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Managing Director,
State Regulatory Operations

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Docket# 2024-SCs

OFFICE OF ENERGY INFRASTRUCTURE SAFETY OF THE CALIFORNIA NATURAL RESOURCES
AGENCY

SUBJECT: Southern California Edison Company's Quarterly Notification Pursuant to Public Utilities Code Section 8389(e)(7) Regarding the Implementation of Its Approved Wildfire Mitigation Plan and Its Safety Culture Assessment Recommendations

Southern California Edison Company (SCE) submits this Notification, which includes discussion of the implementation of our 2023-2025 Wildfire Mitigation Plan (WMP),¹ recommendations of the most recent safety culture assessment, a statement of the recommendations of its board of directors' safety committee² (Committee) during meetings that occurred during 2023 and 2024, and a summary of the implementation of Committee recommendations in the third quarter of 2024 from previous meetings.

PURPOSE

The purpose of this Notification is to comply with the provisions of Public Utilities Code (PUC) Section 8389(e)(7), established by California Assembly Bill (AB) 1054 as amended by AB 148.

BACKGROUND

AB 1054 was signed into law by Governor Newsom on July 12, 2019, and AB 148 was signed into law on July 22, 2021. Section 8389(e)(7), which was added to the PUC by AB 1054 as amended by AB 148, reads:

The Director of the Office of Energy Infrastructure Safety shall issue a safety certification to an electrical corporation if the electrical corporation provides documentation of the following: ... The electrical corporation is implementing its approved wildfire mitigation plan. The electrical corporation shall file a notification of implementation of its wildfire mitigation plan with the office and an information-only submittal with the commission on a quarterly basis that details the implementation of both its approved wildfire

¹ Public Utilities Code Section 8389 requires a quarterly notification detailing the implementation of an electric corporation's approved WMP. SCE is reporting on the implementation of its 2023-2025 WMP, which was submitted to the Office of Energy Infrastructure Safety (Energy Safety) on March 27, 2023.

² SCE's board of directors' safety committee is known as the Safety and Operations Committee of the Board of Directors and referred to herein as the "Committee."

mitigation plan and recommendations of the most recent safety culture assessments by the commission and office, and a statement of the recommendations of the board of directors' safety committee meetings that occurred during the quarter. The notification and information-only submittal shall also summarize the implementation of the safety committee recommendations from the electrical corporation's previous notification and submission. If the office has reason to doubt the veracity of the statements contained in the notification or information-only submittal, it shall perform an audit of the issue of concern. The electrical corporation shall provide a copy of the information-only submittal to the office.³

SCE provides the required information below:

(1) Quarterly Information-Only Submittal to the CPUC

SCE is simultaneously submitting this quarterly notification to the California Public Utilities Commission as an information-only submittal via email to Executive Director Rachel Peterson at rachel.peterson@cpuc.ca.gov; Forest Kaser at forest.kaser@cpuc.ca.gov; Simon Baker at simon.baker@cpuc.ca.gov; Danjel Bout at danjel.bout@cpuc.ca.gov; Eric Wu at eric.wu@cpuc.ca.gov and Leslie Palmer at leslie.palmer@cpuc.ca.gov, Order Instituting Rulemaking to Develop Safety Culture Assessments for Electric and Natural Gas Utilities service list R.21-10-001, Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 service list R.18-10-007, most recent general rate case application proceeding service list A.23-05-010 (Phase 1) and A.24-03-019 (Phase 2), and safetypolicycentralfiles@cpuc.ca.gov.

(2) Implementation of Wildfire Mitigation Plan

On March 27, 2023, SCE submitted its 2023-2025 WMP. The WMP included discussion of 2023-2025 programs and activities, as well as successes and lessons learned from 2022. For 2024, SCE is tracking 37 specific wildfire-related activities, including grid hardening, enhanced inspection and repair programs, continuation of robust vegetation management, increased situational awareness and response, and activities for Public Safety Power Shutoff (PSPS) resilience and community engagement, particularly for underrepresented groups and access and functional needs customers.

In Attachment A (SCE's 2023-2025 Wildfire Mitigation Plan Progress Update – Q3 2024), SCE presents detailed information about the implementation status of each of these wildfire-related mitigation activities. SCE is currently on track to substantially meet the 2024 year-end targets set forth in its WMP, with 17 of the 37 activities completed. Two activities are behind plan (Tree Attachments and Distribution Ground/Aerial Inspections). Two activities (Transmission Open Phase Detection and Grounding Conversions) are at risk of not meeting year-end targets. Four activities (Covered Conductor, Targeted Undergrounding, InspectForce,

³ Pub. Util. Code § 8389(e)(7).

and REFCL Ground Fault Neutralizer) will not meet their year-end targets. Further details on these four activities are provided below:

- SH-1 (Covered Conductor): Year-end target will not be met due to environmental and permitting constraints.
- SH-2 (Targeted Undergrounding): Year-end target will not be met due to multiple constraints, including challenges with permitting and execution delays and delays in obtaining easements.
- SH-17 (Rapid Earth Fault Current Limiter (REFCL) Ground Fault Neutralizer (GFN): Year-end target will not be met due to schedule impacts associated with obtaining long-lead time materials.
- IN-8 (Inspection & Maintenance Tools InspectForce): Year-end target will not be met due to additional efforts to evaluate costs and schedule delays, including the time needed to perform certain software updates associated with distribution and transmission inspections.

(3) Implementation of Objectives

SCE identified 53 objectives in the 2023-2025 WMP submitted March 27, 2023. There are three objective types: (1) Chapter 4.2 objectives⁴ that provide an overview for objectives and are high-level objectives that were provided in the context of SCE's overall WMP strategy and portfolio; (2) Three-year objectives⁵ at the beginning of Chapters 8 and 9; and (3) Ten-year objectives⁶ in Chapter 8 & 9. As of September 31, 2024, all 53 objectives are on track.

(4) Implementation of Most Recent Safety Culture Assessment

Energy Safety issued the 2023 Safety Culture Assessment (SCA) Report for SCE on March 22, 2024. The SCA was conducted by the National Safety Council (NSC), Energy Safety's third-party administrator. As discussed in more detail below, SCE has been addressing the five findings and recommendations of its most recent SCA report.⁷ Below SCE describes how it has implemented actions to address these findings and recommendations in Q3.

⁴ See Southern California Edison Company's 2023-2025 WMP, filed March 27, 2023, [TN11952-2 20230327T125844 20230327 SCE 2023 WMP R0.pdf, pp. 20-21](#)

⁵ SCE WMP, Table 8-1, pp. 231-233, Table 8-12, p. 375, Table 8-21, p. 446, Table 8-33, p.520, Table 8-53, p. 576, Table 9-3, p. 615.

⁶ SCE WMP, Table 8-02, pp. 234-235, Table 8-13, p. 376, Table 8-22, p. 447, Table 8-34, p.521, Table 8-54, p. 577, Table 9-4, p. 616.

⁷ Energy Safety initiated its 2023 SCA process for electrical corporations on June 26, 2023. SCE partnered with Energy Safety and National NSC to complete the management self-assessment and workforce safety culture survey. SCE filed comments on the draft report on March 8, 2024, received its final 2023 SCA report on March 22, 2024, and submitted a Letter Acceptance of 2023 SCA Report on April 24, 2024.

1. *Continue to build SCE's capacity as a learning organization (Recommendation 3.1): SCE should build its capacity as a learning organization. It should take a proactive approach to incorporating feedback to improve organizational processes. It should also take steps to increase workers' psychological safety to improve the quantity and quality of safety event (near-miss and hazard) reports, by:*
 - a. *Focus on improving safety-enabling systems such as the investigation and root cause analysis of incidents.*
 - b. *Offer more opportunities for frontline workers and contractors to discuss lessons learned from safety events (near-misses and hazards) to foster psychological safety (i.e., a sense of safety that allows workers to feel empowered to speak up).*
 - c. *Measure frontline leaders' progress on implementing training concepts such as coaching conversations to provide accountability and allow SCE to evaluate its improvement through learning and refine actions as needed.*
 - d. *Develop and implement a plan to increase the quantity and quality of safety event (near-miss and hazard) reports submitted by frontline employees. The effectiveness of an event investigation depends on the quality of the information reported about the event.*

Addressing this recommendation, SCE continues to implement a refined Incident Management System, embed Human and Organizational Performance (HOP) concepts into operations, and drive learning across employees and contractors.

- a. Addressing recommendations a) and d), the comprehensive Incident Management System platform, which includes a user-friendly interface for reporting observations, will be instrumental in fostering organizational learning. Our focus on high-energy hazards, most likely to result in a Serious Injury or Fatality (SIF), is central to the Environmental Health Safety & Quality (EHSQ's) approach. The Energy-Based Observation (EBO) process helps identify whether direct controls are in place for each observed high-energy hazard and provides that for every high-energy hazard, there is a corresponding control measure to reduce the probability of a SIF occurrence. Such observations can prompt on-site coaching and problem-solving, enhancing safety performance in real time, and foster broader learning as the process matures. We are currently implementing the Incident Management, Corrective Actions, Inspections, Compliance, and Conditional Contractor modules of our Incident Management System through Q1, 2026. These new modules will improve organization learning by providing an easily accessible and user-friendly platform that better integrates safety data.
- b. Weekly Incident Reports continue to drive learning opportunities for frontline workers

and contractors to discuss and apply lessons learned from incidents and close calls.

- c. Substation, Construction, and Maintenance (SC&M) and Grid Operations have held re-occurring HOP Event Learning Sharing Sessions where leaders and field crews identify and share learnings from events, including examples of crews effectively applying HOP principles. Both organizations have embedded HOP principles in their organizational culture. HOP principles and learnings are integrated and shared in a variety of meetings and forums building our capacity as a learning organization.

2. *Strengthen Safety Communications Between Leadership and Frontline Workers (Recommendation 3.2): SCE should continue efforts to improve safety communications between leadership and frontline workers, by:*

- a. *Consider deploying an incident management team liaison to the field during incidents to be a part of monitoring and service restoration to better understand the frontline workers' experiences.*
- b. *Continue to implement measures to increase organizational learning through regular cross-departmental topic-specific safety listening sessions.*

Addressing this recommendation, SCE continues to improve communications between frontline workers and our PSPS operations.

- a. SCE's Incident Management Team (IMT) maintains constant communication with field personnel during incidents through various channels. First, select IMT personnel have roles dedicated to directly communicating with field and switching center personnel during an event. Second, designated leaders or supervisors at the district level act as liaisons between the IMT and field personnel. Third, periodically, senior leaders from PSPS and Operations are in the field during PSPS incidents to engage with and solicit feedback from field and customer support personnel. When this recommendation was first raised in 2022, SCE considered deploying additional liaison positions to the field during IMT incidents in addition to the communication channels and liaisons described above. SCE ultimately determined that further touchpoints were unnecessary and redundant to what was already in place. Further, SCE determined that deploying liaisons at the start of an IMT incident was less efficient than directly communicating with field personnel already in place, given the amount of territory an incident could cover, and the uncertainty of which circuits would ultimately be impacted. When the recommendation was renewed in 2023, SCE revisited the issue and came to the same determination.
- b. SCE continued to advance safety culture through improved understanding by holding in-person "Roundtable" sessions designed to share PSPS and safety-related information, as

well as solicit concerns and feedback. SCE conducted three Roundtable sessions this quarter because multiple PSPS activations took place.

3. *Improve Training for Frontline Workers on New Technologies Related to Wildfire Mitigation (Recommendation 3.3): SCE should increase training for frontline workers on wildfire suppression and the installation and operation of new technologies related to wildfire mitigation, including REFCL devices, by:*
 - a. *Continue to improve its training for frontline workers, particularly concerning wildfire suppression and the installation and operation of new technologies related to wildfire mitigation (e.g., REFCL devices).*
 - b. *Increasing training options to include more hands-on and less computer-based delivery.*

Addressing this recommendation, in Q3 SCE:

- a. Completed initial REFCL training to 100% of all impacted SCE locations for in-scope job classifications. SCE will continue to expand in-person REFCL training throughout 2025. Site specific just-in-time training will be provided to employees assigned to that location once the REFCL at Phelan Substation is ready to be energized.
 - b. Is conducting a holistic review of training materials to identify technical content related to fire suppression training for frontline workers. SCE is targeting a proposal with continuous improvement options by Q4 2024.
4. *Mitigate risk exposure posed by interactions with the public (Recommendation 3.4): SCE should continue to recognize and take action to mitigate the risk exposure posed by interactions with the public by:*
 - a. *Continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.*
 - b. *Continue to track these incidents and further strengthen its strategy for managing risk exposure posed by interactions with the public.*

Addressing this recommendation in Q3, SCE:

- a. Developed and piloted a Customer De-escalation workshop that provides practical skills application and a leader reinforcement tool kit. This workshop is being evaluated as a mitigation to reduce risk exposure.

5. *Increase Engagement in Workforce Survey (Recommendation 3.5): SCE should increase engagement on the safety culture assessment within the workforce supporting wildfire mitigation initiatives, by:*
 - a. *Must employ a more robust communication strategy that involves senior leadership to promote the survey.*
 - b. *Must consider ways to diversify the tactics for soliciting survey responses from the workforce.*

Addressing recommendations a) and b) in Q3, SCE:

Developed a communication plan to ensure leaders are equipped to continue promoting employee engagement in the Workforce Survey. SCE provided field employees with smart devices to better facilitate completion of online surveys in the field.

(5) Recommendations of the Safety and Operations Committee

The Committee had one meeting during the third quarter of 2024, on August 21. During this meeting, the Committee focused on wildfire, public and worker safety issues, among other topics.

In addition to regular Committee meetings each quarter, the Committee Chair meets regularly with SCE management to discuss wildfire and worker safety issues, and visits with teams in the field.

a. Wildfire Safety

The Committee received a report on the status of 2024 wildfire mitigation plan targets, which noted the challenges that SCE has faced to meet the covered conductor WMP target for 2024. Although SCE is not on track to meet the 2024 covered conductor target, SCE has installed approximately 5,900 miles of covered conductor from 2018 to date. The Committee was also briefed on the current fire season and additional risk mitigation measures being implemented in areas of higher risk. The Committee and management discussed new technologies to mitigate wildfire risk, contractor oversight, and communicating with regulators regarding the WMP status.

b. Worker Safety

The Committee received a report on SCE's continued focus on addressing employee and contractor serious injuries and fatalities, which included a discussion of a recent incident resulting in injuries to three SCE employees, SCE's initial response to the incident, and the application of lessons learned. The Committee received a report on the change in the industry definition of the term "Serious Injuries or Fatalities," which will be adopted by SCE, and the

implications of the change. The Committee and management discussed the continued focus on injuries that no longer meet that definition. The Committee also received a report on the implementation of the leader safety talent review process that is driving safety culture and leading indicator improvements in prioritized districts. The Committee received information on the status of safety roadmap implementation, district-level safety performance data, and progress and challenges in certain districts. The Committee and management also discussed contractor oversight, means of influencing contractor behavior and contractor selection.

c. Public Safety

The Committee received a report on water quality at Camp Edison that covered the testing protocol and planned actions to ensure water quality.

d. Committee Recommendations

In addition to discussing the wildfire and worker safety topics during its third quarter meeting, the Committee made the following recommendations:

1. Recommended that management provide an update on contractor safety.
2. Recommended that management provide an update on lessons learned from High Energy Control Assessments (HECA).

e. Completed Management Responses to Committee Recommendations

In response to the Committee's recommendations in prior meetings, management provided the following responses during the third quarter meeting, the details of which are described above or were pending from prior meetings:

- Recommendation (Q2 2024): The Committee recommended that management provide a report on high- and low-energy serious injuries and fatalities (SIFs), as well as potential impacts of future changes to the Edison Electric Institute ("EEI") SIF definition.

Management response: The Committee received information on the high- and low-energy serious injuries and fatalities (SIFs), as well as potential impacts of future changes to the EEI SIF definition at their August 2024 meeting as part of the worker safety report.

- Recommendation (Q2 2024): The Committee recommended that management provide an update on leader safety talent reviews in the Distribution Organizational Unit.

Management response: The Committee received information on leader safety talent review process at its August 2024 meeting as part of the worker safety report.

f. Pending Management Responses to Committee Recommendations

The following recommendations were made by the Committee in past meetings. Management is actively working to address these and will provide an update at future meetings.

- Recommendation (Q3 2023): The Committee recommended that management share Association of Edison Illuminating Companies safety work practices benchmarking as it becomes available at a future meeting.
- Recommendation (Q3 2023): The Committee recommended that management provide an update on the third-party review of all technical training programs for lineworkers as the assessment is completed at a future meeting.

The Committee has one regular Q4 2024 meeting scheduled for December 11, 2024, which will be summarized in the next quarterly notification letter. Additional meetings will be scheduled as appropriate.

CONCLUSION

For questions, please contact Jennifer Kline at (626) 484-0304 or at jennifer.kline@sce.com.

Southern California Edison Company

/s/ Connor J. Flanigan

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CJF:jk:cm Enclosures

SCE's 2023-2025 Wildfire Mitigation Plan (WMP) Progress Update – Q3 2024¹

¹ All data is as of September 31, 2024 (+/- 5 business days). Reported numbers are subject to revision upon data validation.

Energy for What's AheadSM



WMP Activities Summary²

Inactive
 Under Review
 Complete
 On-Track
 Behind Plan, Likely to Meet Year-end Target
 Behind Plan, At-Risk of Not Meeting Year-end Target

Vegetation Management & Inspections

VM-1 Inspect 408 grids/circuits*	VM-2 Inspect and clear 63,700 structures	VM-3 Perform vegetation treatment and maintenance to 50 sites
VM-4 Inspect 485 grids/circuits*	VM-6 Monitor stabilization of Arbora and develop plan to enable VM maintenance programs	VM-7 (Distribution) Inspect 770 grids*
VM-8 (Transmission) Inspect 416 circuits*	VM-9 (Distribution) Inspect 1,020 HFRA circuit miles	VM-10 (Transmission) Inspect 1,500 HFRA circuit miles

Grid Design, Operations, & Maintenance

IN-1.1 (Distribution Ground and Aerial) Inspect 187,000 structures	IN-1.2 (Transmission Ground and Aerial) Inspect 28,000 structures	IN-3 Inspect 5,300* distribution overhead circuit miles
IN-5 Inspect 160 generation related assets	IN-8 Execute approved designs for distribution ground and InspectCam capabilities	IN-4 Inspect 1,000 transmission overhead circuit miles
SH-1 Install 1,050 circuit miles of covered conductor	SH-2 Convert 16 circuit miles of overhead to underground	IN-9.a Inspect 25 spans with Line Vue
SH-5 Install 5 RAR/RCS sectionalizing devices	SH-6 Replace/upgrade 10 CB relay units with fast curve settings	IN-9.b Inspect 50 splices with X-Ray
SH-10 Remediate 500 tree attachments	SH-8 Retrofit TOPD at 5 locations with trip capabilities	SH-8 Retrofit TOPD at 5 locations with trip capabilities
SH-17 Complete construction of GFN at one substation	SH-18 Target four locations for grounding conversion	SH-16 Retrofit vibration dampers on 500 structures

Situational Awareness & Forecasting

SA-1 Install 50 weather stations	SA-3 Equip 200 weather station locations with machine learning capabilities
SA-8 Complete plan on future improvements	
SA-10 Install 10 HD Cameras	SA-11 Install Early Fault Detection (EFD) at 50 locations

Community Outreach & Engagement







DEP-1 Host at least two meetings	DEP-4 Conduct at least three customer studies
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Emergency Preparedness

PSPS-2 85% of batteries delivered within 30 calendar days	PSPS-3 85% of rebates processed within 30 business days
DEP-2 PSPS response teams fully qualified/re-qualified by 7/1 annually	DEP-5 Provide fire agencies with funding to support QRF program

² Information marked with an * denotes changes from the WMP filing that were submitted in the Errata dated April 6, 2023, and applies to all slides.

WMP Activities Summary

 Inactive  Under Review  Complete  On-Track  Behind Plan, Likely to Meet Year-end Target  Behind Plan, At-Risk of Not Meeting Year-end Target

Situational Awareness Activities

Weather Stations

84%
Installed

Weather Stations (SA-1)

Section 8.3.1.2 Page 449

Program Target: Install 50 weather stations in SCE's HFRA. SCE will strive to install up to 55 weather stations in SCE's HFRA, subject to resource and execution constraints.

Status Update: As of Q3, SCE completed installation of 42 weather stations in HFRA.

High Definition (HD) Cameras

80%
Installed

High Definition (HD) Cameras (SA-10)

Section 8.3.1.2 Page 449

Program Target: Install 10 HD Cameras. SCE will strive to install up to 20 HD Cameras, subject to resource and execution constraints.

Status Update: As of Q3, SCE completed installation of 8 HD cameras.

Weather and Fuels Modeling

Weather and Fuels Modeling (SA-3)

Section 8.3.1.2 Page 449

Program Target: Equip 200 weather station locations with machine learning capabilities. SCE will strive to equip up to 300 weather station locations with machine learning capabilities, subject to resource and execution constraints.

Status Update: SCE met target in Q3. Program exceeded its target a total of 441 weather station locations were equipped with machine learning capabilities.

Early Fault Detection (EFD)

62%
Installed

Early Fault Detection (EFD) (SA-11)

Section 8.3.1.2 Pages 449-450

Program Target: Install Early Fault Detection (EFD) at 50 locations. SCE will strive to install EFD at up to 100 locations, subject to resource constraints and other execution risks.

Status Update: As of Q3, SCE completed installation of 31 EFDs.

Fire Spread Modeling

Fire Science (SA-8)

Section 8.3.1.2 Page 449

Program Target: Provide vendor with analytics report and work with the vendor to complete a plan on future improvements.

Status Update: As of Q3, SCE completed progress report on fire spread modeling improvements.

WMP Activities Summary

Inactive
 Under Review
 Complete
 On-Track
 Behind Plan, Likely to Meet Year-end Target
 Behind Plan, At-Risk of Not Meeting Year-end Target

Grid Design and System Hardening

Covered Conductor

49%
Installed

Covered Conductor (SH-1)

Section 8.1.1.2 Page 238

Program Target: Install 1,050 circuit miles of covered conductor in SCE's HFRA. SCE will strive to install up to as many as 1,200 circuit miles of covered conductor in SCE's HFRA, subject to resource constraints and other execution risks.

Status Update: As of Q3, SCE completed installation of 517.25 circuit miles of covered conductor in HFRA. Activity is off track due to multiple constraints on projects. Activity will not meet YE target.

Circuit Breaker Relay Fast Curve

110%
Installed

Circuit Breaker Relay Fast Curve (SH-6)

Section 8.1.1.2 Page 239

Program Target: Replace/upgrade 10 CB relay units with fast curve settings in SCE's HFRA.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 11 CB relay units were replaced/updated.

Undergrounding Overhead Conductor

0%
Removed³

Undergrounding Overhead Conductor (SH-2)

Section 8.1.1.2 Page 238

Program Target: Convert 16 circuit miles of overhead to underground in SCE's HFRA. SCE will strive to convert up to 20 miles of overhead to underground in SCE's HFRA, subject to resource constraints and other execution risks.

Status Update: As of Q3, SCE completed removal of 3.22 overhead miles in support of targeted underground in HFRA. Activity is off track due to multiple constraints on projects. Activity will not meet YE target.

Transmission Open Phase Detection

Transmission Open Phase Detection (SH-8)

Section 8.1.1.2 Page 239

Program Target: Retrofit TOPD at 5 locations with trip capabilities where alarm mode was previously deployed and that serve HFRA circuitry

Status Update: As of Q3, SCE completed wiring for all five lines. Activity is at-risk of not meeting YE target due to emergent repairs needed for one line.

Remote Controlled Automatic Reclosers Settings Update

20%
Installed

Remote Controlled Automatic Reclosers Settings Update (SH-5)

Section 8.1.1.2 Page 239

Program Target: SCE will install 5 RAR/RCS sectionalizing devices subject to 2022 PSPS analysis and subject to change. SCE will strive to install up to 17 RAR/RCS sectionalizing devices subject to 2022 PSPS analysis, resource constraints and other execution risks.

Status Update: As of Q3, SCE completed installation of 1 RAR/RCS sectionalizing device.

Tree Attachment Remediation

36%
Remediations

Tree Attachment Remediation (SH-10)







Section 8.1.1.2 Page 240

Program Target: Remediate 500 tree attachments in SCE's HFRA. SCE will strive to complete up to 600 tree attachment remediations in SCE's HFRA, subject to resource constraints and other execution risks.

Status Update: As of Q3, SCE remediated 181 tree attachments in HFRA. Activity is off track due to aerial cable material shortage which has since been resolved. Activity is expected to return to on-track performance in Q4.

³ The first 5.61 miles removed this year will count toward the 2023 missed target.

WMP Activities Summary

 Inactive  Under Review  Complete  On-Track  Behind Plan, Likely to Meet Year-end Target  Behind Plan, At-Risk of Not Meeting Year-end Target

Grid Design and System Hardening

Long Span Initiative

114%

Remediations

Long Span Initiative (SH-14)

Section 8.1.1.2 Page 240

Program Target: Remediate 1,000 spans in SCE's HFRA. SCE will strive to remediate up to 1,200 spans in SCE's HFRA, subject to resource constraints and other execution risks.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 1,137 spans were remediated.

REFCL
(Grounding
Conversion)

Rapid Earth Fault Current Limiters (REFCL) (Grounding Conversion) (SH-18)

Section 8.1.1.2 Page 241

Program Target: SCE will target four locations for grounding conversion, subject to land availability.

Status Update: As of Q3, SCE is at-risk of not meeting YE target due to delays with securing locations for grounding conversions.

Vibration Damper Retrofit

117%

Installed

Vibration Damper Retrofit (SH-16)

Section 8.1.1.2 Page 241

Program Target: Retrofit vibration dampers on 500 structures where covered conductor is already installed in SCE's HFRA. SCE will strive to retrofit vibration dampers on up to 600 structures where covered conductor is already installed in SCE's HFRA, subject to resource constraints and other execution risks.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 585 structures were retrofitted.

REFCL
(Ground Fault
Neutralizer)

Rapid Earth Fault Current Limiters (REFCL) (Ground Fault Neutralizer) (SH-17)

Section 8.1.1.2 Page 241

Program Target: SCE will complete construction of GFN at one substation (Banducci).

Status Update: As of Q3, Activity will not meet YE target due to schedule impacts associated with long-lead materials.

WMP Activities Summary

Inactive
 Under Review
 Complete
 On-Track
 Behind Plan, Likely to Meet Year-end Target
 Behind Plan, At-Risk of Not Meeting Year-end Target

Asset Management and Inspections

YTD Status

Ground

90%

Aerial

89%

Distribution HFRI Ground / Aerial Inspections and Remediations (IN-1.1)

Section 8.1.1.2 Page 242

Program Target: Inspect 187,000 structures in HFRA. SCE will strive to inspect up to 217,000 structures in HFRA. This target includes HFRI inspections, compliance due structures in HFRA and emergent risks identified during the fire season (e.g., AOCs).

Status Update: As of Q3, SCE completed 167,425 ground and 166,043 aerial inspections in HFRA. Activity is slightly off track due to data sync delays and inspecting certain high risk structures multiple times.

Transmission Infrared Inspections

109%

Targeted Circuits Inspected

Infrared Inspection, Corona Scanning and High-Definition (HD) Imagery of Transmission facilities and equipment (IN-4)

Section 8.1.1.2 Page 243

Program Target: Inspect 1,000 transmission overhead circuit miles in HFRA.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 1,086.20 circuit miles were inspected.

YTD Status

Ground

110%

Aerial

96%

Transmission HFRI Ground / Aerial Inspections and Remediations (IN-1.2)

Section 8.1.1.2 Page 242

Program Target: Inspect 28,000 structures in HFRA. SCE will strive to inspect up to 29,500 structures in HFRA. This target includes HFRI inspections, compliance due structures in HFRA and emergent risks identified during the fire season (e.g., AOCs).

Status Update: SCE met ground inspections target in Q3. Program exceeded target and a total of 30,905 ground inspections were performed. As of Q3, SCE completed 26,922 aerial inspections in HFRA.

Generation Inspections

141%

Inspected

Generation Inspections and Remediations (IN-5)

Section 8.1.1.2 Pages 243-244

Program Target: Inspect 160 generation related assets in HFRA. SCE will strive to inspect 190 generation related assets in HFRA subject to resource constraints and other execution risks.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 225 generation-related assets were inspected.

Distribution Infrared Inspections

102%

Targeted Circuits Inspected

Infrared Inspection of Energized Overhead Distribution Facilities and Equipment (IN-3)

Section 8.1.1.2 Page 243

Program Target: Inspect 5,300* distribution overhead circuit miles in HFRA.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 5,394.13 circuit miles were inspected.

Inspection and Maintenance Tools







Inspection & Maintenance Tools InspectForce (IN-8)

Section 8.1.1.2 Page 244

Program Target: Execute the approved designs/recommendations for incorporating distribution ground and InspectCam capabilities into single digital platform.

Status Update: As of Q3, IT team received governance approval. Due to additional efforts to evaluate costs, schedule delays, as well as scope revisions for further unification of inspections programs, activity will not meet YE target.

WMP Activities Summary

 Inactive  Under Review  Complete  On-Track  Behind Plan, Likely to Meet Year-end Target  Behind Plan, At-Risk of Not Meeting Year-end Target

Asset Management and Inspections

YTD Status

LineVue

132%

X-Ray

124%

Transmission Conductor & Splice Assessment: Spans with LineVue & X-Ray (IN-9)^{4, 5}

Section 8.1.1.2 Pages 244-245

Program Target:

- **IN-9.a:** Will inspect 25 spans with Line Vue. SCE will strive to inspect up to 50 spans with Line Vue, subject to resource constraints and other execution risks.
- **IN-9.b:** Will inspect 50 splices with X-Ray. SCE will strive to inspect up to 100 splices with X-Ray, subject to resource constraints and other execution risks.







Status Update:

- **IN-9.a:** SCE met target in Q2. Program exceeded its target and a total of 33 spans were inspected with LineVue.
- **IN-9.b:** SCE met target in Q2. Program exceeded its target and a total of 62 splices were inspected with X-Ray.

⁴ Per SCE's proposed revision to the target as submitted to OEIS on Nov 1, 2023.

⁵ Per SCE's proposed revision to the target as submitted to OEIS on Nov 1, 2023.

WMP Activities Summary

 Inactive  Under Review  Complete  On-Track  Behind Plan, Likely to Meet Year-end Target  Behind Plan, At-Risk of Not Meeting Year-end Target

Vegetation Management and Inspections

HTMP

91%

Circuits Assessed

Hazard Tree Management Program (VM-1)

Section 8.2.1.2 Page 379

Program Target: Inspect 408 grids/circuits* and prescribe mitigation for hazardous trees with strike potential within those grids in SCE's HFRA.

Status Update: As of Q3, SCE completed inspections on 370 grids in SCE's HFRA.

Dead and Dying Tree Removal

102%

Circuits Inspected

Dead and Dying Tree Removal (VM-4)

Section 8.2.1.2 Page 379

Program Target: Inspect 485 grids/circuits* and prescribe mitigation for dead and dying trees with strike potential along those circuits.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 494 grids/circuits were inspected.

Structure Brushing

140%

Structures Cleared

Structure Brushing (VM-2)

Section 8.2.1.2 Page 379

Program Target Inspect and clear (where clearance is needed) 63,700 structures,* with the exception of structures for which there are customer access or environmental constraints.

SCE will strive to inspect and clear (where clearance is needed) 135,200 structures,* with the exception of structures for which there are customer access or environmental constraints. These structures are in addition to poles subject.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 89,463 structures were inspected.

VM Work Management Tool (Arbora)

VM Work Management Tool (Arbora) (VM-6)

Section 8.2.1.2 Page 378

Program Target Monitor stabilization of Arbora and develop plan and begin execution of plan to enable additional VM maintenance programs.

Status Update: As of Q3, Arbora system performance has been stabilized for the vegetation management programs. SCE will continue to monitor system performance through year-end.

Expanded Clearances for Legacy Facilities

130%

Expanded Clearances Performed







Expanded Clearances for Legacy Facilities (VM-3)

Section 8.2.1.2 Page 378

Program Target: Perform vegetation treatment and maintenance to 50 sites. SCE will strive to perform vegetation treatment and maintenance to 60 sites.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 65 sites were treated and maintained.

WMP Activities Summary

 Inactive  Under Review  Complete  On-Track  Behind Plan, Likely to Meet Year-end Target  Behind Plan, At-Risk of Not Meeting Year-end Target

Vegetation Management and Inspections

Detailed Inspections: Distribution

86%
Inspections

Detailed inspections and management practices for vegetation clearances around Distribution electrical lines, and equipment (VM-7)

Section 8.2.1.2 Page 380

Program Target: SCE plans to inspect 770* grids within our distribution system.

Status Update: As of Q3, SCE completed inspection of 660 grids.

LiDAR Vegetation Inspections – Distribution

111%
Inspections

LiDAR Vegetation Inspections – Distribution (VM-9)

Section 8.2.1.2 Page 380

Program Target: SCE will inspect at least 1,020 HFRA circuit miles. Subject to change based on technology, program adjustments, and grid/circuits layout.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 1130.64 grids/circuits were inspected.

Detailed Inspections: Transmission

101%
Inspections

Detailed inspections and management practices for vegetation clearances around Transmission electrical lines, and equipment (VM-8)

Section 8.2.1.2 Page 380

Program Target: SCE plans to inspect 416 circuits within our transmission system.

Status Update: SCE met target in Q3. Program exceeded its target and a total of 419 circuits were inspected.

LiDAR Vegetation Inspections – Transmission

199%
Inspections







LiDAR Vegetation Inspections – Transmission (VM-10)

Section 8.2.1.2 Page 381

Program Target: SCE will inspect at least 1,500 HFRA circuit miles. Subject to change based on program adjustments and evolution of remote sensing technologies.

Status Update: SCE met target in Q2. Program exceeded its target and a total of 2,986.14 circuit miles were inspected.

WMP Activities Summary

 Inactive  Under Review  Complete  On-Track  Behind Plan, Likely to Meet Year-end Target  Behind Plan, At-Risk of Not Meeting Year-end Target

Emergency Preparedness

Customer Care Programs (Critical Care Backup Battery (CCBB) Program)

100%
On-Time Deployments

Customer Care Programs (Critical Care Backup Battery (CCBB) Program) (PSPS-2)

Section 8.4.1.2 Page 523

Program Target: Complete 85% of battery deliveries to eligible customers within 30 calendar days* of program enrollment, subject to customer availability, reschedule requests and battery supply constraints. Strive to complete 90% of battery deliveries to eligible customers within 45 calendar days of program enrollment, subject to customer availability, reschedule requests and battery supply constraints.⁶

Status Update: As of Q3, 100% of customers enrolled received their battery within 30 calendar days.

Customer Care Programs (Portable Power Station and Generator Rebates)

100%
On-Time Rebates Processed

Customer Care Programs (Portable Power Station and Generator Rebates) (PSPS-3)

Section 8.4.1.2 Page 525

Program Target: Process 85% of all rebate claims within 30 business days* of receipt from website vendor; excluding website related delays and subject to receiving all required customer information. Strive to process 90% of all rebate claims within 45 business days of receipt from website vendor; excluding website related delays and subject to receiving all required customer information.⁷

Status Update: As of Q3, 100% of rebate claims submitted were processed and distributed within 30 business days.

SCE Emergency Responder Training

SCE Emergency Responder Training (DEP-2)

Section 8.4.1.2 Page 523

Program Target: PSPS response teams are fully qualified/re-qualified by 7/1 annually to maintain readiness.

Status Update: SCE met target in Q2, all PSPS response teams are fully qualified/re-qualified by 7/1 annually to maintain readiness.

Aerial Suppression

Aerial Suppression (DEP-5)⁸

Section 8.4.1.2 Page 523

Program Target: Provide fire agencies with funding to support quick reaction force (QRF) program for 2024.







Status Update: SCE met target in Q1. Contracts were issued at the end of 2023 and final payment was provided to the agencies in January 2024.

⁶ Number of calendar/business days subject to change based on customer survey feedback.

⁷ Number of calendar/business days subject to change based on customer survey feedback.

⁸ Per SCE's proposed revision to the target as submitted to OEIS on Nov 1, 2023.

WMP Activities Summary

 Inactive  Under Review  Complete  On-Track  Behind Plan, Likely to Meet Year-end Target  Behind Plan, At-Risk of Not Meeting Year-end Target

Community Outreach & Engagement

**Wildfire Safety
Community
Meetings**
100%
Safety Meetings

Wildfire Safety Community Meetings (DEP-1)⁹

Section 8.5.1.0 Page 579

Program Target: SCE will host at least two wildfire community safety meetings by region in targeted HFRA communities based on the impact of 2023 PSPS events and ongoing wildfire mitigation activities.

Status Update: SCE met target in Q2, SCE hosted two wildfire community safety meetings by region in targeted HFRA communities.

**Customer
Research and
Education**

Customer Research and Education (DEP-4)

Section 8.5.1.0 Page 579

Program Target: SCE plans to conduct at least three PSPS-related customer studies in 2024.

Status Update: As of Q3, SCE completed one PSPS related customer study.

⁹ SCE's proposed revision to the target as submitted to OEIS on Nov 1, 2023.

WMP Activity Narratives

Off-Track Narrative – IN-1.1: Distribution High Fire Risk Informed Inspections in HFRA

YTD Status	Behind Plan
YE Outlook	On Track

Activity Target

- Inspect 187,000 structures in HFRA.
- SCE will strive to inspect up to 217,000 structures in HFRA.**



Key Takeaways

- Distribution Ground off track by 3% (167,425 inspections completed vs plan of 172,640).
- Distribution Aerial off track by 4% (166,043 inspections completed vs plan of 172,640).
- Off track due primarily to data sync delays and decrease in productivity due to reprioritization of resources.

Risks or Challenges

- Resources were deployed to inspect high risk structures multiple times according to SCE's risk assessment, along with ad-hoc time sensitive scope and data sync delays impacted performance.



Actions to Improve Performance / Get Well Plan

- Reprioritization of competing scope to allocate resources appropriately, including use of overtime as needed.
- Vendors hiring additional resources.

WMP Activity Narratives

Off-Track Narrative – IN-8 Inspection and Maintenance Tools: InspectForce

YTD Status	Behind Plan
YE Outlook	Will Not Meet

Activity Target

- Execute the approved designs / recommendations for incorporating distribution ground and InspectCam capabilities into single digital platform.



Key Takeaways

- YE target will not be met due to funding and schedule delays, as well as scope revisions for further unification of inspections programs.
- The project team has determined a need to undertake a more exhaustive planning & analysis phases prior to the start of solution execution.
- 2024 Q2-Q4 milestones will be completed in 2025

Risks or Challenges

- Delays in governance approval has pushed completion of this activity into 2025.



Actions to Improve Performance / Get Well Plan

- As of 10/2/2024, project has received governance approval to complete this scope.
- Extended planning & analysis phases are required and an adjusted Q4 2024 Milestone has been set:
 - Complete the revised planning deliverables and obtain approval for extended analysis phase.

WMP Activity Narratives

Off-Track Narrative – SH-1 Covered Conductor (WCCP and Non-WCCP)

YTD Status	Behind Plan
YE Outlook	Will Not Meet

Activity Target

- Install 1,050 circuit miles of covered conductor in SCE’s HFRA.
- SCE will strive to install up to as many as 1,200 circuit miles of covered conductor in SCE’s HFRA, subject to resource constraints and other execution risks subject to resource constraints and other execution risks.



Key Takeaways

- Off track by 39% (517.25 circuit miles installed vs 854 planned YTD) due to impacts associated with multiple constraints on projects.
 - 490.69 WCCP
 - 26.56 Non-WCCP
- Activity will not meet year-end target.
- Year-end outlook is 875 circuit miles (835 WCCP + 40 other) based on a review of constraints (e.g. permitting, environmental, execution) and ability to resolve in time.

Risks or Challenges

- Several projects are currently constrained by bird nesting season which limits and/or restricts work in those impacted areas.
- Other projects are pending rights checks for potential easements and/or permits which are necessary prerequisites before construction can begin.



Actions to Improve Performance / Get Well Plan

- Prioritize helicopter support through YE in partnership with SCE’s Aviation Logistics and Operational Management.
- Leverage premium time in Regions to expedite deployment of miles.
- Continue to meet weekly with Environmental, Gov’t Lands and Agency relations leadership to resolve project constraints.
- Accelerate 2025 scope to support 2024 execution targets.

WMP Activity Narratives

Off-Track Narrative – SH-2 Undergrounding

YTD Status	Behind Plan
YE Outlook	Will Not Meet

Activity Target

- Convert 16 circuit miles of overhead to underground in SCE's HFRA.
- SCE will strive to convert up to 20 miles of overhead to underground in SCE's HFRA, subject to resource constraints and other execution risks.



Key Takeaways

- Off track by 100% (3.22 circuit miles de-energized YTD) due to impacts associated with multiple constraints on projects.
- The first 5.61 miles removed in 2024 will count toward 2023 target due to previous missed target.
- Activity will not meet year-end target.

Risks or Challenges

- Scope for 2024 execution is affected by multiple constraints including environmental, permitting, and easements.
- Lack of contingency scope that can be brought in for 2024 target.



Actions to Improve Performance / Get Well Plan

- Continue to work with partner organizations to address constraints.
- Review 2024 projects for material demands and confirm availability.
- Project-specific meetings to continue to support execution pace.

WMP Activity Narratives

Off-Track Narrative – SH-8 Transmission Open Phase Detection

YTD Status	On Track
YE Outlook	At-Risk

Activity Target

- Install TOPD at 5 locations that serve HFRA circuitry with both alarm and trip functionality.



Key Takeaways

- Activity is off track YTD and at risk of meeting its year-end target to install TOPD at 5 locations that serve HFRA circuitry with both alarm and trip functionality.
- One of five lines completed, TOPD scheme deployed at Pardee-Vincent2.

Risks or Challenges

- TOPD deployment at risk for the BC3-BC4 line due to a hydraulic blowout of circuit breaker and bad coupling capacitor voltage transformer (CCVT); both pieces of equipment need to be replaced.
- Team is working on prioritizing the design and material procurement for this equipment. However, due to material lead times and resource constraints, replacement may push into 2025.



Actions to Improve Performance / Get Well Plan

- Team is working on prioritizing design and material procurement.

WMP Activity Narratives

Off-Track Narrative – SH-10 Tree Attachment Remediation

YTD Status	Behind Plan
YE Outlook	On Track

Activity Target

- Remediate 500 tree attachments in SCE’s HFRA.
- SCE will strive to complete up to 600 tree attachment remediations in SCE’s HFRA, subject to resource constraints and other execution risks.



Key Takeaways

- Off track by 60% (181 tree attachments remediated vs 448 planned YTD) due to material shortage that impacted regions with tree attachment scope.

Risks or Challenges

- Decreased execution window in San Joaquin region due to material delays.



Actions to Improve Performance / Get Well Plan

- Escalated material concern addressed through supply chain who worked directly with aerial cable manufacturer.
- Material issues resolved and monthly plan to meet year-end target in place to reach ~507 tree attachments (TAs) remediated in San Joaquin Region.
- Helicopter resources necessary to complete projects have been prioritized to support TA work in San Joaquin region.

WMP Activity Narratives

Off-Track Narrative – SH-17 Rapid Earth Fault Current Limiters (REFCL)

YTD Status	On Track
YE Outlook	Will Not Meet

Activity Target

- SCE will complete construction of GFN at one substation (Banducci).



Key Takeaways

- Activity is meeting internal plan YTD but will not meet its year-end target to complete construction of GFN at one substation due to long lead times to obtain materials needed to complete work.

Risks or Challenges

- Long lead materials will delay construction start until early November.
- Construction can take up to 9 months from the time design is approved.
- Testing/commissioning window limited to December-April; if testing is not ready to be performed by April 2025, it will be deferred to December 2025.



Actions to Improve Performance / Get Well Plan

- Final design completed for Banducci Substation.
- PO for structural steel and foundation complete.
- Below Ground construction start ETA in November, with estimated completion early 2025 with electrical construction occurring immediately after (weather permitting).
- Major material procurement in progress for Banducci Substation.
- Circuit breaker in production (delivery expected Q1 2025).

WMP Activity Narratives

YTD Status	Off Track
YE Outlook	At-Risk

Off-Track Narrative – SH-18 Rapid Earth Fault Current Limiters (REFCL) (Grounding Conversion)

Activity Target

- SCE will target four locations for grounding conversion, subject to land availability.
- SCE will strive to target up to 6 locations for grounding conversion, subject to land availability.



Key Takeaways

- Activity is off track YTD and is at risk for completing grounding conversion at four locations due to constraints with location selections.

Risks or Challenges

- Continued delays with land acquisition are impacting design initiation for projects and may impact year-end goals.
- Due to recent fires in the area, resources have been diverted to fire restoration activities.



Actions to Improve Performance / Get Well Plan

- Scheduling is in progress for two projects
- Easement finalization and location discussions on going for remaining projects