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Caroline Thomas Jacobs, Director
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California Natural Resources Agency
715 P Street, 20th Floor
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SUBJECT: Southern California Edison Company's Reply Comments on its 2026-2028 Wildfire Mitigation Plan

Dear Director Thomas Jacobs:

Southern California Edison Company (SCE) appreciates the opportunity to respond to stakeholders' opening comments on SCE's 2026–2028 Wildfire Mitigation Plan (WMP). On June 27, 2025, four stakeholders submitted opening comments on SCE's WMP: (1) Mussey Grade Road Alliance (MGRA), (2) The Green Power Institute (GPI), (3) Rural County Representatives of California, and (4) Resilient Structures. Below, SCE provides reply comments to address specific issues raised by stakeholders, focusing on key issues raised by MGRA and GPI.

Given the large number of recommendations and the length of opening comments, it is not feasible for SCE to address every issue raised by each stakeholder. SCE has therefore limited its reply comments to the most salient subjects. SCE's silence on any particular stakeholder recommendation should not be interpreted as acceptance of, or agreement to, any stakeholder recommendation.

I. EXECUTIVE SUMMARY

MGRA's calls to combine the Integrated Wildfire Mitigation Strategy (IWMS) with the Multi-Attribute Risk Score (MARS) model have been previously considered and rejected by Energy Safety and the Commission, with no new evidence to warrant reconsideration. Other MGRA risk modeling concerns are addressed in separate proceedings. Additionally, SCE demonstrates that MGRA's perceived data discrepancies are in fact due to flawed intervenor comparisons and not indicative of contradictory information. Finally, SCE acknowledges PSPS notification challenges, but highlights the proper channels for such issues to be raised.

Not unlike MGRA, GPI also rehashes risk modeling concerns, this time in regard to wildfire suppression. SCE outlines why these concerns are unfounded, explaining that its wildfire risk models conservatively limit burn duration to eight hours, effectively accounting for suppression impacts and prioritizing accurate building loss representation. GPI's recommendation for an Area for Continuous Improvement (ACI) on Benefit-Cost Ratio (BCR) methodology is also inappropriate given that BCR methodology is still being litigated in the Risk-Based Decision-Making Framework proceeding and the calculations themselves are not required until SCE's 2026 RAMP filing. Lastly, SCE reaffirms plans that address GPI vegetation management recommendations. SCE will improve reporting on vegetation

management residue diversion and debris tracking, assess impacts of the Governor’s 2025 State of Emergency proclamation, and continue partnerships for fuel reduction projects.

II. RESPONSES TO MUSSEY GRADE ROAD ALLIANCE’S COMMENTS

MGRA provides several recommendations that are duplicative of arguments that MGRA has raised unsuccessfully in prior comments to the Office of Energy Infrastructure Safety (Energy Safety), or in other proceedings before the California Public Utilities Commission (Commission).¹ As explained below, MGRA’s recycled recommendations should not be adopted for the same reasons that they were not adopted by Energy Safety in previous years, or because the recommendations would be more appropriately addressed in other forums.

A. SCE’s Integrated Wildfire Mitigation Strategy And Risk Modeling Are Appropriate For Mitigation Scoping

MGRA continues to recommend, as it has done unsuccessfully in previous years, that SCE combine elements of SCE’s Integrated Wildfire Mitigation Strategy (IWMS) with SCE’s Multi-Attribute Risk Score (MARS) model to “create a complete risk model.”² IWMS is SCE’s holistic approach to developing portfolios of effective and complementary mitigations, and deploying them in a manner that focuses on the areas of greatest risk. The IWMS risk framework segments risk in SCE’s high fire risk areas (HFRA) into categories based on location-specific risk factors, which are not fully captured by the MARS methodology.

Energy Safety has extensively vetted IWMS since SCE introduced the framework in its 2022 WMP Update and the Commission has similarly considered it in SCE’s 2022 Risk Assessment Mitigation Phase (RAMP) proceeding.³ As MGRA concedes, its criticisms of IWMS were “previously raised” in comments on SCE’s 2023-2025 WMP and in other forums, where among other things, MGRA has argued that IWMS should incorporate probability of ignition. SCE has previously addressed the flaws in MGRA’s criticism at length, when these issues were already briefed in connection with SCE’s 2023-2025 WMP.⁴ Energy Safety thoroughly considered the parties’ positions when approving SCE’s 2023-2025 WMP, including the IWMS framework. MGRA then made the same argument to the Commission, and the Commission declined to adopt MGRA’s recommendation when ratifying Energy Safety’s approval of SCE’s 2023-2025 WMP. In sum, this issue has been thoroughly considered by Energy Safety and the Commission and MGRA provides no new facts or analysis to support its continued criticisms of IWMS. Because there is no justification for Energy Safety to reverse course at this late juncture on its assessment of IWMS, MGRA’s recommendations should be given no weight. SCE has relied on this precedent to plan and execute its wildfire mitigation strategies.

¹ In multiple instances, MGRA refers to “SDG&E” when the context of MGRA’s comments suggests that MGRA intended to refer to SCE. *See, e.g.*, MGRA Comments, pp. 5, 7, 19. SCE assumes that these references are typographical errors and that MGRA is directing its comments to SCE as opposed to San Diego Gas & Electric Company.

² MGRA Comments, pp. 18, 50.

³ In the 2022 WMP Update and 2022 RAMP, IWMS was referred to as Integrated Grid Hardening Strategy.

⁴ SCE Reply Comments to the 2023-2025 WMP, p. 2, *available at* [Reply to Comments Regarding SCE's 2023-2025 Wildfire Mitigation Plan](#).

MGRA's other recommendations concerning SCE's risk modeling, including methodologies relating to consequence modeling, egress, and assessment of PSPS risk,⁵ are in many cases being discussed in other proceedings, including the Commission's Risk OIR, or in risk modeling working groups. These issues are more appropriately addressed in those other forums. MGRA's recommendations represent MGRA's preferences and are not reflective of settled matters before the Commission or Energy Safety.

B. MGRA's Observations of Data Reporting Across Filings in Different Proceedings Are Erroneous And Should Be Disregarded

MGRA asserts that it observed three differences between certain data that SCE reported in prior years in separate submissions to the Commission or Energy Safety versus data reported in connection with the current WMP: (1) differences in ignition drivers in Table 3-1 of the WMP versus ignition data provided in Quarterly Data Reports (QDRs) for the 2022-2024 period; (2) a difference in damage reports in a 2024 post-season Public Safety Power Shutoff (PSPS) report versus certain data from a QDR; and (3) a difference in certain bare wire ignition rate calculations.⁶ As MGRA itself acknowledges,⁷ these differences can be attributed to the disparate timeframes applicable to specific reports or to differences in guidelines for calculation methods across various filings. The data presented in SCE's WMP, including in Table 3-1, is accurate.

First, Table 3-1 in SCE's WMP is consistent with Energy Safety's guidelines and is accurate. Table 3-1 provides a current list of wildfire risks and risk drivers in accordance with Energy Safety's guidelines for that table. MGRA questions differences between values in Table 3-1 and certain QDR geospatial data restricted to the 2022-2024 time period. MGRA's observation ignores the differences in time periods between the values presented in Table 3-1 and the analysis that MGRA performed. As noted in footnote 1 on page 12 of SCE's WMP, the ignition data in Table 3-1 spans January 2019 to December 2024 and only includes ignitions that meet the Commission's reportable ignition criteria. By contrast, MGRA's analysis covers a different time period (2022-2024) than the data included in Table 3-1. MGRA admits that the difference in the two timeframes, as opposed to any error in Table 3-1, may explain MGRA's observations with respect to Table 3-1.⁸

MGRA's questions regarding Table 3-1 are also unfounded because MGRA erroneously compares SCE's list of current ignition drivers in Table 3-1 with historical, *quarterly* ignition data that is subject to updates over time. Energy Safety's QDR Data Guidelines are updated each year, and changes have been made over the years to the ignition driver field for QDR reporting purposes, which may affect how ignition drivers are categorized, selected, and reported each quarter and from year to year.⁹ In

⁵ MGRA Comments, pp. 50-52.

⁶ MGRA Comments, p. 8.

⁷ See, e.g., MGRA Comments, p. 14 (acknowledging that "GIS data analyzed by MGRA was restricted to the 2022-2024 period" and that potential reasons for differences in ignition reporting include "different selection criteria applied to ignitions" between different filings).

⁸ MGRA Comments, p. 14 ("Potential reasons for these differences are: SCE GIS data analyzed by MGRA was restricted to the 2022-2024 period.").

⁹ For example, the 2022-2023 QDR data guidelines included eleven total ignition drivers, whereas the previous iteration of such guidelines only included eight such drivers. SCE's selection of the "Other/Unknown" ignition driver designation has decreased over time as more specific ignition driver options became available in the QDR template.

some cases, investigations relating to ignitions may not be complete at the time that quarterly data reports are due to Energy Safety. Ignition drivers may also not yet be known at the time of QDR reporting. Again, MGRA admits that differences in ignition driver selection criteria for purposes of the QDR year over year, as opposed to any error in Table 3-1, may explain MGRA's observations.¹⁰

Second, MGRA recommends that SCE resolve a perceived difference between a list of damage reports from a post-PSPS patrol in 2024 submitted as part of a Commission rulemaking proceeding and certain geospatial data reported in a previous QDR to Energy Safety.¹¹ Specifically, MGRA points to reports of damage on November 18 and December 4 that were allegedly in SCE's QDR but not its Post Season Report. As an initial matter, SCE assumes when MGRA refers to SCE's Post Season Report, it is actually referring to SCE's Post-Event Reports and Post Season Report, as the Post Season Report generally does not provide reports of damage linked to specific circuits unless there is a need to correct a discrepancy with a Post-Event Report. For the November 18th event cited, SCE reviewed the Post-Event Report and determined that the necessary information and reporting of damage was included in Tables 1 and 6 of the report. SCE notes the Executive Summary section incorrectly listed "# of damage/hazards found" as "N/A" which may have caused some confusion. SCE is unable to comment on any alleged discrepancies for December 4th, as SCE did not report damage on December 4th in its QDR, Post-Event Report or Post-Season Report, thus it is unclear what MGRA is referring to.

In sum, MGRA has not identified a discrepancy in damage reports between the QDR and SCE's PSPS reports and in any case, an issue regarding a data discrepancy between a report submitted to the Commission in 2024 or 2025 and a historical 2024 QDR is outside the scope of Energy Safety's review of SCE's forward-looking 2026-2028 WMP.

Third, MGRA recommends that SCE explain why certain bare wire ignition rate calculations in previous years differ from a calculation provided in a recent data request response.¹² Again, MGRA's attempt to compare the most recently updated set of ignition data with historical data requests and static quarterly data reports with potentially different parameters is inherently flawed. Historical ignition data is subject to updates as investigations into ignitions progress. MGRA also acknowledges that it has not confirmed that the ignition statistics that MGRA presents from 2019-2024 are derived under the same parameters or using the same definitions each year.¹³ Instead, MGRA applied certain assumptions about conductor types which may have led to the discrepancies that MGRA now observes. This is an issue of MGRA's own making rather than an issue relevant to the assessment of SCE's WMP.

¹⁰ MGRA Comments, p. 14 ("Potential reasons for these differences are...There may be different selection criteria applied to ignitions.").

¹¹ MGRA Comments, p. 36 (alleging that "examination of SCE's QDR data shows three additional reports from the November 18th and December 4th events").

¹² MGRA Comments, p. 46.

¹³ See MGRA Comments, p. 45 (MGRA admitting that there "was some confusion in earlier MGRA data requests this year as to the definition of a 'bare wire' and 'covered conductor' circuit," and noting MGRA's assumption of attributing certain ignitions to the 'nearest' conductor type).

C. SCE's Errata Addressed MGRA's Comments On WMP Table 4-3 Regarding Frequently De-Energized Circuits

MGRA questions whether 2024 outage history should be included for certain circuits in Table 4-3 of the WMP, which provides outage information regarding the Acosta, Castro, and Davenport circuits.¹⁴ On June 2, 2025, SCE submitted errata addressing the outage data in Table 4-3, which also addresses MGRA's comments on that table. Specifically, SCE submitted errata to correct the outage history information for the Davenport circuit.¹⁵ Because Energy Safety's guidelines for Table 4-3 require inclusion of "circuits that have had three or more PSPS events in at least one of the six previous calendar years," SCE did not include 2024 outage information for the Acosta or Castro circuits, as each of those circuits do not meet that criteria.

D. MGRA's Questions Regarding Historical PSPS Notifications And Specific De-Energizations Should Be Addressed Within The Established Oversight Framework At The Commission

SCE acknowledges its PSPS notification challenges under certain circumstances, including during the onset of unexpected or emergent weather conditions outside of SCE's control. SCE understands the impacts that PSPS has on customers, and SCE is continuously developing and implementing improvements to its PSPS notification processes. However, MGRA's recommendations regarding certain historical PSPS reports are outside the scope of this proceeding. Instead, they are more appropriately addressed by the Commission's Safety and Enforcement Division (SED) as part of its oversight responsibilities. First, MGRA's recommendation that Energy Safety require SCE to file a corrective action plan to address alleged historical PSPS notification issues should be raised in comments to the reports submitted in the PSPS rulemaking cited by MGRA, where MGRA states that the same issue was already raised.¹⁶ The same is true as to MGRA's questions regarding SCE's handling of specific de-energizations in 2024.¹⁷ Injecting issues that are already within the scope of existing SED oversight will result in a duplication of efforts, potentially inconsistent directives from Energy Safety and the Commission, and a waste of Energy Safety's, the Commission's, and stakeholders' resources.

III. RESPONSES TO GREEN POWER INSTITUTE'S COMMENTS

A. SCE's Wildfire Simulation Parameters Negate The Need For Suppression Modeling

GPI states that suppression modeling is inconsistent across utilities' wildfire risk models and recommends that utility suppression modeling be aligned.¹⁸ GPI has previously argued that uncertainty of inputs and assumptions regarding suppression may introduce potential errors to wildfire risk planning models.¹⁹

SCE interprets GPI's comments as representing a concern that not accounting for wildfire suppression impacts will lead to overestimating acres burned in wildfire simulations. GPI's concern is mistaken,

¹⁴ MGRA Comments, p. 37.

¹⁵ SCE 2026-2028 WMP Errata (June 2, 2025), p. 10.

¹⁶ MGRA Comments, p. 38.

¹⁷ MGRA Comments, p. 36.

¹⁸ GPI Comments, pp. 2-4.

¹⁹ GPI Comments, pp. 2-3.

however, as it overlooks that SCE’s risk models, as currently configured, account for wildfire suppression by truncating wildfire simulation times to a maximum of 8 hours—a conservative estimate of acres burned that essentially obviates the need to account for suppression. In fact, SCE selected an 8-hour burn duration because it captures the vast majority of structures impacted within that first burning period. In essence, SCE prioritizes representing building losses—which are the vast majority of safety and financial impacts—more accurately, rather than over- or underestimating the number of acres burned.

For all of the reasons listed above, as well as differences in fire regimes in SCE’s and other utilities’ service territories, modeling suppression based on a common standard is unnecessary and unwarranted.

B. An Area For Continuous Improvement (ACI) For Benefit-Cost Ratio (BCR) Methodology Is Premature And Unnecessary

GPI recommends Energy Safety “[i]ssue an ACI for SCE to report on its BCR method in the 2027 WMP Update and provide guidance that will improve method alignment.”²⁰ This recommendation is unnecessary because SCE will report on its BCR methodology as part of SCE’s upcoming 2026 RAMP application, which is due in May 2026.

Developing BCRs involves more than simply translating natural unit consequences into monetized values. There are additional factors, such as escalation and discount rates, as well as various ways of aggregating reliability values. Many of these topics are still being actively discussed in Senate Bill 884 workshops or being litigated in the Commission’s Risk-Based Decision-Making Framework proceeding. Additionally, SCE is in the process of refreshing its wildfire risk, PSPS risk, and Protective Equipment Device Settings (PEDS) assumptions ahead of its forthcoming 2026 RAMP application. It is therefore unnecessary at this stage to issue SCE an ACI regarding BCR methodology.

C. Vegetation Management (VM) Recommendations From GPI

GPI recommends that SCE: (1) improve reporting on VM residue landfill diversion, defensible space practices, and the debris tracking tool²¹; (2) report on plans to conduct VM work under the Governor’s March 2025 Proclamation of a State of Emergency²²; and (3) explore fuels management project partnerships.²³

With respect to the first item, GPI acknowledges that SCE’s WMP includes a qualitative target (VM-11) related to wood and slash management and that “SCE’s VM slash removal process is possibly more progressive than other utilities.”²⁴ As part of VM-11, SCE plans to evaluate current VM residue diversion from landfills, review contractor practices, and establish plans to enhance debris diversion tracking, with implementation contingent on future contract negotiations and timing.

²⁰ GPI Comments, p. 4.

²¹ GPI Comments, p. 14.

²² GPI Comments, p. 16.

²³ GPI Comments, p. 16.

²⁴ GPI Comments, pp.14-15.

For the second item, SCE recognizes the significance of the Governor's Proclamation and is currently assessing its potential impact on VM work plans. SCE is exploring partnerships with agencies and plans to conduct work and report under the Proclamation, subject to project permitting approvals and other agency requirements.

For the third item, since 2023, SCE has partnered with the Eastern Sierra Climate & Communities Resilience Project (ESCCRP)/Whitebark Institute to collaborate on fuel reduction efforts in the eastern Sierras near Mammoth Lakes, CA. Trees and debris removed through SCE's Routine Line Clearance (RLC) and Hazard Tree Program (HTP) are shared with the Whitebark Institute team to support matching funds requests from Cal Fire and other sponsors. These targeted efforts are aimed at reducing potential wildfire risks.

IV. CONCLUSION

SCE appreciates the opportunity to provide these reply comments and looks forward to continuing to work with Energy Safety and stakeholders to reduce wildfire risk in SCE's service area. If you have questions, or require additional information, please contact me at connor.flanigan@sce.com.

Sincerely,

//s//

Connor J. Flanigan

Managing Director, State Regulatory Operations