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 1 2

To: OEIS
Prepared by: Napa Tayavibul
Job Title: Senior Advisor
Received Date: 7/17/2025

Response Date: 7/22/2025

Question 01.a-j:
Regarding Vegetation Clearance Remote Sensing Inspections:

SCE's GRC filing shows that SCE plans to conduct a pilot of full-system remote sensing inspections in 2025. After concluding the pilot study, the GRC filing shows SCE intends to transition from relying primarily on ground inspections to relying nearly exclusively on remote sensing for vegetation clearance inspections.

a. Provide any process documents SCE is using or will use to plan, conduct, and evaluate the remote sensing pilot.
b. Provide any scope of work and process documents SCE has or will provide to contractors or internal employees involved in the remote sensing pilot.
c. Provide the criteria SCE is using or will use to determine if the remote sensing pilot is successful.
d. Provide metrics and targets for success/failure of the pilot (e.g. % agreement between remote sensing and ground inspection prescriptions and what percentage would be considered successful).
e. Provide a timeline for the remote sensing pilot.
f. Provide a data management strategy and any data management process documents for managing the remote sensing data.
g. Describe how SCE plans to phase in this transition, for years 2026, 2027, and 2028.
h. Provide a timeline for the transition.
i. Provide separate targets for remote sensing and ground patrol inspection activities for SCE's clearance inspection programs (VM-7 and VM-8), broken out by year (2026, 2027, 2028). If SCE cannot provide separate targets for each year, it must explain why it cannot do so and when it will be able to provide separate targets.
j. Describe under what conditions SCE plans to conduct ground-based inspections informed by remote sensing results during the WMP cycle (2026-2028).

Response to Question 01.a-j:
Please see SCE's response to OEIS' data request below.

a.) Provide any process documents SCE is using or will use to plan, conduct, and evaluate the remote sensing pilot.

Currently, SCE has two remote sensing pilots underway in 2025. Both pilots use remote sensing technology (typically LiDAR) to determine two separate functions related to Vegetation Management. The first is called "TrimRx" where the technology is being used to

auto-define tree prescriptions. The second is "Crown Association" where the technology is being used to match individual trees with individual crowns for future use with SCE's CanopySense program. Both pilots are being field validated by Quality Control personnel. Because SCE is still piloting and enhancing the new technology, SCE is currently drafting scopes of work and process and procedural documents for TrimRx and Crown Association with the plan to finalize the documents prior to full implementation

b.) Provide any scope of work and process documents SCE has or will provide to contractors or internal employees involved in the remote sensing pilot.

Please see response to item (a) above.

c.) Provide the criteria SCE is using or will use to determine if the remote sensing pilot is successful.

The success criteria for TrimRx will include the percentage of automated trim prescriptions that match a corresponding field-verified trim prescription and/or trim for the piloted circuits/areas. The success criteria for Crown Association will be the percentage of accurate inventory crown-to-tree associations.

d.) Provide metrics and targets for success/failure of the pilot (e.g. % agreement between remote sensing and ground inspection prescriptions and what percentage would be considered successful).

Please see response to item (c) above. SCE is testing the technology capabilities and has not determined specific thresholds or percentages.

e.) Provide a timeline for the remote sensing pilot.

The TrimRx and Crown Association pilots commenced in 2025. Pending results, SCE plans to begin implementing the new technology on an incremental basis in 2026.

f.) Provide a data management strategy and any data management process documents for managing the remote sensing data.

Please see response to item (a) above.

g.) Describe how SCE plans to phase in this transition, for years 2026, 2027, and 2028.

Pending the results of the pilot, SCE plans to begin implementing the new remote sensing technology in 2026. However, the extent of SCE's transition in future years depends on the results of the pilot.

h.) Provide a timeline for the transition.

Please see response to item (g) above.

i.) Provide separate targets for remote sensing and ground patrol inspection activities for SCE's clearance inspection programs (VM-7 and VM-8), broken out by year (2026, 2027, 2028). If SCE cannot provide separate targets for each year, it must explain why it cannot do so and when it will be able to provide separate targets.

SCE plans to use the new technology across the entire service area, which includes inspections for VM-7 and VM-8. For 2026 and beyond, the percentage of remote sensing versus ground inspections utilized will be determined based on the results of the remote sensing pilot.

j.) Describe under what conditions SCE plans to conduct ground-based inspections informed by remote sensing results during the WMP cycle (2026-2028).

For the period 2026 to 2028, SCE plans to continue to use ground-based inspections in areas where remote sensing is unable to perform quality inventory inspections, subject to the results of the remote sensing pilot.

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To: OEIS
Prepared by: Trang L Woo
Job Title: Engineer 3
Received Date: 7/17/2025

Response Date: 7/22/2025

Question 02.k-l:
Regarding Unplanned Distribution System Outages from Jan 1, 2023 to Dec 31, 2024:

In response to OEIS Data Request 09, c-i, SCE provided all outages on circuits where any primary distribution circuits are in the HFRA. Energy Safety is interested in outages that occurred in the HFRA.

k. Provide the number of unplanned distribution outages caused by vegetation contact, where the vegetation contact occurred in the HFRA, from Jan 1, 2023, to Dec 31, 2024.
i. As a subset, provide the number of these unplanned distribution outages caused by vegetation contact during major event days.
l. Provide the number of unplanned distribution outages caused by equipment failure, where the equipment failure occurred in the HFRA, from Jan 1, 2023, to Dec 31, 2024.
i. As a subset, provide the number of these unplanned distribution outages caused by equipment failure during major event days.
ii. As a subset, provide the number of these equipment failures that had an associated, active P2 corrective notification immediately prior to the outage.

Response to Question 02.k-l:
k. There were 167 unplanned distribution outages caused by vegetation contact in HFRA during that time period.

k.i. Of the 167, 32 of them occurred during major event days.

l. SCE is currently unable to provide the requested information in an easily accessible format, as our data collection methods prior to 2025 did not consistently record the asset closest to the fault location. As such, SCE responded to OEIS Data Request 09, c-i with the most accurately catalogued data, which is at the circuit level, with HFRA/non-HFRA flags tracked there.

To provide this information at the asset location for historical outages would require a comprehensive manual review, which is both time-intensive and resource-demanding. This limitation is one of the reasons the previous datasets are only available at the circuit level rather than with greater granularity. Recognizing these challenges, SCE has enhanced our data management processes as of 2025 and is now collecting this information systematically to better support future inquiries and reporting needs.

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To: OEIS
Prepared by: Napa Tayavibul
Job Title: Senior Advisor
Received Date: 7/17/2025

Response Date: 7/22/2025

Question 03.a-f:
Regarding Base and Strive Targets for Additional Structure Brushing (VM-2.1):

On page 70 of its 2020-2022 Base WMP, SCE sets a base target for its Expanded Pole Brushing (VM-2) initiative of 200,000 structures, and a strive target of 300,000 structures. On page 379 of its 2023-2025 Base WMP, SCE sets a base target for VM-2 of 63,700 structures, and a strive target of 135,200 structures. On page 196 of its 2026-2028 Base WMP, SCE sets a base target of 83,000 structures for VM-2.1 (previously VM-2.0) and a strive target of 172,000 structures.

a. Describe what factors led SCE to adjust base and strive targets when transitioning from 2020-2022 to 2023-2025 Base WMP cycles, and from 2023-2025 to 2026-2028 Base WMP cycles (e.g., operational costs, resource availability, including or excluding sub-transmission or transmission structures, Integrated Wildfire Mitigation System [IWMS] models, HFRA designation, etc.).
b. Describe how SCE sets its base targets for structure brushing work that is in addition to PRC § 4292 requirements.
c. Explain why SCE set a base target of 83,000 structures in its 2026-2028 Base WMP considering the actual number of structures it brushed far exceeded 83,000 from 2020 to 2024.
d. Describe how SCE sets its strive targets for structure brushing work that is in addition to pole brushing in compliance with PRC § 4292.
e. Explain the difference between the process of defining a strive target and the process of defining a base target.
f. Explain why SCE set a strive target in its 2026-2028 Base WMP of 172,000 structures considering the actual number of structures it brushed was far below 172,000 from 2021 to 2024.

Response to Question 03.a-f:
Please see SCE's response to OEIS' data request below.

a.) *Describe what factors led SCE to adjust base and strive targets when transitioning from 2020-2022 to 2023-2025 Base WMP cycles, and from 2023-2025 to 2026-2028 Base WMP cycles (e.g., operational costs, resource availability, including or excluding sub-transmission or transmission structures, Integrated Wildfire Mitigation System [IWMS] models, HFRA designation, etc.).*

SCE's adjustments to the WMP base and strive targets for VM-2 have evolved over time due to a range of factors, such as modifications in risk assessment methodologies, changes in the types of structures encompassed within the program's scope, and updates to fire risk

area designations.

As stated in SCE's 2022 WMP Update, "[i]n 2020 and 2021, SCE's expanded pole brushing program [for VM-2.1, previously VM-2] was based on the quantity of poles in HFRA without examining the risks and consequences specific to each structure. In 2022, SCE has incorporated vegetation management risk-based prioritization consistent with OEIS feedback" (p. 262).

For the 2023-2025 WMP and 2026-2028 WMP, SCE defined its structure brushing scope using a risk informed methodology that leveraged the Integrated Wildfire Mitigation Strategy (IWMS) to define the base and strive targets. The 2023-2025 WMP VM-2 scope focused on structures in Distribution and Sub-Transmission while the 2026-2028 WMP VM-2 scope expanded to include Bulk Transmission structures. Additionally, the risk models that inform the IWMS categorization are updated periodically (i.e., yearly) which influence the available population of inventory and affect the target quantities at the times the targets are created.

b.) *Describe how SCE sets its base targets for structure brushing work that is in addition to PRC § 4292 requirements.*

Since the methodology for defining structure brushing targets has changed over the previous WMP cycles, as discussed in item (a) above, this response will be focused on the process used to set the VM-2.1 target for SCE's 2026-2028 WMP.

In SCE's 2026-2028 WMP, SCE set its base target for Additional Structure Brushing (VM-2.1) for structures that are not included in the PRC 4292 population by assessing the risk of its structures. The potential VM-2.1 scope is identified based on risk either through the IWMS category or if the structure is identified as part of an Area of Concern (AOC). The available base target population includes Distribution and Transmission structures in High Fire Risk Area (HFRA) that are identified as being in IWMS Severe Risk Area and/or AOCs at the time the targets are defined. Additionally, the base target is defined by considering potential factors that could impact brushing execution in the field, such as access or environmental constraints.

Lastly, the population of structures that qualify for the VM 2.1 activity may change over time due to revisions in State Responsibility Areas (SRA) and HFRA, as well as the type of equipment included on the structures. The risk information for the structures used to identify IWMS risk categories may be updated over the years as well which could influence the mix of available structure brushing inventory from which to set target quantities.

c.) *Explain why SCE set a base target of 83,000 structures in its 2026-2028 Base WMP*

considering the actual number of structures it brushed far exceeded 83,000 from 2020 to 2024.
Please see the response to item (b) above.

d.) Describe how SCE sets it's strive targets for structure brushing work that is in addition to pole brushing in compliance with PRC § 4292.

Since the methodology for defining structure brushing targets has changed over the previous WMP cycles, as discussed in item (a) above, this response will be focused on the process used to set the VM-2.1 target for SCE's 2026-2028 WMP.

In SCE's 2026-2028 WMP, SCE set the strive target for Additional Structure Brushing (VM-2.1) for structures that are not included in the PRC 4292 population by assessing the risk of structures. The strive target includes the inventory at the point in time that the target was set of Distribution and Transmission structures in HFRA that are identified as being in IWMS High Consequence Areas.

e.) Explain the difference between the process of defining a strive target and the process of defining a base target.

The methodology to define the base target and strive target for VM 2.1 structure brushing scope both comprehensively considers all qualifying Transmission and Distribution structures, but structures categorized as higher risk are included in the base target and the next risk categories are included in the strive target.

f.) Explain why SCE set a strive target in its 2026-2028 Base WMP of 172,000 structures considering the actual number of structures it brushed was far below 172,000 from 2021 to 2024.
Please see response to item (d) above.