



Gary Chen  
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Tony Marino  
Acting Deputy Director  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**SUBJECT:** Amendment of SCE's Comments on Draft WMP Guidelines - Package 1

Dear Acting Deputy Director Marino:

Southern California Edison (SCE) writes to amend the comments that it previously provided on the Draft WMP Guidelines – Package 1 (Draft Guidelines) that was issued by the Office of Energy Infrastructure Safety (Energy Safety) on November 12, 2024.

SCE submitted Opening Comments on the Draft Guidelines on December 6, and Reply Comments on December 12, 2024. In those comments, SCE stated that the WMP submission deadline should be no earlier than mid-April 2025, based on the timeframe set by Energy Safety for the 2025 WMP Update.

SCE wishes to amend its position to more clearly state that while mid-April would represent the earliest acceptable deadline based on the timing of the 2025 WMP Update cycle, SCE would support the proposal of the Public Advocates Office for a deadline no earlier than mid-June 2025 for the 2026-2028 WMP submission, with pre-submissions four weeks earlier. Such a schedule is appropriate given:

- (a) The extensive nature and importance of a base WMP.
- (b) The pendency of SCE's outstanding General Rate Case (GRC); submitting the WMP after SCE's GRC decision (expected in Q1 or early Q2 of 2025) will obviate the need to submit a subsequent petition to amend.
- (c) Competing priorities in critical wildfire-related regulatory proceedings such as SCE's Woolsey Fire application.

SCE appreciates Energy Safety's consideration of this amendment to SCE's comments on the Draft Guidelines. If you have questions, or require additional information, please contact me at gary.chen@sce.com.

Sincerely,

//s//

Gary Chen  
Director, Safety & Infrastructure