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Docket# 2023-2025-WMPs

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Reply to Comments on SCE's 2025 Wildfire Mitigation Plan Update Draft Decision

Dear Director Thomas Jacobs:

Southern California Edison Company (SCE) appreciates the opportunity to respond to stakeholder comments on the Office of Energy Infrastructure Safety's (OEIS) Draft Decision (Draft Decision) on SCE's 2025 Wildfire Mitigation Plan Update (WMP Update). The Draft Decision was issued by OEIS on August 22, 2024. Stakeholder opening comments were submitted on September 11, 2024 by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), the Green Power Institute (GPI), and Mussey Grade Road Alliance (MGRA).

Although stakeholders provided several observations and recommendations in their opening comments, SCE has limited these reply comments to the specific issues discussed below, and SCE's silence on a particular issue or point raised in stakeholders' opening comments should not necessarily be construed as tacit assent.

THE LANGUAGE IN THE DRAFT DECISION REQUIRING SCE TO CONTINUE EXPLORATION OF PROBABILISTIC DISTRIBUTIONS SHOULD NOT BE MODIFIED

In its 2025 WMP Update, SCE was required to show either that (1) its methodology to calculate risk scores using maximum consequence values is appropriate, or (2) provide a plan for adopting probability distributions rather than maximum consequence values.[1] The Draft Decision concludes that SCE "provided sufficient information demonstrating that its current methodology for using maximum values is more accurate for determining catastrophic fires when compared to the use of averages."[2] The Draft Decision also finds that SCE "provided sufficient information on why it uses a deterministic model as opposed to a probabilistic model."[3] The Draft Decision directs SCE to continue exploring the use of probability distributions and lists five specific items concerning the use of probability distributions that SCE must address in its 2026-2028 Wildfire Mitigation Plan.[4]

[1] Draft Decision, page 13.
[2] Draft Decision, page 13.
[3] Draft Decision, page 14.
[4] Draft Decision, page 50.

MGRA suggests that OEIS require SCE to "provide a working plan to integrate its [Integrated Wildfire Mitigation Strategy] model into a probabilistic framework and present this plan in the 2026-2028 WMP, and implement the plan throughout the 2027 to 2028 updates."[5]

Contrary to MGRA's recommendation, the Draft Decision's requirement that SCE continue exploring use of probability distributions in calculating risk scores is appropriate, and MGRA's criticism that "OEIS language must be more highly prescriptive"[6] is unsupported. MGRA's recommendation ignores existing language in the Draft Decision for Area of Continued Improvement (ACI) SCE-25U-01 that is both detailed and comprehensive. For example, ACI SCE-25U-01 already requires SCE to:

- Continue exploration of probabilistic distributions, including "piloting in place of maximum consequence and comparing results for its risk assessment strategy";
- Provide an update on analysis performed on wildfire simulations and weather scenarios as described in the 2025 WMP Update;
- Report on any updates made to SCE's risk models and associated impacts related to probability distributions as a result of the CPUC's Phase 3 Decision in the Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities (Risk OIR);[7]
- Analyze "where and how to implement probability distributions into [SCE's] risk models;" and,
- Describe any steps SCE is taking to explore the use of probability distributions in the future.[8]

The detailed requirements of ACI SCE-25U-01 will allow OEIS and other parties to evaluate the relative merits of different approaches to wildfire risk analysis. MGRA's recommendation to modify the language of the ACI is overly prescriptive in presuming its preferred approach to "integrate IWMS into a probabilistic framework" is superior. This is particularly true given the Draft Decision's finding that SCE demonstrated that its current methodology for using maximum consequence values "is more accurate for determining catastrophic fires when compared to the use of averages."[9] MGRA's recommendation is also unnecessary given SCE's existing reporting obligations under the Draft Decision.

MGRA's citation to Decision (D.)24-05-064—which was issued in the Risk OIR—does not support its recommendation.[10] In the Risk OIR, the CPUC held a workshop addressing incorporation of "tail risk"[11] into utility risk modeling, and certain utilities proposed modifications to the CPUC's risk-based decision-making framework (RDF) in a white paper regarding modeling methodologies.[12] The Commission ultimately declined to modify the existing RDF requirements, noting that the RDF

[5] MGRA Comments, page 9.
[6] MGRA Comments, page 9.
[7] Rulemaking 20-07-013, Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities.
[8] Draft Decision, page 50.
[9] Draft Decision, page 13.
[10] Rulemaking 20-07-013, Order Instituting Rulemaking to Further Develop a Risk-Based Decision-Making Framework for Electric and Gas Utilities.
[11] D.24-05-064, page 57 ("Tail risks represent low-probability, high-consequence events.").
[12] D.24-05-064, page 60.

"authorizes a utility to present a tail risk analysis but does not require this."[13] The Commission also noted that a white paper "that presents justification for a model based purely on consequences will be rejected" as inconsistent with the RDF.[14]

MGRA claims that D.24-05-064 "curtails" SCE's ability to use its IWMS model.[15] This claim is inaccurate because the language cited by MGRA[16] does not represent a settled view or final disposition by the CPUC on how tail risk should be assessed, let alone direct SCE to modify its IWMS model. MGRA itself had argued that the record in the Risk OIR regarding the tail risk issue "requires further development," and the decision is clear that consideration of the tail risk issue "may continue in later phases of [the] proceeding."[17] MGRA's portrayal of the decision as a final determination that "curtails" SCE's ability to use its IWMS model is thus contrary to the record.

GPI also suggested revisions to the text of ACI SCE-25U-01 to make the ACI more prescriptive.[18] Although both the Draft Decision and GPI's proposed changes would require SCE to "pilot" the use of probability distributions in place of maximum consequence values and to compare results in SCE's 2026-2028 WMP, GPI recommends a more detailed reporting requirement.[19] Like MGRA, GPI's proposed revisions are overly prescriptive, unnecessary in light of the existing ACI language, and should be rejected.

CAL ADVOCATES INCORRECTLY CHARACTERIZES ENERGY SAFETY'S CONCLUSIONS ON SCE'S INSPECTION EVALUATION CRITERIA

According to Cal Advocates, "Energy Safety's Draft Decision states that SCE has not provided adequate documentation on how it determines whether a notification poses an ignition risk."[20] Cal Advocates then recommends that "Energy Safety should direct SCE to provide comprehensive documentation of the criteria it uses to determine ignition risk in all distribution and transmission asset notifications,"[21] and that "Energy Safety should require that SCE's risk evaluation procedures be made available to stakeholders and the public, to enhance transparency and external scrutiny."[22]

These comments incorrectly characterize Energy Safety's findings in the Draft Decision. Energy Safety states the following:

> SCE did not provide documentation used in the determination of ignition-risk tags but did provide the criteria used to evaluate the ignition risk of a notification. SCE stated it considers the location, wildfire consequence score, area of concern identifier, PSPS identifier,

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[13] D.24-05-064, page 65.
[14] D.24-05-064, pages 55-56.
[15] MGRA Comments, page
[16] MGRA Comments, page 8 (citing D.24-05-064, pp. 55-56), available at: https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M533/K099/533099839.PDF
[17] D.24-05-064, page 67.
[18] GPI Comments, page 4.
[19] GPI Comments, page 4.
[20] Cal Advocates Comments, page 6.
[21] Cal Advocates Comments, page 6.
[22] Cal Advocates Comments, page 7.

compliance due date, problem statement, probability of ignition, and age of the notification to determine ignition risk. SCE stated its process for prioritizing tag closures uses a formula that includes wildfire consequence score, probability of ignition, areas of concern, and PSPS history.[23]

Cal Advocates' comments do not accurately or fully recognize the extent of material and information provided by SCE. The Draft Decision states that "SCE sufficiently responded to this area for continued improvement"[24] by providing details including its commitments to close open work orders, risk prioritization procedures, and resource allocation plans. In addition, regarding Cal Advocates' recommendations to Energy Safety that SCE should provide specific risk factors and risk evaluation procedures, SCE provided the specific factors considered in its risk assessment of notifications as documented in the 2025 WMP Update[25] and provided further information on its risk prioritization formula in response to an Energy Safety data request.[26]

SCE APPROPRIATELY MITIGATES INTERIM RISK IN AREAS SCOPED FOR LONGER LEAD TIME MITIGATIONS SUCH AS TARGETED UNDERGROUNDING

Cal Advocates states that "undergrounding introduces challenges and trade-offs, particularly in SRAs [Severe Risk Areas], where terrain complexity and permitting obstacles can lead to extended project timelines"[27] and provides two suggested revisions to the Draft Decision. First, Cal Advocates recommends that SCE should be required to "develop more robust contingency plans that emphasize the need for continuous monitoring and data-driven adjustments to interim measures, ensuring they remain effective throughout any delays in undergrounding projects." Second, Cal Advocates recommends that the Draft Decision should "include clear and measurable metrics by which the efficacy of SCE's interim actions should be evaluated."[28]

SCE has addressed this issue in the 2023-2025 Base WMP,[29] in the 2025 WMP Update,[30] and in response to data requests.[31] Cal Advocates' suggestions are redundant to SCE's existing practices, which are data-driven and informed by grid hardening lead times. SCE's practices include:

- Higher frequency of asset and vegetation inspections, driven by risk analysis, as often as twice per year;[32]
- Additional asset inspection, remediation, and vegetation management activities for Areas of Concern, which are identified as areas with high wildfire risk based on short-term data and

[23] Draft Decision, page 34.
[24] Draft Decision, page 35.
[25] SCE's 2025 WMP Update, pages 76-77.
[26] SCE response to data request OEIS-P-WMP_2024-SCE-03, Question 8, available at www.sce.com/wmp
[27] Cal Advocates Comments, page 2.
[28] Cal Advocates Comments, page 3.
[29] SCE 2023-2025 WMP, Section 7.2.3, pages 228-229.
[30] SCE 2025 WMP Update, Section 2.1, pages 26-27.
[31] SCE response to data request CalAdvocates-SCE-2025WMP-05, Question 3, available at www.sce.com/wmp
[32] SCE 2023-2025 WMP, Section 8.1.3.1, Figure SCE 8-22, page 286; also see Section 8.1.3.2, Figure SCE 8-25, page 291.

location-specific factors such as fuel growth, potential for high winds, and egress constraints;[33]
- Monitoring and analysis of ignitions through SCE's Fire Incident Preliminary Analysis (FIPA) program;[34] and,
- Fast Curve settings to detect and respond to fault conditions that otherwise could lead to potential ignitions (WMP activity SH-6).

SCE also utilizes measures such as Early Fault Detection (WMP activity SA-11) and Long Span Initiative (WMP activity SH-14) as mitigations in areas scoped for longer-lead programs such as covered conductor, targeted undergrounding, or REFCL.

CONCLUSION

SCE appreciates the opportunity to reply to stakeholders' opening comments on the Draft Decision on SCE's 2025 WMP Update. If you have questions, or require additional information, please contact me at gary.chen@sce.com.

Sincerely,

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Gary Chen
Director, Safety & Infrastructure Policy

[33] AOCs are discussed in many instances in SCE's 2023-2025 WMP such as pages 284, 287, 291, 296, 328, 401, 408, 424, and 514.
[34] The FIPA program is discussed in several areas of SCE's 2023-2025 WMP, but a summary is provided in Chapter 11, page 651.