

**ANNUAL REPORT (APRIL 2020) OF SOUTHERN CALIFORNIA
EDISON COMPANY (U 338-E)
REGARDING COMPLIANCE WITH ITS 2019 WILDFIRE MITIGATION PLAN**

Pursuant to Public Utilities Code (P.U.C.) Section 8386.3(c)(1), established by Assembly Bill (AB) 1054, SCE hereby provides this annual report addressing its compliance with its 2019 Wildfire Mitigation Plan (WMP) within three months after the end of its initial compliance period ending December 31, 2019. SCE substantially complied with its Commission-approved 2019 WMP, as set forth in detail below. Accordingly, pursuant to P.U.C. Section 8386.3(c)(2)(b)(i), after its retention, the Independent Evaluator (IE) should deem SCE to be in compliance with its 2019 WMP, and the Commission's Wildfire Safety Division (WSD) should affirm the safety certification pursuant to P.U.C Section 8386.3(c)(4).

BACKGROUND

On October 25, 2018, the California Public Utilities Commission (Commission or CPUC) opened Rulemaking (R.)18-10-007 to implement the provisions of Senate Bill (SB) 901 related to electric utility wildfire mitigation plans. New provisions of PUC 8386, enacted as part of SB 901, require all California electric utilities to prepare and submit wildfire mitigation plans that describe the utilities' plan to prevent, combat, and respond to wildfires affecting their service territories. On February 6, 2019, SCE submitted its 2019 WMP that describes strategies, programs, and activities that were in place, being implemented, or were under development at the time, to proactively address and mitigate the threat of electrical infrastructure-associated ignitions that could lead to wildfires, further harden the electric system against wildfires, and enhance wildfire suppression efforts.

After an extensive review process that included discovery, workshops and comments, the Commission, on May 30, 2019, found that SCE's WMP contained each of the required statutory elements and approved SCE's 2019 WMP in D.19-05-038, subject to certain reporting, metrics, data, and advice letter requirements.

COMPLIANCE WITH 2019 WILDFIRE MITIGATION PLAN

Since approval of its 2019 WMP, SCE has complied with the follow-up requirements ordered in D.19-05-038 and D.19-05-036 including submitting three Tier 1 advice letters and one Tier 3 advice letter Off Ramp Report, and submitting its Data Collection on Wildfire Mitigation Plans Report:

- On July 5, 2019, SCE submitted three Tier 1 advice letters in compliance with D.19-05-038

- **Advice 4030-E** describes SCE’s wildfire mitigation work that it has completed, plans to complete, and may do so during the 2019 WMP year in high fire risk areas (HFRA) outside the Commission’s High Fire Threat District (HFTD) map;¹
- **Advice 4031-E** describes SCE’s Enhanced Overhead Inspections (EOI) initiative by clarifying the differences from SCE’s existing inspections, explaining what the EOI involve, the specific activities that will be performed, and the data that will be collected as well as databases related to EOI; and
- **Advice 4032-E** describes and justifies covered conductor installation outside the Commission’s HFTD map as part of SCE’s Wildfire Covered Conductor Program (WCCP).
- As required by D.19-05-036, SCE submitted **Advice 4120-E** on December 2, 2019 describing SCE’s proposals to modify, reduce, increase or end wildfire mitigation measures in SCE’s 2019 WMP, as appropriate (“Off-Ramp” Advice Letter).²

In 2019, SCE tracked 58 specific wildfire-related mitigation activities included in its WMP. Some of these activities such as risk-informed tree removals, Enhanced Overhead Inspections, and installing covered conductor are designed to reduce the risk of ignitions

¹ In D.17-12-024, the Commission adopted new fire-safety regulations requiring investor-owned utilities (IOUs) to integrate into their operations a new High Fire Threat District (HFTD) map, indicating areas in California that are affected by Tree Mortality High Hazard Zones (Zone 1) or represent an elevated (Tier 2) or extreme (Tier 3) wildfire risk due to utility infrastructure-associated ignitions. These tier designations drive certain maintenance, inspection, and vegetation management criteria/inspection intervals of overhead assets in high fire-threat areas. Prior to the creation of the CPUC HFTD, SCE utilized multiple sources to specify which areas in its service area historically represented high fire risk. Since the issuance of that final decision, SCE maintained HFRA that was a combination of its historical map boundaries (based on past fire management and response experiences), CAL FIRE’s Fire Hazard Severity Zone (FHSZ) maps, and most recently, the CPUC HFTD map. From December 2017 through June 2019, SCE considered all four categories (*i.e.*, Zone 1, Tier 2, Tier 3, and non-CPUC historical high fire risk areas) to be “HFRA.” As shown in Table 3-5 of SCE’s 2019 WMP, approximately 4,200 square miles of SCE’s service territory (or approximately 8 percent) consisted of non-CPUC HFRA. In the fall of 2018, a team consisting of SCE employees with subject matter expertise in fire management/response, fire behavior/fuels, meteorology, maintenance/inspection, grid operations, vegetation management, and geospatial analysis embarked on a project to evaluate these non-CPUC HFRA areas (divided geospatially into over approximately 1,000 areas known as “polygons”). In June of 2019, SCE completed that review, and on August 19, 2019 filed a Petition for Modification (PFM) of D.17-12-024 to formally include the minority of at-issue non-HFTD HFRA polygons in the Commission’s official HFTD map. That PFM remains pending Commission action. In June 2019 SCE stopped treating as HFRA the majority of those at-issue polygons that SCE determined through its deliberative process to no longer constitute high fire threat risk. Conversely, however, prior to June of 2019, from an operational perspective SCE prudently treated those now tentatively “de-designated” HFRA polygons in a similar fashion to areas that fell within the Commission’s formal HFTD fire threat maps, in respect to some (but not all) of SCE’s wildfire mitigation activities and programs. Accordingly, some of activities SCE describes in this compliance filing were incurred in areas that while at the time were considered by SCE to be HFRA, are no longer considered as such.

² The Commission approved the vast majority of Advice 4120-E in D.20-03-004 in R.18-10-007. *See id.* at Ordering Paragraph 23.

associated with utility infrastructure. Others are targeted towards situational awareness and emergency preparedness in the event a wildfire occurs. Still others are associated with customer and community notifications and associated customer-impact mitigations regarding Public Safety Power Shutoff (PSPS) events. SCE also explored and evaluated several alternative technologies to potentially improve its ability to reduce the risk of and better respond to wildfire-related events.

Table 1 summarizes SCE’s compliance with its Commission-approved 2019 WMP across various activities and programs. In 2019, SCE met or exceeded its goals for the vast majority of activities identified in its plan, substantially completed the remaining activities, and greatly exceeded its plan in some areas. In many cases, SCE was able to accelerate activities in 2019 that provided greater and earlier reduction of wildfire risk than the plan anticipated as well as additional data to further enhance future plans. As reported in **Advice 4153-E**,³ SCE did not meet its initial plans in a handful of WMP activities by the end of 2019 due to resource constraints, operational challenges, inclement weather conditions that are outside of the direct control of SCE, and reprioritizing activities to address emergent issues such as PSPS events. These activities were subsequently completed in the first quarter of 2020 or will be completed early in the second quarter of 2020.

SCE has and is continuing to analyze operational data and modify its planning and deployment approaches to help improve performance in 2020 and beyond. SCE has already applied some of the lessons learned from implementing the wildfire mitigation activities and made appropriate modifications to its WMP activities as outlined in SCE’s “Off Ramp” Advice Letter report and 2020-2022 Wildfire Mitigation Plan.

As part of the normal operation of the electric grid, circuit topology within SCE’s service territory, including its HFRA will change from time to time to respond to changing load demands and operational needs. As a result, reported circuits and circuit miles within HFRA may differ between different reporting times. Accordingly, the numbers in this compliance report correspond to a snapshot of SCE’s HFRA at a specific period of time and prior or subsequent reports may differ depending on the state of the HFRA circuit topology at those times.

³ Southern California Edison Company’s Quarterly Advice Letter Pursuant to Assembly Bill 1054 Regarding the Implementation of Its Approved Wildfire Mitigation Plan and Its Safety Recommendations, January 31, 2020.

Table 1 - SCE 2019 Wildfire Mitigation Plan Goals and Compliance

	Activity	Description	2019 Goal	Progress
1.	RA-1	Expansion of risk analysis	Conduct risk analysis which includes, but is not limited to, 2018 fire ignition data, additional distribution and transmission information, and consequence modeling to evaluate wildfire risk at a circuit segment level	Complete. Conducted a risk analysis incorporating 2018 fire ignition data, additional system information, and consequence modeling.
2.	EVAL-1	Evaluation of High Fire Risk Area (HFRA) boundaries	Complete evaluation of non-CPUC HFRA for retention or exclusion	Complete. The technical review of non-CPUC HFRA for retention or exclusion was completed and the non-CPUC HFRA boundary-related Petition for Modification (PFM) of D.17-12-024 was filed in August 2019 in R.15-06-006.
3.	OP-1	Annual SOB 322 Review	Review and update SOB 322 to reflect lessons learned from past elevated fire weather threats and integrate, where applicable, new and improved data from its situational awareness resources	Complete. Revised SOB 322 now includes more details on 1) operating restrictions during elevated fire weather threats, 2) blocking transmission reclosers, 3) fast curve settings, 4) operations during PSPS events, 5) lessons learned from actual PSPS events, and 6) best practices from other utilities.
4.	OP-2	Wildfire Infrastructure Protection Team Additional Staffing	Hire one additional meteorologist	Complete. Hired one additional meteorologist for the Wildfire Infrastructure Protection Team.
5.	IN-1	Distribution Enhanced Overhead Inspections and Remediation in HFRA	IN-1.1: Complete visual inspection of all distribution circuits in HFRA before 5/31 ⁴	Complete. All distribution circuits in HFRA, were inspected under the EOI initiative in 2019. ⁵
6.			IN-1.2: Remediate all conditions that create a fire risk in accordance with CPUC requirements	Substantially Complete. Approximately 98% of notifications identified through the EOI initiative were remediated by 2019 year-end. Inclement weather and resource constraints partially driven by reallocation to emergent issues, including PSPS events, impacted work schedules. Almost all of the remaining notifications due in 2019 that had no valid GO-95 exception were remediated by the end of Q1 2020, with a small percentage to be remediated in the second quarter of 2020.

⁴ As described in SCE's December 2, 2019 Off Ramp Report (Advice 4120-E), to improve its ground-based EOI effort, SCE launched a comprehensive and complementary aerial inspection of pole tops, wooden crossarms, steel structures, and all conductor/hardware that may not be easily visible from the ground. SCE also initiated an effort to ensure all applicable electrical assets co-located with utility-owned generation assets were being inspected through the transmission and distribution EOI efforts.

⁵ Two circuits, out of more than 1,000 circuits, were inspected during June and July of 2019. While previous reports indicated that all distribution "structures" in HFRA were completed in 2019, SCE clarifies that all distribution "circuits" in HFRA were inspected in 2019. SCE's current analysis of the data indicates that less than one percent of total structures on circuits in HFRA do not have supporting records to demonstrate they have been inspected pursuant to EOI in 2019, so SCE will be inspecting or reinspect them again in 2020. SCE is still in the process of finalizing the data quality assurance process.

	Activity	Description	2019 Goal	Progress
7.	IN-2	Transmission Enhanced Overhead Inspections and Remediation in HFRA	IN-2.1: Complete visual inspection of all transmission circuits in HFRA before 5/31	Complete. All transmission circuits in HFRA were inspected under the EOI initiative in 2019. ⁶
8.			IN-2.2: Remediate all conditions that create a fire risk in accordance with CPUC requirements	Substantially Complete. Approximately 82% of notifications identified through the EOI initiative were remediated by 2019 year-end. Inclement weather and resource constraints partially driven by reallocation to emergent issues, including PSPS events impacted work schedules. Almost all of the remaining notifications due in 2019 that had no valid GO-95 exception were remediated by the end of Q1 2020, with a small percentage to be remediated by early in the second quarter of 2020. ⁷
9.	IN-3	Quality Oversight / Quality Control of Enhanced Overhead Inspections (EOI)	Perform quality review on approximately 7,500 Transmission and Distribution structures in HFRA based on EOI inspections	Complete. More than 17,000 EOI Transmission and Distribution structures in HFRA were inspected for quality review.
10.	IN-4	Infrared Inspection of energized overhead distribution facilities and equipment	IN-4.1: Inspect 50% of overhead circuit lines in HFRA	Complete. 56% (or approximately 4,900 miles) of distribution overhead circuit lines in HFRA were inspected.
11.			IN-4.2: Remediate conditions as required based on inspection results	Complete (one item after original target date). All conditions identified for remediation in 2019, except one, was completed by end of 2019. This one exception, that was delayed due to weather, was completed in early January of 2020.
12.	IN-5	Infrared Inspection, Corona Scanning, and High Definition imagery of energized overhead transmission facilities and equipment	IN-5.1: Complete IR, Corona, and HD image scanning of all overhead transmission lines in HFRA that are loaded to 40% of rated capacity or higher ⁸	Complete. All overhead transmission lines in HFRA were infrared and corona scanned and HD imaged. ⁹
13.			IN-5.2: Integrate remediation with EOI activities	Complete. SCE integrated infrared inspection, corona scanning, and HD imaging-identified remediation with EOI work. Priority 1 conditions or notification items were

⁶ One circuit (out of more than 400) was inspected in August 2019. While previous reports indicated that all transmission "structures" in HFRA were inspected in 2019, SCE clarifies that the 2019 WMP goal was to inspect all transmission "circuits" in HFRA. SCE's current analysis of the data indicates that less than one percent of total structures on circuits in HFRA do not have supporting records to demonstrate they have been inspected pursuant to EOI in 2019, so SCE will be inspecting or reinspecting them again in 2020. SCE is still in the process of finalizing the data quality assurance process to ensure every structure on the relevant circuits was inspected in 2019.

⁷ SCE's quality assurance review may identify additional notifications that will need to be addressed.

⁸ As described in its Off Ramp Report (4120-E), SCE elected to conduct these inspections on lines loaded at lower than 40% of their rated capacity and in months with lower ground temperatures.

⁹ One transmission line was not flown independently and only a small portion was captured. SCE is still in the process of finalizing the data quality assurance process to validate the total mileage scanned.

	Activity	Description	2019 Goal	Progress
				immediately evaluated and remediated. Priority 2 and 3 notifications went through an internal review and validation process prior to being sent to field crews to remediate.
14.	SH-1	Covered Conductor	Install at least 96 circuit miles of covered conductor in HFRA	Complete. Installed well in excess of 96 circuit miles of covered conductor in HFRA. ¹⁰
15.	SH-2	Evaluation of Undergrounding in HFRA	Conduct evaluation of undergrounding for HFRA	Complete. Method for selecting circuit segments for undergrounding was developed, and initial scope selection completed.
16.	SH-3	Composite Poles and Crossarms	Install at least 1,100 composite poles	Complete. More than 1,400 composite poles installed. ¹¹
17.	SH-4	Branch Line Protection Strategy	Install at least 7,500 CLF in HFRA locations	Complete. CLFs installed at more than 7,500 locations in HFRA. ¹²
18.	SH-5	Remote Controlled Automatic Reclosers (RAR) Installations	Install at least 50 new RAR	Complete. 55 RARs were installed.
19.	SH-6	Remote Controlled Automatic Reclosers Setting Updates	Update at least 150 existing RAR settings	Complete. 151 RAR settings were updated.
20.	SH-7	Circuit Breaker Fast Curve	SH-7.1: Develop engineering plan to upgrade remaining Circuit Breaker relays and update settings	Complete. Engineering plan completed. All job walks completed, projects scoped and updated into work plan for design/execution.
21.			SH-7.2: Conduct Circuit Breaker upgrades and setting updates according to plan	Complete. Engineering design commenced for all projects according to plan. Engineering contracts have been issued to the regional engineering vendors who are currently working on the design for execution in 2020.
22.	VM-1	Hazard Tree Mitigation program	VM-1.1: Perform at least 125,000 tree-specific threat assessments in HFRA	Complete. More than 129,000 tree assessments completed.
23.			VM-1.2: Perform at least 7,500 risk-based tree removals or mitigations in HFRA	Incomplete per original goal (complete per revised goal communicated to the CPUC). ¹³ Approximately 5,900 hazard trees removed. SCE encountered obstacles regarding timely permission for removals and slower than

¹⁰ The exact number of installed circuit miles of covered conductor is subject to confirmation through additional and ongoing field validation.

¹¹ Previous SCE reports indicated that exactly 1,421 composite poles were installed in 2019. SCE is still in the final data quality assurance process to validate exact counts.

¹² SCE is still in the final data quality assurance process to validate the exact counts of CLFs installed during 2019 but is confident it is more than 7,500.

¹³ As communicated in SCE's 2019 WMP Progress Update as of July 2019 and in the CPUC WMP Phase 2 Workshop (September 17, 2019), permitting issues resulted in a revised internal forecast of approximately 4,500 trees to be removed.

	Activity	Description	2019 Goal	Progress
				expected onboarding of contractors needed to perform the removals.
24.	VM-2	Expanded Pole Brushing	1) Inspect and clear brush to 10 feet radial clearance at the base of the pole (at least 25,000 additional poles) 2) Clear brush as necessary to achieve 10 feet of clearance	Complete. Conducted more than 80,000 instances of brush and vegetation clearances on HFRA poles (goal was 25,000 additional poles as compared to PRC 4292 compliance baseline).
25.	VM-3	Expanded clearance distances at time of maintenance	Obtain tree-to-line clearance of 12 feet, as achievable, in HFRA at time of maintenance for line voltages of 2.4kV to 69kV	Complete. 2019 Goal was adoption of the new standard, to be fully implemented within 12 to 18 months. The new standard (12 feet at time of trim) for distribution voltages piloted in Q1 and Q2 and was implemented across SCE's HFRA in June. Post-adoption, SCE pruned to 12 feet when feasible, and tree-specific exceptions were evaluated to ensure the regulatory compliance requirement distances(s) were maintained. SCE worked with local governments and hired "notification consultants" to directly interact with customers.
26.	VM-4	Drought Relief Initiative (DRI) quarterly inspections and removals	VM-4.1: Perform all quarterly DRI inspections	Complete. All quarterly DRI inspections were completed.
27.			VM-4.2: Remove identified dead, dying, or diseased trees in accordance with SCE's vegetation management program	Complete. Removed identified trees in accordance with SCE's vegetation management program.
28.	VM-5	LiDAR Inspections of Transmission (220 kV and above)	LiDAR inspect at least 1,000 conductor miles in HFRA (results from LiDAR inspections will be used to inform of subject trees assessed under the Hazard Tree Mitigation program)	Complete. Over 1,400 transmission conductor miles were LiDAR inspected. ¹⁴
29.	VM-6	Perform Quality Control inspections of vegetation management	VM 6.1: Quality Control inspect vegetation adjacent to approximately 450 miles of distribution circuits	Complete. Vegetation adjacent to over 2,100 miles of distribution circuits were inspected for quality control. ¹⁵
30.			VM 6.2: Quality Control inspect vegetation adjacent to 400 miles of transmission circuits	Complete. Vegetation adjacent to over 850 miles of transmission circuits were inspected for quality control.
31.	SA-1	Additional Weather Stations	Install at least 315 units in HFRA	Complete. Over 350 Weather Stations installed.
32.	SA-2	Fire Potential Index (FPI) Phase II	Enhance capabilities of FPI by increasing granularity, adding historical climatology data, and	Complete. Enhanced capabilities of FPI by increasing granularity, adding historical climatology data, and expanding to cover all of SCE's service territory. Phase II will continue

¹⁴ Previous reports indicated a slightly different number of miles of LiDAR inspections, but in all instances, SCE greatly exceeded its 2019 WMP goal.

¹⁵ Previous reports indicated a slightly different number of distribution circuit miles.

	Activity	Description	2019 Goal	Progress
			expanding to cover all of SCE's service territory	to be further enhanced per SCE's 2020-2022 WMP.
33.	SA-3	Additional HD Cameras	Install at least 62 cameras on 31 towers	Complete. Approximately 90 HD cameras installed.
34.	SA-4	High-Performing Computer Weather Modeling System	Procure and install High Performance Computing Cluster (HPCC) weather and fuels modeling system	Complete. 1 HPCC installed and operational.
35.	SA-5	Develop Asset Reliability & Risk Analytics Capability	Complete implementation of the Asset Reliability and Risk Analytics tools	Complete. Completed implementation of the Wildfire Risk Model which calculates risk at the asset level.
36.	PSPS-1	De-Energization Notifications	PSPS 1.1: Notify applicable public safety agencies and local governments of possible de-energization	Complete. Notifications sent to public safety agencies and local governments for each of the 16 PSPS events in 2019.
37.			PSPS 1.2: Notify CalOES through the State Warning Center of possible de-energization	Complete. Notifications sent to CalOES through the State Warning Center for each of the 16 PSPS events in 2019.
38.			PSPS 1.3: Notify the CPUC of possible de-energization	Complete. Notifications sent to the CPUC for each of the 16 PSPS events in 2019.
39.			PSPS 1.4: Enhance Emergency Outage Notification System to include in-language messages	Complete. In Language Solution was implemented on November 25, 2019 and PSPS messaging will be delivered in English plus the five primary additional languages within SCE's service area.
40.	AT-1	Alternative Technology Pilots	AT-1.1: Pilot installation of 50 CAL FIRE-exempt surge arrestor units in target locations	Complete. CAL FIRE-exempt surge arrestors installed in more than 50 pilot locations to understand operating characteristics ¹⁶
41.			AT-1.2: Pilot meter alarming for downed energized conductor (MADEC)	Complete. Completed pilot meter alarming for downed energized conductor. As described in its December 2, 2019 Off Ramp Report, following a successful pilot SCE broadly operationalized this MADEC algorithm across its service territory.
42.	AT-2	GSRP Wildfire Mitigation Program Study	AT-2.1: Evaluate distributed fault anticipation technology and conduct pilot installations of at least 10 devices	Complete. Evaluation of technology completed, and 54 pilot units were installed, of which 24 units were fully commissioned by end of 2019.
43.			AT-2.2: Evaluate Beyond Visual Line of Sight Unmanned Aerial System capabilities.	Complete. Evaluation and study report completed. Results and second phase of this pilot are outlined in SCE's 2020-2022 WMP.
44.	AT-3	Alternative Technology Evaluations	AT-3.1. Evaluate Rapid Earth Fault Current Limiters/Arc Suppression Coils	Complete. Assessment completed with a recommendation to proceed with a pilot installation as outlined in SCE's 2020-2022 WMP.

¹⁶ Previous reports indicated SCE had installed surge arrestor units in 50 pilot locations. Upon further data validation, SCE confirms that number of pilot locations was actually 56 in 2019.

	Activity	Description	2019 Goal	Progress
45.			AT-3.2. Evaluate alternate fault detection technology	Complete. Assessment completed with a recommendation to proceed with pilot installations as outlined in SCE's 2020-2022 WMP.
46.			AT-3.3. Evaluate fire retardant barrier for wood poles	Complete. Completed evaluation of new fire-retardant wrap for wood poles as an alternative to fire-resistant composite poles and issued associated design standards. Evaluation demonstrated that fire-retardant wrap should be implemented as an option, along with composite poles as the other option, as part of SCE's fire-resistant pole strategy.
47.			AT-3.4: Evaluate substation-class electronic fuses	Complete. Engineering evaluation completed. Determined to not move forward with this technology at this time.
48.			AT-3.5: Evaluate branch line protection to include single phase reclosing	Complete. Evaluation completed. 8 pilot units installed.
49.	AT-4	Alternative Technology Implementation	AT-4.1: Develop standard installation practices for Aeolian vibration dampers	Complete. Standards published for use of aeolian dampers with existing conductor. SCE evaluating use of aeolian dampers with covered conductor.
50.			AT-4.2: Develop standard installation practices for ridge pin construction for conductor rebuild	Complete. Standards published and operational.
51.			AT-4.3: Update Distribution Overhead Construction Standards requirements for connector selection in HFRA	Complete. Updated and published Design and Construction standards for connector selection for use in HFRA.
52.	DEP-1	Customer Education and Engagement	DEP-1.1: Conduct a direct mail campaign to inform customers in HFRA	Complete. Sent direct mail campaign to over 1 million customer accounts in HFRA. ¹⁷ Direct mailers also sent to a subset of customers in non-HFRA, starting in November 2019.
53.			DEP-1.2: Develop Local Government Education and Engagement Community Meeting plan	Complete. Local Government Education and Engagement Community Meeting Plan developed.
54.			DEP-1.3: Execute Local Government Education and Engagement Community Meeting according to plan	Complete. Local Government Education and Engagement Community Meeting Plan executed including 145 meetings with local elected officials, cities and counties, Board of Supervisors, and first responders; 138 presentations at City Council/Board of Supervisor meetings; 63 meetings with legislators; 16 briefings with priority business

¹⁷ Previous reports described the number of “customers” who were sent letters. Here SCE clarifies the number of “customer accounts” that were sent letters.

	Activity	Description	2019 Goal	Progress
				associations; 7 briefings with priority governmental associations; and 12 Community Meetings throughout the SCE territory.
55.	DEP-2	Emergency Responder Training	DEP-2.1: Wildfire response training for new or existing responders	Complete. All new and existing IMT members trained on wildfire response.
56.			DEP-2.2: Conduct internal IMT Training around wildfire response and de-energization protocols	Complete. Conducted internal IMT training for key personnel on PSPS Incident Management Teams.
57.	DEP-3	Bolster Incident Management & Incident Support Team members	DEP-3.1: Determine positions that need enhanced staffing	Complete. Conducted assessment for enhanced staffing as described in SCE's Off Ramp Report (Advice 4120-E), evaluation resulted in: expansion of PSPS IMTs from 4 to 6 teams; addition of one position to each role on the teams; and establishment of enhanced Circuit Evaluation (ACE) team to support analysis of environmental and circuit health conditions.
58.			DEP-3.2: Train, exercise, and qualify new staff to meet identified need	Complete. All new responders/staff trained and exercised prior to activation on an IMT.