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February 3, 2025

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 fourth 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 the following recipients: Executive Director Rachel Peterson at <u>rachel.peterson@cpuc.ca.gov</u>; Forest Kaser at <u>forest.kaser@cpuc.ca.gov</u>; Simon Baker at <u>simon.baker@cpuc.ca.gov</u>; Danjel Bout at <u>danjel.bout@cpuc.ca.gov</u>; Eric Wu at <u>eric.wu@cpuc.ca.gov</u>; Leslie Palmer at <u>leslie.palmer@cpuc.ca.gov</u>; the service list for the Order Instituting Rulemaking to Develop Safety Culture Assessments for Electric and Natural Gas Utilities (R.21-10-001); the service list for the Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901 (R.18-10-007); the service list for SCE's most recent general rate case application proceeding, A.23-05-010 (Phase 1) and A.24-03-019 (Phase 2); and <u>safetypolicycentralfiles@cpuc.ca.gov</u>.

(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 – Q4 2024), SCE presents detailed information about the implementation status of each of these wildfire-related mitigation activities. SCE substantially met its 2024 year-end WMP targets, with 32 of the 37 activities completed. SCE has further work to do to complete the 2024 year-end targets for five activities (Covered Conductor, Targeted Undergrounding, InspectForce, Rapid Earth

³ Pub. Util. Code § 8389(e)(7).

Fault Current Limiter (REFCL) Ground Fault Neutralizer (GFN), and REFCL Grounding Conversion). Further details on these five activities are provided below:

- SH-1 (Covered Conductor): Year-end target was not met due to environmental and permitting constraints.
- SH-2 (Targeted Undergrounding): Year-end target was not met due to multiple constraints, including challenges with permitting and execution delays and delays in obtaining easements.
- SH-17 (REFCL GFN): Year-end target was not met due to schedule impacts associated with obtaining long-lead time materials.
- SH-18 (REFCL Ground Conversion): Year-end target was not met due to delays with land acquisition that impacted design initiation.
- IN-8 (Inspection & Maintenance Tools InspectForce): Year-end target was not met due to additional efforts to evaluate costs, as well as scope revisions for further unification of inspections programs.

(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 December 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 Q4.

1. Continue to build SCE's capacity as a learning organization (Recommendation 3.1):

⁴ See Southern California Edison Company's 2023-2025 WMP, filed March 27, 2023, <u>TN11952-</u> 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.

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 highenergy 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 second phase of our Incident Management System platform, focusing on system design and user testing. The launch for both SCE and contractors is targeted for Q2 of 2025.
- 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 completed

HOP fundamentals training in 2022 and 2023, respectively. We continue making progress with HOP sustainability efforts to foster a learning organization. These efforts include re-occurring HOP Event Learning Sharing Sessions where leaders and field crews identify and share learnings from events, good catches and great work applying HOP Principles. We are also implementing HOP training concepts such as coaching conversations grounded in HOP Principles and have sustained new-to-role HOP training for Acting Operators. We also continue to expand our HOP Champion Team by developing new champions to build bench strength for further HOP growth, integration and learning across the organization. We continue to integrate HOP Principles and learnings across various meetings and forums to expand SCE's 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.

- 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 computerbased delivery.

Addressing this recommendation, in Q4 SCE:

- a. Completed initial REFCL training to 100% of all impacted SCE locations for in-scope job classifications. SCE also provided site specific in-person training to impacted personnel at Phelan Substation and impacted districts when the Ground Fault Neutralizer was put into service.
- b. Conducted a comprehensive review of training materials to identify technical content for frontline fire suppression training. SCE developed a robust training plan to ensure all in-scope employees receive structurally sound instruction, emphasizing the following enhancements: clearly defined learning objectives with advanced cognitive application, integration of active learning techniques, and embedded metrics for evaluating training effectiveness.
 - 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 Q4, 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 Q4, SCE:

Began to execute the communication plan described in the previous quarterly report 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 fourth quarter of 2024, on December 11. 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 and management discussed recent PSPS events, the Franklin Fire and customer notifications by contractors for PSPS incidents. The Committee received a report on the status of Wildfire Mitigation Plan activities. The Committee and management discussed factors contributing to the expected 2024 shortfall in completed covered conductor installation and the actions being taken to focus on targeted undergrounding, including benchmarking with other utilities and implementing new processes for permitting. They also discussed the alternatives to targeted undergrounding being explored.

b. Worker Safety

The Committee was informed about recent leadership changes in the Transmission and Distribution organizational unit, including significant changes based on assessments of leader safety attributes. The Committee and management discussed the expected impact of the changes on worker safety.

The Committee received a report on trends in employee safety and discussed jobs subject to high energy control assessments with management. Management described the facts and circumstances of three recent contractor employee fatalities and SCE actions in response to the incidents. Management responded to questions from the Committee, including contractor safety incident reporting, responsibility for contractor management and SCE contractor safety oversight. Management and the Committee discussed contractor oversight and management, insourcing versus outsourcing work, and factors considered in applying SCE standard safety methods to contractors.

c. Public Safety

The Committee received a report on public safety that covered areas of focus, including vandalism, dig-ins, and idle facilities and SCE actions to mitigate risks to the public in these focus areas.

d. Committee Recommendations

In addition to discussing the wildfire and worker safety topics during its fourth quarter meeting, the Committee recommended that management conduct a review of SCE's contractor safety oversight policies and practices including industry benchmarking.

e. Completed Management Responses to Committee Recommendations

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

• Recommendation (Q3 2024): The Committee recommended that management provide an update on contractor safety.

<u>Management response</u>: The Committee received information on contractor safety at its December 2024 meeting as part of the worker safety report.

• Recommendation (Q3 2024): The Committee recommended that management provide an update on lessons learned from High Energy Control Assessments (HECA).

<u>Management response</u>: The Committee received an update on lessons learned from HECA at its December 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 Q1 2025 meeting scheduled for February 26, 2025, which will be summarized in the next quarterly notification letter. Additional meetings will be scheduled as appropriate.

CONCLUSION

For questions, please contact Lisa Mau at (626) 302-3684 or at lisa.mau@sce.com.

Southern California Edison Company

<u>/s/ Connor J. Flanigan</u> Connor J. Flanigan

CC: Wildfire and Safety Performance Section, <u>SafetyPolicyDivision@cpuc.ca.gov</u> Eric Wu, Ph.D., P.E., Program and Project Supervisor, <u>Eric.Wu@cpuc.ca.gov</u> CJF:lm:cm Enclosures

SCE's 2023-2025 Wildfire Mitigation Plan (WMP) Progress Update – Q4 2024¹

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



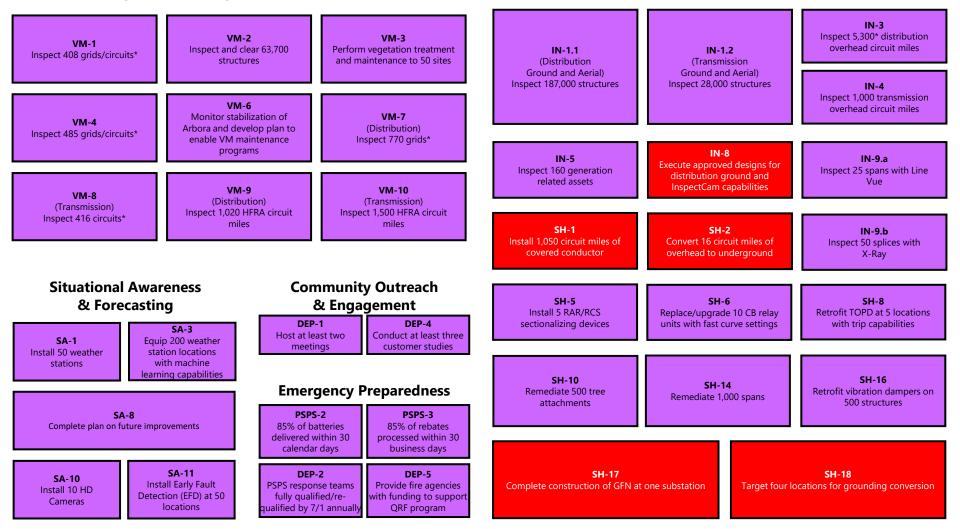
Energy for What's Ahead[™]

WMP Activities Summary²



Vegetation Management & Inspections

Grid Design, Operations, & Maintenance



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.



Behind Plan, Likely to Meet Year-end Target Behind Plan, At-Risk of Not Meeting Year-end Target

Situational Awareness Activities

Weather Stations 110% 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: SCE met target in Q4. Program exceeded its target and a total of 55 weather stations were installed.	High Definition (HD) Cameras 100% 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: SCE met target in Q4 to install 10 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 and a total of 441 weather station locations were equipped with machine learning capabilities. 	Early Fault Detection (EFD)	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: SCE met target in Q4. Program exceeded its target and a total of 53 locations were installed with 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: SCE met target in Q4 to provide vendor with analytics report and work with the vendor to complete a plan on future improvements.		

Inactive Under Review Complete On-Track

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 77% 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: SCE missed 2024 target to install 1,050 circuit miles of covered conductor in SCE's HFRA, due to multiple constraints on projects. As of YE, SCE completed a total of 809.45 circuit miles (758.18 WCCP and 51.27 Non-WCCP)	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/upgraded with fast curve settings.
Undergrounding Overhead Conductor 76% Removed	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: SCE missed 2024 target to convert 16 circuit miles of overhead to underground in SCE's HFRA, due to multiple constraints on projects. As of YE, SCE completed a total of 12.18 circuit miles	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: SCE met target in Q4 to install TOPD at 5 locations that serve HFRA circuitry with both alarm and trip functionality.
Remote Controlled Automatic Reclosers Settings Update 100% 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: SCE met target in Q4 and a total of 5 RAR/RCS sectionalizing devices were installed.	Tree Attachment Remediation	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: SCE met target in Q4. Program exceeded its target and a total of 521 tree attachments were remediated.

4



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

132%

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 1,315 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: SCE missed 2024 target to target four locations for grounding conversion due to delays with securing locations for grounding conversions. As of YE, 2 locations completed, 1 location substantially complete, and 1 location pending. Additional contingency location pending county / forest service clearance.

Vibration Damper Retrofit

142% Installed

REFCL

(Ground Fault Neutralizer)

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 710 structures were retrofitted

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: SCE missed 2024 target to complete construction of GFN at one substation (Banducci) due to schedule impacts associated with long-lead materials. As of 1st week in January, construction is 30% complete.

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	Distribution HFRI Ground / Aerial Inspections and Remediations (IN-1.1)	Transmission Infrared	Infrared Inspection, Corona Scanning and High- Definition (HD) Imagery of Transmission facilities
Ground	Section 8.1.1.2 Page 242 Program Target: Inspect 187,000 structures in HFRA. SCE will strive to	Inspections	and equipment (IN-4) Section 8.1.1.2 Page 243
112%	inspect up to 217,000 structures in HFRA. This target includes HFRI inspections, compliance due structures in HFRA and emergent risks	109%	Program Target: Inspect 1,000 transmission overhead circuit miles in HFRA.
Aerial	identified during the fire season (e.g., AOCs). Status Update: SCE met target in Q4. Program exceeded its target	Targeted Circuits Inspected	Status Update: SCE met target in Q3. Program exceeded its target and a total of 1,086.20 circuit miles were inspected.
111%	and conducted a total of 208,828 distribution ground inspections and 206,903 distribution aerial inspections.		

YTD Status Ground 113% Aerial 110%	Transmission HFRI Ground / Aerial Inspections and Remediations (IN-1.2)Section 8.1.1.2 Page 242Program 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 target in Q4. Program exceeded its target and a conducted total of 31,711 transmission ground inspections and 30,735 transmission aerial inspections.	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 5,399.97 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: SCE missed the 2024 target to execute the approved designs / recommendations for incorporating distribution ground and InspectCam capabilities into single digital platform. Status Update: SCE missed the 2024 target to execute the approved designs / recommendations for incorporating distribution ground and InspectCam capabilities into single digital platform due to additional efforts to evaluate costs, as well as scope revisions for further unification of inspections programs. As of YE, SCE completed Architecture Vision Definition (AVD).

nd Remediations (IN-5)

6



Track Behind Plan, Likely to Meet Year-end Target

ly to Behind Plan, At-Risk of Not Arget Meeting Year-end Target

Asset Management and Inspections

YTD Status	Transmission Conductor & Splice Assessment: Spans with LineVue & X-Ray (IN-9) ³
LineVue	Section 8.1.1.2 Pages 244-245 Program Target:
132%	 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.
X-Ray	 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.
140%	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 70 splices were inspected with X-Ray.

³ Per SCE's proposed revision to the target as submitted to OEIS on Nov 1, 2023.



Behind Plan, Likely to Meet Year-end Target

Behind Plan, At-Risk of Not Meeting Year-end Target

Vegetation Management and Inspections

нтмр

Hazard Tree Management Program (VM-1)

107% Circuits Assessed

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: SCE met target in Q4. Program exceeded its target and a total of 437 grids/circuits were inspected and mitigated where needed.

Structure Brushina

183%

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 116,388 structures were inspected and cleared (where clearance is needed).

Expanded **Clearances for** Legacy Facilities

140%

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 70 sites were treated and maintained.

Dead and Dying

Tree Removal

120% **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 581 grids/circuits were inspected and mitigated where needed

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: SCE met target in Q4 to monitor stabilization of Arbora and develop plan and begin execution of plan to enable additional VM maintenance programs.



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 101% 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: SCE met target in Q4. Program exceeded its target and a total of 778 grids were inspected. 	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 1,130.64 grids/circuits were inspected.
Detailed Inspections: Transmission 103% 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 430 circuits were inspected.	LiDAR Vegetation Inspections – Transmission 212% 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 3,180.92 circuit miles were inspected.

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)

SCE Emergency

Responder

Training

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.⁴

Status Update: SCE met target in Q4. 100% of eligible customers who enrolled in the program received their batteries within 30 days, The program exceeded the 85% target and 90% strive target.

Customer Care Programs (Portable Power Station and Generator Rebates)

Aerial

Suppression

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.⁵

Status Update: SCE met target in Q4. 100% of all rebate claims were successfully paid within the target of 30 days, The program exceeded the 85% target and 90% strive target

SCE Emergency Responder Training (DEP-2)

Section 8.4.1.2 Page 523 **Program Target:** PSPS response teams are fully qualified/requalified by 7/1 annually to maintain readiness.

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

Aerial Suppression (DEP-5)6

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.

⁴ Number of calendar/business days subject to change based on customer survey feedback.

⁵ Number of calendar/business days subject to change based on customer survey feedback.

⁶ Per SCE's proposed revision to the target as submitted to OEIS on Nov 1, 2023.



rack 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)7

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 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: SCE met target in Q4 by completing three PSPS-related customer studies in 2023.

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

YTD StatusOff TrackYE OutlookDid 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

- Missed 2024 target due to impacts associated with multiple constraints on projects.
- As of YE, 809.45 circuit miles completed:
 - 758.18 WCCP
 - 51.27 Non-WCCP

Risks or Challenges

- Several projects constrained by environmental, outages and access issues
- Other projects are pending rights checks for potential easements and/or permits which are necessary prerequisites before construction can begin.

- Continue to work with partner organizations to understand and work to resolve the status of constraints with a focus on environmental, government lands, easements/right of way, permitting, railroads, and select agencies (e.g., Caltrans)..
- Established bi-weekly cadence of meetings to ensure timely completion of the Design phase to meet expected field release dates; identify resolution and potential reprioritization.

Off-Track Narrative – <u>SH-2 Undergrounding</u>

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.

YTD StatusOff TrackYE OutlookDid Not Meet

Key Takeaways

- Missed 2024 target due to impacts associated with multiple constraints on projects.
- As of YE, 12.18 OH miles de-energized.
 - 6.57 miles toward the 2024 target.
 - 5.61 miles toward 2023 target.

Risks or Challenges

- Several projects constrained by environmental, outages and access issues.
- Other projects are pending rights checks for potential easements and/or permits which are necessary prerequisites before construction can begin.
- Lack of contingency scope that can be brought in for 2024 target.

- Continue to work with partner organizations to understand and work to resolve the status of constraints with a focus on environmental, government lands, easements/right of way, permitting, railroads, and select agencies (e.g., Caltrans)..
- Established bi-weekly cadence of meetings to ensure timely completion of the Design phase to meet expected field release dates; identify resolution and potential reprioritization.

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

YTD StatusOff TrackYE OutlookDid Not Meet

Activity Target

• SCE will complete construction of GFN at one substation.



Key Takeaways

- Missed 2024 target to complete construction of GFN at one substation due to long lead times to obtain materials needed to complete work.
- As of January 2025, below-ground construction complete.

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.

- Above-ground construction in progress.
- Major material procurement in progress.
- Circuit breaker in production (delivery expected Q1 2025).

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

- Missed 2024 target to complete grounding conversion at four locations due to delays with securing locations for grounding conversions.
- As of YE, 2 locations completed, 1 location (Stoneman) substantially complete, and 1 location (Brydon) pending.
- Additional contingency location (Blue Ridge) pending county / forest service clearances.

Risks or Challenges

- Continued delays with land acquisition impacted design initiation and ability to meet year-end goal.
- Due to recent fires in the area, resources have been diverted to fire restoration activities.

- Pheasant and Dysart construction completed
- Stoneman construction in progress, will resume as crews are freed up from restoration activities
- Brydon design initiated as location discussions continue with city. Pending rights check, continuing to work with city
- Blue Ridge contingency project, on hold pending forest service clearance, continuing to work on clearance, resources impacted by fires restoration efforts

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

Activity Target

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



YTD StatusOff TrackYE OutlookDid Not Meet

Key Takeaways

- Missed 2024 target due primarily to funding, as well as scope revisions for further unification of inspections programs.
- Architecture Vision Definition (AVD) completed in Q4 2024.
- Revised Solution Planning & Analysis is in progress.
- Remaining 2024 milestones will be completed in 2025.

Risks or Challenges

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

- Project team is conducting weekly check-ins to ensure project remains on schedule.
- Remaining milestones will continue into 2025, ETA for completion is Q2/Q3 2025.