

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET OEIS - P - WMP _ 2025 - SCE - 007

To: OEIS
Prepared by: Eghosa Obasohan
Job Title: Senior Advisor
Received Date: 6/10/2025

Response Date: 6/13/2025

Question 01.a-e:

Regarding SCE's Wood and Slash Management Procedures:

On page 346 of its 2026-2028 Base WMP, SCE states that "SCE strives to reduce slash (e.g., cut limbs and other wood debris) resulting from vegetation management activities by directing pruning or tree removal contractors to chip and haul the material away to be disposed or recycled, subject to constraints and customer requests. 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 definition of "slash" as referenced on this page of the WMP.
- b. Provide SCE's definition of "debris" as referenced on this page of the WMP.
- c. Explain how wood greater than 4" in diameter that is generated by SCE's vegetation management activities is managed, including wood greater than four inches in diameter that cannot be removed from a property due to logistical constraints.
- d. Provide procedure document(s), including version(s) and effective date(s) for managing wood generated by vegetation management activities that is greater than four inches in diameter.
- e. If procedure documents do not exist for the management of wood generated by vegetation management activities that is greater than four inches in diameter:
 - i. Explain why SCE does not have procedure(s) documents specific to this activity.
 - ii. Explain any plans SCE has to create procedure(s) documents for this activity.

Response to Question 01.a-e:

- a. For Section 9 of the WMP, SCE defines "slash" as woody debris generated from vegetation management activities. This includes intentionally cut branches and inadvertent broken pieces of wood resulting from SCE VM Operations.
- b. For Section 9 of the WMP, SCE defines "debris", in a broader context encompassing any organic material, including slash, that accumulates in proximity to trees as woody debris generated from vegetation activities as well as natural processes.
- c. Wood greater than 4" in diameter that is generated by SCE's vegetation management activities is generally managed by contractors removing slash and disposing at a facility of their choice. If wood greater than four inches in diameter cannot be removed from a property due to logistical constraints, SCE contractors will generally perform "lop & scatter" techniques for limbs and leave larger trunks for natural decomposition.
- d. As stated in SCE's 2026-2028 WMP, "Reducing slash from Vegetation Management initiatives

is a standard prudent practice conducted during and after Vegetation Management activities, as documented in SCE's contractor Statement of Work. SCE requires Vegetation Management contractors to include debris removal as part of their vegetation management activities, with a few exceptions such as remote forested areas where lopping and scattering of debris is permitted by land agencies or when requested by customers" (p.346). Below is a screenshot of an excerpt from SCE's Vegetation Management contractor Statement of Work, effective January 2025.

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.

1. If Contractor will be working at the same job site for consecutive days and plan to leave debris behind for clean-up to occur on the following day, the contractor must provide the customer with notice of their intention to leave the debris.
2. Contractor must cone off the debris left behind to prevent trip and fall incidents.

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3. Contractor shall not leave behind any debris if they will not be returning to the job site within one business day.
 4. Contractor shall not complete work request (date stamp) in SCE work management system until all debris is cleaned from site and work is fully completed.

In all circumstances, Contractor must comply with all local, state, and federal requirements for debris and fuel management. This may include requirements to manually haul brush up to 100 ft to roadways or outside of ESAs, or lop and scatter brush at the edges of SCE ROW in select areas including but not limited to Government Lands, Ranch Lands, lines that are inaccessible for equipment, etc.

e. Please refer to 1d above.

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Question 02.a-e:

VM-8 Targets:

In Table 4-1 on page 27 of the 2026-2028 Base WMP, SCE lists 1,988 circuit miles of overhead transmission lines in HFTD Tier 2 and 2,429 circuit miles in HFTD Tier 3, for a total of 4,417 circuit miles within the HFTD. In Table 9-2 on page 331 of the 2026-2028 Base WMP, for Inspections for Vegetation Clearance from Transmission Lines (VM-8) SCE lists a “Cumulative Quarterly Target for 2026, Q4”, of “3,800 circuit miles within transmission system in HFRA”, a “% HFTD Covered in 2026” of “100%”, and a “% Risk Reduction for 2026” of “0.37%”.

- a. Provide the number of transmission circuit miles within SCE’s HFRA.
- b. Provide the percentage of transmission circuit miles within the HFTD that are also within SCE’s HFRA.
- c. Explain the difference in the HFTD circuit miles listed in Table 4-1 and the VM-08 target.
- d. Is the “% of HFTD Covered in 2026” in Table 9-2 for VM-8 calculated using the 3,800 circuit mile target as the total number of circuit miles inspected?
 - i. If no, provide the values used to calculate “% HFTD Covered in 2026” and explain how they were chosen.
 - ii. If no, provide the “% of HFTD Covered in 2026” using the 3,800 circuit mile target as the total amount of work done.
- e. Is the “% Risk Reduction for 2026” in Table 9-2 for VM-8 calculated using the 3,800 circuit mile target as the total number of circuit miles inspected?
 - i. If no, provide the values used to calculate “% Risk Reduction for 2026” and explain how they were chosen.
 - ii. If no, provide the “% Risk Reduction for 2026” using the 3,800 circuit mile target as the total number of circuit miles inspected.

Response to Question 02.a-e:

- a. SCE clarifies that the % HFTD covered in 2026 for VM-8 is 86% rather than 100% documented in Table 9-2. SCE identified this typographical error and will submit a correction as part of non-substantive errata due by 6/30/25. SCE also identified a similar typographic error for the % HFTD covered in 2026 for VM-7 and will correct this as part of the non-substantive errata.
- b. 100% of transmission circuit miles in HFTD are within SCE’s HFRA. SCE uses a 200-foot buffer extended from the HFTD to account for possible internal mapping discrepancies of assets as an additional margin for scoping enhanced wildfire mitigation activities.
- c. Please refer to the response to 2a above.

- d. Yes, % HFTD covered in 2026 is calculated using the 3,800 transmission circuit miles target out of the total of 4,417 transmission circuit miles, which equals 86%. Please refer to the response to 2a above for additional details.
- e. Yes.