Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: Napa Tayavibul
Job Title: Senior Advisor
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 01.a-c:
Regarding Inconsistent HFTD Overhead Distribution Circuit Mile Values:

On page 27 of its 2026-2028 Base WMP, SCE states that there are 9,342 overhead distribution circuit miles in the HFTD (3,820 miles in Tier 2 and 5,522 miles in Tier 3). SCE indicates on page 362 of its 2026-2028 Base WMP that the population size of HFTD-only Inspections for Vegetation Clearances around Distribution Lines (VM-7) is 9,177 circuit miles. On page 331 of its 2026-2028 Base WMP, SCE indicates that VM-7 has an annual target of 7,900 HFRA circuit miles.

a. Describe the difference between these three values.

b. Provide an explanation of why the population size of HFTD-only inspections does not include the total overhead distribution circuit miles in the HFTD.

c. Provide a justification for why the VM-7 annual target does not include inspecting all overhead distribution circuit miles in the HFTD.

Response to Question 01.a-c:
See SCE's response to Energy Safety's questions below.

a.) Describe the difference between these three values.

The difference between the first two of these values (i.e., 9,342 circuit miles and 9,177 circuit miles) is due to the timing of when the data was extracted from SCE's system and when service area remapping and system updates occur.

In Section 4, Overview of the Service Territory, SCE identified 3,820 miles in Tier 2 and 5,522 miles in Tier 3, for a total of 9,342 overhead distribution circuit miles.

Section 9.11.1, Vegetation Management and Inspections – Quality Assurance and Quality Control, SCE identified a total of 9,177 distribution circuit miles. As explained in footnote 159 of SCE's 2026-2028 Base WMP, "population and sample size in circuit miles is approximated and may vary based on HFRA zone remapping" (p. 362).

The third value, 7,900 circuit miles in Section 9.1, Vegetation Management and Inspections – Quantitative Targets, is a target for VM-7 for which SCE aims to inspect approximately 85% of the total distribution circuit mile population. As explained above, the exact total on which the target is based depends on the point in time when the circuit miles data was referenced.

SCE also notes that in Table 9-6 on p. 362 of SCE's 2026-2028 Base WMP, the QA/QC sample size is not derived from the total circuit miles alone but is instead based on a stratified methodology that prioritizes risk. Specifically:

- TRI-A circuits, which represent the highest risk tier, account for 5,134 miles and are sampled at a 100% confidence level.
- TRI-B, TRI-C, and TRI-D circuits, totaling 4,043 miles, are sampled using a 99% confidence level with a 3% confidence interval.
- This tiered approach ensures that the riskiest areas receive the most rigorous scrutiny, regardless of minor fluctuations in total mileage.

b.) Provide an explanation of why the population size of HFTD-only inspections does not include the total overhead distribution circuit miles in the HFTD.

See SCE's response in item (a) above.

c.) Provide a justification for why the VM-7 annual target does not include inspecting all overhead distribution circuit miles in the HFTD.

SCE strives to inspect as many circuit miles as possible annually, to reduce wildfire risk. SCE's WMP annual target for VM-7 is developed based on risk prioritization and subject to resource constraints. For more information on the development of VM-7 target, please see SCE's response in item a above.

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: BILL KOTTEAKOS
Job Title: Senior Manager, Regulatory and Compliance
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 02.a-b:
Regarding Quality Control Population/Sample Unit Identification:

On page 362, SCE indicates that the "Population/Sample Unit" is circuit miles for Inspections for Vegetation Clearances around Distribution and Transmission Lines (VM-7 and VM-8). On page 364, SCE states that "for VM-1, VM-4, VM-7 and VM-8, the sample unit is one tree that passes or fails a QC audit."

a. Clarify if the population/sample unit is circuit miles or trees for VM-7 and VM-8.

b. If the population/sample unit is a single tree that "passes or fails a QC audit" estimate the quantity of trees in the population and sample for VM-7 and VM-8.

i. If "circuit mile" is the population/sample unit, indicate how SCE calculates the pass rate at the circuit mile level based on individual tree pass/fail data.

Response to Question 02.a-b:

a. Population size for VM-7 and VM-8 inspections is circuit miles. For QC within the sampled circuit miles, individual trees are inspected.

b. The explanation below is based on 2024 inspection quantities:

- 5,582 HFRA miles were inspected (5,064 in Distribution and 518 in Transmission)
- 2,898 non-HFRA miles were inspected (2,585 in Distribution and 313 in Transmission)
- Trees are inspected within these sampled circuit miles. In 2024, SCE transitioned from its S123 database to Arbora. The quantities below are from both databases:
    - In S123, 32,6581 trees were inspected, with approximately 77% being in HFRA
    - In Arbora, 108,829 trees were inspected with approximately 77% being in HFRA
- Pass rates are calculated on trees inspected

Screen shots below show the 2024 overall QC inspection results for trees inspected[1].

[1] RCD = Regulation Clearance Distance, CCD = Compliance Clearance Distance (CCD is 1.5 x RCD and SCE's internal standard when achievable).

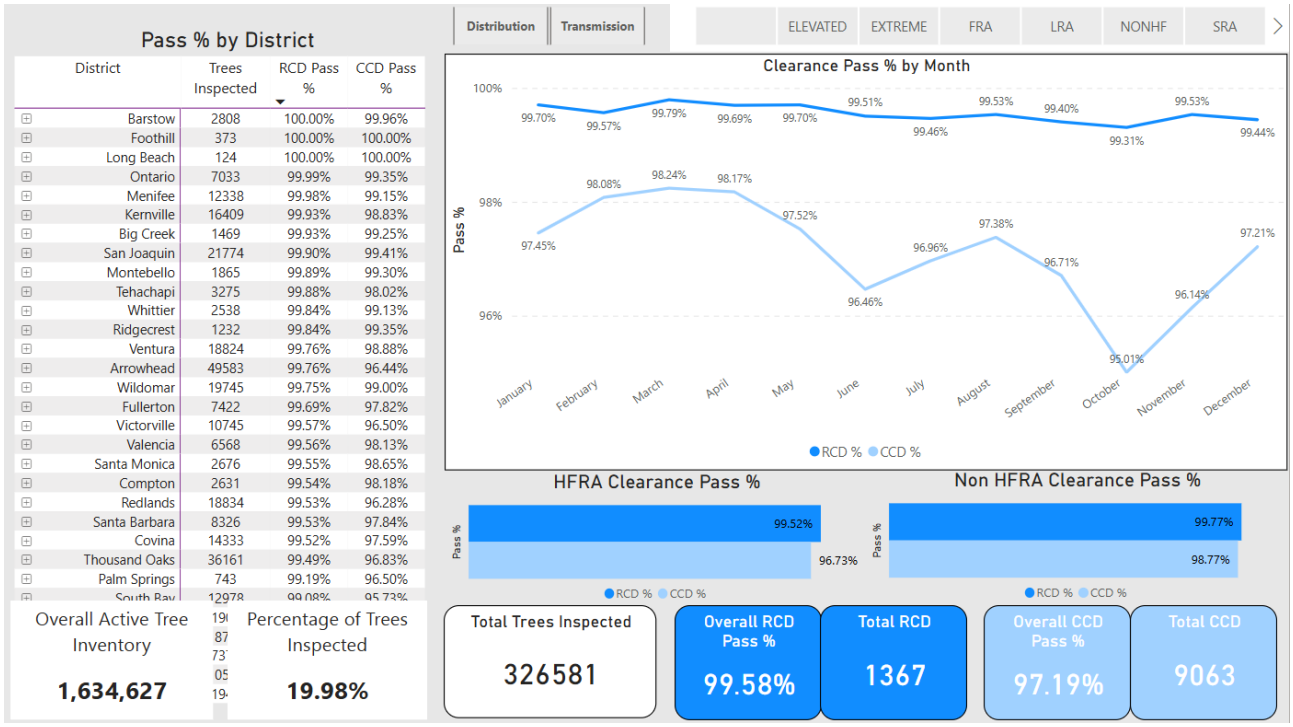


Image from S123 database

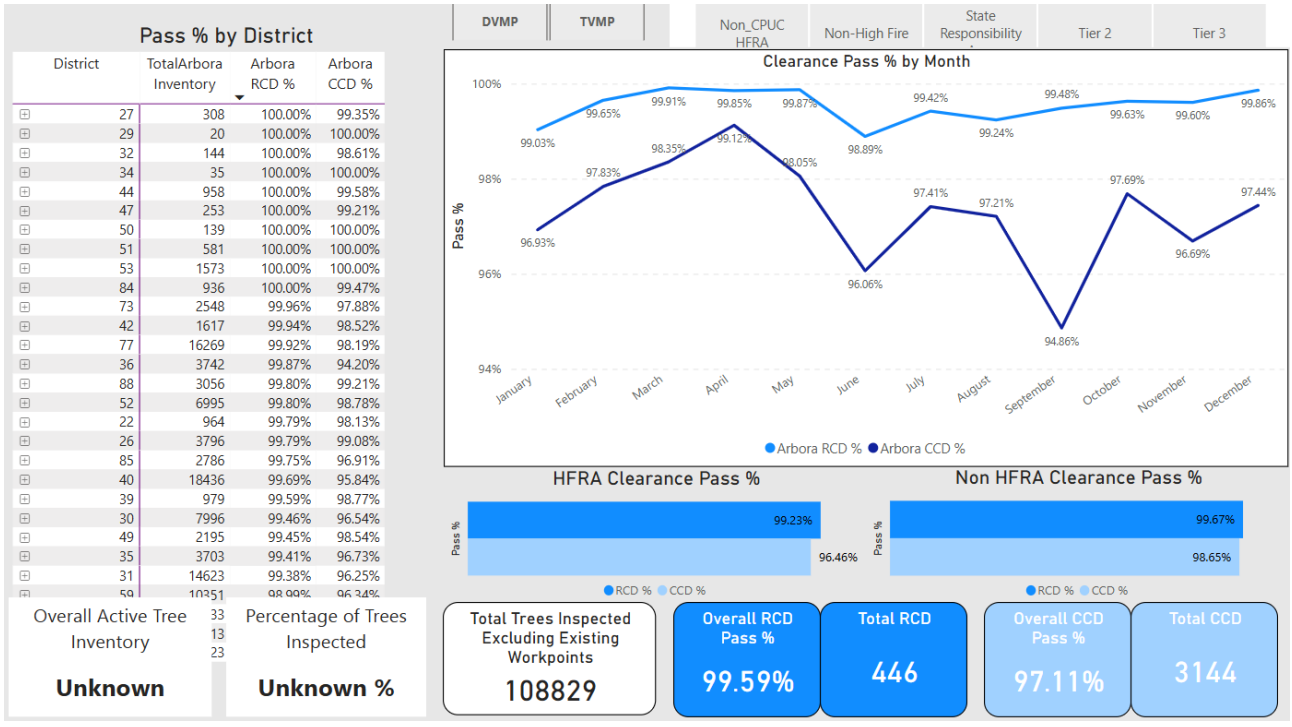


Image from Arbora database[2]

[2] Due to database transition, overall active tree inventory and percentage of trees inspected is not calculated

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: BILL KOTTEAKOS
Job Title: Senior Manager, Regulatory and Compliance
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 03.a-b:
Regarding Quality Control Judgmental Sampling:

On page 363 of its 2026-2028 Base WMP, SCE indicates that for quality control it "uses a combination of risk-based (through its TRI risk model) and judgmental sampling for this activity and applies varying Confidence Levels (CL) and Confidence Intervals (CI). SCE's TRI risk model identifies four specific risk categories: A, B, C and D, with A being the highest risk tranche." SCE then states that "100% of Category A High Fire Risk miles will [be] inspected, when practical" and that it uses judgmental sampling to audit "miles within Category B, C & D…using a Confidence Level / Confidence Interval of 99/3%."

a. For Tranches B, C, and D, provide a detailed description of the process of judgmental sampling. What factors make it more or less likely that SCE will select a specific location for a quality control audit?

b. Explain why SCE uses judgmental sampling rather than a stratified random sampling strategy to obtain a representative number of audit locations from each contractor's work.

Response to Question 03.a-b:

a. Judgmental sampling is performed in risk categories B, C, and D because QC is required to be performed on all vegetation line clearing pre-inspection (PI) and tree trimming (TT) contractors. SCE has eight pre-inspection and eight tree trim contractors that operate in different geographies, and if stratified random sampling was performed, sampling may not be uniform across all contractors and areas. Additionally, SCE monitors the performance of all its VM contractors, and if performance declines are noted, more inspections may be performed in those areas where a decline in performance is identified.

b. See response to (a).

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: BILL KOTTEAKOS
Job Title: Senior Manager, Regulatory and Compliance
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 04.a-b:
Regarding QC in Non-HFTD Areas:

On page 362 of its 2026-2028 Base WMP, SCE specifies that 100% of VM-1, VM-2.2, VM-4, and VM-7 QC samples are from locations within the HFTD.

a. For these audits, does SCE perform QC in its HFRA?
   i. If yes, describe its QC program in its HFRA.
   ii. If no, explain why it does not extend its QC program to its HFRA.
b. For these audits, does SCE perform QC in non-HFTD areas?
   i. If yes, describe its QC program in non-HFTD areas.
   ii. If no, explain why it does not extend its QC program to non-HFTD areas.

Response to Question 04.a-b:

a.i. Yes. QC is performed for VM-1, VM-2.2, VM-4, VM-7 and VM-8 as noted below:

- VM-1, QC performs 100% verification to confirm the required mitigation was performed
- VM-2.2, QC performs sampling at confidence level/confidence interval (CL/CI) of 99/2% for structures subject to PRC 4292, which includes structures in HFRA.
- VM-4, QC performs 100% verification to confirm the required mitigation was performed
- VM-7 & VM-8, refer to question 2 for QC performed

a.ii. N/A

b.i. Yes. In addition to the QC performed in item (a), SCE also performs QC for routine line clearing in non-HFRA areas at a lower sample size. Refer to question 2 for additional non-HFRA inspection details. SCE does not perform QC for VM-1 or VM-4 in non-HFTD areas as these programs only exist in HFRA. QC for VM-2.2 is performed in the State Responsibility Area, which may include non-HFRA areas.

b.ii. N/A

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: BILL KOTTEAKOS
Job Title: Senior Manager, Regulatory and Compliance
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 05.a:
Regarding Post Work Verification of Vegetation Clearances around Distribution and Transmission Lines:

On page 360 of its 2026-2028 Base WMP, SCE states that the objective of its audit of Inspections for Vegetation Clearances around Distribution Lines and Transmission Lines (VM-7 and VM-8) is "to ensure vegetation inspected and/or mitigated by vegetation crews meet internal and regulatory clearance requirements." This suggests the pass rate that the quality control audit finds is based on the combined outcome of pre-inspection and tree crew work. However, SCE's Post Work Verification differentiates between pre-inspector and tree trimming work quality. During post work verification, SCE Senior Specialists (SSPs) verify the quality of "a mixture of Pre-Inspection (Pl) and Tree Trimming (TT) work of approximately 20% and 80% respectively, when practical." (Post Work Verification and UVM Program Oversight, UVM-07, Version 10, Effective Date 3/24/2025).

a. Complete the table, below, to provide sampling parameters for SCE's Post Work Verification of distribution and transmission Pre-Inspector and Tree-Trimming work.

Response to Question 05.a:

a. SSPs are located across SCE's entire service area and are Vegetation Management's first line of defense in the assurance process. Post-work verification (PWV) is not specifically performed for Transmission or Distribution at quantities that can be entered into the requested table format. SCE is providing the following information related to PWV using 2024 quantities.

- PWV is performed by SCE Vegetation Management Senior Specialists (SSP) who are all International Society of Arboriculture (ISA)-certified Arborists.
- In 2024, approximately 79,000 PWVs were performed by approximately 45 SSPs.
- Sampling is performed at approximately a confidence level (CL) of 99% and a confidence interval (CI) of 1.5%, derived from the following:
    - Annually, approximately 1.6M trees (~133K/Month) are inspected by PIs
    - Annually, approximately 950K tree mitigations (~80K/Month) are performed by TTs
    - Combined PI and TT quantities are approximately 213,000 per month
    - Sampling quantity was based on an anticipated staff of 56 SSPs (end state)
    - 213,000 @ 99/1.5% is approximately 85,000 annual inspections
- In 2024, PWV was documented in two databases, S123 and Arbora

- In 2024, PWV was targeted to include a mixture of PI/TT at 50% each, this was changed to a targeted mixture of 20% PI and 80% TT in March 2025
- The following PWVs were performed in S123:
    - Approximately 48K inspections, of which ~44% were PI, ~31% were TT, and ~25% included both PI and TT
    - PWVs included a combination of HFRA and non-HFRA
- The following PWVs were performed in Arbora
    - Approximately 31K inspections, of which ~45% were PI, ~42% were TT, and ~13% included both PI and TT
    - PWVs included a combination of HFRA and non-HFRA

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: John Graass
Job Title: Senior Advisor
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 06.a-d:
Regarding SCE's Additional Structure Brushing (VM-2.1) Target:

On page 331 of its 2026–2028 Base WMP, SCE sets annual "compliance" targets of 80,000 structures and "strive" targets of 172,000 structures for each year of the WMP cycle. SCE also reports figures in the "% HFTD covered in 2026" column of Table 9-2 that the 2026 target will cover 46% of the HFTD and reports in the "% risk reduction" columns of the same table that the target is expected to achieve risk reductions of 4.04% in 2026, 4.01% in 2027, and 3.96% in 2028. It is unclear if these figures relate to SCE's "compliance" VM-2.1 target or its "strive" VM-2.1 target.

a. Provide "% HFTD in 2026" figures for SCE's "compliance" VM-2.1 target using the calculation defined in the WMP Guidelines.

b. Provide "% HFTD in 2026" figures for SCE's "strive" VM-2.1 target using the calculation defined in the WMP Guidelines.

c. Provide "% risk reduction" figures for 2026, 2027 and 2028 for SCE's "compliance" VM-2.1 target using the calculations provided in the WMP Guidelines.

d. Provide "% risk reduction" figures for 2026, 2027 and 2028 for SCE's "strive" VM-2.1 target using the calculations provided in the WMP Guidelines.

Response to Question 06.a-d:
SCE clarifies that the VM-2.1 base target is 83,000 structures, not 80,000 structures.

06.a: VM-2.1 base target % HFTD in 2026 is approximately 27%

06.b: VM-2.1 strive target % HFTD in 2026 is approximately 46% (~19% incremental HFTD covered by the additional structures that make up the strive target).

06.c: VM-2.1 base % Risk Reduction from 2026 to 2028

Year	% Risk Reduction
2026	2.49%
2027	2.46%
2028	2.40%

06.d: VM-2.1 strive % Risk Reduction from 2026 to 2028

Year	**% Risk Reduction**	**Incremental % Risk Reduction (Between Strive and Base)**
2026	4.04%	1.55%
2027	4.01%	1.55%
2028	3.96%	1.56%

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: John Graass
Job Title: Senior Advisor
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 07.a-c:
Regarding SCE's Additional Structure Brushing Scope:

On page 345 of its 2026-2028 Base WMP, SCE states that "Since the last WMP submission, SCE has expanded the scope of Additional Structure Brushing. In 2024, SCE made incremental adjustments to include transmission structures to its Additional Structure Brushing scope for 2025 as prioritized by IWMS. Additionally, SCE adjusted the sub-transmission structure brushing scope in response to the Climate Adaptation Vulnerability Assessment, adding approximately 200 structures." On page 331 of its 2026–2028 Base WMP, SCE sets annual additional pole clearing "compliance" and "strive" targets (VM-2.1) of 80,000 structures and 172,000 structures respectively for each year of the WMP cycle.

a. Provide the number of structures that will be brushed as part of SCE's VM-2.1 "compliance" target as a result of SCE's adjustments to its Additional Structure Brushing scope, IWMS prioritization and Climate Adaptation Vulnerability Assessment.

b. Provide the number of structures that will be brushed as part of SCE's VM-2.1 "strive" target as a result of SCE's adjustments to its Additional Structure Brushing scope, IWMS prioritization and Climate Adaptation Vulnerability Assessment.

c. Explain SDG&E's decision-making process for including both a "compliance" and "strive" target for its additional structure brushing target (VM-2.1).

Response to Question 07.a-c:
SCE clarifies that the VM-2.1 base target is 83,000 structures, not 80,000 structures.

a. Approximately 5,000 transmission structures were included under the VM-2.1 base target (83,000) due to updates from IWMS prioritization and the Climate Adaptation Vulnerability Assessment (CAVA).
b. Approximately 4,400 additional transmission structures were included under the VM-2.1 strive target (172,000) because of the same adjustments.
c. SCE has established both "base" and "strive" targets to ensure a comprehensive approach to brushing around structures. The "base" target is based on historical data and risk assessments that are focused on potential greater-risk structures within Severe Risk Areas and Areas of Concern (AOC). The "strive" target goes beyond and aims to enhance safety and reliability by addressing additional risk factors within High Consequence Areas. The inclusion of both targets supports a more resilient vegetation management strategy by addressing both immediate and emerging wildfire risks.

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: Napa Tayavibul
Job Title: Senior Advisor
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 08.a-c:
Regarding Wood and Slash Management Tracking:

On page 347 of its 2026-2028 Base WMP, SCE states that "in 2024, SCE piloted a debris tracking tool with our contract workforce and will continue to evaluate the benefits of maintaining this data."

a. Describe the capabilities of the debris tracking tool and how it is utilized.
b. Provide the pilot study results.
c. Provide explanation as to why SCE has chosen to utilize or not utilize the debris tracking tool during the 2026-2028 plan cycle.

Response to Question 08.a-c:
See SCE's response to Energy Safety's questions below.

a.) *Describe the capabilities of the debris tracking tool and how it is utilized.*
SCE is piloting the use of a tracking tool in Microsoft Excel, referred to as the "Tonnage Tracker," to track and monitor disposal of debris generated from vegetation management activities. On a monthly basis, SCE's vegetation contractors are asked to provide data and tonnage receipts documenting their debris disposal. This information is documented in SCE's Tonnage Tracker for potential analysis and reporting, with the intent to identify alternative and ideal disposal options, where possible.

b.) *Provide the pilot study results.*
For Q1 2025, SCE identified a positive trend of over 3,000 tons delivered to biomass recycling facilities, which helps keep these materials out of landfills.

c.) *Provide explanation as to why SCE has chosen to utilize or not utilize the debris tracking tool during the 2026-2028 plan cycle.*
SCE is still evaluating the initial data and trends collected from the pilot, and results are not complete as the tracker is still being adopted by SCE vegetation vendors. In SCE's 2026-2028 Base WMP, SCE included a new Wood and Slash Management initiative to incorporate holistic improvements to debris management. VM-11 is a qualitative WMP target and includes reviewing and identifying potential updates to contract terms for debris management.

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: Napa Tayavibul
Job Title: Senior Advisor
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 09.a-b:
Regarding Wood and Slash Management Tracking:

On page 347 of its 2026-2028 Base WMP, SCE states that "SCE's Statement of Work (SOW) requires contractors to rake up and dispose of vegetation, and to leave work sites in a condition consistent with the condition before work was performed."

a. Provide SCE's Statement of Work document referenced on this page of the WMP.

b. Explain how SCE ensures that its contractors abide by the requirements of SCE's Statement of Work as it relates to the management of downed wood and slash generated from vegetation management activities.

Response to Question 09.a-b:
See SCE's response to Energy Safety's questions below.

a.) Provide SCE's Statement of Work document referenced on this page of the WMP.

Please see images below for excerpts from SCE's Statement of Work (SOW) requiring contractors to properly cleanup and dispose of vegetation debris.

Routine Line Clearing

4.9 Debris Clean-up & Disposal

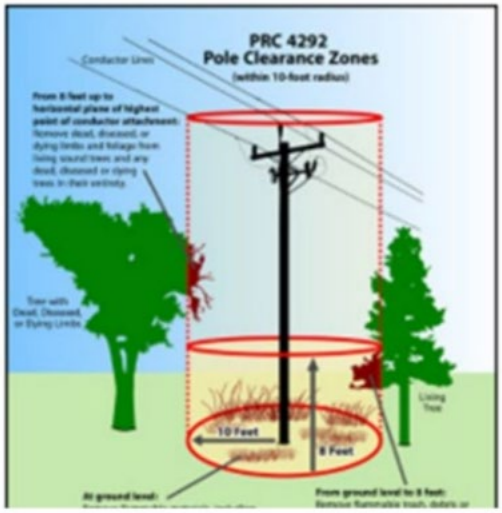
Contractor is responsible for immediate cleanup and disposal of all debris generated from line clearing or other Edison support or vegetation management activity. Contractor shall leave the property in the same condition as it was when they entered the property.

Structure Brushing

STRUCTURE CLEARANCE

STRUCTURE INSPECTION & CLEARANCE

- **All in-scope structures in inventory, regardless of applicability to PRC 4292, shall be inspected, cleared (if required) and maintained in a manner compliant with:**
  - Public Resource Code 4292, 4295 & 4296
  - California Code of Regulation 14 1253, 1254 & 1255
  - The latest version of the California Power Line Fire Prevention Field Guide
  - SCE's Wildfire Mitigation Plan
- If clearance of vegetation is required[11], the contractor crew must clear a 10-foot radius by 8-foot-high area around each subject pole or tower leg by:
  - Eliminating weeds, grass, and other flammable materials to bare soil from 10-foot radius at ground level to a height of 8 feet.
- Scattering/broadcasting of cleared brush outside of clearance area, where allowed. Excessive brush that would require stacking and/or present a hazard must be hauled away to dump on the same day.



HTMP and Dead and Dying Tree Removal Program

4.7. Debris Clean-Up & Disposal

Contractor is responsible for immediate cleanup and disposal of all debris generated from vegetation management activity. Contractor shall leave the property in the same condition as it was when they entered the property.

b.) *Explain how SCE ensures that its contractors abide by the requirements of SCE's Statement of Work as it relates to the management of downed wood and slash generated from vegetation management activities.*

SCE performs post-work verifications by internal Senior Specialists (SSPs) who are ISA-certified arborists that are required to look for debris removal and site clean-up as part of their oversight and review. In addition, specifically for SCE's Structure Brushing program, QC Inspectors assess whether debris was removed as part of their QC procedure. Below is an excerpt from SCE's Structure Brushing QC form, which includes confirming debris cleanup:

QC Fail/YesReason (Choose all that apply)	• Insufficient Clearance (Green/Dead material not cleared) Choose:Yes or No • Insufficient Clean-Up (clearing-related brush or branches left on site) Choose:Yes or No • Poor Documentation (Before/after photos inaccurate, Photos not showing full clearance, structure number incorrect, etc.) Choose Yes or No

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DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: Rashad Lamar Tyler
Job Title: Engineering Senior Manager
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 10.a-b:
Regarding SCE's Zanja Supply Line:

SCE provides power to BVES's Radford Circuit from its Zanja Substation in Riverside. Energy Safety has been informed that the supply line from the Zanja Substation is currently in the design phase for reconductoring and recloser upgrades.

a. Provide the status of the Zanja Supply Line reconductoring and recloser upgrade project, including anticipated start and completion dates, permitting status, and scope of work.

b. Provide the current protective device settings for the Zanja Supply Line and indicate whether any updates are planned as part of the reconductoring and recloser upgrade work.

Response to Question 10.a-b:
Response 10.a:

The project Scope for the Zanja Supply Line (also known as the Bear Vallery 33 kV) involves replacing approximately 11 miles of the existing overhead (OH) conductor with new OH covered conductor. There are no plans to upgrade existing reclosers or install new reclosers on the Bear Valley 33 kV at this time.

The project schedule is as follows:

- Anticipated Start Date: August 31, 2025
- Anticipated Completion Date: November 30, 2025
- Permitting Status: Pending environmental permits with San Bernardino National Forest. Expecting a response in approximately 1 month.

Project Status: Scheduled, but the completion date could be delayed due to permitting delays or other factors found prior to or during construction.

Response 10.b:

The Upstream Protection Device Settings are as follows:

- **Control Device**: SEL-351R-4
- **CT Ratio**: 1000:1
- **Phase Pickup**: 220 A
- **Ground Pickup**: 12 A
- **Phase Trip Curve**: U3, Time Dial (TD) = 1.9
- **Ground Trip Curve**: U3, Time Dial (TD) = 4.0
- **Device Information:** The upstream protection device is currently a Remote Automatic Recloser upstream of the Bear Valley Electric SCE service point on the SCE Bear Valley 33 kV Circuit out of Zanja Substation.

These protection settings are based on current system conditions and are subject to change as system requirements evolve.

Southern California Edison
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DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: Hunly Chy
Job Title: Senior Manager
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 11.a-d:
Regarding Idle Transmission Power Lines:

On page 263 of its WMP, SCE states that it "will assess and disconnect, or remove as appropriate, energized idle distribution facilities in HFRA and HFRA-adjacent areas. This activity may extend to 2026, depending on the scope of facilities that need to be disconnected or removed."

a. How many circuit miles of idle transmission lines does SCE currently have located within the HFTD and HFRA?

b. Do any of these idle transmission lines run parallel to and in close proximity with energized transmission lines?

i. If so, provide the number of circuit miles, and describe the spacing characteristics.

c. Provide a preliminary estimate of idle transmission line miles planned for removal between 2026 and 2028.

d. Provide SCE's latest findings on whether any of the identified idle transmission lines present a potential induction risk that could result in unintended energization.

Response to Question 11.a-d:

a. How many circuit miles of idle transmission lines does SCE currently have located within the HFTD and HFRA?

SCE notes that the quoted passage from page 263 of the WMP refers to distribution facilities, whereas this question refers to transmission lines. SCE has approximately 355 miles of idle transmission lines in HFRA.

b. Do any of these idle transmission lines run parallel to and in close proximity with energized transmission lines?

i. If so, provide the number of circuit miles, and describe the spacing characteristics.

SCE is unsure what "close proximity" means as it is used in this question. SCE has approximately 305 miles of idle transmission lines that are parallel to and within 1,000 feet of energized transmission lines 55 kV or greater.

c. Provide a preliminary estimate of idle transmission line miles planned for removal between 2026 and 2028.

At this time, SCE does not have a preliminary estimate of idle transmission lines planned for removal between 2026 and 2028.

d. Provide SCE's latest findings on whether any of the identified idle transmission lines present a potential induction risk that could result in unintended energization.

SCE has not done a line-by-line analysis of the potential that an idle line may become energized through induction. Generally, the potential depends on multiple factors, including proximity to energized lines and voltage of the energized line.

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: Arianne Luy
Job Title: Engineering Manager
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 12.a-j:
Regarding Hardening Plans:

Provide a list via Excel of all undergrounding and covered conductor projects planned for 2026-2028 with the following columns:

a. Circuit/circuit segment ID
b. Circuit/circuit segment mileage
c. Type of hardening (undergrounding or combined covered conductor)
d. Year for planned project (2026, 2027, or 2028)
e. Circuit mileage of project
f. Overall utility risk score
g. Risk-per-mile score
h. Current IWMS tranche (SRA, HCA, Other HFRA)
i. 2023-2025 IWMS tranche (SRA, HCA, Other HFRA)
j. HFTD/HFRA designation (Tier 2, Tier 3, non-HTFD HFRA, non-HFRA)

Response to Question 12.a-j:

CONFIDENTIAL

The Attachment(s) Are Marked Confidential In Accordance With Applicable Law and Regulation.
Basis for Confidentiality In Accompanying Confidentiality Declaration.
Public Disclosure Restricted.

Please see the attached file labeled *OEIS-P-WMP_2025-SCE-004 Q12.xlsx*.

Note that the data used in this analysis is based on forecast data used for the 2026-2028 WMP filing. Also note that the IWMS tranche used for the 2026-2028 WMP is based on the WRRM 7.6 risk model, the 2023-2025 IWMS tranche is based on the WRRM 6.0 risk model, and the utility risk scores are based on the FireSight 8 risk model.

Also, because the data provided is at the circuit segment level, the mileage provided for part b and part e are the same. Additionally, for segments already tied to existing projects, the segment mileage provided reflects the actual project miles. Project miles were allocated by evenly distributing the total project mileage across all segments associated with that project. Mileages

provided may also reflect only the portion of the segment that is unhardened and may incorporate the 1.1 multiplier provided to better reflect actual distances.

Also note that SCE continually updates its segment data as geomatic improvements and changes to the circuits (i.e. line extensions, line removals) are made. Therefore, data for existing segments IDs may be updated (location, conductor length, circuit name, HFRA designation, etc.), new segment IDs may be generated, or existing segment IDs may be removed to reflect these changes. Because of these updates, 2023-2025 IWMS Tranches or HFRA designations may not be available.

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: Arianne Luy
Job Title: Engineering Manager
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 13.a-c:
Regarding IWMS Tranches:

In response to Energy Safety Data Request 1 Question 1 part (a), SCE provided its latest mileages for its various IWMS risk tranches. Compared to its 2023-2025 Base WMP R 3.1, page 114, the mileages changed as follows:

a. For every circuit segment that had circuit mileage that is part of the 268 additional SRA miles since 2023-2025 Base WMP, provide the following information:
   i. Circuit/circuit segment ID
   ii. Circuit mileage of new SRA
   iii. Overall utility risk score
   iv. Risk-per-mile score
   v. SRA qualifier (fire risk egress constrained area, significant fire consequence, high winds, or CEFCs)
   vi. Previous IWMS tranche (SRA, HCA, Other HFRA)
   vii. HFTD/HFRA designation (Tier 2, Tier 3, non-HTFD HFRA, non-HFRA)

b. Describe what led to the decrease in mileage for Other HFRA.

c. In response to Energy Safety Data Request 1 Question 1 part (a), SCE provided that 2667 SRA miles are already planned to be hardened by 2026. Provide a list of projects and associated circuit mileage that SCE is planning on undergrounding that have already been hardened.

Response to Question 13.a-c:

CONFIDENTIAL
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a. Please see the attached document labeled OEIS-P-WMP_2025-SCE-004 Q13a.xlsx.

   Although the overall delta for Severe Risk Area (SRA) between the 2023-2025 WMP and the current filing is 268 miles, note that certain segments and their associated miles were moved out of the original 2023-2025 WMP SRA list as well. Therefore, 268 miles does not equate to the total miles for segments that are currently designated as SRA but were not considered SRA during the 2023-2025 WMP filing. Note that a 1.1 multiplier has been

applied to the miles provided to better reflect actual distances.

One main factor that contributed to these category changes were wildfire risk model updates. The 2023-2025 WMP used WRRM 6, whereas the IWMS categories for the 2026-2028 WMP are based on WRRM 7.6. Some changes were also driven by SCE's Review and Revise process where subject matter experts (SME's) review initial model outputs and perform a detailed qualitative review which may result in changes to IWMS category designations.

Also note that SCE continually updates its segment data as geomatic improvements and changes to the circuits (i.e., line extensions, line removals) are made. Therefore, data for existing segment IDs may be updated (location, conductor length, circuit name, HFRA designation, etc.), new segment IDs may be generated, or existing segment IDs may be removed to reflect these updates. The data provided does not include new segment IDs that did not exist during the 2023-2025 WMP filing. Also, if the data is updated, the data comparison between the 2023-2025 WMP filing and the current filing may not be like-for-like. Lastly, HFRA designations may not be available for some segments due to these updates.

Please also note that while the current IWMS tranche is based on WRRM 7.6, the Overall Utility Risk Score is based on FireSight 8. In addition, SRA qualifiers may not be available for segments that were identified through the Review and Revise process.

b. Please see the response to part (a), above.

c. The following table provides project and mileage information for areas with covered conductor that are planned to be undergrounded based on the 2026-2028 TUG forecast used in the 2026-2028 WMP. The length of covered conductor planned to be converted to undergrounding is listed in the third column from the left. These covered conductor locations are planned to be converted to undergrounding due to operational and risk considerations. Note that this data is based on the original miles approved for the project initially and does not include potential scope changes that may occur during the planning and construction process. This data also does not account for recent fire rebuild areas.

PIF	Circuit	CC converted to TUG (mi)	Total OH Removed in PIF (mi)	Year Forecasted
535018	Merlin	0.74	13.80	2026
535017	Cuthbert	0.51	6.30	2026
535022	Plateau	1.11	15.59	2026
531040	Poultry	0.40	12.80	2026
535021	Paradise	0.10	12.10	2026
634073	Del Carbon	0.30	5.77	2028

635049	Maguire	0.83	18.80	2026
635041	Sienna	0.33	3.08	2027
631072	Crump	0.08	2.52	2027
IWP045272	Romanus	0.14	0.78	2027
IWP045263	Cornwall	0.17	0.36	2028

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 0 4

To: OEIS
Prepared by: William Wojciak Jr.
Job Title: Senior Advisor
Received Date: 5/30/2025

Response Date: 6/5/2025

Question 14.a-c:
Regarding SCE's Response to SCE-25U-02:

On pages 577-578 of its 2026-2028 Base WMP, SCE discusses various topics in which SCE has collaborated with other utilities or attended industry-related events. Provide the following information regarding these collaborations in 2024:

a. Date of meeting/event
b. List of attending electric utilities (if meeting)
c. WMP topics covered

Response to Question 14.a-c:
While SCE attends numerous conferences and performs subject-specific benchmarking with peer electrical corporations, the collaborations described on page 577 of the 2026-2028 WMP refer to meetings in 2024 with attending utilities and topics including the following:

Meeting Date	**Attending Utilities**	**WMP Topics Covered**
January 10-11, 2024	• SCE • PG&E • SDG&E	• 2025 WMP Update • 2025 Maturity Model Update • ACIs Common Across IOUs • Senate Bill 884 • New Technologies • 2024 Utility Conference Participation
February 9, 2024	• SCE • PG&E • SDG&E	• 2025 WMP Update • 2025 Maturity Model Update • Undergrounding • Windspeed Threshold Analysis
March 13-14, 2024	• SCE • PG&E • SDG&E • Bear Valley	• 2025 WMP Update • 2025 Maturity Model Update • ARC Update • 2026-2028 WMP Guidelines • Safety Culture Assessment • PSPS Planning • Undergrounding
April 12, 2024	• SCE • PG&E	• Review of 2025 WMP & Maturity Survey Filing Process

	• SDG&E	• Review of ARC Filing Process • 2026-2028 WMP Guidelines
May 8-9, 2024	• SCE • PG&E • SDG&E • Bear Valley	• 2025 WMP Update • Wildfire Modeling • Fuse Inspections • 2024 Utility Conference Participation
July 10-11, 2024	• SCE • PG&E • SDG&E • Bear Valley	• WMP Performance Management • 2026-2028 WMP Development • Emergency Operations • Fire Incident Preliminary Analysis Overview • New Technologies
September 11-12, 2024	• SCE • PG&E • SDG&E • Bear Valley • Liberty • PacifiCorp	• 2025 WMP Update • 2026-2028 WMP Development • Work Prioritization for Corrective Maintenance • Affordability Efforts • Overhead to Underground Conversion Process
October 11, 2024	• SCE • PG&E • SDG&E • Bear Valley • Liberty • PacifiCorp • Hawaiian Electric	• 2025 WMP Update • 2026-2028 WMP Development • 2026-2028 Maturity Survey Planning
November 21-22, 2024	• SCE • PG&E • SDG&E • Bear Valley • PacifiCorp	• 2026-2028 WMP Development • Safety Culture Assessment • Vegetation Management • Advanced Meter Initiative and Wildfire Mitigation Requirements
December 13, 2024	• SCE • PG&E • SDG&E • Bear Valley • Liberty • Hawaiian Electric	• 2026-2028 WMP Development • Joint ACIs