staffing, training, and qualifications of staff in our annual WMP filings.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
3.1.2.Q1	Does the database contain Name, Lifespan, Age, Voltage, and Inspection finding history for each equipment within the service territory?	3.1.2.Q1 - Please revise question to identify the type of equipment this is referring to.	Interpretation required
3.1.2.Q2	Does the database contain the operating history for each equipment within the service territory?	3.1.2.Q2 - Please revise question to identify the type of equipment this is referring to.	Interpretation required
3.1.2.Q3	Does the database contain the overload history for each equipment within the service territory?	3.1.2.Q3 - Please revise question to identify the type of equipment this is referring to.	Interpretation required
3.1.2.Q5	Does the database contain the manufacturer for each equipment within the service territory?	3.1.2.Q5 - SCE tracks this information for all relevant electrical equipment tracked within SAP (e.g. Transformers, Switches, etc.)	Interpretation required
3.1.2.Q6	Does the database contain repair history for each equipment within the service territory?	3.1.2.Q6 - SCE tracks this information for all repairs of relevant electrical equipment identified through first responder findings and/or during compliance or risk based inspections (e.g. Patrols, Detailed Inspections, Intrusive Inspections, etc.)	Interpretation required
3.1.2.Q7	What fraction of assets and components have age data?	3.1.2.Q7 - SCE tracks this information for all relevant electrical equipment tracked within SAP (e.g. Transformers, Switches, etc.)	Interpretation required
3.1.4.Q1	Is the accuracy of the asset inventory and condition database evaluated by subject matter experts at least once annually?	3.1.4.Q1 - SCE interprets accuracy to mean data quality. With this in mind, SCE performs quality checks on an annual basis through inspections confirming that what is in the field with what is in our database. SCE also checks data quality for completeness, consistency, and conformity on a monthly basis (e.g. Poles, Transformers, Conductor, Switches, etc.)	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
3.3.2.Q1	Does the electrical corporation address level 1 findings (as defined in GO-95 rule 18) immediately?	3.3.2.Q1 - SCE interprets this question to mean 'to the extent possible'. This is part of our standard operating procedure. Exceptions are collected, documented, and shared with the California Public Utilities Commission (CPUC) for full transparency.	Interpretation required
3.3.2.Q2	Does the electrical corporation address level 2 findings (as defined in GO-95 rule 18) within the time identified in GO-95?	3.3.2.Q2 - SCE interprets this question to mean 'to the extent possible'. This is part of our standard operating procedure. Exceptions are collected, documented, and shared with the California Public Utilities Commission (CPUC) for full transparency.	Interpretation required
3.3.2.Q3	Does the electrical corporation address routine findings (level 3 as defined in GO-95 rule 18) within five years?	3.3.2.Q3 - SCE interprets this question to mean 'to the extent possible'. This is part of our standard operating procedure. Exceptions are collected, documented, and shared with the California Public Utilities Commission (CPUC) for full transparency.	Interpretation required
3.4.2.Q5	Are the new initiatives pursued by the electrical corporation independently evaluated using laboratory facilities by a trained team of grid innovation specialists?	3.4.2.Q5 - SCE interprets this to mean initiatives that have been around and tested by others. If an initiative is new to the industry, third-party support is not always available.	Interpretation required
3.4.4.Q1	Are risk buy-down estimates used to select grid design features?	3.4.4.Q1 - SCE interprets this to mean the specific design features of asset construction	Interpretation required
3.4.4.Q4	Is the degree of wildfire risk reduction used in selecting grid hardening initiatives?	3.4.4.Q4 - SCE interprets this to mean the entire grid hardening program.	Interpretation required
3.5.1.Q3	Does the electrical corporation participate in annual benchmarking exercises to identify areas of improvement regarding the training and QA of asset personnel?	3.5.1.Q3 - SCE interprets this training to mean "inspections and quality" training. This does not refer to Transmission and Distribution (T&D) technical training (e.g.; technical compliance, core for	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		apprentice, lineman, substation, and maintenance beyond core).	
3.5.2.Q1	Does the electrical corporation provide standard training materials to all employees?	3.5.2.Q1 - SCE interprets standard training to mean First Aid, CPR, Environmental training, etc.	Interpretation required
3.5.4.Q4	Are asset and grid personnel drills conducted with pass/fail criteria?	3.5.4.Q4 - SCE interprets "drills" to mean exercises where the employee performs a certain set of activities. Pass/Fail criteria is mostly applied to new hire trainings.	Interpretation required
3.5.4.Q7	Are at least 75% of asset and grid personnel drills passed?	3.5.4.Q7 - SCE interprets drill in this case to mean ad-hoc training to assess the qualifications of non-routine work. Activities such as Hurt man rescue (TRT) is conducted and re-tested until the employee passes. Web based training is also conducted and retested until passed.	Interpretation required
3.5.4.Q9	Are asset and grid personnel drills conducted at least once annually?	3.5.4.Q9 - SCE interprets drill in this case to mean ad-hoc training to assess the qualifications of non-routine work. Activities such as Hurt man rescue (TRT) is conducted and re-tested until the employee passes. Web based training is also conducted and retested until passed.	Interpretation required
3.5.4.Q11	Are at least 95% of asset and grid personnel drills passed?	3.5.4.Q11 - SCE interprets drill in this case to mean ad-hoc training to assess the qualifications of non-routine work. Activities such as Hurt man rescue (TRT) is conducted and re-tested until the employee passes. Web based training is also	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		conducted and retested until passed.	
4.1.3.Q4	Is the vegetation database assessed through subject matter expert review at least four times per year?	4.1.3.Q4 - Vegetation inspections by QC personnel are performed on a daily basis typically lagging the work completion by 60 days. Although the vegetation database is being reviewed and updated by QC daily, only work inspected receives updates and the same tree is not reviewed 4 times per year	Interpretation required
4.2.2.Q1	Do the measured parameters and procedures applied during vegetation inspections enable identifying higher risk areas and vegetation?	4.2.2.Q1 - SCE interprets this as asking if inspections inform risk modeling.	Interpretation required
4.3.2.Q1	Does the electrical corporation proactively trim trees based on predictive modeling results (such as species-specific vegetative growth and limb, trunk, or root failure rates)?	4.3.2.Q1 - SCE interprets this as asking if inspections inform risk modeling, which ours do.	Interpretation required
4.3.2.Q4	How quickly does the electrical corporation respond to severe findings from pre-inspections (e.g., dying tree which is likely to fall on a line)?	4.3.2.Q4 - SCE interprets this question to be asking about the time between finding a P1 condition and beginning remediation for that emergency condition.	Interpretation required
5.1.5.Q1	Over what fraction of the territory does the electrical corporation incorporate protective equipment and device settings?	5.1.5.Q1 - SCE interprets protective equipment to be inclusive of circuit breakers.	Interpretation required
5.2.2.Q1	Does the electrical corporation track and document electric operational history of circuits when operating equipment above current carrying capacity at the circuit level?	5.2.2.Q1 - SCE interprets carrying capacity to mean the planning capacity of a circuit, not the absolute thermal capacity. SCE's morning report and EDNA system tracks circuits that exceed planning limits.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
5.2.2.Q2	Does the electrical corporation track and document electric operational history of assets continuously and flags when ratings are exceeded?	5.2.2.Q2 - SCE interprets carrying capacity to mean the planning capacity of a circuit, not the absolute thermal capacity. Emergency Management System (EMS) has alarm capability for exceedance for line loading and substation transformer loading.	Interpretation required
5.2.4.Q1	The process for incorporating wildfire risk in determination of electric control limits beyond equipment current carrying capacity undergoes subject matter expert review at what frequency?	5.2.4.Q1 - SCE interprets carrying capacity to mean the planning capacity of a circuit, not the absolute thermal capacity.	Interpretation required
5.2.5.Q1	Does the electrical corporation have a clearly defined process for incorporating wildfire risk in determination of electric control limits beyond equipment current carrying capacities?	5.2.5.Q1 - SCE interprets carrying capacity to mean the planning capacity of a circuit, not the absolute thermal capacity.	Interpretation required
5.2.5.Q2	Is equipment ever operated above current carrying capacity within the HFTD?	5.2.5.Q2 - SCE interprets carrying capacity to mean the planning capacity of a circuit, not the absolute thermal capacity. SCE exceeds planning capacity if needed, but not thermal capacity, as that would overload a circuit and cause the protection equipment to trip.	Interpretation required
5.3.3.Q1	Does the electrical corporation average less than 1 hour of PSPS customerhours per year per customer?	5.3.3.Q1 - Please provide calculation required for this question to ensure alignment.	Interpretation required
5.3.3.Q3	Does the electrical corporation average less than 0.5 hour of PSPS customerhours per year per customer?	5.3.3.Q3 - SCE interprets this question as the number of total customer hours of Public Safety Power Shutoff (PSPS) interruption, divided by the total number of SCE customers. Please provide calculation required for this question to ensure alignment.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
5.3.3.Q5	Does the electrical corporation average less than 0.25 hour of PSPS customer hours per year per customer?	5.3.3.Q5 - SCE interprets this question as the number of total customer hours of Public Safety Power Shutoff (PSPS) interruption, divided by the total number of SCE customers. Please provide calculation required for this question to ensure alignment.	Interpretation required
5.3.3.Q8	Does the electrical corporation average less than 0.1 hour of PSPS customer hours per year per customer?	5.3.3.Q8 - SCE interprets this question as the number of total customer hours of Public Safety Power Shutoff (PSPS) interruption, divided by the total number of SCE customers. Please provide calculation required for this question to ensure alignment.	Interpretation required
5.3.6.Q1	What fraction of PSPS events are initiated when actual conditions did not warrant a PSPS (i.e., forecasted conditions were more extreme than actually observed)?	5.3.6.Q1 - SCE interprets PSPS events as circuit de-energizations. SCE only de-energizes circuits if current wind and Fire Potential Index (FPI) conditions necessitate that action.	Interpretation required
5.5.1.Q1	Does the electrical corporation actively seek information from and provide information to other electrical corporations on its ignition prevention and suppression training?	5.5.1.Q1 - SCE interprets this capability as ignition prevention and incipient-stage ignition suppression. SCE is not responsible for larger suppression activities.	Interpretation required
5.5.1.Q2	Does the electrical corporation have a consistent format and venue/medium through which information on procedures related to ignition prevention and suppression are exchanged?	5.5.1.Q2 - SCE interprets this capability as ignition prevention and incipient-stage ignition suppression. SCE is not responsible for larger suppression activities.	Interpretation required
5.5.1.Q3	Does the electrical corporation participate in annual benchmarking exercises to identify areas of improvement regarding ignition prevention and suppression?	5.5.1.Q3 - SCE interprets this capability as ignition prevention and incipient-stage ignition suppression. SCE is not responsible for larger suppression activities.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
5.5.1.Q4	Does the electrical corporation have a standard process for testing applicability of best practices and lessons learned of other electrical corporations regarding ignition prevention and suppression?	5.5.1.Q4 - SCE interprets this capability as ignition prevention and incipient-stage ignition suppression. SCE is not responsible for larger suppression activities.	Interpretation required
5.5.1.Q5	Does the electrical corporation have procedures for exchanging best practices and lessons learned with other electrical corporations and implementing information from other electrical corporations regarding ignition prevention and suppression?	5.5.1.Q5 - SCE interprets this capability as ignition prevention and incipient-stage ignition suppression. SCE is not responsible for larger suppression activities.	Interpretation required
5.5.3.Q3	Does the electrical corporation have fire suppression and safety teams on site during asset and vegetation management work the HFTD?	5.5.3.Q3 - When required to so (i.e., working on federal land), SCE will hire a suppression company (e.g., Capstone) to be on site during work.	Interpretation required
6.1.1.Q8	Does the electrical corporation take a primary partner role in planning, coordinating, and integrating plans across all public safety partners in the service territory including state and tribal partners?	6.1.1.Q8 - SCE interprets the primary partner role as participating in these conversations within the Standardized Emergency Management Systems (SEMS) framework. SCE is required to offer every city and county in its territory the ability to review and provide feedback on our emergency response plans. Furthermore, SCE meets with public safety partners annually to review its Public Safety Power Shutoff (PSPS) protocol.	Interpretation required
6.1.2.Q1	Does the electrical corporation emergency and disaster preparedness plan include standard wildfire- and PSPS-specific emergency operational policies, practices, and procedures before, during and after an incident?	6.1.2.Q1 - SCE interprets this as specific to electrical outages. SCE deploys public notifications systems to advise customers of all outage types, including Public Safety Power Shutoff (PSPS). This is described in SCE's All Hazards Plan and PSPS communications strategy document.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
6.1.2.Q2	Does the electrical corporation emergency and disaster preparedness plan include physical emergency response and recovery systems (e.g., detection and notification systems, communications systems)?	6.1.2.Q2 - SCE interprets this as specific to electrical outages. SCE deploys public notifications systems to advise customers of all outage types, including Public Safety Power Shutoff (PSPS). This is described in SCE's All Hazards Plan and PSPS communications strategy document.	Interpretation required
6.1.2.Q5	Does the electrical corporation emergency and disaster preparedness plan include verification of coordination efforts with Public Safety Partners?	6.1.2.Q5 - SCE interprets this question to determine if SCE documents engagement with Public Safety Partners for emergency planning purposes. SCE is required to offer every city and county in its territory the ability to review and provide feedback on our emergency response plans. Furthermore, SCE meets with public safety partners annually to review its Public Safety Power Shutoff (PSPS) protocol.	Interpretation required
6.1.4.Q5	Are wildfire- and PSPS-emergency operations and preparedness plans assessed by subject matter experts after every catastrophic wildfire?	6.1.4.Q5 - SCE interprets this question to assume that SCE's incident management team would be activated to support such an event, in which case an after action report would be created.	Interpretation required
6.2.2.Q1	Does the electrical corporation coordinate its wildfire-, PSPS and power restoration- specific interoperation communication strategies, procedures, and protocols interoperability with Public Safety Partners and other interconnected electrical corporations at least every two years?	6.2.2.Q1 - SCE interprets this question to pertain to engagement with applicable public safety partners and partner IOUs. SCE is required to afford every city and county in its territory the ability to review and provide feedback on our emergency response plans. Furthermore, SCE meets with public safety partners annually to review its PSPS protocol. Joint IOU meetings and Western Energy	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		Institute meetings occur to benchmark with other utilities.	
6.3.1.Q6	Does the electrical corporation automatically communicate the locations of support services to members of the public and public safety partners?	6.3.1.Q6 - SCE interprets support services as our Community Resource Centers and Community Crew Vehicles. Their deployment is communicated via SCE.com/psps and Public Safety Partner Portal.	Interpretation required
6.3.2.Q8	Does the electrical corporation coordinate a means to verify message receipt with Alerting Authorities or public interest groups?	6.3.2.Q8 - SCE interprets this to mean whether public alerting authorities receive PSPS notifications, which SCE accomplishes through in-event briefings with emergency management entities.	Interpretation required
6.3.4.Q8	Does the electrical corporation provide public notification (i.e., warnings and alerts) of PSPS incidents no more than two days before wildfires, outages due to wildfires and PSPS, and service restoration?	6.3.4.Q8 - SCE interprets this question to mean does SCE provide PSPS notifications ahead of potential PSPS de-energizations, when possible. SCE does not provide notifications in advance of wildfire as this is not possible.	Interpretation required
6.3.4.Q20	Does the electrical corporation provide messaging that is designed to be specific, consistent, confident, clear, and accurate per IPAWS to the public for wildfires, outages due to wildfires and PSPS, and service restoration?	6.3.4.Q20 - SCE interprets this question to mean, is SCE's communications strategy consistent with emergency alert best practices and clear and accurate. SCE's notification protocol for PSPS events is captured in SCE's PSPS communication strategy document and PSPS-04-CS-02 Perform Customer Notifications.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
6.3.4.Q26	Does the electrical corporation provide website override alerts?	6.3.4.Q26 - N/A - SCE is not familiar with the term "override alert", except for the potential reference to an FCC requirement for radio, TV, cable companies to allow local government to override normal broadcasting with an emergency message. SCE has not seen this in the context of a website and certainly not a utility website	Interpretation required
6.3.5.Q1	How frequently are maintenance, testing, and inspection of the physical systems that provide detection, alarm, notification, central monitoring, and transmission of “approved” reporting information performed?	6.3.5.Q1 - SCE interprets this question to ask about standard maintenance cadence. Failures and other breakdowns are addressed immediately.	Interpretation required
6.6.1.Q1	How frequently is proactive diagnostic/performance testing recorded and evaluated to identify lessons learned and implement corrective action plans?	6.6.1.Q1 - SCE interprets this to mean frequency after an event or drill. SCE hosts after action reviews for lessons learned directly after each event.	Interpretation required
6.6.1.Q3	How frequently are environmental risk factors (e.g., weather conditions, vegetation conditions) recorded and evaluated to identify lessons learned and implement corrective action plans?	6.6.1.Q3 - SCE interprets this to mean frequency after an event or drill. SCE's weather stations collect observations every 10 minutes, while fuel sampling is done every two weeks. Review is performed after each event in order to identify lessons learned and implement corrective actions.	Interpretation required
6.6.1.Q4	How frequently are staff and contractor behaviors recorded and evaluated to identify lessons learned and implement corrective action plans?	6.6.1.Q4 - SCE interprets this to mean frequency after an event or drill. SCE hosts after action reviews for lessons learned directly after each event.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
6.6.1.Q5	How frequently are wildfire emergency management data recorded and evaluated to identify lessons learned and implement corrective action plans?	6.6.1.Q5 - SCE interprets this to mean frequency after an event or drill. SCE hosts after action reviews for lessons learned directly after each event.	Interpretation required
6.6.1.Q6	How frequently are technical systems performance (e.g., detection, alarm, notification) recorded and evaluated to identify lessons learned and implement corrective action plans?	6.6.1.Q6 - SCE interprets this to mean frequency after an event or drill. SCE hosts after action reviews for lessons learned directly after each event.	Interpretation required
6.6.1.Q7	How frequently are interactions with response and other government agencies recorded and evaluated to identify lessons learned and implement corrective action plans?	6.6.1.Q7 - SCE interprets this to mean frequency after an event or drill. SCE hosts after action reviews with public safety partners after each event or drill and solicits lessons learned via the Public Safety Partner survey that is sent out at the conclusion of each event.	Interpretation required
6.6.1.Q8	How frequently are pre-incident diagnostics, drills, training, and stress-testing recorded and evaluated to identify lessons learned and implement corrective action plans?	6.6.1.Q8 - SCE interprets this to mean frequency after an event or drill. SCE hosts after action reviews for lessons learned directly after each event.	Interpretation required
7.1.1.Q1	Does the electrical corporation provide a community outreach and education awareness program before, during and after wildfire and PSPS incidents?	7.1.1.Q1 - SCE interprets this as wildfire related mitigation, resiliency and outages outreach and education. Broader education on Wildfires is out of the Utility's authority, knowledge, or control.	Interpretation required
7.1.2.Q1	How spatially granular are the public outreach and education awareness program(s) for wildfires, outages due to wildfire or PSPS events, power restoration before, during and after the incident?	7.1.2.Q1 - SCE interprets this as wildfire related mitigation, resiliency and outages outreach and education. Broader education on Wildfires is out of the Utility's authority, knowledge, or control.	Interpretation required
7.3.1.Q3	Does the electrical corporation identify specific concerns, interests, and needs before, during and after a wildfire or	7.3.1.Q3 - SCE interprets this as wildfire related mitigation, resiliency and outages concerns. General concerns	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
	PSPS event for each vulnerable group?	relating to Wildfires is out of the Utility's authority, knowledge, or control.	
7.3.1.Q8	Does the electrical corporation develop and implement a diverse range of outreach, educational engagement and support programs targeted and specifics to the needs of vulnerable group at country level?	7.3.1.Q8 - SCE assumes this is referring to county, not country.	Interpretation required
7.4.1.Q3	Does the electrical corporation identify key community partnerships to collaborate and coordinate on wildfire and PSPS mitigation planning efforts?	7.4.1.Q3 - SCE interprets this question as mitigation impacts to the community. With that SCE identifies and coordinates regularly with Community Based Organizations (CBOs) to better understand the various needs of our customers are represented and addressed. SCE conducts quarterly regional Working Group meetings with local governments, critical infrastructure providers, and organizations serving the Access and Functional Needs (AFN) community to review best practices and lessons learned related to wildfire, Public Safety Power Shutoff (PSPS), and outage management. SCE proactively participates in the California Fire Safe Council, as well as numerous local fire safe councils, with representation from SCE's fire, vegetation management, and local public affairs subject matter experts.	Interpretation required

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
7.4.1.Q9	What percentage of community partners does the electrical corporation establish working relationships and provide support for in conducting local wildfire mitigation planning in the electrical corporation's service territory?	7.4.1.Q9 - SCE interprets this question to consider the number of possible community partners in SCE's service territory. While the number of possible community partners in the service territory may be difficult to ascertain, SCE has a list of over 15,000 community partners that it has worked with or intends to work with to support community outreach and education programs. This is accomplished through advertising campaigns, traditional media, social media, direct customer mailing, and news / public story telling for Public Safety Power Shutoff (PSPS), wildfire, and emergency events.	Interpretation required
1.1.2.Q9	Do electrical corporation models include fire suppression activities as inputs?	1.1.2.Q9 - Technosylva will be providing this information in the future models.	Outside utility responsibility, knowledge, or control.
1.1.2.Q11	Does the electrical corporation use models to generate air quality effects including greenhouse gas emissions and population health impacts?	1.1.2.Q11 - N/A - Outside utility jurisdiction, knowledge or control. SCE requests removal of this question.	Outside utility responsibility, knowledge, or control.
1.1.3.Q2	Are model inputs version controlled and maintained in the electrical corporation database(s)?	1.1.3.Q2 - SCE does this for Probability of Ignition (POI). For Fire Potential Index (FPI), inputs are captured daily and stored in our database. For weather models, SCE does not do this since this is a government database and there is no value in SCE storing this. Propose to split this question by model type.	Outside utility responsibility, knowledge, or control.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.2.3.Q1	Are wildfire and PSPS risk severity and exposure model inputs version controlled and maintained in the electrical corporation database(s)?	1.2.3.Q1 - SCE houses all input information for risk severity and exposure models except Technosylva proprietary simulation information.	Outside utility responsibility, knowledge, or control.
1.2.3.Q3	Are wildfire and PSPS risk severity and exposure model software versions controlled, documented, and maintained in the electrical corporation database(s)?	1.2.3.Q3 - SCE houses all input information for risk severity and exposure models except Technosylva proprietary simulation information.	Outside utility responsibility, knowledge, or control.
1.2.8.Q7	Are model verification and validation suites (data plus code) provided to the regulator for third-party review?	1.2.8.Q7 - N/A - Wildfire consequence code is proprietary to Technosylva. Wildfire and PSPS consequence, if shared with the public, could also pose a public safety risk. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
1.4.2.Q7	Does the combination of risks and risk components include evaluation of the relative importance of Environmental Protection?	1.4.2.Q7 - Please remove question as it is outside utility responsibility, knowledge, and control.	Outside utility responsibility, knowledge, or control.
1.6.1.Q6	Is the risk reduction impact of mitigation initiatives automated for air quality effects including greenhouse gas emissions and population health impacts?	1.6.1.Q6 - SCE does not automatically include air quality effects (e.g., greenhouse gases) for its mitigations in its risk reduction impact assessment; however, SCE is exploring this issue along with other stakeholders in the context of Office of Energy Infrastructure (OEIS) workshops.	Outside utility responsibility, knowledge, or control.
1.6.2.Q6	Do model inputs include community-specific vegetation treatment plans throughout the service territory?	1.6.2.Q6 - SCE does not have access to community-specific information related to vegetation treatment plans. Additionally, this would be overly burdensome to collect. However, once a community's plan is implemented and the results are evident in the data (e.g., prescribed burns are indicated in remote sensed	Outside utility responsibility, knowledge, or control.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		fuel data), then those impacts would be captured by SCE's models.	
2.2.2.Q15	Do the electrical corporation weather forecasting model outputs include air quality impacts from smoke?	2.2.2.Q15 - N/A - This is the responsibility of the Air Quality Management District (AQMD). Air quality impacts from smoke are not a decision factor for Public Safety Power Shutoff (PSPS) and thus the use case for this is not applicable.	Outside utility responsibility, knowledge, or control.
2.2.4.Q4	Are model software versions controlled, documented, and maintained in the electrical corporation database(s)?	2.2.4.Q4 - N/A - Software is proprietary to vendor and they maintain version control.	Outside utility responsibility, knowledge, or control.
2.2.11.Q8	Are model verification and validation suites (data plus code) provided to the regulator for third-party review?	2.2.11.Q8 - N/A - This is not SCE's model and is proprietary to the vendor. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.3.Q1	Are model inputs and outputs maintained in the electrical corporation database(s) with the model and data versions documented and maintained?	2.3.3.Q1 - N/A - An external vendor documents and maintains model inputs and outputs. SCE recommends that Energy Safety remove questions from the maturity model that are outside of SCE authority, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.3.Q2	Are model inputs version controlled and maintained in the electrical corporation database(s)?	2.3.3.Q2 - N/A - An external vendor documents and maintains model inputs and outputs. SCE recommends that Energy Safety remove questions from the maturity model that are outside of SCE authority, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
2.3.3.Q3	Are model outputs version controlled and maintained in the electrical corporation database(s)?	2.3.3.Q3 - N/A - An external vendor documents and maintains model inputs and outputs. SCE recommends that Energy Safety remove questions from the maturity model that are outside of SCE authority, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.3.Q4	Are model software versions controlled, documented, and maintained in the electrical corporation database(s)?	2.3.3.Q4 - N/A - An external vendor documents and maintains model inputs and outputs. SCE recommends that Energy Safety remove questions from the maturity model that are outside of SCE authority, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.5.Q1	Is the electrical corporation model software modular, with sub-modules which can be replaced to evaluate the impact of different assumptions on the results?	2.3.5.Q1 - N/A - This is the vendor's software and we can't dictate changes to its construction or its design. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.7.Q2	Is a statistical summary of data and model performance provided to the public?	2.3.7.Q2 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.7.Q3	Is model technical documentation available to the public?	2.3.7.Q3 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.7.Q5	Are model software, source code, and data for verification and validation available to the public?	2.3.7.Q5 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.8.Q2	Does the electrical corporation quantify confidence intervals used in model predictions?	2.3.8.Q2 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.

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2.3.8.Q3	Is the sensitivity of downstream models to uncertainty in modeling known and documented?	2.3.8.Q3 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility , knowledge, or control.
2.3.8.Q4	Is the inherent uncertainty in predictions due to model limitations known and documented?	2.3.8.Q4 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility , knowledge, or control.
2.3.8.Q5	Is the sensitivity of model output predictions to uncertainty in each input parameter known and documented?	2.3.8.Q5 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility , knowledge, or control.
2.3.8.Q6	Does the electrical corporation meet a confidence level of 60% for model predictions?	2.3.8.Q6 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility , knowledge, or control.
2.3.8.Q7	Is the uncertainty in measurements used in model validation known and documented?	2.3.8.Q7 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility , knowledge, or control.
2.3.8.Q8	Does the electrical corporation meet a confidence level of 84% for model predictions?	2.3.8.Q8 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility , knowledge, or control.
2.3.8.Q9	Does the electrical corporation meet a confidence level of 97.5% for model predictions?	2.3.8.Q9 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility , knowledge, or control.
2.3.8.Q10	Is uncertainty propagation analytically calculated and presented using standard methods such as Bayesian inference and uncertainty quantification?	2.3.8.Q10 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility , knowledge, or control.
2.3.9.Q2	Are model verification and validation suites automated?	2.3.9.Q2 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility , knowledge, or control.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
2.3.9.Q3	Are model verification and validation suites version controlled?	2.3.9.Q3 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.9.Q4	Are model verification and validation suites reevaluated every time underlying data or models are updated?	2.3.9.Q4 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.9.Q5	Are discrepancies between production model and observations quantified, statistically evaluated, and used to inform performance improvements?	2.3.9.Q5 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.9.Q6	Is annual blind model validation accomplished by analyzing model performance for the previous year based on the data available and assumptions made at the time of WMP submission?	2.3.9.Q6 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.3.9.Q7	Are model verification and validation suites (data PLUS code) provided to the regulator for third-party review?	2.3.9.Q7 - N/A - This is proprietary information outside utility obligation, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
2.5.2.Q1	Does the electrical corporation provide detailed documentation for its wildfire detection methods?	2.5.2.Q1 - SCE interprets "detection technologies" as ALERT California HD Cameras; SCE does not utilize cameras for detecting wildfires. Thus, SCE does not have formal wildfire detection methods.	Outside utility responsibility, knowledge, or control.
2.5.2.Q2	Does the electrical corporation provide detailed documentation for its detection technologies?	2.5.2.Q2 - SCE interprets "detection technologies" as ALERT California HD Cameras; SCE does not utilize cameras for detecting wildfires. Further, SCE does not have a formal wildfire detection product.	Outside utility responsibility, knowledge, or control.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
2.5.2.Q3	Does the electrical corporation provide detailed documentation for its distribution of detection technologies?	2.5.2.Q3 - SCE interprets "detection technologies" as ALERT California HD Cameras; SCE does not utilize cameras for detecting wildfires.	Outside utility responsibility, knowledge, or control.
2.5.2.Q4	Does the electrical corporation provide detailed documentation for its wildfire confirmation strategies?	2.5.2.Q4 - Though SCE is piloting AI on its cameras, SCE is not in the wildfire detection/confirmation space and has no direct need to develop or disseminate wildfire confirmation strategy documents. SCE does not have a formal fire confirmation product/technology; current contractual language with vendor clearly dictates this is in a pilot phase	Outside utility responsibility, knowledge, or control.
2.5.4.Q1	Does the electrical corporation have clearly defined operational processes and procedures in place to integrate lessons learned from risk events to improve the capabilities of its fire detection and alarm systems?	2.5.4.Q1 - SCE interprets "detection technologies" as ALERT California HD Cameras; SCE does not utilize cameras for detecting wildfires. SCE is not in the Wildfire detection arena.	Outside utility responsibility, knowledge, or control.
2.5.4.Q2	Does the electrical corporation have a clearly defined process to track and adjudicate comments from stakeholders on the lessons learned from risk events and the associated corrective action program?	2.5.4.Q2 - SCE interprets "detection technologies" as ALERT California HD Cameras; SCE does not utilize cameras for detecting wildfires. SCE is not in the Wildfire detection arena.	Outside utility responsibility, knowledge, or control.
2.5.6.Q1	Does the electrical corporation provide detailed documentation regarding sensor technology deployed for ignition detection and wildfire confirmation?	2.5.6.Q1 - SCE interprets "detection technologies" as ALERT California HD Cameras; SCE does not utilize cameras for detecting wildfires. SCE provides details on HD camera technology to third party vendors via an API (application programming interface) who in turn may leverage it for wildfire detection/confirmation.	Outside utility responsibility, knowledge, or control.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
2.5.6.Q2	Are results of sensor and system capability testing provided for review?	2.5.6.Q2 - The HD camera system is managed by a third party vendor. Third party vendors are responsible for system capability testing, configuration, and maintenance of HD camera system.	Outside utility responsibility, knowledge, or control.
2.5.6.Q3	Does each circuit in the grid have at least one sensor technology installed to detect an ignition?	2.5.6.Q3 - SCE interprets "detection technologies" as ALERT California HD Cameras; SCE does not utilize cameras for detecting wildfires. SCE is not in the wildfire detection/confirmation space and as such is not putting together or disseminating wildfire detection/confirmation documents. SCE does not have a camera on each circuit nor is it associated with circuit affiliations. It is cost-prohibitive to install a HD camera for each circuit as it would not provide a significant increase in territorial coverage.	Outside utility responsibility, knowledge, or control.
2.5.6.Q4	Does each circuit in the grid have at least two sensor technologies installed to detect an ignition?	2.5.6.Q4 - SCE interprets "detection technologies" as ALERT California HD Cameras; SCE does not utilize cameras for detecting wildfires. SCE is not in the wildfire detection/confirmation space and as such is not putting together or disseminating wildfire detection/confirmation documents. SCE does not have a camera on each circuit nor is it associated with circuit affiliations. It is cost-prohibitive to install a HD camera for each circuit as it would not provide a significant increase in territorial coverage.	Outside utility responsibility, knowledge, or control.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
2.5.6.Q5	Are sensors deployed on each circuit with automatic verification?	2.5.6.Q5 - SCE interprets "detection technologies" as ALERT California HD Cameras; SCE does not utilize cameras for detecting wildfires. All HD cameras can be found on https://alertcalifornia.org/. Third party vendors are able to generate verification through this data feed.	Outside utility responsibility, knowledge, or control.
6.1.1.Q6	Are at least 50% of the electrical corporation emergency and disaster preparedness plans integrated into relevant public safety partner's emergency plans within the service territory?	6.1.1.Q6 - N/A - SCE does not integrate its plans into other public safety partners plans, however SCE uses Standardized Emergency Management Systems (SEMS) and other response systems, and has regular conversations with public safety partners. SCE has no authority to require agencies to integrate their plans. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
6.1.1.Q7	Are at least 75% of the electrical corporation emergency and disaster preparedness plans integrated into relevant public safety partner's emergency plans within the service territory?	6.1.1.Q7 - N/A - SCE does not integrate its plans into other public safety partners plans, however SCE uses Standardized Emergency Management Systems (SEMS) and other response systems, and has regular conversations with public safety partners. SCE has no authority to require agencies to integrate their plans. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
6.1.3.Q12	Does the electrical corporation review memoranda of agreement and mutual aid agreements with key public safety partners for any required updates annually, immediately after each core fire season?	6.1.3.Q12 - N/A - SCE is not eligible to participate in public sector mutual assistance agreements. SCE has Mutual Assistance Agreements with other utilities as required by GO166. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
6.1.3.Q13	Does the electrical corporation review and provide feedback on public safety partners' Emergency and Disaster Preparedness plans to be in-line with the electrical corporation's plans at least every five years?	6.1.3.Q13 - SCE provides feedback as requested/as appropriate, but there is not an established process as SCE is not routinely invited to provide plan feedback. SCE only reviews the utility portion of PSP plans.	Outside utility responsibility, knowledge, or control.
6.1.3.Q14	Does the electrical corporation review and provide feedback on public safety partners' Emergency and Disaster Preparedness plans to be in-line with the electrical corporation's plans at least every two years?	6.1.3.Q14 - SCE provides feedback as requested/as appropriate, but there is not an established process as SCE is not routinely invited to provide plan feedback. SCE only reviews the utility portion of PSP plans.	Outside utility responsibility, knowledge, or control.
6.2.1.Q4	Are resources available for Mutual Aid Agreements?	6.2.1.Q4 - N/A - Public sector memoranda of agreements are outside utility authority, knowledge or control. SCE has multiple mutual assistance agreements with relevant public safety partners. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
6.2.1.Q5	What percentage of relevant Public Safety Partners provided consultation and/or verbal or written comments on electrical corporation’s most recent plan?	6.2.1.Q5 - N/A - SCE cannot require public safety partners to review and provide comments on our plans. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
6.2.1.Q6	What percentage of relevant Public Safety Partners’ communication strategy (e.g., protocols, procedures, and systems) are coordinated with the electrical corporation to inform public safety partners and other interconnected electrical corporation partners of wildfire, PSPS and re-energization incidents?	6.2.1.Q6 - N/A - SCE does not dispatch notifications for wildfire incidents and this is outside SCE's authority, knowledge or control. SCE prescribes to the CA Alert & Warning System. If they public safety partners provide SCE with opportunity for feedback, it is provided. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
6.2.2.Q11	Does the electrical corporation review memoranda of agreements with key public safety partners and interconnected electrical corporations for any required updates at least once annually, immediately after each core fire season?	6.2.2.Q11 - N/A - Participation in public sector memoranda of agreements is outside SCE's authority, knowledge or control. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
6.3.1.Q1	Is the detection of an ignition automatically communicated to public safety partners?	6.3.1.Q1 - N/A - It is outside utility jurisdiction, knowledge or control of a utility to automatically detect and report fires. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
6.3.1.Q7	Does the electrical corporation automatically communicate instructions for emergency action to members of the public and public safety partners?	6.3.1.Q7 - N/A - It is outside the utilities' authority, knowledge or control to communicate instructions for emergency action to members of the public and public safety partners. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
6.3.4.Q6	Does the electrical corporation provide support services at locations in the community within one hour of wildfire detection; two days before PSPS implementation, outages due to wildfires and PSPS, and service restoration?	6.3.4.Q6 - N/A - It is not SCE's responsibility to provide support services for wildfires. SCE only provides support services like Community Resource Centers for outages due to PSPS. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
6.3.4.Q7	Does the electrical corporation provide instructions for emergency protective action and links to credible public safety partners' emergency communications (e.g., shelter-in-place, evacuation) within 30 minutes of wildfire detection; two days before PSPS implementation, outages due to wildfires and PSPS, and service restoration?	6.3.4.Q7 - N/A - It is outside utility jurisdiction, knowledge or control to provide support services for wildfires. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
6.4.2.Q2	Is the electrical corporation's re-energization and recovery plan annually coordinated and integrated with at least 75% of state, county, and city agencies in the electrical corporation's service territory?	6.4.2.Q2 - N/A - SCE shares our plans for re-energization with the appropriate jurisdictions and agencies, but has no control over other public safety partners' final plans. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
6.4.2.Q3	Is the electrical corporation's re-energization and recovery plan annually coordinated and integrated with all state, county, and city agencies in the electrical corporation's service territory?	6.4.2.Q3 - N/A - SCE shares our plans for re-energization with the appropriate jurisdictions and agencies, but has no control over other public safety partners' final plans. SCE recommends removing this question.	Outside utility responsibility, knowledge, or control.
7.4.1.Q6	Does the electrical corporation provide annual feedback and input on at least four local wildfire mitigation activities (e.g., CWPPs, safety elements in general plans, local hazard mitigation plans)?	7.4.1.Q6 - N/A - N/A - It is outside utility jurisdiction, knowledge or control. There is often no official forum for SCE to provide this feedback, but SCE gladly does so if requested.	Outside utility responsibility, knowledge, or control.
7.4.1.Q7	Is the frequency of electrical corporation’s effort based on the update cycle of the respective planning effort (e.g., every five years for a CWPP)?	7.4.1.Q7 - N/A - N/A - It is outside utility jurisdiction, knowledge or control. There is often no official forum for SCE to provide this feedback, but SCE gladly does so if requested.	Outside utility responsibility, knowledge, or control.
1.1.2.Q6	Does the electrical corporation use models to generate statistically relevant design conditions at baseline, 20-year, 60-year, and 300-year return intervals (i.e., Wind Load Conditions 1 through 4)?	1.1.2.Q6 - SCE has generated statistically relevant design conditions at baseline (i.e., applies Wind Load Condition 1 across its territory) and extreme conditions (e.g., 12, 18, 24 psf).	Rationale unclear
1.1.2.Q8	Does the electrical corporation use models to generate estimated acres burned at baseline, 20-year, 60-year, and 300-year return intervals (i.e., Wind Load Conditions 1 through 4)?	1.1.2.Q8 - Please specify rationale for this metric, per subject matter experts there are more appropriate ways to demonstrate maturity. SCE uses deterministic wildfire modeling which does not utilize return intervals. However, SCE's wildfire consequence model provides estimated acres burned based	Rationale unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		on the 444 worst weather days, which accounts for extreme weather conditions (e.g., extreme wind loading).	
1.1.8.Q6	Are model software source code and data for verification and validation available to the public?	1.1.8.Q6 - We provide this information to the public when requested except for Probability of Ignition and other CEII information that would create a public safety risk.	Rationale unclear
1.1.10.Q8	Model performance on each key metric demonstrates a systematic bias of what level?	1.1.10.Q8 - N/A - Systematic bias is undefined for SCE's model. Models are changing every year and calculating a systematic bias is not practical. SCE recommends removing this question.	Rationale unclear
1.1.10.Q9	Model performance on each key metric demonstrates a standard deviation in error of what level?	1.1.10.Q9 - N/A - Standard deviation is undefined for SCE's model. Models are changing every year and calculating a standard deviation is not practical. SCE recommends removing this question.	Rationale unclear
1.2.2.Q6	Do models of wildfire and PSPS risk exposure potential include property damage as an output?	1.2.2.Q6 - SCE uses property damage for wildfire models. SCE assess the number of buildings impacted and uses a financial multiplier to estimate the impacts. However SCE does not model PSPS risk exposure for property damage.	Rationale unclear
1.2.2.Q7	Do models of wildfire and PSPS risk exposure potential include acres burned as an output?	1.2.2.Q7 - SCE uses acres burned for wildfire models. However SCE does not model PSPS risk exposure for acres burned.	Rationale unclear
1.2.2.Q12	Do models of wildfire and PSPS risk exposure potential include ingress and egress capacity and planning as an input?	1.2.2.Q12 - SCE uses a Severe Risk Area Methodology for its models. This does not apply to PSPS.	Rationale unclear

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1.2.7.Q2	Is a statistical summary of data and model performance provided to the public?	1.2.7.Q2 - N/A - SCE does not have a statistical summary value large enough to validate the data. SCE would not share this with the public for security and public safety reason.	Rationale unclear
1.2.7.Q6	Are model software source code and data for verification and validation available to the public?	1.2.7.Q6 - N/A - Wildfire consequence source code and data is proprietary to Technosylva. Wildfire and PSPS consequence, if shared with the public, could also pose a public safety risk.	Rationale unclear
1.4.8.Q6	Are model software source code and data for verification and validation available to the public?	1.4.8.Q6 - SCE provides requested information to the public with the exception of Probability of Ignition (POI), CEII information, or other sensitive/ confidential information that would create a public safety risk. For example, SCE provides information for weather and Fire Potential Index (FPI). Data from Technosylva may be proprietary.	Rationale unclear
1.4.9.Q6	Does the electrical corporation justify the design percentiles used in model predictions to evaluate downstream models and decision-making processes in the WMP?	1.4.9.Q6 - No, SCE does not currently evaluate the downstream models for all of the risk components.	Rationale unclear
1.4.9.Q8	Does the electrical corporation evaluate model predictions at an 84th design percentile to evaluate downstream models and decision-making processes?	1.4.9.Q8 - SCE uses one design scenario (one wind, weather, and vegetation) scenario for planning purposes and does not intend to align to an 84th design percentile. Please specify rationale for this metric, per subject matter experts there are more appropriate ways to demonstrate maturity.	Rationale unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.4.9.Q10	Does the electrical corporation evaluate model predictions at a 97.5th design percentile to evaluate downstream models and decision-making processes?	1.4.9.Q10 - SCE uses one design scenario (one wind, weather, and vegetation) scenario for planning purposes and does not intend to align to a 97.5th design percentile. Please specify rationale for this metric, per subject matter experts there are more appropriate ways to demonstrate maturity.	Rationale unclear
1.4.10.Q8	Model performance on each key metric demonstrates a systematic bias of what level?	1.4.10.Q8 - N/A - SCE interprets this capability as a combination of the previous three. Please see systemic bias comments there. SCE recommends removing this question.	Rationale unclear
1.4.10.Q9	Model performance on each key metric demonstrates a standard deviation in error of what level?	1.4.10.Q9 - N/A - SCE interprets this capability as a combination of the previous three. Please see standard deviation comments there. SCE recommends removing this question.	Rationale unclear
1.6.8.Q8	Model performance on each key metric demonstrates a systematic bias of what level?	1.6.8.Q8 - N/A - Models are changing every year and calculating a systemic bias is not practical. SCE recommends removing this question.	Rationale unclear
1.6.8.Q9	Model performance on each key metric demonstrates a standard deviation in error of what level?	1.6.8.Q9 - N/A - Models are changing every year and calculating a standard deviation is not practical. SCE recommends removing this question.	Rationale unclear
2.1.1.Q1	Is the ignition likelihood estimation linked to deterministic weather forecasts?	2.1.1.Q1 - SCE machine learning models are only used for planning purposes therefore only uses aggregated historical weather conditions in order to generate statistical probability models that inform ignition likelihood over long time scales. SCE recommends removing this question.	Rationale unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
2.1.1.Q3	Is integration of weather data and forecasts into the ignition likelihood model automated?	2.1.1.Q3 - SCE machine learning models are only used for planning purposes therefore only uses aggregated historical weather conditions in order to generate statistical probability models that inform ignition likelihood over long time scales. SCE recommends removing this question.	Rationale unclear
2.1.1.Q5	Is integration of vegetative fuel moisture forecasts into the ignition likelihood model automated?	2.1.1.Q5 - SCE machine learning models are only used for infrastructure replacement planning purposes in order to generate statistical probability models that inform ignition likelihood over long time scales (years). SCE recommends removing this question.	Rationale unclear
2.1.1.Q6	Is the ignition likelihood estimation linked to ensemble weather forecasts?	2.1.1.Q6 - SCE machine learning models are only used for planning purposes therefore only uses aggregated historical weather conditions in order to generate statistical probability models that inform ignition likelihood over long time scales. Vegetative fuel moisture varies drastically over the aggregated time scale of the ignition models. SCE recommends removing this question.	Rationale unclear
2.1.1.Q7	Is the ignition likelihood estimation linked to a probabilistic real-time risk model?	2.1.1.Q7 - SCE machine learning models are only used for planning purposes in order to generate statistical probability models that inform ignition likelihood over long time scales. Real-time risk modeling would not benefit infrastructure replacement. SCE recommends removing this question.	Rationale unclear

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2.1.5.Q8	Does the electrical corporation modeling software include a module for impact(s) of weather on seasonal vegetation moisture?	2.1.5.Q8 - SCE will consider this module but believes other improvements to be of greater value.	Rationale unclear
2.1.8.Q5	Are model software, source code, and data for verification and validation available to the public?	2.1.8.Q5 - N/A - SCE does not share this information as it may cause public safety concerns.	Rationale unclear
2.1.9.Q7	Does the electrical corporation evaluate model predictions at an 84th design percentile to evaluate downstream models and decision-making processes?	2.1.9.Q7 - SCE uses one design scenario (one wind, weather, and vegetation) scenario for planning purposes and does not intend to align to an 84th design percentile. Please specify rationale for this metric, per subject matter experts there are more appropriate ways to demonstrate maturity.	Rationale unclear
2.1.9.Q8	Does the electrical corporation evaluate model predictions at a 97.5th design percentile to evaluate downstream models and decision-making processes?	2.1.9.Q8 - SCE uses one design scenario (one wind, weather, and vegetation) scenario for planning purposes and does not intend to align to a 97.5th design percentile. Please specify rationale for this metric, per subject matter experts there are more appropriate ways to demonstrate maturity.	Rationale unclear
2.1.10.Q8	Model performance on each key metric demonstrates a systematic bias of what level?	2.1.10.Q8 - N/A - A systematic bias calculation would require enough observed fire data to validate and is impractical. SCE recommends removing this question.	Rationale unclear
2.2.4.Q2	Are model inputs version controlled and maintained in the electrical corporation database(s)?	2.2.4.Q2 - Currently, SCE does not maintain public weather model inputs because they are archived publicly. This will be done in the future.	Rationale unclear

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2.3.1.Q4	Is wildfire spread forecasting automatically integrated with notification with the public?	2.3.1.Q4 - SCE interprets this question as notifications to public during a PSPS event. The answers are all no's because we do not intend to integrate any forecasting data with notifications to the public. The wildfire forecasting will be used in the background for decision-making in the future, but not visible via a notification to the public. The information will also be available via post event reports.	Rationale unclear
2.3.2.Q13	Do the electrical corporation wildfire spread model outputs include air quality impacts?	2.3.2.Q13 - No because public data is already available for smoke impacts and transport winds. SCE recommends removing this question.	Rationale unclear
2.3.9.Q8	Model performance on each key metric demonstrates a systematic bias of what level?	2.3.9.Q8 - N/A - A systematic bias calculation would require enough observed worst weather conditions and fire data to validate and is impractical. SCE recommends removing this question.	Rationale unclear
2.3.9.Q9	Model performance on each key metric demonstrates a standard deviation in error of what level?	2.3.9.Q9 - N/A - A standard deviation calculation would require enough observed worst weather conditions and fire data to validate and is impractical. SCE recommends removing this question.	Rationale unclear
3.1.2.Q4	Does the database contain the minimum line clearance beyond GO based on risk analysis for each equipment within the service territory?	3.1.2.Q4 - SCE interprets this to mean that the asset inventory database contains additional information beyond GO 95 requirements.	Rationale unclear
3.4.1.Q1	How frequently is the grid design evaluated?	3.4.1.Q1 - SCE recommends removing since more frequent designs will not add value.	Rationale unclear

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
5.4.1.Q1	What fraction of de-energized circuits are inspected using processes that do not involve on-site inspection by a physically present observer (e.g., drones, LiDAR) prior to re-energization?	5.4.1.Q1 - N/A - SCE does not intend to pursue remote processes for circuit re-energization, as onsite assessment by SMEs is a safer process.	Rationale unclear
5.4.3.Q1	The electrical corporation restores service to the grid within what timeframe after conditions have returned to sub-PSPS thresholds?	5.4.3.Q1 - Please remove this question since utilities must perform required safety checks before re-energization; speed does not equate to safety which does not equate to maturity.	Rationale unclear
6.4.1.Q1	How automated are safety checks prior to re-energization?	6.4.1.Q1 - SCE uses drones in limited circumstances for Public Safety Power Shutoff (PSPS) restoration patrols. SCE urges that fully automated safety checks are not desired and are not more mature. SCE will likely not increase in maturity because safety checks should not be fully automated for safety reasons.	Rationale unclear
1.1.7.Q10	Do your annual model validation results indicate that no changes should be made to your modeling assumptions?	1.1.7.Q10 - SCE plans to continuously improve modeling based on Energy Safety/California Public Utilities Commission (CPUC) feedback, Joint Investor Owned Utility (IOUs) workshops and best practices. SCE works to incorporate changes in its models (e.g., updated assumptions) throughout the year, as appropriate. SCE expects models to be dynamic to account for changes in data and assumptions from various sources including validation. SCE suggests removing this question to encourage ongoing improvements of models.	Survey logic

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.2.6.Q10	Do your annual model validation results indicate that no changes should be made to your modeling assumptions?	1.2.6.Q10 - SCE plans to continuously improve modeling based on Energy Safety/California Public Utilities Commission (CPUC) feedback, Joint Investor Owned Utility (IOUs) workshops and best practices. SCE works to incorporate changes in its models (e.g., updated assumptions) throughout the year, as appropriate. SCE expects models to be dynamic to account for changes in data and assumptions from various sources including validation. SCE recommends removal to encourage ongoing improvements of models.	Survey logic
1.3.6.Q10	Do your annual model validation results indicate that no changes should be made to your modeling assumptions?	1.3.6.Q10 - SCE plans to continuously improve modeling based on Energy Safety/California Public Utilities Commission (CPUC) feedback, Joint Investor Owned Utility (IOUs) workshops and best practices. SCE works to incorporate changes in its models (e.g., updated assumptions) throughout the year, as appropriate. SCE expects models to be dynamic to account for changes in data and assumptions from various sources including validation. SCE recommends removal to encourage ongoing improvements of models.	Survey logic

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
1.4.2.Q10	Model inputs and outputs meet, at a minimum, what maturity level for each of the following capabilities? 1. Statistical Weather, Climate, and Fire Modeling 2. Estimation of Wildfire and PSPS Risk Exposure 3. Estimation of Community Vulnerability to Wildfire and SPS 4. Ignition Likelihood Estimation 5. Weather Forecasting Ability 6. Wildfire Forecasting Ability	1.4.2.Q10 - N/A - SCE has chosen the highest maturity because this question double penalizes SCE by applying ratings from earlier questions. SCE recommends removing this question.	Survey logic
1.4.6.Q1	Spatial granularity requirements for model inputs, outputs, calculation steps, and validation basis meet, at a minimum, what maturity level for each of the following capabilities? 1. Statistical Weather, Climate, and Fire Modeling 2. Estimation of Wildfire and PSPS Risk Exposure 3. Estimation of Community Vulnerability to Wildfire and PSPS 4. Ignition Likelihood Estimation 5. Weather Forecasting Ability 6. Wildfire Forecasting Ability	1.4.6.Q1 - N/A - SCE has chosen the highest maturity because this question double penalizes SCE by applying ratings from earlier questions. SCE recommends removing this question.	Survey logic
1.4.7.Q10	Do your annual model validation results indicate that no changes should be made to your modeling assumptions?	1.4.7.Q10 - SCE plans to continuously improve modeling based on Energy Safety/California Public Utilities Commission (CPUC) feedback, Joint Investor Owned Utility (IOUs) workshops and best practices. SCE works to incorporate changes in its models (e.g., updated assumptions) throughout the year, as appropriate. SCE expects models to be dynamic to account for changes in data and assumptions from various sources including validation. SCE recommends removing	Survey logic

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
		this question to encourage ongoing improvements of models.	
1.6.7.Q10	Do your annual model validation results indicate that no changes should be made to your modeling assumptions?	1.6.7.Q10 - SCE plans to continuously improve modeling based on Energy Safety/California Public Utilities Commission (CPUC) feedback, Joint Investor Owned Utility (IOUs) workshops and best practices. SCE works to incorporate changes in its models (e.g., updated assumptions) throughout the year, as appropriate. SCE expects models to be dynamic to account for changes in data and assumptions from various sources including validation. SCE recommends removing this question to encourage ongoing improvements of models.	Survey logic
2.1.7.Q9	Do your annual model validation results indicate that no changes should be made to your modeling assumptions?	2.1.7.Q9 - SCE plans to continuously improve modeling based on Energy Safety/California Public Utilities Commission (CPUC) feedback, Joint Investor Owned Utility (IOUs) workshops and best practices. SCE recommends removing this question to encourage ongoing improvements of models.	Survey logic

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
2.2.8.Q10	Do your annual model validation results indicate that no changes should be made to your modeling assumptions?	2.2.8.Q10 - SCE plans to continuously improve modeling based on Energy Safety/California Public Utilities Commission (CPUC) feedback, Joint Investor Owned Utility (IOUs) workshops, best practices, and lessons learned. Furthermore, it is not practical to assume that there will never be continuous improvement to these models. SCE recommends removing this question.	Survey logic
2.3.1.Q13	Weather forecasting automation requirements meet those of what maturity level for capability 8?	2.3.1.Q13 - N/A - SCE has chosen the highest maturity because this question double penalizes SCE by applying ratings from earlier questions.	Survey logic
2.3.2.Q14	The electrical corporation wildfire spread model inputs include the weather forecasting requirements of what maturity level of capability 8?	2.3.2.Q14 - N/A - SCE has chosen the highest maturity because this question double penalizes SCE by applying ratings from earlier questions. SCE recommends removing this question.	Survey logic
2.3.6.Q1	The horizontal resolution of weather forecasting requirements meets the requirements for what maturity level in capability 8?	2.3.6.Q1 - N/A - SCE has chosen the highest maturity because this question double penalizes SCE by applying ratings from earlier questions. SCE recommends removing this question.	Survey logic
3.4.3.Q2*	**Do the grid design, design evaluation, and grid impact evaluation consider the total percentage of grid localization features normalized by circuit length in the HFTD?**	**3.4.3.Q2 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.**	**Survey logic**
4.2.1.Q1*	**Are vegetation inspections for the entire grid conducted at least once annually?**	**4.2.1.Q1 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.**	**Survey logic**

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
4.2.1.Q3*	**Are vegetation inspections for the entire grid conducted at least once every six months?**	**4.2.1.Q3 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.**	**Survey logic**
4.2.1.Q6*	**Are vegetation inspections for the entire grid conducted at least every three months?**	**4.2.1.Q6 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.**	**Survey logic**
5.2.4.Q2	The predictive model used for shortening the expected life of equipment undergoes subject matter expert review at what frequency?	5.2.4.Q2 - SCE does not currently relate equipment usage or loading with lifespan reductions and thus chose the lowest maturity score.	Survey logic
6.3.1.Q2*	**Does the electrical corporation automatically communicate the location and extent of the wildfire perimeter to members of the public and public safety partners?**	**6.3.1.Q2 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.**	**Survey logic**
6.3.4.Q10*	**Does the electrical corporation provide public notification of wildfire incident immediately when there is an imminent threat to life, health, or property to the public?**	**6.3.4.Q10 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.**	**Survey logic**
6.3.4.Q11*	**Does the electrical corporation provide the location and extent of wildfire perimeter?**	**6.3.4.Q11 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.**	**Survey logic**
6.3.4.Q13*	**Does the electrical corporation provide the public information on the ability of carriers to redistribute communications during wildfires and PSPS?**	**6.3.4.Q13 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.**	**Survey logic**
6.3.4.Q15*	**Does the electrical corporation provide the public information on cross-jurisdictional needs during wildfires and PSPS?**	**6.3.4.Q15 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.**	**Survey logic**

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6.3.4.Q17*	Does the electrical corporation provide the public information on loss of internet connectivity during wildfires and PSPS?	6.3.4.Q17 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.	Survey logic
6.3.4.Q18*	Does the electrical corporation provide the public information on loss of cell towers or overloaded cell systems during wildfires and PSPS?	6.3.4.Q18 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.	Survey logic
6.3.4.Q21*	Does the electrical corporation provide the public information on overloaded networks during wildfires and PSPS?	6.3.4.Q21 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.	Survey logic
6.3.4.Q23*	Has the electrical corporation adopted Integrated Public Warning Systems (IPAWS)?	6.3.4.Q23 - N/A - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.	Survey logic
6.3.4.Q28*	Does the electrical corporation provide high-frequency radio alerts?	6.3.4.Q28 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.	Survey logic
6.5.1.Q3*	Does the electrical corporation provide billing adjustments to residential and non-residential customers within four hours of wildfire and PSPS incidents?	6.5.1Q3 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.	Survey logic
6.5.1.Q4*	Does the electrical corporation provide deposit waivers to residential and nonresidential customers within four hours of wildfire and PSPS incidents?	6.5.1.Q4 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.	Survey logic
6.5.1.Q5*	Does the electrical corporation provide extended payment plans to residential and non-residential customers within four hours of wildfire and PSPS incidents?	6.5.1.Q5 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.	Survey logic

Question Number	Question (Final Guidelines)	Final Submitted Comments	Concern
6.5.1.Q6*	**Does the electrical corporation provide suspension of disconnection and nonpayment fees to residential and non-residential customers within four hours of wildfire and PSPS incidents?**	**6.5.1.Q6 - N/A - SCE agrees with OEIS proposal to remove this question, as it is inappropriate for this maturity survey.**	**Survey logic**