



June 27, 2025

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

Electronically Filed to Docket #2026-2028-WMPs

RE: Opening Comments of the Rural County Representatives of California on Southern California Edison's 2026-2028 Wildfire Mitigation Plan R0

Dear Director Thomas Jacobs:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to provide comments on Southern California Edison (SCE) 2026-2028 Wildfire Mitigation Plan (WMP) R0. Wildfire Mitigation Plans are essential tools to drive meaningful progress in safeguarding communities from utility-caused wildfire risks while promoting the provision of safe, reliable energy. RCRC is an association of forty rural California counties, with a Board of Directors comprised of elected supervisors from each member county. Southern California Edison is the service provider in portions of several RCRC counties, primarily in Inyo, Mono, Kings, Santa Barbara, and Tulare.

SCE has made significant progress in deploying covered conductor (with approximately 6,400 miles installed, with an additional 440 miles planned) as a cornerstone of its wildfire mitigation strategy.¹ Covered conductor has demonstrated high ignition risk reduction, with SCE's modeling showing it to be one of the most effective mitigations across its risk portfolio with zero ignitions occurring from risk drivers where covered conductor has been deployed as of the year-end 2024.²

RCRC recognizes the importance of protective equipment and device settings (PEDS) for reducing wildfire ignition risk. SCE's Fast Curve program appears to operate in a more targeted and risk-based manner versus PG&E's Enhanced Powerline Safety Settings (EPSS) program, which is broadly applied and always enabled in many areas.³

¹ SCE 2026-2028 WMP R0, page 3.

² Ibid, page 223.

³ SCE enables Fast Curve settings on overhead miles within its High-Fire Risk Areas (HFRA) during elevated fire conditions, such as red flag warnings. See pages 317-318.

As a result, SCE appears to achieve protective benefits with more selective Fast Curve deployments, reducing the cumulative burden on customers.

However, not all utilities report on PEDS in the same manner as PG&E. While we appreciate the publishing of a Top Ten Impacted Circuits list for Fast Curve outages, SCE doesn't quantify the ignition reduction effectiveness in the same manner that PG&E does for EPSS. RCRC recommends requiring that SCE publish average restoration times for Fast Curve outages, including a comparison of performance on circuits with covered conductor versus those with bare wire, as well as CAIDI-equivalent metrics. Such data may ensure better benchmarking across utilities.

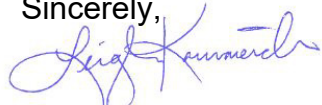
Moreover, we encourage Energy Safety to promote greater comparisons across utilities in order for greater learning on optimizing PEDS to achieve both wildfire risk reduction benefits while minimizing customer disruption. SCE's experience suggests that a measured, risk-based approach may better balance safety and reliability outcomes for customers. RCRC also recommends that all utilities publish circuit-specific data on both the outage frequency and system hardening prioritization for the Top Ten Impacted Circuits.

The 2026-2028 WMP also highlights important insights following the 2023 and 2024 PSPS seasons with missed customer notifications. We acknowledge the resulting improvements in communication success rates and outreach efforts that followed. That said, we appreciate SCE re-evaluating customer support programs and the lessons learned following the January 2025 extreme weather conditions, wildfires, and PSPS events that left customers without power for extended periods of time.⁴

Lastly, we also urge consideration of long-term solutions to address crew response times in remote areas, such as Mono County, where staffing challenges and geographic isolation can delay emergency repairs. While we commend the current practice of pre-staging crews during PSPS events, we urge exploring greater local staffing options that would further enhance grid resilience in these regions.

SCE's 2026-2028 WMP reflects positive progress in several areas, and we appreciate the ongoing efforts to ensure that WMPs deliver meaningful outcomes while preserving grid reliability and ratepayer affordability. If you have any questions, please do not hesitate to contact me at (916) 447-4806 or lkammerich@rcrcnet.org.

Sincerely,



LEIGH KAMMERICH
Policy Advocate

⁴ Ibid, page 212.