

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET O E I S - P - W M P _ 2 0 2 5 - S C E - 0 1 2

To: OEIS

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Job Title: Senior Advisor

Received Date: 7/17/2025

Response Date: 7/22/2025

Question 03.a-f:

Regarding Base and Strive Targets for Additional Structure Brushing (VM-2.1):

On page 70 of its 2020-2022 Base WMP, SCE sets a base target for its Expanded Pole Brushing (VM-2) initiative of 200,000 structures, and a strive target of 300,000 structures. On page 379 of its 2023-2025 Base WMP, SCE sets a base target for VM-2 of 63,700 structures, and a strive target of 135,200 structures. On page 196 of its 2026-2028 Base WMP, SCE sets a base target of 83,000 structures for VM-2.1 (previously VM-2.0) and a strive target of 172,000 structures.

- a. Describe what factors led SCE to adjust base and strive targets when transitioning from 2020-2022 to 2023-2025 Base WMP cycles, and from 2023-2025 to 2026-2028 Base WMP cycles (e.g., operational costs, resource availability, including or excluding sub-transmission or transmission structures, Integrated Wildfire Mitigation System [IWMS] models, HFRA designation, etc.).
- b. Describe how SCE sets its base targets for structure brushing work that is in addition to PRC § 4292 requirements.
- c. Explain why SCE set a base target of 83,000 structures in its 2026-2028 Base WMP considering the actual number of structures it brushed far exceeded 83,000 from 2020 to 2024.
- d. Describe how SCE sets its strive targets for structure brushing work that is in addition to pole brushing in compliance with PRC § 4292.
- e. Explain the difference between the process of defining a strive target and the process of defining a base target.
- f. Explain why SCE set a strive target in its 2026-2028 Base WMP of 172,000 structures considering the actual number of structures it brushed was far below 172,000 from 2021 to 2024.

Response to Question 03.a-f:

Please see SCE's response to OEIS' data request below.

- a.) *Describe what factors led SCE to adjust base and strive targets when transitioning from 2020-2022 to 2023-2025 Base WMP cycles, and from 2023-2025 to 2026-2028 Base WMP cycles (e.g., operational costs, resource availability, including or excluding sub-transmission or transmission structures, Integrated Wildfire Mitigation System [IWMS] models, HFRA designation, etc.).*

SCE's adjustments to the WMP base and strive targets for VM-2 have evolved over time due to a range of factors, such as modifications in risk assessment methodologies, changes in the types of structures encompassed within the program's scope, and updates to fire risk

area designations.

As stated in SCE's 2022 WMP Update, "[i]n 2020 and 2021, SCE's expanded pole brushing program [for VM-2.1, previously VM-2] was based on the quantity of poles in HFRA without examining the risks and consequences specific to each structure. In 2022, SCE has incorporated vegetation management risk-based prioritization consistent with OEIS feedback" (p. 262).

For the 2023-2025 WMP and 2026-2028 WMP, SCE defined its structure brushing scope using a risk informed methodology that leveraged the Integrated Wildfire Mitigation Strategy (IWMS) to define the base and strive targets. The 2023-2025 WMP VM-2 scope focused on structures in Distribution and Sub-Transmission while the 2026-2028 WMP VM-2 scope expanded to include Bulk Transmission structures. Additionally, the risk models that inform the IWMS categorization are updated periodically (i.e., yearly) which influence the available population of inventory and affect the target quantities at the times the targets are created.

b.) Describe how SCE sets its base targets for structure brushing work that is in addition to PRC § 4292 requirements.

Since the methodology for defining structure brushing targets has changed over the previous WMP cycles, as discussed in item (a) above, this response will be focused on the process used to set the VM-2.1 target for SCE's 2026-2028 WMP.

In SCE's 2026-2028 WMP, SCE set its base target for Additional Structure Brushing (VM-2.1) for structures that are not included in the PRC 4292 population by assessing the risk of its structures. The potential VM-2.1 scope is identified based on risk either through the IWMS category or if the structure is identified as part of an Area of Concern (AOC). The available base target population includes Distribution and Transmission structures in High Fire Risk Area (HFRA) that are identified as being in IWMS Severe Risk Area and/or AOCs at the time the targets are defined. Additionally, the base target is defined by considering potential factors that could impact brushing execution in the field, such as access or environmental constraints.

Lastly, the population of structures that qualify for the VM 2.1 activity may change over time due to revisions in State Responsibility Areas (SRA) and HFRA, as well as the type of equipment included on the structures. The risk information for the structures used to identify IWMS risk categories may be updated over the years as well which could influence the mix of available structure brushing inventory from which to set target quantities.

c.) Explain why SCE set a base target of 83,000 structures in its 2026-2028 Base WMP

considering the actual number of structures it brushed far exceeded 83,000 from 2020 to 2024.

Please see the response to item (b) above.

- d.) Describe how SCE sets its strive targets for structure brushing work that is in addition to pole brushing in compliance with PRC § 4292.*

Since the methodology for defining structure brushing targets has changed over the previous WMP cycles, as discussed in item (a) above, this response will be focused on the process used to set the VM-2.1 target for SCE's 2026-2028 WMP.

In SCE's 2026-2028 WMP, SCE set the strive target for Additional Structure Brushing (VM-2.1) for structures that are not included in the PRC 4292 population by assessing the risk of structures. The strive target includes the inventory at the point in time that the target was set of Distribution and Transmission structures in HFRA that are identified as being in IWMS High Consequence Areas.

- e.) Explain the difference between the process of defining a strive target and the process of defining a base target.*

The methodology to define the base target and strive target for VM 2.1 structure brushing scope both comprehensively considers all qualifying Transmission and Distribution structures, but structures categorized as higher risk are included in the base target and the next risk categories are included in the strive target.

- f.) Explain why SCE set a strive target in its 2026-2028 Base WMP of 172,000 structures considering the actual number of structures it brushed was far below 172,000 from 2021 to 2024.*

Please see response to item (d) above.