

Southern California Edison
2026-WMPs – 2026-WMPs

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To: OEIS
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Response Date: 6/5/2025

Question 01.a-c:

Regarding Inconsistent HFTD Overhead Distribution Circuit Mile Values:

On page 27 of its 2026-2028 Base WMP, SCE states that there are 9,342 overhead distribution circuit miles in the HFTD (3,820 miles in Tier 2 and 5,522 miles in Tier 3). SCE indicates on page 362 of its 2026-2028 Base WMP that the population size of HFTD-only Inspections for Vegetation Clearances around Distribution Lines (VM-7) is 9,177 circuit miles. On page 331 of its 2026-2028 Base WMP, SCE indicates that VM-7 has an annual target of 7,900 HFRA circuit miles.

- a. Describe the difference between these three values.
- b. Provide an explanation of why the population size of HFTD-only inspections does not include the total overhead distribution circuit miles in the HFTD.
- c. Provide a justification for why the VM-7 annual target does not include inspecting all overhead distribution circuit miles in the HFTD.

Response to Question 01.a-c:

See SCE's response to Energy Safety's questions below.

a.) Describe the difference between these three values.

The difference between the first two of these values (i.e., 9,342 circuit miles and 9,177 circuit miles) is due to the timing of when the data was extracted from SCE's system and when service area remapping and system updates occur.

In Section 4, Overview of the Service Territory, SCE identified 3,820 miles in Tier 2 and 5,522 miles in Tier 3, for a total of 9,342 overhead distribution circuit miles.

Section 9.11.1, Vegetation Management and Inspections – Quality Assurance and Quality Control, SCE identified a total of 9,177 distribution circuit miles. As explained in footnote 159 of SCE's 2026-2028 Base WMP, "population and sample size in circuit miles is approximated and may vary based on HFRA zone remapping" (p. 362).

The third value, 7,900 circuit miles in Section 9.1, Vegetation Management and Inspections – Quantitative Targets, is a target for VM-7 for which SCE aims to inspect approximately 85% of the total distribution circuit mile population. As explained above, the exact total on which the target is based depends on the point in time when the circuit miles data was referenced.

SCE also notes that in Table 9-6 on p. 362 of SCE's 2026-2028 Base WMP, the QA/QC sample size is not derived from the total circuit miles alone but is instead based on a stratified methodology that prioritizes risk. Specifically:

- TRI-A circuits, which represent the highest risk tier, account for 5,134 miles and are sampled at a 100% confidence level.
- TRI-B, TRI-C, and TRI-D circuits, totaling 4,043 miles, are sampled using a 99% confidence level with a 3% confidence interval.
- This tiered approach ensures that the riskiest areas receive the most rigorous scrutiny, regardless of minor fluctuations in total mileage.

b.) Provide an explanation of why the population size of HFTD-only inspections does not include the total overhead distribution circuit miles in the HFTD.

See SCE's response in item (a) above.

c.) Provide a justification for why the VM-7 annual target does not include inspecting all overhead distribution circuit miles in the HFTD.

SCE strives to inspect as many circuit miles as possible annually, to reduce wildfire risk. SCE's WMP annual target for VM-7 is developed based on risk prioritization and subject to resource constraints. For more information on the development of VM-7 target, please see SCE's response in item a above.