

March 27, 2023

Lucy Morgans  
Program Manager, Electric Safety Policy Division  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**SUBJECT:** Southern California Edison Company's 2023-2025 Wildfire Mitigation Plan Submission

Dear Program Manager Morgans:

Southern California Edison Company (SCE) provided its 2023-2025 Wildfire Mitigation Plan (WMP) Pre-Submission to the Office of Energy Infrastructure Safety (Energy Safety) on February 13, 2023. Energy Safety reviewed SCE's WMP Pre-Submission for completeness in accordance with Section 4.1 of the 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines.

On March 6, 2023, Energy Safety issued a determination letter stating that SCE's WMP Pre-Submission did not satisfy the completeness check. SCE has addressed the completeness check items (as shown in Appendix A). SCE has also made additional corrections to fix non-substantive errors (as shown in Appendix B).

SCE's WMP and its supporting documents are publicly available at:  
<https://www.sce.com/safety/wild-fire-mitigation>

If you have questions, or require additional information, please contact me at [michael.backstrom@sce.com](mailto:michael.backstrom@sce.com).

Sincerely,

//s//

Michael A. Backstrom  
Vice President, Regulatory Affairs  
Southern California Edison Company

## **APPENDIX A – COMPLETENESS CHECK ITEMS**

Below is a list of incomplete information in SCE’s 2023-2025 WMP Pre-Submission as identified by Energy Safety on March 6, 2023.

<b>Section of SCE’s WMP Pre-Submission</b>	<b>WMP Pre-Submission PDF page number</b>	<b>Information Required to Make Complete</b>	<b>SCE’s Actions to Make Complete</b>
6.3 Risk Scenarios	157	Overview not provided. Please include the overview required in this section.	SCE added an overview to Section 6.3.
6.3.2 Extreme Event/High Uncertainty Scenarios	162	Multiple scenarios are referred to in this section, however, only one is diagramed. Please include diagrams for the other scenarios.	SCE added an overview to Section 6.3.2 and clarified why only one diagram is presented.
6.5 Enterprise System for Risk Assessment	172	Overview not provided. Please include the overview required in this section.	SCE added an overview to Section 6.5.
8.1.2.4 Transmission Pole/Tower Replacements and Reinforcements	270	Section lacks detail and references other sections which do not directly discuss pole programs but discuss transmission overall. Please include an informative discussion of pole programs.	SCE added more information on pole programs in Section 8.1.2.4.
8.1.6 Quality Assurance and Quality Control	334	References supporting documentation that is unavailable (i.e., WMP includes company website link for documentation, but website shows supporting documentation is “TBD”). Please update to include supporting documentation or provide a direct link.	SCE provides its supporting documentation for the 2023-2025 WMP on its WMP and Related Documents website <a href="https://www.sce.com/safety/wild-fire-mitigation">https://www.sce.com/safety/wild-fire-mitigation</a> .
8.1.7 Open Work Orders	336	References supporting documentation that is unavailable (i.e., WMP includes company website link for documentation, but website shows supporting documentation is “TBD”). Please update to include supporting documentation or provide a direct link.	SCE provides its supporting documentation for the 2023-2025 WMP on its WMP and Related Documents website <a href="https://www.sce.com/safety/wild-fire-mitigation">https://www.sce.com/safety/wild-fire-mitigation</a> .
8.4.2.1 Emergency Preparedness Plan	538	Wildfire response flowchart is not included. Please include wildfire response flowchart.	SCE added two additional flowcharts related to wildfire response.
8.4.3.1 Emergency Planning	558	References supporting documentation that is unavailable (i.e., WMP includes company website link for documentation, but website shows supporting documentation is “TBD”). Please update to include	SCE provides its supporting documentation for the 2023-2025 WMP on its WMP and Related Documents website <a href="https://www.sce.com/safety/wild-fire-mitigation">https://www.sce.com/safety/wild-fire-mitigation</a> .
8.4.3.2 Communication Strategy with	561	References supporting documentation that is unavailable (i.e., WMP includes company website link for documentation, but website	SCE provides its supporting documentation for the 2023-2025 WMP on its

Section of SCE's WMP Pre-Submission	WMP Pre-Submission PDF page number	Information Required to Make Complete	SCE's Actions to Make Complete
Public Safety Partners		shows supporting documentation is "TBD"). Please update to include supporting documentation or provide a direct link.	WMP and Related Documents website <a href="https://www.sce.com/safety/wild-fire-mitigation">https://www.sce.com/safety/wild-fire-mitigation</a> .
8.4.3.3 Mutual Aid Agreements	562	Table 8-48 is incomplete. Please update the table with all required information: <ul style="list-style-type: none"> <li>• Add text on whether each MAA is for wildfire emergencies and/or disasters, Public Safety Power Shutoff (PSPS) events, or both</li> <li>• For Column B ("Scope of Mutual Aid Agreement"), summarize the scope of the MAA agreement</li> <li>• Information in column C ("Available Resources from Mutual Aid Partner") should be added to column A ("Mutual Aid Partner")</li> <li>• For column C ("Available Resources from Mutual Aid Partner"), include a list of the "resources" (not entities) that are available from the MAA partner (e.g., equipment, personnel, etc.)</li> <li>• The aerial suppression aide discussed in Section 8.4.3.3.1 should be an added row to the table</li> </ul>	SCE revised Table 8-48 with the requested information.
8.4.5.2 Planning and Allocation of Resources	570	The WMP references the "All-Hazards Plan Concept of Operations" but does not include the document in the pre-submission. Please include the document, or those portions relevant to Sec. 8.4.5.2, or a direct link.	SCE provides its supporting documentation for the 2023-2025 WMP on its WMP and Related Documents website <a href="https://www.sce.com/safety/wild-fire-mitigation">https://www.sce.com/safety/wild-fire-mitigation</a> .
8.4.6 Customer Support in Wildfire and PSPS Emergencies	574-575	Overviews not provided. Please provide required overviews of customer support provided during wildfire and PSPS emergencies for the following: outage reporting, support for low-income customers, and medical baseline support services.	SCE added an overview for the requested areas to Section 8.4.6.
8.5.3 Engagement with Access and Functional Needs Populations	602-603	References supporting documentation, its 2023 Annual Access and Functional Needs (AFN) Plan, however no link is provided. Please provide a direct link and include a narrative description of AFN challenges and needs.	SCE provides a reference to the AFN Plan and highlights AFN challenges and needs in Section 8.5.3.
9.1.4 Targets	616-617	Targets are not specific to PSPS. Please provide specific PSPS-reduction targets.	SCE provided PSPS-reduction targets in Section 9.1.4.

## **APPENDIX B - NON-SUBSTANTIVE ERRORS**

SCE and Energy Safety have identified a limited number of non-substantive errors since submitting the WMP on February 13, 2023. The table below summarizes the non-substantive revisions made by SCE.<sup>1</sup>

SCE has endeavored to accurately update page number references as required in various tables in Sections 3, 8 and 9. Some page numbers, in particular the references to the end of a section, may be slightly off due to pagination changes in converting the document to PDF. However, internal hyperlinks within the PDF should take the reader to the correct page.

<b>Location of Change<sup>1</sup></b>		<b>Nature of Change</b>
<b>Section / Table/ Figure</b>	<b>Page #</b>	
7.1.3 Table 7-2	189-190	Total mile figures listed in the three risk tranches were incorrect and did not match another instance of the same data in Table SCE 6-04. Table 7-2 was updated with the following changes: <ul style="list-style-type: none"> <li>• Severe Risk Areas: from 2,950 to 2,925 total miles</li> <li>• High Consequence Areas: from 4,400 to 4,275 total miles</li> <li>• Other HFRA: from 2,250 to 2,400 total miles</li> </ul>
8.1.2.3.2 (Figure SCE 8-06)	260	Dead-End Structure image was inadvertently removed in the pre-submission. Figure was revised to add the dead-end structure image to the left of the image.
8.1.2.5.2 (Figure SCE 8-09)	265	Long Span Initiative Process Flow revised to remove superfluous process box.
8.2.1.2 Vegetation Management Targets	378-381	SCE removed duplicated targets in Tables 8-14 and 8-15. Targets related to vegetation management inspections (e.g., SCE’s Hazard Tree Mitigation Program) were placed in Table 8-15 and were not repeated in Table 8-14. Table 8-14 now only contains VM-3 and VM-6. Table 8-15 has the additional VM initiatives beyond VM-3 and VM-6.
Table numbering	Tables and figures throughout WMP	SCE updated table and figures numbers throughout the WMP, following the numbering system and formatting from the WMP Guidelines to remove an extra space (e.g., Table 8- 15 changed to Table 8-15).

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<sup>1</sup> This list does not include minor non-substantive edits due to formatting, typographical, spelling, or grammatical errors.