



David LeBlond
Principal Manager, Regulatory Affairs-Wildfire & Public Safety
david.leblond@sce.com

Docket: 2026-2028 Electrical Corporation Wildfire Mitigation Plans
Docket# 2026-2028-Base-WMPs
Revision 3
Volume 1 of 1

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Tony Marino
Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: SCE's Substantive Errata for the 2026-2028 Wildfire Mitigation Plan (WMP)

Dear Deputy Director Marino:

Following SCE's second revised 2026-2028 WMP and non-substantive errata filing to the Office of Energy Infrastructure Safety (OEIS), OEIS identified non-substantive errors that remain for SCE to correct. The Notice on Errata to SCE also allows additional non-substantive errors to be submitted at the same time. SCE's corrections are set forth in the table and redlines on the following pages.

SCE's 2026-2028 WMP and associated materials are available at <https://www.sce.com/wmp/>

Sincerely,
//s//

David LeBlond
Principal Manager, Regulatory Affairs-Wildfire & Public Safety
david.leblond@sce.com

Table of Errata

The table below lists requested corrections to the September 15, 2025 submission of SCE's 2026-2028 Base WMP R2.

Section	Page Number(s)	Description of Correction
Table of Contents	Starting on page i	SCE has updated the table of contents page number references to accurately reflect the correct WMP Sections, subsections, and page numbers throughout the WMP.
Section 4.2 Catastrophic Wildfire History	Page 31	SCE has updated Table 4-2: Catastrophic Wildfires to show the correct ignition date for the Round fire.
Section 9.2.1.5 Scheduling & Section 9.2.2.5 Scheduling	Pages 339 and 342	SCE has updated its 2026-2028 Base WMP to include the clarifications made in its response to Data Request 18, Questions 1 and 2.
Section 9.12 Work Orders	Page 375	SCE has adjusted Table 9-7 and Table 9-8 so that past due vegetation management work order totals for each table are the same.
Section 13.3 Discontinued Activities	Page 502	SCE has revised Section 13.3 of its 2026-2028 Base WMP to remove the SH-10 and SA-10 activities consistent with its response to Data Request 18, Question 3.

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Table 4-2: Catastrophic Wildfires

Ignition Date ¹⁷	Fire Name	Official Cause ¹⁸	Fire Size (acres)	No. of Fatalities	No. of Structures Destroyed and Damaged	Financial Loss (US\$) ¹⁹	Lesson(s) Learned
10/20/2007	RANCH	USFS opined that the fire was caused by SCE equipment	>58,000	0	9 Structures Damaged or Destroyed	Data not available	See Section 4.2 narrative
11/14/2008	SAYRE	USFS opined that the fire was caused by SCE equipment	11,262	0	604 Structures Destroyed / 147 Structures Damaged	Data not available	See Section 4.2 narrative
2/6/2015	ROUND	CAL FIRE opined that the fire was caused by SCE equipment	7,000	0	43 Structures Destroyed / 5 Structures Damaged	Data not available	See Section 4.2 narrative
8/18/2016	REY	USFS opined that the fire was caused by SCE equipment	32,606	0	5 Structures Destroyed	Data not available	See Section 4.2 narrative
12/4/2017	THOMAS/ KOENIGSTEIN	CAL FIRE & VCFD opined that the fires were caused by SCE equipment	281,893	2	1,060 Structures Destroyed / 274 Structures Damaged	Data not available	See Section 4.2 narrative

¹⁷ Wildfire history data is derived from various sources including SCE incident reports and related communications, CAL FIRE (<https://www.fire.ca.gov/stats-events/>), and U.S Forest Service (<https://nap.nwcg.gov/NAP/>).

¹⁸ Wildfire history data is derived from various sources including SCE incident reports and related communications, CAL FIRE (<https://www.fire.ca.gov/stats-events/>), and U.S Forest Service (<https://nap.nwcg.gov/NAP/>).

¹⁹ In some instances, an agency may provide data related to one component of financial loss such as costs associated with suppression efforts; however, SCE is not aware of an authoritative government source that provides all-inclusive data regarding financial loss.

Ignition Date¹⁷	Fire Name	Official Cause¹⁸	Fire Size (acres)	No. of Fatalities	No. of Structures Destroyed and Damaged	Financial Loss (US\$)¹⁹	Lesson(s) Learned
12/5/2017	CREEK	USFS opined that fire was caused by LADWP equipment	15,619	0	123 Structures Destroyed / 81 Structures Damaged	Data not available	See Section 4.2 narrative
12/5/2017	RYE	CAL FIRE opined that the fire was caused by SCE equipment	6,049	0	6 Structures Destroyed / 3 Structures Damaged	Data not available	See Section 4.2 narrative
11/8/2018	WOOLSEY	CAL FIRE opined that the fire was caused by SCE equipment and an unidentified communication line	96,949	3	1,643 Structures Destroyed / 364 Structures Damaged	Data not available	See Section 4.2 narrative
10/10/2019	SADDLE RIDGE	Los Angeles City Fire Dept opined that the cause of the fire is undetermined	8,799	1	24 Structures Destroyed / 91 Structures Damaged	Data not available	See Section 4.2 narrative
9/6/2020	BOBCAT	USFS opined that the fire was caused by SCE equipment	115,997	0	169 Structures Destroyed / 47 Structures Damaged	Data not available	See Section 4.2 narrative
10/26/2020	SILVERADO	CAL FIRE and OCFA opined that the fire was caused by SCE and T-Mobile equipment	12,466	0	5 Structures Destroyed / 11 Structures Damaged	Data not available	See Section 4.2 narrative

Ignition Date¹⁷	Fire Name	Official Cause¹⁸	Fire Size (acres)	No. of Fatalities	No. of Structures Destroyed and Damaged	Financial Loss (US\$)¹⁹	Lesson(s) Learned
9/5/2022	FAIRVIEW	CAL FIRE opined that the fire was caused by SCE equipment	28,307	2	36 Structures Destroyed / 8 Structures Damaged	Data not available	See Section 4.2 narrative
1/7/2025	EATON	No official cause. Under investigation	14,021	17	9,413 Structures Destroyed / 1,074 Structures Damaged	Data not available	See Section 4.2 narrative

SCE uses the GRCD to determine clearances from distribution lines which are based on standards set forth in GO 95 Rule 35 (Case 13 and Case 14), GO 95 Rule 37, PRC 4293, PRC 4292 Title 14 CCR Sections 1250-1258, and SCE's internal procedures UVM-03 and UVM-09. SCE strives to obtain expanded clearances of 12 feet or greater for distribution lines in HFRA. At a minimum, SCE's Inspections for Vegetation Clearances from Distribution Lines maintains at least the required four feet clearance for distribution lines within HFRA. Vegetation Inspections assess whether the vegetation meets these clearance requirements and prescribe corrective actions if necessary.

Certain tree species, due to their characteristics, have the potential to cause "grow-in" or "blow-in" incidents that could lead to an outage or an ignition. SCE manages high-risk species of vegetation and implements clearances, where possible, to reduce the probability of vegetation contacting electric facilities by providing species-specific categorization to its workforce to make appropriate work prescriptions.

Fast-growing species are typically pruned to maintain compliance for annual cycles. If the tree is not expected to maintain the compliance clearance distance (which is SCE's internal clearance target), for one year, a removal is typically pursued.

As an example, palms drive a significant number of off-cycle trims and emergency work required to prevent circuit interruptions and other safety risks. While the overall inventory of palms is low, historically palms have accounted for a significant portion of the Tree Caused Circuit Interruptions (TCCIs). To further mitigate public and worker safety risks associated with trimming palm trees, palms near lines are typically targeted for removal. Similarly, bamboo is one of the fastest growing plant species and SCE's preferred method is to remove it when possible.

9.2.1.4 Fall-in Mitigation

In this section, the electrical corporation must describe how it identifies fall-in risks, such as hazard trees, during the inspection (e.g., Level 1, Level 2, etc.). As applicable, the electrical corporation must describe how it differently prescribes removal of high-risk species of vegetation.

Fall-in mitigation is primarily addressed through SCE's Hazard Tree and Dead and Dying Tree Programs. Please refer to Sections [9.2.3.4](#) and [9.2.4.4](#).

9.2.1.5 Scheduling

In this section, the electrical corporation must describe how the inspection activity (program) is scheduled. This must include the frequency (e.g., annual, quarterly, three-year cycle) and/or triggers (e.g., severe weather events, risk model outputs) of the inspection activity (program). It must also identify how the frequency and/or trigger might differ by HFTD tier or other risk designation.

If the inspection activity (program) is based on a fixed frequency (e.g., annual, three-year cycle), the electrical corporation must explain how it uses risk prioritization in the scheduling of the inspection activity (program) to target high-risk areas). If the electrical corporation does not use risk prioritization in the scheduling of the inspection activity (program), it must explain why.

Inspections for vegetation clearances from distribution lines are scheduled and conducted on an annual basis. The timing and scheduling of inspections may be adjusted in Areas of Concern (AOC) based on weather data, risk models, and environmental conditions. AOC are areas that pose increased fuel-driven and wind-driven fire risk. AOCs are identified based on several factors, including fire history, current and near-term fuel and weather conditions, vegetation type and amount, and impact to communities and SCE infrastructure. To mitigate the potential risk in AOC, SCE may adjust its vegetation inspection schedules to address risk in AOC.¹⁵⁵

SCE targets annual vegetation inspections for all HFRA distribution circuit miles. Completion of this scope may be constrained by environmental conditions (e.g., snow, high winds, sensitive environmental regions) and risk prioritization efforts (such as emergent inspections), which may influence inspection timing and scheduling but does not typically prevent inspections from occurring. While the timing of inspection work may not always adhere to the original planned schedule, it is ultimately completed. In accordance with SCE's internal guidelines, VM schedulers monitor delays and follow up as necessary to verify that inspections are completed. In addition, circuit mileage totals are dynamic and may shift due to HFRA boundary changes, GIS and data refinements, and asset-related adjustments such as conductor span length variations due to asset removal or installation.

9.2.1.6 Updates

In this section, the electrical corporation must discuss changes/updates to the inspection activity (program) since its last WMP submission, including known future plans (beyond the current year) and new/novel strategies the electrical corporation may implement in the next five years (e.g., references to and strategies from pilot projects and research). The electrical corporation must include lessons learned as applicable.

In 2024, SCE continued its implementation of a consolidated inspection strategy to improve contractor management, optimize work scheduling, support the transition from grid-based to circuit-based inspections, and enable increased use of remote sensing. This involves requiring Pre-Inspection contractors to perform inspection across all three vegetation management programs: Routine Line Clearing,¹⁵⁶ Hazard Tree Management Program, and Dead and Dying Tree Removal. As part of the consolidated inspection strategy, SCE started the transition from a grid-based inspection strategy (Vegetation Management grids are SCE-defined geographic boundaries that define a work area) to a more linear circuit-based inspection strategy. Shifting to a circuit-based inspection approach allows for alignment with other company initiatives, such as remote sensing to enable near real-time data capture.

In this 2026-2028 WMP, SCE is combining two prior WMP activities – expanded clearances for distribution lines (VM-7) and remote sensing distribution inspections (VM-9) – into a single WMP activity called “Inspections for Vegetation Clearance from Distribution Lines” (new VM-7). It is beneficial to combine the remote sensing and ground inspections because SCE plans to augment VM-7 by increasing the use of remote sensing technologies in its inspections. This shift will facilitate the transition from ground-based inspections to more remote sensing methodologies, thus providing valuable data for predictive models.

In 2025 and beyond, SCE plans to introduce the use of CanopySense, a suite of technology tools to aid in performing vegetation management inspection activities around distribution and transmission assets. CanopySense is a cloud-based platform that utilizes LiDAR or imagery (e.g., satellite, orthoimagery) to determine vegetation encroachment to SCE's circuit lines.

SCE's CanopySense project has completed two proofs of concept, Crown Segmentation

¹⁵⁶ AOCs do not provide a comprehensive list of every area that could potentially have a major wildfire as this is not conceivable. AOCs concentrate on the more obvious locations where major wildfires could occur.

¹⁵⁵ SCE refers to the inspections for vegetation clearances from distribution lines (VM-7) and transmission lines (VM-8) as Routine Line Clearing (RLC). Both programs are collectively termed Routine Line Clearing.

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9.2.2.4 Fall-in Mitigation

In this section, the electrical corporation must describe how it identifies fall-in risks, such as hazard trees, during the inspection (e.g., Level 1, Level 2, etc.). As applicable, the electrical corporation must describe how it differently prescribes removal of high-risk species of vegetation.

Fall-in mitigation is primarily addressed through SCE's Hazard Tree and Dead and Dying Tree Programs. Please refer to sections [9.2.3.4](#) and [9.2.4.4](#).

9.2.2.5 Scheduling

In this section, the electrical corporation must describe how the inspection activity (program) is scheduled. This must include the frequency (e.g., annual, quarterly, three-year cycle) and/or triggers (e.g., severe weather events, risk model outputs) of the inspection activity (program). It must also identify how the frequency and/or trigger might differ by HFTD tier or other risk designation.

If the inspection activity (program) is based on a fixed frequency (e.g., annual, three-year cycle), the electrical corporation must explain how it uses risk prioritization in the scheduling of the inspection activity (program) to target high-risk areas. If the electrical corporation does not use risk prioritization in the scheduling of the inspection activity (program), it must explain why.

SCE uses the same procedures for scheduling inspections for vegetation clearances from transmission lines¹⁵⁷ and distribution lines. See section [9.2.1.5](#) for details.

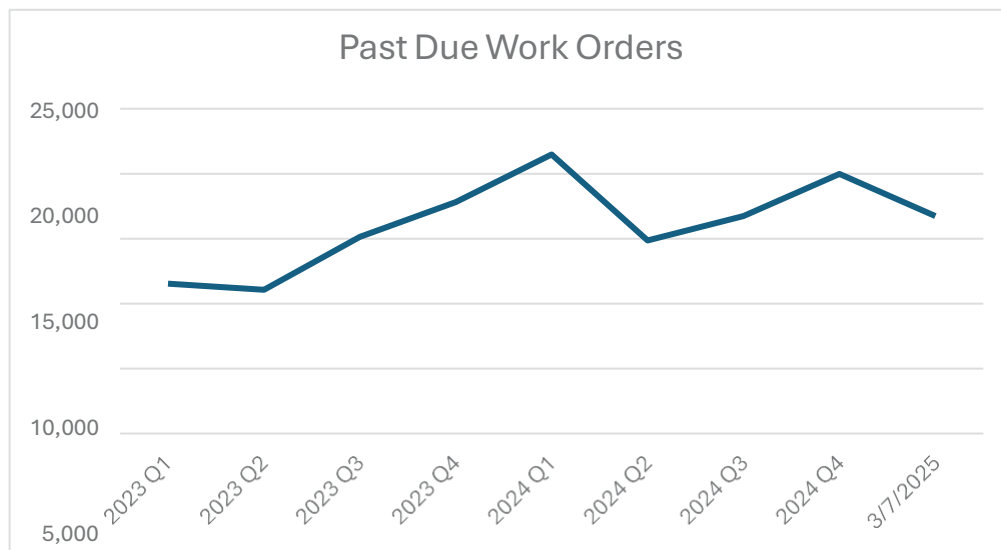
SCE targets annual vegetation inspections for all transmission HFRA circuit miles. Completion of this scope may be constrained by environmental conditions (e.g., snow, high winds, sensitive environmental regions) and risk prioritization efforts (such as emergent inspections), which may influence inspection timing and scheduling but does not typically prevent inspections from occurring. While the timing of inspection work may not always adhere to the original planned schedule, it is ultimately completed. In accordance with SCE's internal guidelines, VM schedulers monitor delays and follow up as necessary to verify that inspections are completed. In addition, circuit mileage totals are dynamic and may shift due to HFRA boundary changes, GIS and data refinements, and asset-related adjustments such as conductor span length variations due to asset removal or installation.

9.2.2.6 Updates

In this section, the electrical corporation must discuss changes/updates to the inspection activity (program) since its last WMP submission, including known future plans (beyond the current year) and new/novel strategies the electrical corporation may implement in the next five years (e.g., references to and strategies from pilot projects and research). The electrical corporation must include lessons learned as applicable.

In this 2026-2028 WMP, SCE is combining two prior WMP activities – expanded clearances for transmission lines (VM-8) and remote sensing transmission inspections (VM-10) – into a single WMP activity called “Inspections for Vegetation Clearance from Transmission Lines” (new VM-8). It is beneficial to combine the remote sensing and ground inspections because SCE plans to augment VM-8 by increasing the use of remote sensing technologies in its inspections.

As mentioned above in [9.2.1.6](#), in 2025 and beyond, SCE plans to introduce use of CanopySense for vegetation management inspection activities around transmission lines.

Figure SCE 9-02: Volume of Past Due Work Orders¹⁷⁰Table 9-7: Number of Past Due Vegetation Management Work Orders Categorized by Age and HFTD Tier¹⁷¹

HFTD Area	0-30 Days	31-90 Days	91-180 Days	181+ Days	Total
Non-HFTD	6,029 5,103	118 100	58 55	25 22	6,230 5,280
HFTD Tier 2	5,414 4,654	59 56	133	102	5,708 4,945
HFTD Tier 3	4,636 3,753	41	85 83	35 34	4,797 3,911
Total	16,079 13,510	218 197	276 271	162 158	16,735 14,136

Table 9-8: Number of Past Due Vegetation Management Work Orders Categorized by Age and Priority Levels Timeline Category^{172,173}

Priority Level	0-30 Days	31-90 Days	91-180 Days	181+ Days	Total
Priority 1 (24 hours)	0	0	0	0	0
Priority 1 (72 hours)	0	0	0	0	0
Priority 2 - Less than RCD (<30 days)	1,727	55	22	2	1,806
Priority 2 - Between RCD and TCD (<90 days)	11,751	117	108	67	12,045
Priority 2 - Hazard Tree Management and Dead and Dying Tree (<180 days)	30	25	141	89	285
Strain or Abrasion on Secondary Lines ¹⁷⁴	N/A	N/A	N/A	N/A	N/A

170 As of 3/7/2025.

171 As of 3/7/2025. Excludes work points with clearance equal to or greater than GRCD.

172 The electrical corporation must use the priority levels it defines in section 9.12.1

173 As of 3/7/25. As explained in SCE's response to Data Request Set OEIS-P-WMP_2025-SCE-018, Question 1, SCE clarifies this data excludes work points with clearance equal to or greater than GRCD.

174 Strain or Abrasion on Secondary Lines is not a formal category SCE tracks as part of its vegetation management inspections.

13.3 Discontinued Activities

The electrical corporation must provide all activities from previous WMP submissions that it is no longer implementing (“Discontinued Activities”),²¹² the rationale for discontinuation, the applicable lessons learned, and a list of the new or existing activities that mitigate risk in place of the discontinued activity (“Replacement Activities”), including cross-references to the page numbers within the WMP where each replacement activity is discussed.

Table 13-2 provides the required format for this information.

SCE plans to replace transmission splice inspections with X-Ray (IN-9.b) with proactive splice shunting (SH-20) for the 2026 Base WMP. Many activities included in the 2023 Base WMP have been completed and reached a steady state, such as software development and implementation, system hardening, or planned remediations.

Activities in the 2023 Base WMP concluding prior to 2026 include:

- DG-1 WiSDM / Ezy Data
- IN-9.a Transmission Spans with LineVue
- SA-1 Weather Station Installs
- ~~SA-10 HD Cameras~~
- SA-8 Fire Spread Modeling
- ~~SH-10 Tree Attachment Remediation~~
- SH-15 Vertical Switches
- SH-4 Branch Line
- SH-6 Circuit Breaker Relay Hardware for Fast Curve
- SH-8 Transmission Open Phase Detection
- VM-10 LiDAR Vegetation Inspections – Transmission
- VM-3 Expanded Clearances for Generation Legacy Facilities
 - VM-9 LiDAR Vegetation Inspections – Distribution

Discontinued activities are summarized in Table 13-2.

²¹² Discontinued activities do not include activities that the electrical corporation has completed. An activity that has been completed is not a discontinued activity.