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Docket: 2026-2028 Electrical Corporation Wildfire Mitigation Plans
Docket# 2026-2028-Base-WMPs
Revision 1

September 15, 2025

Tony Marino
Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Response to SCE's 2026-2028 Base Wildfire Mitigation Plan (WMP) Revision Notice

Dear Deputy Director Marino:

On May 15, 2025, SCE submitted its 2026-2028 WMP to the Office of Energy Infrastructure Safety (OEIS). On August 15, 2025, OEIS issued a Revision Notice to SCE requiring certain updates to SCE's WMP. In accordance with the Revision Notice and WMP Guidelines section 4.1.3, SCE submits the following:

- SCE's response to the Revision Notice, including responses to all 10 critical issues identified by OEIS.
- A redlined version of SCE's 2026-2028 Base WMP showing the changes and updates SCE made in response to the Revision Notice to SCE's 2026-2028 Base WMP R0 submission.
- A clean version of SCE's 2026-2028 Base WMP that incorporates the updates reflected in the redlined version. The clean version also reflects errata that SCE previously submitted on June 2, 2025 and June 30, 2025, consistent with Section 7 of the Process Guidelines.
- Revised Excel files of WMP tables matching redline changes to SCE's 2026-2028 WMP.
- Revised annual data submission matching redline changes to SCE's 2026-2028 WMP.

SCE's 2026-2028 WMP and associated materials listed above are available at www.sce.com/wmp. Please contact me if you have questions.

Sincerely,
//s//

Gary Chen
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Cover Letter Appendix A – Changes to Address Critical Issues

The table below lists updates required by the August 15, 2025 Revision Notice issued by OEIS.

Section	Table or Figure (if applicable)	Page Number(s)	Energy Safety Finding	Description of Correction
Throughout	Tables 6-3, 6-4, 8-1, 9-2, 10-1, 11-1	Redline: 195-196, 201-205, 216-218, 223, 229, 225, 238, 243, 247, 251, 260, 274, 279, 280, 285, 331-331.1, 345, 366-367, 377-378, 384, 390, 422, 428-429, 459, 470 Clean: 198-199, 204-208, 219-221, 226, 228, 232, 241, 246, 250, 254, 263, 277, 282, 283, 288, 335, 350, 371-372, 382-383, 389, 395, 427, 433-434, 464, 475	RN-SCE-26-01: SCE commits to low WMP targets while indicating it can likely achieve much more via the inclusion of what it calls “strive targets.”	SCE has removed “strive targets” from Tables 8-1, 9-2, 10-1, and 11-1 and updated any resulting columns or additional tables impacted by that change. For each activity with a strive target, SCE has added narrative description of what factors led to the selection of that target.
5.2.1	Table SCE 5-02a	Redline: 60.1-61 Clean: 61-62	RN-SCE-26-02: SCE’s Severe Risk Area increase lacks explanation.	SCE has included the new Table SCE 5-02a showing HFRA overhead distribution miles by IWMS tranche designation. Additional requested detail for mileage changes is also provided below in response to RN-SCE-26-02 and in the Base WMP.
5.6.1	N/A	Redline: 138-138.2	RN-SCE-26-03: SCE’s risk methodology	SCE has updated Section 5.6.1 narrative

Section	Table or Figure (if applicable)	Page Number(s)	Energy Safety Finding	Description of Correction
		Clean: 139-141	lacks independent review.	to include details about the scope and timing of an independent third-party review of risk models.
9.1.2	Table 9-2	Redline: 331, 335, 337 Clean: 335, 339, 342	RN-SCE-26-04: SCE's Vegetation Management inspection targets and the scope of inspections do not align.	SCE has revised the targets for VM-7 and VM-8 in Table 9-2 to represent 100% of HFRA circuit miles for distribution and transmission and added explanatory language to Sections 9.2.1.5 and 9.2.2.5.
9.1.1	Table 9-1	Redline: 330 Clean: 333	RN-SCE-26-05: SCE's wood and slash management target is not specific or measurable.	SCE has updated Table 9-1 and revised the wood and slash management qualitative target (VM-11) to be more specific.
9	Table 9-2	Redline: 331-331.1 Clean: 335	RN-SCE-26-06: SCE dilutes its commitments to its quantitative pole clearing targets with qualifying language in the footnotes.	SCE has removed footnotes 4 and 5 from Table 9-2 and revised the targets for VM-2.1 and VM-2.2 accordingly.
9.1.2 and 9.12.1	Table 9-2	Redline: 331.1, 366-367 Clean: 335, 371-372	RN-SCE-26-07: SCE also dilutes its commitment to its quantitative pole clearing targets by using equivocating language in Table 9-2 via cross-referencing to another WMP section.	SCE has removed footnote 1 from Table 9-2 and removed related language identified by this critical issue from section 9.12.1.
9.2.1.6	N/A	Redline: 335-335.1 Clean: 339-340	RN-SCE-26-08: SCE failed to disclose two remote sensing pilot programs in its 2026-2028 Base WMP.	SCE has updated section 9.2.1.6 to discuss CanopySense and its associated proof of concepts, Crown Segmentation

Section	Table or Figure (if applicable)	Page Number(s)	Energy Safety Finding	Description of Correction
				and TrimRx (Trim Prescription).
9.2.1.6	Table 9-1	Redline: 330-330.1, 335-335.1 Clean: 333-334, 339-340	RN-SCE-26-09: SCE's transition from ground inspections to remote sensing lacks explanation.	SCE has updated section 9.2.1.6 to further describe SCE's transition from ground to remote sensing inspections and has added four related qualitative targets to Table 9-1.
12	Table 12-1	Redline: 473, 475 Clean: 474, 480	RN-SCE-26-10: SCE's targets in Table 12-1 lack specificity and are not measurable.	SCE has revised targets VM-6 (vegetation management work system) and IN-8 (inspections work management system) to be more specific and measurable. Planned changes are also noted in the Section 12.2 narrative.

Cover Letter Appendix B – Changes to Address Non-Substantive Errors

The table below lists updates to the Base WMP that SCE has made to address non-substantive errors requested in Section 4 of the August 15, 2025 Revision Notice issued by OEIS.

Section	Table or Figure (if applicable)	Page Number(s)	Energy Safety Finding	Description of Change
8.2.1.1 Covered Conductor	N/A	Redline: 225 Clean: 228	SCE's planned completion of its covered conductor program lacked explanation requested by Energy Safety. SCE must revise Section 8.2.1.1 of its 2026-2028 Base WMP to include the explanations provided in its response to Data Request 10.	SCE has revised Section 8.2.1.1 of its 2026-2028 Base WMP to include the explanations provided in its response to Data Request 10.
9.5 Wood and Slash Management	N/A	Redline: 346 Clean: 351	SCE lacked clear definitions and plans for wood and slash management requested by Energy Safety. SCE must revise its 2026-2028 Base WMP to define debris and explain how it manages wood over 4 inches in Section 9.5 of its WMP to align with its response to Data Request 7, Question 1.	SCE has revised Section 9.5 of its 2026-2028 Base WMP to define debris and explain how it manages wood over four inches.
9.12 Work Orders	Table 9-8	Redline: 370-370.1 Clean: 375	SCE's priority levels for past due work orders were inconsistent between the	SCE has revised Table 9-8 in its 2026-2028 Base WMP to include all five priority levels described in Section 9.12.1, as

Section	Table or Figure (if applicable)	Page Number(s)	Energy Safety Finding	Description of Change
			narrative description and Table 9-8. SCE must revise Table 9-8 in its 2026-2028 Base WMP to include all five priority levels described in Section 9.12.1, as provided in its response to Data Request 2, Question 2.	provided in its response to Data Request 2, Question 2.

Cover Letter Appendix C – Other Changes not related to Critical Issues or Non-substantive Errors Identified by OEIS

The table below lists updates to the Base WMP that SCE has made to address substantive and non-substantive updates that SCE is making of its own accord, and do not correspond to OEIS findings.

Section	Table or Figure (if applicable)	Page Number(s)	Description of Change
8.1.2	Table 8-1	Redline: 216 Clean: 219	SCE has revised the Long Span Initiative (LSI; SH-14) annual targets to the following values: 600 spans remediated in 2026, 400 spans remediated in 2027, and Remediate the balance of remaining spans in SCE’s HFRA in 2028. SCE has evaluated remaining LSI scope and determined that total remaining scope is insufficient to meet the targets initially set in the Base WMP. This is due primarily to overperformance of historical LSI goals, as well as overlapping grid hardening work. While covered conductor is a common LSI remediation, some LSI notifications are located on a circuit segment already scoped for wildfire covered conductor program (WCCP) work in the near future. In this case, that LSI notification is removed from scope and counted towards SH-1 scope instead.
8.2.9 and 8.2.12.1	N/A	Redline: 263-266 Clean: 266-269	SCE added additional narrative to Line Removal (8.2.9) and the Transmission Integrated Wildfire Mitigation Strategy (IWMS) Engineering Analysis and Testing (8.2.12.1) activities to clarify plans for idle transmission lines.
8.3.1.3	N/A	Redline: 277 Clean: 280	SCE has added the following language to the “Accomplishments, Roadblocks, and Updates” section of Distribution High Fire Risk-Informed (HFRI) Inspections - Ground and Aerial (IN-1.1) to provide an update on the activity: In 2026-2028, SCE will include detailed inspections of telecommunication equipment on distribution poles as part of its HFRI distribution inspections. These inspections

Section	Table or Figure (if applicable)	Page Number(s)	Description of Change
			are currently performed across SCE's service territory through SCE's overhead detailed inspection program. By bundling telecom inspections with HFRI distribution activities, SCE aims to improve operational efficiency and minimize repeat visits to the same location within inspection cycles.
8.3.2.3	N/A	Redline: 280 Clean: 283	SCE has added the following language to the "Accomplishments, Roadblocks, and Updates" section of Transmission High Fire Risk-Informed (HFRI) Inspections - Ground and Aerial (IN-1.2) to provide an update on the activity: In 2026-2028, SCE will also incorporate detailed inspections of telecommunication equipment on transmission poles and towers into its HFRI transmission inspections. This approach mirrors the bundling strategy used in distribution HFRI inspections, with the goal of streamlining operations and reducing repeat site visits during inspection cycles.

Cover Letter Appendix D – Responses to Critical Issues

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RN-SCE-26-01: SCE commits to low WMP targets while indicating it can likely achieve much more via the inclusion of what it calls “strive targets.”

Required Remedies:

SCE must revise its 2026-2028 Base WMP to provide the following:

- *For mitigation activities in which SCE has “strive targets,” it must explain why there is a difference between the target and the “strive target,” including*
 - *The factors that prevent SCE from setting the “strive target” as its target.*
 - *The steps SCE plans to take to reduce the difference between the target and “strive target” in the future.*
- *SCE must discuss its “strive targets” in the mitigation activity narrative and must remove “strive targets” and associated footnotes from all target tables. With the removal of “strive targets” from the target tables, SCE must update any information impacted by the removal in both the tables and supporting narrative.*
- *For targets that are currently set below any of SCE’s historical performance since 2020 and where SCE met or exceeded its targets, SCE must either:*
 - *Increase its target to better align with SCE’s historical performance where SCE met or exceeded its targets, or*
 - *Explain why it cannot do so. SCE must provide explanations for all sections that currently contain targets and strive targets, including:*
 - *Situational Awareness,*
 - *Grid Design, Operations, and Maintenance,*
 - *Vegetation Management, and*
 - *Emergency Preparedness.*

SCE Response:

SCE must discuss its “strive targets” in the mitigation activity narrative and must remove “strive targets” and associated footnotes from all target tables. With the removal of “strive targets” from the target tables, SCE must update any information impacted by the removal in both the tables and supporting narrative.

As directed, SCE has removed “strive targets” from Tables 8-1, 9-2, 10-1, and 11-1. All discussions of strive targets are now included in the mitigation activity narratives for each respective activity. The following list contains activities with strive targets:

Table 8-1: SCE Grid Design, Operations, and Maintenance Targets by Year

- Covered Conductor (SH-1)
- Undergrounding Overhead Conductor in HFRA (SH-2)
- FR Wrap Expanded Deployment (SH-19)
- Long Span Initiative (SH-14)
- Distribution HFRI Inspections (Ground and Aerial) (IN-1.1)

- Transmission HFRI Inspections (Ground and Aerial) (IN-1.2)
- Generation HFRI Inspections (IN-5)
- REFCL (Ground Fault Neutralizer) (SH-17)
- REFCL (Grounding Conversion) (SH-18)
- Remote Controlled Automatic Reclosers (SH-5)

Table 9-2: SCE Vegetation Inspections and Pole Clearing Targets by Year

- Additional Structure Brushing (VM-2.1)

Table 10-1: Situational Awareness Targets by Year

- Fuel Sampling (SA-17)
- Early Fault Detection (EFD) (SA-11)
- Weather Station Calibrations (SA-12)

Table 11-1: Emergency Preparedness and Tribal/Stakeholder Outreach Targets by Year

- Wildfire Safety Community Meetings (DEP-1)
- Customer Research and Education (DEP-4)
- Customer Care Programs: Critical Care Backup Battery Program (PSPS-2)
- Customer Care Programs: Portable Power Station and Generator Rebates (PSPS-3)

In addition to removing strive targets from the annual target columns and three-year total columns, SCE also adjusted the risk reduction columns if it was calculated using previous strive target values. Because the risk reductions for mitigation activities impact the inputs for Tables 6-3 (SCE Risk Impact of Activities) and 6-4 (SCE Summary of Risk Reduction for Top-Risk Circuits), those tables have also been updated.

For mitigation activities in which SCE has “strive targets,” it must explain why there is a difference between the target and the “strive target,” including

- *The factors that prevent SCE from setting the “strive target” as its target.*
- *The steps SCE plans to take to reduce the difference between the target and “strive target” in the future.*

Since the 2020-2022 WMP, SCE has included a compliance and strive target for many mitigation activities to account for the possibility that unforeseen circumstances could affect the level of execution for certain wildfire mitigation activities in a given year. The compliance target represents a goal that SCE believes it can achieve under normal circumstances, and the strive target represents a goal that SCE believes it can achieve if factors outside of SCE’s control facilitate execution of additional units of that mitigation. Those factors include weather, permitting time, access issues, customer engagement, etc. For example, system hardening projects, vegetation management activities, and inspection and maintenance work can be hindered if SCE is delayed in receiving necessary permits or environmental clearances. Situational awareness activities like fuel sampling and weather station calibrations may be deferred due to issues accessing sites during adverse weather. Finally, Stakeholder Outreach activity levels for activities like surveys and community

meetings are dependent upon engagement and interest from communities and customers themselves.

In the future, to adhere to the guidance from Energy Safety in the Revision Notice, SCE will discontinue the use of strive targets.

For targets that are currently set below any of SCE's historical performance since 2020 and where SCE met or exceeded its targets, SCE must either:

- *Increase its target to better align with SCE's historical performance where SCE met or exceeded its targets, or*
- *Explain why it cannot do so. SCE must provide explanations for all sections that currently contain targets and strive targets*

Energy Safety notes that certain 2026-2028 WMP activity targets are set below historical performance since 2020. Below, SCE explains why the current targets are appropriate and should not be raised to match historical performance.

Grid Design, Operations, and Maintenance Targets

- Covered Conductor (SH-1): Starting with a target of 700 miles in 2020, the SH-1 target peaked at 1,100 miles in 2023 and has continued to decrease annually since then. SCE's targets for covered conductor installation are 240 miles in 2026, 125 miles in 2027, and 75 miles in 2028. The targets SCE set from 2026-2028 are appropriate because SCE is approaching the end of the program's proactive replacement of bare wire with covered conductor. Aside from 2024, SCE has consistently overperformed targets for SH-1, installing over 6,000 circuit miles since 2020. This historical performance has reduced the amount of available scope. SCE's targets are consistent with the fact that there are now less miles in SCE's HFRA where bare wire must be proactively replaced with covered conductor.
- Undergrounding Overhead Conductor in HFRA (SH-2): Not applicable. 2026-2028 WMP targets are higher than historical performance as SCE continues to ramp up targeted undergrounding implementation.
- FR Wrap Expanded Deployment (SH-19): Not applicable. This is a new activity in the 2026-2028 WMP and does not have historical performance to compare against.
- Long Span Initiative (SH-14): The SH-14 target was highest in 2022 with a target of 1,400 remediations, and SCE completed 1,694 remediations that year. Long Span Initiative (LSI) scope has steadily decreased to the point where SCE is targeting 600 spans remediated in 2026, 400 in 2027, and the balance of remaining scope in 2028. Like covered conductor, SCE is approaching the end of this program's available scope for remediation because of the progress that SCE made in previous years. Thus, SCE can no longer set targets at historical levels for this activity.
- Distribution HFRI Inspections (Ground and Aerial) (IN-1.1): Not applicable. 2026-2028 WMP targets are higher than historical targets and completed units.
- Transmission HFRI Inspections (Ground and Aerial) (IN-1.2): Not applicable. 2026-2028 WMP targets are higher than the average historical targets and average completed units.

- Generation HFRI Inspections (IN-5): SCE has historically met or exceeded its target for IN-5. SCE set its 2026-2028 targets lower than historical levels because SCE is currently going through a divestment process for some small hydro generation facilities, so SCE expects that it will have less generation facilities to inspect compared to prior years. Pending the completion of the divestment process and regulatory approvals, SCE would further adjust program scope to no longer inspect assets that have been transferred to a new owner.
- REFCL (Ground Fault Neutralizer) (SH-17): Not applicable. 2026-2028 WMP targets are in line with average historical targets and are above average completed units.
- REFCL (Grounding Conversion) (SH-18): Not applicable. 2026-2028 WMP targets are in line with average historical targets and are above average completed units.
- Remote Controlled Automatic Reclosers (SH-5): Remote Automatic Recloser (RAR) installation peaked in 2020 with 49 units installed (against a target of 45 units). Since then, SCE's targets for SH-5 have decreased, and SCE is anticipating installation of 5 units annually from 2026-2028. RARs are intended to further sectionalize circuits and circuit segments to improve SCE's ability to reduce the scope of Public Safety Power Shutoffs (PSPS). SCE's annual targets for SH-5 are lower in this WMP cycle compared to historical targets for this activity because SCE has installed RARs on circuits frequently impacted by PSPS. As SCE has made progress installing RARs on these circuits, there are now fewer circuits that need this mitigation.

Vegetation Inspections and Pole Clearing Targets

- Additional Structure Brushing (VM-2.1): In response to RN-SCE-26-01, SCE is increasing its VM-2.1 target from 83,000 to 135,000. This is higher than the additional structure brushing inspection totals in 2022, 2023, and 2024 (105,377, 113,570, and 116,388, respectively). While totals appeared higher in 2020 and 2021, those numbers were not comparable as they included compliance structure brushing inspections, which SCE included as a separate target (VM-2.2) in the 2026-2028 WMP pursuant to OEIS guidelines. In addition, the previous totals included attempts to inspect that may have been hindered by access or environmental constraints (approximately 20% of the total), which SCE has removed from its new targets for 2026-2028 as directed by the Revision Notice and discussed below in RN-SCE-26-06. Accordingly, the combined structure brushing inspection targets for 2026-2028 exceed the historical combined number of structure brushing inspections (adjusted for unsuccessful attempts) in previous years.

Situational Awareness Targets

- Fuel Sampling (SA-17): Not applicable. This is a new activity in the 2026-2028 WMP and does not have historical performance to compare against.
- Early Fault Detection (EFD) (SA-11): Not applicable. 2026-2028 WMP targets are higher than historical performance, as SCE continues to ramp up early fault detection implementation.
- Weather Station Calibrations (SA-12): Not applicable. This is a new activity in the 2026-2028 WMP and does not have historical performance to compare against.

Emergency Preparedness and Tribal/Stakeholder Outreach Targets

- Wildfire Safety Community Meetings (DEP-1): From 2020-2022, SCE hosted a total of 30 wildfire safety community meetings to educate customers on SCE's wildfire mitigation strategy, PSPS, emergency preparedness and SCE's program, services, and resources. As customers became more educated on SCE's wildfire mitigation strategy, PSPS and its services and resources, SCE saw a decrease in attendance in community safety meetings. As a result, in 2023, SCE hosted four wildfire safety community meetings grouping all counties by region (North, South, East and West). Beginning in 2024, SCE hosted two virtual meetings and allowed customers to select dates, which increased participation by approximately 30% from 2023 to 2024. In 2026-2028, SCE will host at least two virtual wildfire community safety meetings each year. SCE plans to host additional wildfire community safety meetings based on PSPS activity and community needs.
- Customer Research and Education (DEP-4): In 2021, because SCE lacked certain data on customer demographics and needs, SCE conducted 9 surveys to improve its foundational understanding of how to improve its PSPS-related programs and services offered to customers. In 2022 and 2023, SCE conducted 6 surveys and 5 surveys, respectively, to continue to obtain insights on how to reduce the impacts of wildfires, PSPS, and wildfire mitigation work for its customers. Beginning in 2024, SCE conducted three surveys because SCE could build on learnings from prior surveys and hence fewer additional surveys were needed. In 2026-2028, SCE will conduct at least three wildfire mitigation / PSPS-related customer studies surveys and will conduct additional surveys based on PSPS activity and/or community needs.
- Customer Care Programs: Critical Care Backup Battery Program (PSPS-2): Not applicable. Since targets have transitioned to the current performance metric, target levels have remained consistent and continue in the 2026-2028 WMP.
- Customer Care Programs: Portable Power Station and Generator Rebates (PSPS-3): Not applicable. Target levels have remained consistent and continue in the 2026-2028 WMP.

RN-SCE-26-02: SCE's Severe Risk Area increase lacks explanation.

Required Remedies:

SCE must revise its 2026-2028 Base WMP to provide the following:

1. *A table showing the breakout of IWMS categories by circuit mileage that SCE is using for its 2026-2028 Base WMP mitigation planning, as SCE provided in its 2023-2025 Base WMP.*
2. *Explanation for the changed number of circuit miles within its SRA from the 2023-2025 Base WMP to the 2026-2028 Base WMP, include a discussion of what changed since the 2023-2025 Base WMP that lead to the increase in circuit mileage, broken out by each of the four SRA criteria:*
 - a. *Fire Risk Egress Constrained Area*
 - b. *Significant Fire Consequence*
 - c. *High Winds*
 - d. *Communities of Elevated Fire Concern*

SCE Response:

SCE must revise its 2026-2028 Base WMP to provide the following:

1. *A table showing the breakout of IWMS categories by circuit mileage that SCE is using for its 2026-2028 Base WMP mitigation planning, as SCE provided in its 2023-2025 Base WMP*

Please see below for Table SCE 5-02a, which shows SCE's total overhead HFTD miles broken out by IWMS risk tranche. This data uses SCE's WRRM 7.6 risk model, which was the model iteration used for 2026-2028 WMP mitigation planning. The circuit mileage data in the table matches the information that SCE transmitted to Energy Safety in Response to Data Request 1, Question 1, which shows 3,218 circuit miles in Severe Risk Areas (SRA).

Table SCE 5-02a – Circuit Miles Per IWMS Risk Tranche

IWMS Risk Tranche	Approximate Circuit Miles
Severe Risk Areas	3,218
High Consequence Areas	4,466
Other HFRA	1,659
Total	9,343

SCE has also included this table in its revised 2026-2028 Base WMP on page 61.

SCE must revise its 2026-2028 Base WMP to provide the following:

2. *Explanation for the changed number of circuit miles within its SRA from the 2023-2025 Base WMP to the 2026-2028 Base WMP, include a discussion of what changed since the 2023-2025 Base WMP that lead to the increase in circuit mileage, broken out by each of the four SRA criteria*

As SCE continuously enhances risk modeling inputs and iterations of its risk model, IWMS risk tranche output miles are subject to change. Since the 2023-2025 WMP, SCE's revised risk model incorporated more granular simulations, included an updated fuel model, adjusted asset locations, and enhanced metrics such as fire behavior and wind speeds. Please see SCE's 2025 Wildfire Mitigation Plan Update¹ for more details about updates to risk models since the filing of the 2023-2025 WMP.

Changes to mileage and IWMS designation are also possible during SCE's Review & Revise process, which is discussed in Section 5.2.1.2.2 of SCE's 2026-2028 WMP. This expert-led analysis evaluates local conditions on a project-by-project basis to validate modeled outputs. In certain instances, SCE's inspection photos, geographic information system (GIS), and Google Maps or Street Views, along with local area knowledge from engineers, fire scientists, and emergency operations professionals, including partners such as CAL FIRE, may contradict model outputs. In that case, the recommendation from the detailed SME review would be to convert the SRA designation to a different IWMS designation, or vice versa.

Since the 2023-2025 WMP, the total number of circuit miles designated as Severe Risk Areas has increased based on mileage updates associated with the four main SRA criteria: (1) fire risk egress constrained areas, (2) significant fire consequence, (3) extremely high winds, and (4) communities of elevated fire concern. These changes are explained below.

- Fire Risk Egress Constrained Areas: Increased by approximately 130 miles
- Significant Fire Consequence: Increased by approximately 280 miles
- Extremely High Winds: Decreased by approximately 165 miles
- Communities of Elevated Fire Concern: Decreased by approximately 85 miles

These updates resulted in the following changes to the circuit miles associated with each IWMS risk tranche between the 2023-2025 WMP and the 2026-2028 WMP:

- a net increase in total SRA mileage from approximately 2,950 circuit miles to 3,218 circuit miles.
- a net increase in total High Consequence miles from approximately 4,400 circuit miles to 4,466 circuit miles.
- a net decrease in Other HFRA miles from approximately 2,250 circuit miles to 1,659 circuit miles.

Note that SRA miles can meet multiple criteria of the four criteria above. For example, a circuit mile might reach the Significant Fire Consequence threshold and be egress constrained. If modeling updates result in that mile no longer displaying significant consequence, those overall miles could go down, but the total SRA mileage would not change because the circuit in question is still egress constrained. For that reason, overall SRA mileage change is not equivalent to the net change from the four presented SRA criteria.

¹ <https://www.sce.com/sites/default/files/AEM/Wildfire%20Mitigation%20Plan/2023-2025/SCE%202025%20WMP%20Update%20R1.pdf>, pp. 1-24.

See below for a comparison of SRA, High Consequence, and Other HFRA miles from 2023-2025 and 2026-2028.

Table RN-SCE-26-02 – Circuit Miles Per IWMS Risk Tranche by Recent WMP Cycle

IWMS Risk Tranche	2023-2025 WMP Approximate Circuit Miles	2026-2028 WMP Approximate Circuit Miles
Severe Risk Areas	2,950	3,218
High Consequence Areas	4,400	4,466
Other HFRA	2,250	1,659
Total	9,600	9,343

RN-SCE-26-03: SCE's risk methodology lacks independent review.

Required Remedies:

SCE must revise its 2026-2028 Base WMP to provide a plan for an independent review of its risk models that must include the following:

- 1. A description of the scope of the independent review, which must include all data, models, and sub-models used in the risk calculation. In addition to an overall review of SCE's risk models and decision-making frameworks, the scope of the independent review must include a specific discussion of each of the following components:*
 - a. Burn probability: including, but not limited to, verification of the applicability of the approach, given the difference in its approach from the Guidelines and the industry.*
 - b. Fire weather days: including, but not limited to, verification that the assumptions made in the quasi-probabilistic model align with best practices in risk assessment.*
 - c. Fire climate zones: including, but not limited to, consideration of the criteria for defining FCZs and how these zones are used in the risk calculation.*
 - d. Custom fuels and fuel adjustment processes: including, but not limited to, a check for accuracy of these adjustments and an analysis of the associated impact of the adjustments.*
 - e. Incorporation of PEDS risk: including, but not limited to, verification that the new approach appropriately captures the risk impact.*
 - f. Any other component the independent reviewer deems necessary.*
- 2. The timeline for obtaining an independent reviewer, and the routine or recurrence schedule in which the review is performed.*
- 3. Documentation demonstrating progress towards obtaining an independent reviewer, such as the notice of Request for Proposals (RFP) issuance, or the RFP itself.*

SCE Response:

SCE must revise its 2026-2028 Base WMP to provide a plan for an independent review of its risk models that must include the following:

- 1. A description of the scope of the independent review, which must include all data, models, and sub-models used in the risk calculation.*

SCE is currently in the process of obtaining third-party independent reviews of components of its wildfire risk models. These reviews will help validate existing features and identify opportunities for modeling enhancements to incorporate into future versions of the models.

Planned external independent review efforts are focused on two areas: (1) SCE's probability of failure models; and (2) elements of SCE's fire potential index, which include review of fire weather days, fire climate zones, and fuels. This work is at various stages and is anticipated to be completed by end of Q1 2026.

While these efforts cover portions of SCE's risk models, some model components not in scope may require supplementary efforts. For example, item (e) below – PEDS risk – is not currently in scope. SCE is evaluating options to incorporate this scope into existing external, independent review

efforts. If this is not feasible, SCE will engage an independent third party during this WMP cycle to review this and other modeling components raised in this Remedy.

SCE will consider timing and scope of future independent reviews based on the results of these efforts. Considering the costs and resourcing requirements needed to support these reviews, SCE envisions future model reviews will be most helpful when aligned to significant model, process, and/or risk framework changes.

Below, SCE provides some additional context that will further inform independent reviews for the risk modeling components specifically identified in this Required Remedy.

- a. Burn probability: As described in Section 5 of its 2026-2028 WMP, SCE notes that Burn Probability components are typically used in conjunction with stochastic models (e.g., U.S. Forest Service model), rather than the deterministic models used by most California utilities. Given that this is a required component, for the purpose of completeness, SCE assumes a conditional burn probability of “1.” in its deterministic model. SCE anticipates an external, independent review will also assess this approach that SCE has taken.
- b. Fire Weather Days: As described in Section 5 of its 2026-2028 WMP, the selection of Fire Weather Days (FWDs) is an important input into SCE’s deterministic wildfire model. FWDs represent the live and dead fuel moisture, wind (intensity, speed, direction), and other critical weather attributes present at the time of the simulated deterministic wildfire ignition events. SCE anticipates an independent review will evaluate SCE’s approach to selecting FWDs.
- c. Fire Climate Zones (FCZs): As described in Section 5 of its 2026-2028 WMP, SCE divided its service territory into Fire Climate Zones (FCZ), which are sub-regions of SCE’s service territory with similar terrain, fuels, weather, and fire activity. The designation of FCZs is a critical component of SCE’s overall risk modeling approach, as these regions are used to guide FWD selection and PSPS thresholds for different parts of SCE’s service territory.

SCE anticipates an independent review will assess the criteria for defining FCZs and how these zones are used in the risk calculation. This may also include assessing topographic, vegetative, and other variables, as well as the fire regimes that influence wildfire risk in each area.
- d. Custom Fuels and Fuel Adjustment Processes: As described in Section 5 of its 2026-2028 WMP, in addition to the traditional Scott and Burgan 40 (Scott and Burgan 2005)² commonly used in deterministic wildfire risk models, SCE has supplemented its models with 19 custom fuel models to better represent recent industry science around wildfire modeling. This information includes the creation of new models to replace existing Scott and Burgan fuels based on several seasons of calibration with CalFire FireGuard data, as well as the creation of new fuel models to better represent how wildfires progress adjacent to urban

² Scott, J. H., & Burgan, R. E. (2005). Standard fire behavior fuel models: A comprehensive set for use with Rothermel’s surface fire spread model (General Technical Report RMRS-GTR-153). U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station.

areas. SCE anticipates an independent review will evaluate how these new custom fuels were created and the impact the adjustments have.

- e. Incorporation of PEDs Risk: As described in Section 5 of its 2026-2028 WMP, and in accordance with new OEIS guidelines to assess Protective Equipment Device Settings (PEDS) risk, SCE developed a new risk model to incorporate PEDs as an Outage Risk, sub-model. SCE anticipates an independent third-party review will assess how this approach appropriately captures the risk impact, including a review of model assumptions, data used, and interaction with other risk components.
- f. Other Components: In addition to the specific items listed above, SCE will define the independent reviewer's scope to have some flexibility to include other necessary assessments of SCE's risk models. Additional component reviews will be considered within the context of whether SCE has a reasonable amount of time to integrate recommendations into its current wildfire risk model development cycle.

Throughout this review process, SCE will provide the independent reviewer(s) with access to model documentation, academic papers, and relevant OEIS and CPUC risk modeling guidelines. SCE will support the independent reviewer(s) in accessing relevant non-proprietary vendor documentation and relevant subject matter experts.

SCE must revise its 2026-2028 Base WMP to provide a plan for an independent review of its risk models that must include the following:

- 2. *The timeline for obtaining an independent reviewer, and the routine or recurrence schedule in which the review is performed.*

Where possible, SCE intends to explore opportunities to leverage contracts from existing engagements with qualified independent reviewers to conduct similar evaluations. SCE anticipates independent reviews originating from these existing engagements to be completed by the end of Q1 2026, which would include a review of components of SCE's probability of failure models and fire potential index. Further, SCE will assess the feasibility of issuing change orders or contract amendments with independent reviewers to reduce the lead time for review of other components where possible, while maintaining its integrity and independence. In these cases, SCE anticipates independent reviews to be completed in 2026, where feasible. In instances where new contracts must be established through competitive processes, SCE will seek to commence those contracting efforts in 2026. In all cases, SCE will provide updates on these efforts in future WMP filings.

SCE must revise its 2026-2028 Base WMP to provide a plan for an independent review of its risk models that must include the following:

- 3. *Documentation demonstrating progress towards obtaining an independent reviewer, such as the notice of Request for Proposals (RFP) issuance, or the RFP itself.*

Please see Appendix D: RN-SCE-26-03 Evidence for summary documents used to solicit third-party independent reviewers. SCE will provide updates on the results of this work in future WMP submissions.

RN-SCE-26-04: SCE's Vegetation Management inspection targets and the scope of inspections do not align.

Required Remedies:

SCE must revise its VM-7 and VM-8 targets in Table 9-2: SCE Vegetation Inspections and Pole-Clearing Targets by Year of its 2026-2028 Base WMP to cover 100 percent of SCE's HFTD and HFRA, to accurately reflect the described scope of these inspection activities in Table 9-3: Vegetation Management Inspection Frequency, Method, and Criteria.

SCE Response:

SCE has revised its VM-7 and VM-8 targets to equal 100% of the scope of HFRA circuit miles for distribution and transmission assets, respectively. The revised targets are documented below in Table SCE-RN-SCE-26-04 and are reflected in an updated Table 9-2 in the 2026-2028 Base WMP.

SCE has updated the associated narrative in sections 9.2.1.5 and 9.2.2.5 to describe: (1) the factors that influence the total circuit miles of distribution and transmission lines, including HFRA boundary changes, GIS and data updates, conductor span length changes due to asset removal or installation and other factors; and (2) completion of scheduled inspections, which may be impacted by environmental constraints and the need to manage risk prioritization, among other factors.

Table SCE-RN-SCE-26-04: Revised Vegetation Inspections Targets by Year

Activity (Tracking ID)	Cumulative Quarterly Target 2026, Q4	Cumulative Quarterly Target 2027, Q4	Cumulative Quarterly Target 2028, Q4	Three-year Total
Inspections for Vegetation Clearance from Distribution Lines (VM-7)	Inspect 100% of distribution circuit miles in HFRA and prescribe mitigation as needed to achieve clearance	Inspect 100% of distribution circuit miles in HFRA and prescribe mitigation as needed to achieve clearance	Inspect 100% of distribution circuit miles in HFRA and prescribe mitigation as needed to achieve clearance	100% annually
Inspections for Vegetation Clearance from Transmission Lines (VM-8)	Inspect 100% of transmission circuit miles in HFRA and prescribe mitigation as needed to achieve clearance	Inspect 100% of transmission circuit miles in HFRA and prescribe mitigation as needed to achieve clearance	Inspect 100% of transmission circuit miles in HFRA and prescribe mitigation as needed to achieve clearance	100% annually

RN-SCE-26-05: SCE's wood and slash management target is not specific or measurable.

Required Remedies:

SCE must revise its 2026-2028 Base WMP to include a qualitative target for its wood and slash management program that conforms to the requirements of the WMP Guidelines and ensures that the contract terms for wood and slash management are performed, documented, and enforced.

From WMP Guidelines, page A-15: "Specific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program."

SCE Response:

SCE has revised the qualitative target for wood and slash management. The revised target is documented below in Table SCE-RN-SCE-26-05 and is reflected in the updated Table 9-1 in the 2026-2028 Base WMP.

Table SCE-RN-SCE-26-05: Revised Wood and Slash Management Qualitative Target

Activity (Tracking ID)	2026 Status	2027 Status	2028 Status
Wood and Slash Contractor Management (VM-11)	Implement Work Management System mandatory fields to document the removal method for all wood and slash (debris) and implement mandatory QC fields for sample- based verification.	Monitor and develop reporting capability to document completion of wood and slash management activities.	Continue to monitor wood and slash management activities and identify updates to wood and slash management practices, where applicable.

RN-SCE-26-06: SCE dilutes its commitments to its quantitative pole clearing targets with qualifying language in the footnotes.

Required Remedies:

SCE must revise its 2026-2028 Base WMP to remove footnotes 4 and 5 of Table 9-2 and must stop equating attempts to inspect with completed inspections when establishing its targets.

SCE Response:

SCE has removed footnotes 4 and 5 from Table 9-2. Historically, SCE has counted attempts to inspect that could not be completed due to lack of access or other constraints towards its targets. This was in part due to the provisions of California Public Resources Code Section 4295 which states, “a person is not required by Section 4292 or 4293 to maintain any clearing on any land if such person does not have the legal right to maintain such clearing, nor do such sections require any person to enter upon or to damage property which is owned by any other person without the consent of the owner of the property.” Going forward, SCE will set the targets for VM-2.1 and VM-2.2 to exclude the historical scope of structures that SCE is unable to inspect due to factors such as property access hindrances, permitting and environmental constraints.

Based on 2024 data, this accounted for approximately 20% of the total counted towards Compliance and Additional Structure Brushing inspection targets. The change to VM-2.1, along with the changes discussed above in RN-SCE-26-01, results in a net increase to the initial target from 83,000 to 135,000. The change to VM-2.2 results in a decrease to the initial target from 91,500 structures to 73,000 structures. Subject to the constraints mentioned above, SCE makes reasonable attempts to brush all structures that are identified for structure brushing in HFRA and under PRC 4292.

Based on these adjustments, the revised targets for VM-2.1 and VM-2.2 are shown in Table SCE-RN-SCE-26-06 below and reflected in the updated Table 9-2 in the 2026-2028 Base WMP.

Table SCE-RN-SCE-26-04: Revised Pole Clearing Targets by Year

Activity (Tracking ID)	Cumulative Quarterly Target 2026, Q4	Cumulative Quarterly Target 2027, Q4	Cumulative Quarterly Target 2028, Q4	Three-year Total
Additional Structure Brushing (VM-2.1)	Inspect 135,000 structures and perform clearance where necessary	Inspect 135,000 structures and perform clearance where necessary	Inspect 135,000 structures and perform clearance where necessary	405,000
Compliance Structure Brushing (VM-2.2)	Inspect 73,000 structures and perform clearance where necessary and feasible	Inspect 73,000 structures and perform clearance where necessary and feasible	Inspect 73,000 structures and perform clearance where necessary and feasible	219,000

RN-SCE-26-07: SCE also dilutes its commitment to its quantitative pole clearing targets by using equivocating language in Table 9-2 via cross-referencing to another WMP section.

Required Remedies:

SCE must revise its 2026-2028 Base WMP to remove footnote 1 and its associated language from Table 9-2. SCE also must remove all equivocating language from the narrative in Section 9.12.1 that dilutes its commitments, including but not limited to references to targets as “internal,” “aspirational,” and commitments that SCE will “endeavor” to achieve.

SCE Response:

SCE has removed footnote 1 from Table 9-2 and removed related language identified by this critical issue in section 9.12.1. As mentioned in SCE’s responses to RN-SCE-26-01 and RN-SCE-26-06, SCE has revised its VM-2.1 and VM-2.2 targets to reflect the removal of footnote 1 that referenced environmental, access and other constraints. SCE explains in the narrative in section 9.4.3 that it will continue to strive to brush constrained structures.

RN-SCE-26-08: SCE failed to disclose two remote sensing pilot programs in its 2026-2028 Base WMP.

Required Remedy:

SCE must revise its 2026-2028 WMP to provide details on and discussion of its remote sensing pilot programs and must include:

- *All the information about SCE's remote sensing pilots disclosed in SCE's response to Data Request 12.*
- *A description of which remote sensing technologies SCE is piloting and which remote sensing technologies SCE is considering for future use.*
- *A description of how SCE is evaluating and will continually evaluate remote sensing for use in its inspections, including a process, criteria, and metrics for determining the success/failure of the pilot and the ongoing effectiveness of remote sensing inspections.*

SCE Response:

SCE has updated section 9.2.1.6 to discuss CanopySense and its associated proofs of concept, Crown Segmentation and TrimRx (Trim Prescription). CanopySense is comprised of these two solutions which were launched in 2025 and use remote sensing data (typically LiDAR) to determine vegetation location and clearance for Vegetation Management purposes. Crown Segmentation is being used to identify, with high accuracy, the location of vegetation around overhead lines and then match those with historical tree inventory records. The imagery-defined tree canopy (crown) records will be reimaged in future years to provide ongoing data for tree growth and diminution. The TrimRx (Trim Prescription) technology is being used to auto-define tree work prescriptions based on clearance measurements. TrimRx will evolve over time and integrate other factors such as tree growth rates and seasonal weather patterns to better calibrate auto-defined prescriptions.

Both solutions are being field validated by quality control personnel throughout 2025 and the beginning of 2026. Pending satisfactory results, SCE plans to pilot the new CanopySense technology in a phased approach starting in 2026. 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 supplemented ground inspections will be determined based on the pilot results. From 2026 to 2028, subject to the results of the remote sensing pilot, SCE plans to continue to use ground-based inspections in areas where remote sensing is unable to perform quality inventory inspections. Additionally, ground inspections will continue to be used for VM-1 (HTMP).

The success criteria for TrimRx will include the accuracy of automated trim prescriptions that match a corresponding field-verified trim prescription for the piloted circuits/areas. Other success criteria for Crown Segmentation will include the accuracy of individual tree canopies (crowns) that can be compared to existing manually collected inventory records.

RN-SCE-26-09: SCE's transition from ground inspections to remote sensing lacks explanation.

Required Remedy:

SCE must revise its 2026-2028 Base WMP to provide details on and discussion of its plans to transition from ground patrol inspections to remote-sensing technologies, including:

- *A description of how SCE plans to phase into remote sensing from ground-based patrol inspections, for years 2026, 2027, and 2028.*
 - *timeline, including measurable and auditable milestones, for the transition.*
 - *The timeline and milestones must be included in Table 9-1 as a qualitative target.*
- *A description of how and when SCE will perform ground-based patrol inspections in areas that have inconclusive remote sensing results or were not captured by remote sensing.*
- *Qualitative targets for mitigation activities the new VM-7 and VM-8 in Table 9-2 and correlating narrative consistent with SCE's response to Data Request 12, Question 1.*

SCE Response:

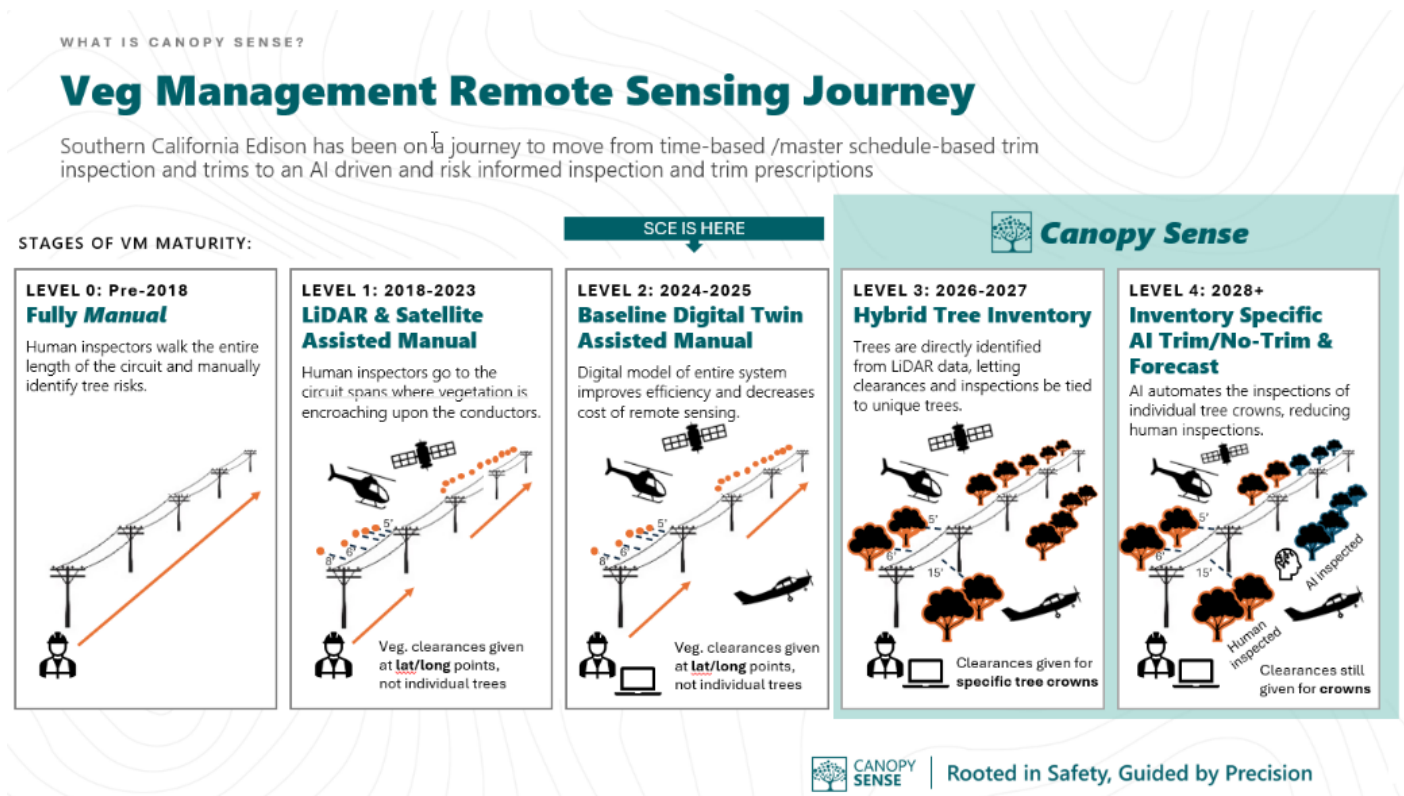
SCE has added four new qualitative targets as shown in table SCE-RN-SCE-26-09 below to represent plans to phase in remote sensing inspections and to evaluate the effectiveness of remote sensing pilots. In section 9.2.1.6 in the revised WMP, SCE explains how ground-based inspections will be performed in areas that have inconclusive remote sensing results.

Table SCE-RN-SCE-26-09: New Vegetation Management Qualitative Targets

Activity (Tracking ID)	2026 Status	2027 Status	2028 Status
Transition from Ground-based Inspections to Remote Sensing to Perform a Portion of Inspections for Clearances from Distribution Lines (VM-15)	Build core capabilities (crown segmentation and trim prescription) for Distribution to implement remote inspections and work prescriptions.	Begin operationalization and evaluation of remote sensing effectiveness for Distribution ground inspection reductions.	Deploy remote sensing where applicable and determine ground inspection reduction based on proven effectiveness of technology.
Transition from Ground-based Inspections to Remote Sensing to Perform a Portion of Inspections for Clearances from Transmission Lines (VM-16)	Begin operationalization and evaluation of remote sensing effectiveness for Transmission ground inspection reductions.	Deploy remote sensing where applicable and determine ground inspection reduction based on proven effectiveness of technology.	Evaluate and identify opportunities to increase effectiveness of technology by leveraging machine learning models.

Activity (Tracking ID)	2026 Status	2027 Status	2028 Status
Effectiveness of Remote Sensing Pilot – Distribution (VM-17)	Produce metrics for Distribution ground and remote sensing inspection efficacy.	N/A – Remote Sensing Pilot is scheduled to be completed in 2026.	N/A – Remote Sensing Pilot is scheduled to be completed in 2026.
Effectiveness of Remote Sensing Pilot – Transmission (VM-18)	Produce metrics for Transmission ground and remote sensing inspection efficacy.	N/A – Remote Sensing Pilot is scheduled to be completed in 2026.	N/A – Remote Sensing Pilot is scheduled to be completed in 2026.

Figure SCE-RN-SCE-26-09: SCE Anticipated Vegetation Management Remote Sensing Journey



RN-SCE-26-10: SCE's targets in Table 12-1 lack specificity and are not measurable.

Required Remedies:

SCE must revise its 2026-2028 Base WMP to provide qualitative targets for its activities listed in Table 12-1 that are “[s]pecific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program.” SCE must provide qualitative targets that reflect the changes described in the associated WMP narrative for Energy Safety to verify how SCE plans to monitor its vegetation management system work or make needed upgrades during the 2026-2028 WMP cycle.

SCE Response:

SCE has proposed new Enterprise System targets for the 2026-2028 WMP cycle that are specific, measurable, and align with planned changes as described in Section 12.2 of SCE's WMP. SCE has elaborated on planned changes as a part of stabilization and enhancement of its Vegetation Management (VM-6) and Inspections (IN-8) work management systems in updated targets added to Table 12-1.

The new VM-6 target describes SCE's plan to integrate CanopySense and transition more VM recordkeeping to Arbora. SCE will verify progress towards the completion of VM-6 through the number of IT tickets, project documentation, and work management system records.

The new IN-8 target specifies how SCE's inspections work management and data will migrate from legacy systems to the InspectForce software solution and integrate machine learning (ML) computer vision (CV) models in 2027 and 2028. SCE will verify progress towards IN-8 through training records, inspection documentation, and data showing evidence of the software solution running. SCE has added a sentence to Section 12.2 that clarifies how CV models referenced in IN-8 relate to machine learning models described in Section 8.3.1.3.

Table SCE-RN-SCE-26-10: Revised Enterprise System Targets

Activity (Tracking ID #)	2026 End of Year Total / Completion Date ³	2027 Total / Status	2028 Total / Status
Vegetation Work Management System (VM-6)	Continue enhancements and stabilization of Salesforce Field Service (SFS) Mobile application	Integrate CanopySense into Arbora for VM Transmission & Distribution inspections	Transfer record keeping from Fulcrum to Arbora for emergency response VM activities

³ The completion date for all qualitative targets is December 31st for each year unless otherwise specified.

Inspection and Maintenance Tools (IN-8)	Train users and roll out InspectForce software solution for distribution (ground-only) and 360 inspections (combined aerial & ground)	Integrate baseline computer vision (CV) models into 360 Inspections process to enhance inspection efficiency using InspectForce by reducing survey questions for manual data collection	Integrate expanded set of computer vision (CV) models into 360 Inspections process to further enhance efficiency of field inspection using InspectForce by reducing or avoiding the addition of new survey questions
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The Revision Notice states that SCE's qualitative targets for VM-6 and IN-8 lacked specificity, were not measurable, and therefore did not meet the WMP Guidelines requirements. The Revision Notice does not specify the same concerns for SCE's risk assessment (RM-1) and situational awareness (SA-14, SA-18, SA-3) enterprise system targets. Those four targets are specific, measurable, and remain unchanged. The existing targets align with changes described in Section 12.2 to refresh SCE's POI model using asset records on an annual basis and Chapter 10 discussion of situational awareness activities.

Cover Letter Appendix E – RN-SCE-26-03 Evidence

2025 FPI 2.0 Request for Proposal Summary

Overview	
ID	Doc5201065583
Status	Completed
Event Type	RFP
Template	SCE - Guided Sourcing Request for Proposal
Base Language	English
Departments	Indirect Services
Currency	US Dollar
Creation Date	06/05/2025

Timing Rules	
Publish time	6/6/2025 5:43 PM
Response end time	6/25/2025 4:00 PM
Estimated Award Date	07/07/2025
Close Date	7/25/2025 4:51 PM

Name
Totals
SCE Company Background
Southern California Edison (SCE) is one of the largest electric utilities in the United States and the largest subsidiary of Edison International. It is separate from other Edison International companies which are not regulated by the California Public Utilities Commission (CPUC). SCE is California's second largest investor-owned electric utility company supplying power to a population of over 14 million with over 5 million residential and business customers. SCE is a longtime leader in renewable energy and energy efficiency and has more than 125 years of experience in the transmission and distribution of electricity. SCE is headquartered in Rosemead, California. Please visit the company website at www.sce.com for more information about the company.
General Description
Southern California Edison is soliciting proposals from qualified suppliers for the procurement of service on a fixed price basis as requested by Enterprise Risk Management (ERM) and System Planning & Engineering (SP&E) departments. For the purposes of this proposal request, the terms "Edison", "Customer" and "SCE" are defined as Southern California Edison Company.
SCE seeks to conduct a thorough and independent evaluation of its fire potential index (FPI) 2.0, which is used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions. This effort will evaluate underlying model inputs, methodology and coding to identify limitations, potential gaps or areas for improvement that may exist to enhance risk modeling accuracy, including benchmarking. The evaluation will inform the use of FPI 2.0 and its components across wildfire and PSPS-related functions.
RFP Timeline
The following dates have been established as milestones for this RFP. Edison reserves the right to modify or change this timeline at its absolute discretion. Bidders who are responding to this RFP should time their correspondence with Edison in accordance with these milestone dates.

**** Please note, there is no "Bidder's Conference" activity planned for this event.**

- **06/06/2025:** RFP issued to Bidders
- **06/16/2025:** Intent to Bid Response
- **06/18/2025:** Bidder's written questions submitted through Ariba, due by 12pm (noon) PST
- **06/18/2025:** SCE to publish response to all written questions by End of Day (EOD)
- **06/25/2025:** RFP proposals due by 4pm PST
- **Mid-Late June:** Negotiations
- **Late June:** RFP Award announced

** Event has been extended and Timeline dates have been subsequently shifted*

**Another Extension has been granted to ensure quality bids are provided*

RFP Submission Response

Please upload all of your RFP responses documents in this section

Upload Pricing Workbook Response - Follow the directions in the RFP Pricing Workbook provided. SCE shall be utilizing this format as a baseline for grading.

Price Protection: All pricing and rates for services shall not exceed the proposed rates submitted in this RFP including those in any necessary Change Orders that are within scope.

Upload Statement of Work Responses - Provide redlined Statement of Work here, as part of your proposal response.

Upload Executive Summary Response

Upload Supplier Questionnaire Response

Upload Resumes of Proposed Resources - Response Resumes for the Proposed Team.

Upload Client References Response - Provide up to three (3) Client References

Upload Experience Information Response - (i.e. Case Study, Whitepaper, Project Examples)

****OPTIONAL Upload Alternative Proposal Response - if applicable, Bidder can choose to include alternative proposal items (zip file)**

2025 Risk Model Review Statement of Work Summary

SUMMARY STATEMENT OF WORK ("SOW")

Independent Assessment of In-House Wildfire Risk Models and Mechanisms

Introduction: SCE seeks to conduct a thorough and independent evaluation of SCE internally developed risk models and methodologies to identify whether or not potential gaps or areas for improvement exist to enhance risk modeling accuracy, ensure continued compliance with regulatory requirements and alignment with industry standards. These in-house models, developed since 2018, form a foundational layer for risk mitigation and scope selection.

Contractor will perform the following Services pursuant to this SOW:

Project Name:	<i>Independent Assessment of In-House Wildfire Risk Models and Mechanisms</i>
Description of Services:	<i>Third-party to conduct peer review of all in-house modeling work supporting wildfire mitigation and scope:</i> 1. POF Model Assessment and Validation: Evaluate asset failure models which drive the Probability of Ignition (POI) plus ancillary models which do not drive POI yet. This includes evaluating data quality and consistency, failure target consistency, feature recommendations, model code and model governance. 2. POI Model Calibration and Risk Modeling Alignment: Evaluate Probability of Ignition model and associated processes. This includes a review of model assumptions and methodology, validation of post-processing, back-casting, inventorying and evaluating model inputs and outputs, benchmarking, and calibration. 3. Mechanism for Mitigation Scoping and Selection: Document and evaluate logic, criteria, and methodology. This includes review and validation of input data sources, decision methodologies, modeling, benchmarking, etc. 4. Guidance on Consequence Ensemble Modeling: Provide guidance and recommendations on ensemble wildfire consequence models and SCE's potential approach.