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Docket# 2023-ARC

October 8, 2025

Patrick Doherty, Program Manager
Office of Energy Infrastructure Safety
Compliance Assurance Division
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Comments on the Office of Energy Infrastructure Safety's 2023 Annual Report on Compliance

Dear Mr. Doherty:

Southern California Edison Company ("SCE") respectfully submits the following comments on the Office of Energy Infrastructure Safety's ("Energy Safety") Annual Report on Compliance for SCE's 2023 Wildfire Mitigation Plan ("2023 ARC").

I. INTRODUCTION

SCE appreciates the opportunity to provide comments on the 2023 ARC, which reflects Energy Safety's evaluation of SCE's compliance with its 2023 Wildfire Mitigation Plan ("WMP"). Energy Safety found that "SCE completed 46 of 51 (90%) of its 2023 targets for initiative activities in its 2023-2025 Base WMP," including nine of the ten initiatives with the largest planned expenditures.¹ The 2023 ARC also concludes that "Energy Safety did not find any systemic issues that hindered SCE's ability to adequately implement its WMP in 2023."²

SCE's comments focus on two aspects of the 2023 ARC: (1) SCE clarifies the reasons for small differences between SCE's quarterly and year-end WMP target completion data for certain initiatives, and (2) SCE notes its ongoing concern regarding the retrospective use of outcome metrics to evaluate compliance with an approved WMP because such metrics are often influenced by external factors outside the utility's control such as extreme weather.

II. SCE'S 2023 WMP TARGET COMPLETION DATA WAS REPORTED IN ACCORDANCE WITH ESTABLISHED REQUIREMENTS FOR QUARTERLY AND YEAR-END FILINGS

The 2023 ARC states that Energy Safety identified eleven examples of inconsistent WMP target completion data reported between SCE's Quarterly Data Reports ("QDRs") and SCE's

¹ Energy Safety's 2023 ARC, p. 1.

² Energy Safety's 2023 ARC, p. 39.

year-end 2023 Annual Report on Compliance.³ In those eleven cases, the small differences in reporting are attributable to differences in timing between the QDR submissions and the filing of SCE's 2023 Annual Report on Compliance and year-end data validations.⁴

Each QDR represents a snapshot in time of data that SCE has available to it at the time of quarterly reporting. SCE's fourth quarter 2023 QDR was filed on February 1, 2024 and preceded SCE's 2023 Annual Report on Compliance filing by two months. Between the time the QDR is submitted and the time that SCE files its Annual Report on Compliance two months later, SCE's systems of record may be updated to reflect further data processing, updates to systems of record, and data validations that are not yet known at the time of QDR submission. SCE reflects its updated annual WMP target completion values in the year-end Annual Report on Compliance and considers that report as the authoritative source of information in cases of differences between WMP target completion data reported in earlier QDRs.

III. OUTCOME METRICS DO NOT NECESSARILY REFLECT WMP COMPLIANCE OR IMPLEMENTATION OF WMP INITIATIVES

Energy Safety explains that it "assessed each electrical corporation's infrastructure performance for the calendar years 2016 through 2023 with particular attention on the 2023 outcomes."⁵ As part of this performance evaluation, the 2023 ARC presents historical data for several "ignition risk metrics" and "outcome metrics," including ignition counts, wire down events, acres burned, and structures damaged or destroyed by wildfires, among other metrics.⁶

Consistent with SCE's comments on Energy Safety's Annual Report on Compliance for SCE's 2022 WMP,⁷ SCE remains concerned that outcome metrics may be overemphasized or used retrospectively to measure compliance with an approved WMP. SCE is committed to implementing wildfire mitigation activities designed to reduce the risk of catastrophic wildfires associated with its electrical infrastructure. Through an extensive review and approval process, SCE developed a comprehensive 2023-2025 WMP aimed at reducing wildfire risk, which was vetted by multiple stakeholders, approved by Energy Safety, and ratified by the California Public Utilities Commission.

The question of whether SCE complied with its WMP is distinct from the question of how certain risk events or yearly changes in outcome metrics demonstrate performance of an electrical corporation's infrastructure. This distinction is important because outcome metrics do not necessarily reflect whether an electrical corporation performed the initiatives in an approved

³ Energy Safety's 2023 ARC, p. 38.

⁴ Energy Safety also notes that the Substantial Vegetation Management Audit ("SVM") assessed 10 initiatives that were not included in SCE's Annual Report on Compliance. See Energy Safety 2023 ARC, p. 11 fn. 55. SCE did not include the 10 SVM initiatives in its 2023 Annual Report on Compliance because the 2023 Compliance Guidelines specified an assessment of "the electrical corporation's completion of all targets identified for each initiative listed in the tables in Section 8 of its WMP." See 2023 Compliance Guidelines, p. 10. SCE interpreted this guidance to refer to the WMP initiatives with specific prefixes and numerical identifiers in its WMP (e.g., SH-1) as opposed to the separate initiatives in the SVM audit.

⁵ Energy Safety's 2023 ARC, p. 16.

⁶ Energy Safety's 2023 ARC, pp. 16-37.

⁷ See SCE's Response to the Office of Energy Infrastructure Safety's 2022 Annual Report on Compliance, [TN14981_20241104T111658_SCE_Response_to_Energy_Safety's_ARC_for_SCEs_2022_WMP.pdf](https://www.sce.com/~/media/Files/2024/04/TN14981_20241104T111658_SCE_Response_to_Energy_Safety's_ARC_for_SCEs_2022_WMP.pdf)

WMP. Because outcome metrics are dependent on exogenous factors such as fuel moisture and weather conditions, a compliance assessment that overemphasizes such metrics may be disconnected from whether an electrical corporation actually performed the up front, approved activities outlined in its WMP. SCE's implementation of its approved WMPs should be evaluated based on adherence to its WMP activities rather than factors outside of its control.

IV. CONCLUSION

SCE appreciates the opportunity to provide these comments on the 2023 ARC and looks forward to continued collaboration with Energy Safety to continue to mitigate wildfire risk in SCE's service area. If you have questions, or require additional information, please contact me at gary.chen@sce.com.

Sincerely,

//s//

Gary Chen

Director, Safety & Infrastructure Policy