Connor J. Flanigan
Managing Director,
State Regulatory Operations

May 1, 2024

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) hereby 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 committee[2] (Committee) during meetings that occurred during the fourth quarter of 2023, and a summary of the implementation of Committee recommendations in the first 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 mitigation plan and recommendations of the most recent safety culture assessments by

[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 that 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."

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.[3] 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.[4]

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; Daniel Bout at danjel.bout@cpuc.ca.gov; Eric Wu at eric.wu@cpuc.ca.gov and Leslie Palmer at leslie.palmer@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 programs and activities, as well as successes and lessons learned from 2022. For 2024, SCE tracked 37 specific wildfire-related activities, including grid hardening, enhanced inspection and repair programs, continuation of robust vegetation management, increased situational awareness and response, and augmented 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 – Q1 2024), SCE presents detailed information about the implementation status of each of these wildfire-related mitigation activities. As referenced in Attachment A, SCE is currently on track to substantially meet the 2024 year-end targets set forth in its WMP. One of the 37 activities has been completed. Seven activities are showing as behind plan due to several factors including severe weather in Q1, material shortages, and resource availability. However, SCE has implemented plans to address the delays and expects to meet year-end targets for these activities. Two activities, SH-1 (Covered Conductor) and SH-2 (Targeted Undergrounding) are at-risk of not meeting their year-end targets due to weather delays and other constraints which may affect completion in 2024. One of these activities, SH-17 (Rapid Earth Fault Current Limiter

[3] SCE is simultaneously submitting this quarterly notification to the California Public Utilities Commission as an information-only submittal via email to Rachel Peterson, Forest Kaser, Simon Baker, Danjel Bout, Eric Wu, and Leslie Palmer.

[4] Pub. Util. Code § 8389(e)(7).

(REFCL)), has long lead times for materials needed to complete the work that will challenge our ability to achieve the year-end target.

(3) 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, 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.[5] Below SCE describes how it has implemented actions to address these findings and recommendations in Q1.

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:*

    - *Focus on improving safety-enabling systems such as the investigation and root cause analysis of incidents.*
    - *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).*
    - *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.*
    - *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, in Q1 SCE:

a. Implemented several components of their Environmental, Health, Safety, and Quality (EHSQ) Information Management System across the entire enterprise, including office

[5] Energy Safety initiated its 2023 Safety Culture Assessment (SCA) process for electrical corporations on June 26, 2023. SCE partnered with Energy Safety and National Safety Council (NSC), its third-party administrator, to complete the management self-assessment and workforce safety culture survey. SCE received its 2023 SCA report on March 22, 2024 and submitted a Letter Acceptance of 2023 Safety Culture Assessment Report on April 24, 2024.

and field observations. The system allows users to submit Safety Observations, Critical Observable Actions, Focused Observations, and Energy-Based Observations. These submissions enhance the reporting, tracking, and management of frontline employees' observations, ensuring safe work practices. EHSQ will help improve the learning of the organization by providing a platform that is easily accessible and user-friendly to report any incident that meets the reporting criteria. The platform provides functionality to help end-users fill out incident reports by providing user assistance throughout the solution to support with context, use, and population of fields and forms within the system (helper text, informational context/pop-ups on forms). As of April 2024, approximately 94% of 9,918 employees have completed web-based training.

b. Continued to share lessons learned via SCE's Weekly Incident Report, which provides more opportunities for frontline workers and contractors to discuss lessons learned from completed safety incidents evaluations, initial learnings from pending evaluations and tips for prevention.

c. The second phase of the EHSQ system will commence Q2 2024. This phase is planned to include Incident Management (Enhancing incident reporting and investigation processes) and Corrective and Preventative Actions (Implementing measures to prevent the recurrence of incidents).

d. Human and Organizational Performance (HOP) sustainably efforts continue to reinforce a learning organization through Monthly HOP Learning Sharing Sessions engaging managers and frontline leaders in sharing and learning from events, while implementing training concepts such as coaching conversations grounded in HOP principles. HOP principles and learnings are also being integrated and shared in variety of meetings and forums.

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:

- *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.*

- *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. In Q1 SCE:

a. 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. This quarter 7 sessions were conducted exceeding the planned 4 locations per quarter.

b. Conducted annual Wildfire PSPS Pulse Check survey, to gain insight in how we can continue to improve our efforts to keep frontline workers informed and provide opportunities for two-way engagement. 62% of survey respondents acknowledged improvements in communication through increased virtual and in-person outreach, a clearer understanding of PSPS risks, improved coordination for faster responses and enhanced preparedness through better tools, all contributing to a more robust safety framework.

c. Will revisit this recommendation from the 2022 assessment to implement an incident management team liaison in the field during incidents to determine if the needs have changed.

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 rapid earth fault current limiter (REFCL) devices, by:*
    - *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., rapid earth fault current limiter [REFCL] devices).*
    - *Increasing training options to include more hands-on and less computer-based delivery.*

Addressing this recommendation, in Q1 SCE:

a. Is in the process of discussing an implementation plan for the requirement to improve training for frontline workers for wildfire suppression.

b. Is in the process of scheduling in-person make-up sessions for Rapid Earth Fault Current Limiters with enhanced training materials that provide content tailored to the target audience. Audience has been expanded to include all Switching Centers in 2024 and 2025 since there are multiple Ground Fault Neutralizer projects within the coming years that could potentially impact this population.

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:*

- *Continue to recognize and take action to mitigate the risk exposure posed by interactions with the public.*

- *Continue to track these incidents and further strengthen its strategy for managing risk exposure posed by interactions with the public.*

Addressing this recommendation in Q1, SCE:

a. Implemented an inspection form and process for inspectors and vendors to request customer contact info to set up an inspection appointment after repeated attempts to gain access to the property.

SCE's efforts continue to have a positive effect with overall threats and assaults against workers continuing to decrease. There was a 15% reduction in reported assault/threat cases in Q1 2024 compared to Q4 2023 and a 27% reduction in reported assault/threat cases in Q1 2024 compared to the Q1 three-year average (from 2021 to 2023).

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:*
    - *Must employ a more robust communication strategy that involves senior leadership to promote the survey.*
    - *Must consider ways to diversify the tactics for soliciting survey responses from the workforce.*

Addressing this recommendation in Q1, SCE:

a. SCE will align our internal survey schedules to reduce the potential for overlap with the Energy Safety Wildfire Safety Culture Assessment. SCE will also implement a communication plan that ensures senior leadership continues to share the importance of completing the survey.

(4) Recommendations of the Safety and Operations Committee

The Committee had one meeting during the first quarter of 2024, on February 21st. During this meeting, the Committee focused on wildfire and safety issues in the following categories: Wildfire Safety and Worker Safety, among other topics.

Each of these areas are addressed below. 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 SCE's completion of nearly all the 2023 WMP goals. The report also covered potential changes to the 2025 WMP goals and the reasons for and impact of the potential changes. The Committee also received a report on the internal review regarding recent PSPS notifications and the plans to address the issues identified in the review. The Committee and management also discussed covered conductor replacement including a pilot to sample installed covered conductor for corrosion.

b. Worker Safety

The Committee received an overview of safety priorities, the leader safety talent review process, expectation setting with employees regarding safety performance and High Energy Control Assessments. The Committee received a report on district-level heatmap of leading and lagging indicators of safety performance. The Committee discussed with management trends and applying the lessons learned across regions. The Committee also received a report on next steps and timing for implementation of the Safety Management System and discussed with management the implementation of a risk management system and management of change process, including coordination with labor unions and labor union leadership. The Committee and management discussed the safety dashboard report provided by management and impact of recent California storms on SCE.

c. Committee Recommendations

In addition to discussing the wildfire, worker, and public safety topics during its first quarter meetings, the Committee made the following recommendations:

1. Recommended that management provide additional details on recent serious injuries and identify lessons learned and actions being taken in response.
2. Recommended that management provide an update on covered conductor corrosion and the proactive replacement strategy.

d. Completed Management Responses to Committee Recommendations

In response to the Committee's recommendations in prior meetings, management provided the following responses during the Q1 meeting, the details of which are described above or were pending from prior meetings:

- Recommendation (Q4 2023): The Committee recommended that management provide additional details on the implementation of its 2024 worker safety roadmap.

Management response: The Committee received information on the implementation of the 2024 worker safety roadmap at its February 2024 and April 2024 meetings as part of the worker safety reports.

- Recommendation (Q4 2023): The Committee recommended that management share district-level data related to worker safety performance.

  Management response: The Committee received district-level data related to worker safety performance in a worker safety report at its February 2024 meeting.

e. 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 (AEIC) 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 Q2 2024 meeting scheduled for April 24, 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 by electronic mail at jennifer.kline@sce.com.

Southern California Edison Company

/s/ Connor J. Flanigan
Connor J. Flanigan

CC: Wildfire and Safety Performance Section, SafetyPolicyDivision@cpuc.ca.gov
Eric Wu, Ph.D., P.E., Program and Project Supervisor, Eric.Wu@cpuc.ca.gov

CJF:jk:cm Enclosures

SCE's 2023-2025 Wildfire Mitigation Plan (WMP) Progress Update – Q1 2024

(All data is as of March 31, 2024)[1]

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

WMP Activities Summary[2,3]

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

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

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

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-4
Inspect 1,000 transmission overhead circuit miles

IN-5
Inspect 160 generation related assets

IN-8
Execute approved designs for distribution ground and InspectCam capabilities

IN-9.a
Inspect 25 spans with Line Vue

SH-1
Install 1,050 circuit miles of covered conductor

SH-2
Convert 16 circuit miles of overhead to underground

IN-9.b
Inspect 50 splices with X-Ray

SH-5
Install 5 RAR/RCS sectionalizing devices

SH-6
Replace/upgrade 10 CB relay units with fast curve settings

SH-8
Retrofit TOPD at 5 locations with trip capabilities

SH-10
Remediate 500 tree attachments

SH-14
Remediate 1,000 spans

SH-16
Retrofit vibration dampers on 500 structures

SH-17
Complete construction of GFN at one substation

SH-18
Target four locations for grounding conversion

[2] Source: All data is as of March 31, 2024 (+/- 5 business days). Reported numbers are subject to revision upon data validation.

[3] Information marked with an * denotes changes from the WMP filing that were submitted in the Errata dated April 6, 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

Situational Awareness Activities

Weather Stations

20%
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: In Q1, SCE completed installation of 10 weather stations in HFRA.

High Definition (HD) Cameras

0%
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: Activity is scheduled to begin in Q2.

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: In Q1, SCE identified over 300 potential weather station locations for new machine learning.

Early Fault Detection (EFD)

32%
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: In Q1, SCE completed installation of 16 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: In Q1, SCE provided the analytics report to the vendor for analysis.

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

10%
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: In Q1, SCE completed installation of 108.15 circuit miles of covered conductor in HFRA. Activity is off track due to weather impacting deployment of miles, along with impacts associated with constraints on multiple projects. Activity is at-risk of not meeting YE target

Undergrounding Overhead Conductor

0%
Installed [4]

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: In Q1, SCE completed removal of 0.08 overhead miles in support of targeted underground in HFRA which will be counted toward 2023 target (note: the first 5.61 miles removed in 2024 will count toward 2023 target due to missed target). Activity is off track due to multiple constraints that may delay execution in 2024. Activity is at-risk of not meeting YE target. [4]

Remote Controlled Automatic Reclosers Settings Update

0%
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: Activity is scheduled to begin in Q2.

Circuit Breaker Relay Fast Curve

50%
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: In Q1, SCE completed replacement/upgrade of 5 CB relays with fast curve settings in HFRA.

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: In Q1, SCE completed its first milestone of establishing the project artifacts for the 5 in-scope locations.

Tree Attachment Remediation

1%
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: In Q1, SCE remediated 5 tree attachments in HFRA. [4] Activity is off track due to material shortage and severe weather that impacted regions with tree attachment scope. Activity is expected to return to on-track performance in Q4.

[4] 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

26%
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: In Q1, SCE remediated 256 spans in HFRA.

Vibration Damper Retrofit

3%
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: In Q1, SCE retrofit vibration dampers on 13 structures in HFRA. Activity is off-track due to focus in Q1 on vibration damper notice of violation (NOV) scope requiring a completion date in May which took priority over current scope. Activity is expected to return to on-track performance in Q2.

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: In Q1, SCE 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.

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: In Q1, SCE finalized location and Initiated development of Construction Standards, as well as placed material purchase orders and work order design is currently in progress.

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

21%

Aerial

19%

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: In Q1, SCE completed 40,047 ground and 36,363 aerial inspections in HFRA.

Transmission Infrared Inspections

16%

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: In Q1, SCE completed inspections of 164.90 transmission circuit miles in HFRA.

YTD Status

Ground

26%

Aerial

26%

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: In Q1, SCE completed 7,308 ground and 7,235 aerial inspections in HFRA.

Generation Inspections

0%

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: Activity is scheduled to begin in Q2.

Distribution Infrared Inspections

0%

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: Activity is scheduled to begin in Q2.

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: In Q1, SCE completed Solution Architecture Document (SAD) for design to incorporate distribution ground and InspectCam capabiltiies into a single digital platform.

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

64%

X-Ray

72%

Transmission Conductor & Splice Assessment: Spans with LineVue & X-Ray (IN-9)

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.[5]
- **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.[6]

Status Update:

- **IN-9.a:** In Q1, SCE completed LineVue inspections on 16 spans.
- **IN-9.b:** In Q1, SCE completed X-Ray inspections on 36 splices.

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

34%
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: In Q1, SCE completed inspections on 137 grids in SCE's HFRA.

Dead and Dying Tree Removal

36%
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: In Q1, SCE completed inspections of 176 grids/ circuits.

Structure Brushing

7%
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: In Q1, SCE completed inspections and cleared (where clearance is needed) 4,583 structures in HFRA.

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: In Q1, SCE completed draft system stabilization metrics for existing maintenance programs.

Expanded Clearances for Legacy Facilities

30%
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: In Q1, SCE performed vegetation treatment and maintenance at 15 sites.

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

30%
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: In Q1, SCE completed inspection of 231 grids.

LiDAR Vegetation Inspections – Distribution

0%
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: Activity is scheduled to begin in Q2.

Detailed Inspections: Transmission

24%
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: In Q1, SCE completed inspection of 99 grids.

LiDAR Vegetation Inspections – Transmission

21%
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: In Q1, SCE completed inspection of 316.82 HFRA circuit miles in HFRA. Activity is off track due to due to lower than anticipated performance by the primary vendor performing the work. Activity is expected to return to on-track performance in Q2.

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.[7]

Status Update: In Q1, 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.[8]

Status Update: In Q1, 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: In Q1, all PSPS readiness trainings are in the process of being developed and training dates are scheduled.

Aerial Suppression

Aerial Suppression (DEP-5) [9]

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.

[7] Number of calendar/business days subject to change based on customer survey feedback.
[8] Number of calendar/business days subject to change based on customer survey feedback.
[9] 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

0%

Safety Meetings

Wildfire Safety Community Meetings (DEP-1) [10]

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: Activity is scheduled to begin in Q2.

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 has not completed PSPS-related customer studies in Q1. Activity is off-track due to challenges associated with collecting Business customer data/surveys. Activity is expected to return to on-track performance in Q2.

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

WMP Activity Narratives

YTD Status	Behind Plan
YE Outlook	At-Risk

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

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 49% (108.15 circuit miles installed vs 210 planned YTD) due to weather impacts and constraints on multiple projects
- 633 circuit miles are authorized to proceed through month end March, with 70 miles that are 80% complete in the field or more
- Year-end target is at risk and recovery plan in progress

Risks or Challenges

- 238 miles currently constrained by weather, environmental and other factors
- Several projects are currently constrained by bird nesting season which limits and/or restricts work in those impacted areas
- Several 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

- Recovery plan being developed: Program Management (PM) to work with partner organizations to review work line by line in each region to develop monthly execution recovery pace (to be complete by end of April)
- Meeting weekly with Environmental counterparts to work to resolve constraints
- Increased focus on closing out work in our system of record as soon as the work order is field complete
- Moving secondary contractor to San Joaquin region to support execution
- Establishing a strike team to maximize covered conductor execution in Bishop

WMP Activity Narratives

Off-Track Narrative – SH-2 Undergrounding

YTD Status	Behind Plan
YE Outlook	At-Risk

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

- Activity is at-risk of not meeting year-end target due to multiple constraints that may delay execution in 2024
- Due to missed 2023 program target, the first 5.61 miles removed in 2024 will count toward completion of the 2023 target

Risks or Challenges

- Material Shortage – Aluminum Cable, UG Transformer (expected in April), B - material
- Scope for 2024 execution is affected by multiple constraints such as environmental reviews/clearances, permitting, and easements

Actions to Improve Performance / Get Well Plan

- Continue to work with partner organizations to address constraints
- Conversion of UG installed miles to OH removed miles to be complete by mid April
- Review 2024 projects for material demands and confirm availability
- Newly established strike team created to review targeted undergrounding processes

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 92% (5 remediations vs 65 planned YTD) due to weather and material impacts.
- 186 locations released for construction
- Activity expected to return to on track by early Q4
- Recovery plan in progress

Risks or Challenges

- Aerial cable shortage causing delays to work in San Joaquin region
- 30 locations in Rural region delayed due to snow

Actions to Improve Performance / Get Well Plan

- Escalated material concern through supply chain who is working directly with aerial cable manufacturer
- The manufacturer has committed to increased aerial cable delivery volumes in May/June to provide enough material for projects in San Joaquin Region
- Rural region work to commence in summertime once snow melts

WMP Activity Narratives

Off-Track Narrative – SH-16 Vibration Damper Retrofit

YTD Status	Behind Plan
YE Outlook	On Track

Activity 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

Key Takeaways

- Off track by 35% (13 retrofitted vs 20 planned YTD) due to focus in Q1 on vibration damper notice of violation (NOV) scope requiring a completion date in May which took priority over current scope.
- Expected to return to on track in Q2.

Risks or Challenges

- 2024 scope received in March, later than anticipated.

Actions to Improve Performance / Get Well Plan

- Work being assigned to District crews to simplify costs being charged.
- As of April 10th, a total of 45 vibration damper retrofits have been completed.

WMP Activity Narratives

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

YTD Status	On Track
YE Outlook	At-Risk

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.
- SCE anticipated this schedule delay and proactively proposed an update to the 2024 target language which was not approved by OEIS.

Risks or Challenges

- Long lead materials will delay construction start until Q4.
- Construction can take up to 9 months from the time design is approved.

Actions to Improve Performance / Get Well Plan

- Design in progress.
- Continue to work with vendors to finalize vendor drawings.
- Ground bank ordered in Q4 of 2023, expected delivery early Q1 of 2025.

WMP Activity Narratives

YTD Status	Behind Plan
YE Outlook	On Track

Off-Track Narrative – VM-10 LiDAR Transmission Vegetation Inspections

Activity Target

- SCE will inspect at least 1,500 HFRA circuit miles**

** Subject to change based on program adjustments and evolution of remote sensing technologies

Key Takeaways

- Off track by 59% (316.82 circuit miles YTD vs 780 planned).
- Activity is off track due to lower than anticipated performance by the primary vendor performing the work.
- Q1 deliverables are in progress, activity is expected to return to on track in Q2.

Risks or Challenges

- Lower than anticipated vendor performance may delay completion of planned scope.

Actions to Improve Performance / Get Well Plan

- Work with vendors to establish revised performance targets to complete backlog of planned scope.
- Continue to onboard the secondary vendors on SCE processes and requirements to support primary vendor.

WMP Activity Narratives

YTD Status	Behind Plan
YE Outlook	On Track

Off-Track Narrative – DEP-4 Customer Research and Education

Activity Target

- SCE plans to conduct at least 3 PSPS-related customer studies in 2024

Key Takeaways

- Off track by 100% due to challenges associated with collecting Business customer data/surveys
- Lower response rates / participation levels from Business customers which is taking longer and impacted achieving the target # of completed surveys (Business surveys launched in late February -- a week later than Residential)
- PSPS Tracker survey fieldwork continued in March. 80% or more Residential surveys were finished in Q1 (from mid-February to end of March); Business surveys were more difficult to complete
- Expected to return to on track in Q2

Risks or Challenges

- Delays in receiving business customer responses may impact overall schedule

Actions to Improve Performance / Get Well Plan

- SCE discussed with vendor ways to accelerate fieldwork next year (especially with challenges associated with collecting Business customer surveys)
- Residential customer data collection concluded in early April and Business customer surveys will conclude in mid-to-late April (final reports due in May)