

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine  
Electric Utility De-Energization of Power  
Lines in Dangerous Conditions

Rulemaking 18-12-005

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) AMENDMENT TO  
PUBLIC SAFETY POWER SHUTOFF 2025 PRE-SEASON REPORT**

**PUBLIC VERSION**

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Pursuant to the California Public Utilities Commission’s Decisions (D.) 21-06-014 and D.21-06-034, Southern California Edison Company (“SCE”) hereby submits this Amendment to its Public Safety Power Shutoff 2025 Pre-Season Report (Attachment A hereto).

SCE also provides the following link to access and download the Amended 2025 Pre-Season Report thereto: <https://on.sce.com/PSPSPreSeasonReporting>

Respectfully submitted,

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**Attachment A**  
**Amendment to SCE 2025 PSPS Pre-Season Report, Appendix D - After Action Report**  
**(Public)**



# **2025 SCE PSPS Exercise Series**


**Tabletop Exercise: April 28 | 8:00 AM to 1:00 PM | Virtual**

**Functional Exercise: June 2 - 3 | 8:00 AM to 4:00 PM | Virtual**

## **After-Action Report**

## Exercise Overview

Exercise Name	2025 Public Safety Power Shutoff (PSPS) Exercise Series
Exercise Dates	Tabletop Exercise (TTX)   April 28, 2025 Functional Exercise (FE)   June 2 - 3, 2025
Scope	<p>The 2025 PSPS Exercise Series consisted of two exercises:</p> <ul style="list-style-type: none"> <li>The Tabletop Exercise was a three-hour virtual event organized by Southern California Edison (SCE) to convene SCE personnel and external partners to discuss their roles and responsibilities pertaining to PSPS high fire risk event.</li> <li>The Functional Exercise was a two-day virtual event hosted by SCE to assess roles and responsibilities during PSPS high fire risk events. Exercises focused on executing tasks based off latest CPUC guidelines, internal preparedness planning and PSPS training.</li> </ul>
Training Objectives	<ol style="list-style-type: none"> <li><b>Operational Coordination:</b> Execute the SCE PSPS response plan for planning, de-energization, and re-energization in accordance with all prescribed PSPS requirements, plans, and protocols to help protect customers and communities from the risk of wildfire.</li> <li><b>Customer Notification:</b> Deliver all necessary notifications to impacted public safety partners and customers, according to all PSPS guidelines.</li> <li><b>Public Safety Partner Coordination:</b> Engage with public safety partners to provide sustained situational awareness and mitigate downstream impacts to customers and communities.</li> <li><b>Community Resilience:</b> Deploy resources to mitigate customer impacts throughout PSPS conditions, including Customer Resource Centers (CRC) and support for people with access and functional needs.</li> </ol>
Threat/Hazards	Wind and Fire Potential Index (FPI) conditions forecast to exceed PSPS thresholds.
Participating Organizations	<ul style="list-style-type: none"> <li>SCE PSPS Dedicated Incident Management Team (IMT), SCE PSPS IMTs 1, 2, 3, 4, SCE various Pooled IMT positions</li> <li>Representatives from 211 LA, City of Menifee, City of Wildomar, San Manuel Mission Band of Indians, Mojave Airport, County of San Bernardino OES, Madera County OES, SGD&amp;E,</li> </ul>

	PG&E, Pacific Corps, Crestview Water District, T Mobile, California Department of Social Services, CPUC, and Cal OES observed exercise on 6/2. Pacific Corps, CPUC and Cal OES observed exercise on 6/3.)
Point of Contact	

## **Exercise Series Summary**

The 2025 SCE PSPS Tabletop (TTX) and Functional Exercises (FE) were designed to validate and enhance internal coordination, external engagement, and operational readiness for managing complex PSPS events during dangerous fire weather conditions — which include strong winds, dry vegetation and low humidity. The exercises engaged SCE's Dedicated PSPS IMT, PSPS IMTs, pooled positions, and key external partners in simulating a multi-county PSPS activation prompted by worsening Santa Ana wind conditions and critically low humidity across Southern California. Additionally, for the 2025 PSPS Exercise Series, the SCE Exercise Task Force built in ongoing wildfire incidents running concurrently with the PSPS events as part of an effort to continue to build capabilities and test operational coordination between the PSPS IMT and the ES IMT response structure following the windstorm events in January.

The 2025 PSPS Exercise Series demonstrated SCE's ongoing commitment to ensuring cross-functional readiness for PSPS events. Through realistic scenarios, SCE validated core response processes, strengthened interdepartmental coordination, and affirmed alignment with regulatory and safety expectations.

## **Exercise Scenario:**

While the scenarios were similar for both the Tabletop and Functional Exercise, the Functional Exercise introduced a second wildfire that starts during the middle of exercise play on Day 1 and continues through Day 2. This was designed to drive operational coordination between the IMTs activated to support the fire and the PSPS IMT.

For the Functional Exercise, exercise play was artificially split across two days and two shifts of IMT players on June 2 & 3. This allowed the Dedicated PSPS IMT and PSPS IMT members, along with pooled positions, to simulate a PSPS activation from the start of the Period of Concern, through approval of circuits in scope to de-energization.

## **Weather Data used for exercise over both days of play:**

**Period of Concern:** 0900 June 2 through 1500 June 3

## **Day 1 - Santa Ana Wind Event:**

- Moderate to strong Santa Ana winds
- Sustained Winds: between 20–30 mph
- Wind Gusts: Gusts up to 40 mph, strongest mid-morning through afternoon
- Relative Humidity: 6 to 10%

- Concurrent Fire: The Apple Fire was burning at 32,000+ acres with 42% containment, and the IST was activated to support SCE's response in Riverside and San Bernardino Counties.
- Counties Affected: Riverside, San Bernardino, Los Angeles, Orange, Ventura, Kern.

## **Day 2 - Eastern Sierra Wind Event:**

- New onshore winds in the Eastern Sierras
- Sustained Winds: between 20–30 mph, up to 35 mph in Mono and Inyo
- Wind Gusts: Up to 50 mph in Mono, Inyo, and Kern
- Relative Humidity: 4 to 8%
- Concurrent Fire: The Cattle Canyon Fire started on June 2 around 11:20 AM near the Cattle Canyon Bridge in the Angeles National Forest. It grew to over 2,000 acres overnight with 0% containment, impacting both San Bernardino and Los Angeles Counties.
- Additional Counties Affected: Kern, Mono, Inyo

## **Total impacts from exercise:**

- 8 Counties impacted (Riverside, San Bernardino, Los Angeles, Orange, Ventura, Kern, Mono, Inyo)
- 355 Circuits impacted; 1 shared circuit impacted (Tuolumne / Mono Counties)
- 92,657 Customers impacted at peak.

## **Analysis of Capabilities:**

This analysis reviews simulated events and performance to identify strengths and areas for improvement, enhancing future efforts. Analyses are completed with the benefit of hindsight and are not intended to determine if any of the actions or decisions of management, vendors, internal organizations, or individual personnel during an event or simulated event were reasonable or prudent based on the information available at the time.

### **Strengths:**

Several areas of success were noted throughout the exercise. These strengths should continue to be replicated in the future to ensure strong activations and response efforts:

1. **Effective Cross-Team Coordination:** The PSPS IMT demonstrated strong cross-functional coordination by using dashboards and collaborative tools to support timely, consistent communication. These tools were applied in ways that mirrored real-world activation protocols, reinforcing internal alignment and decision-making efficiency.
2. **Engaged and Role-Ready Personnel:** Participants, including both experienced staff and newer team members, actively engaged in information-sharing and collaborative problem-solving. This demonstrated a shared understanding of roles and responsibilities and supported by a cohesive, well-informed response posture. Newer participants demonstrated retention of recent training.
3. **Operational Agility and Adaptability:** Players adapted effectively to initial Central Data Platform (CDP) tool access limitations due to technical issues. The team's ability to maintain focus and continuity of operations despite these challenges reflected operational agility and resilience under dynamic conditions.
4. **Practical Use of Technology and Systems:** Teams demonstrated familiarity with and effective use of key technological systems, validating their ability to leverage digital platforms and tools that support PSPS operations. This included real-time tracking, information dissemination, and coordination with internal and external stakeholders.
5. **Ability to manage concurrent emergencies:** Players adapted effectively to evolving scenario conditions, including realistic concurrent wildfire threats.
6. **Pre-Exercise Preparation and Readiness:** Annual PSPS training contributed to overall team preparedness. This foundational knowledge supported confident engagement throughout the exercise and was especially valuable for staff new to the PSPS process, ensuring readiness across all levels of participation.



### **Areas for improvement:**

1. The exercise scenario was specifically designed to test interoperability between an ES IMT activated to respond to a wildfire and a PSPS IMT. In most instances, the PSPS IMT operates independently and rarely with concurrent IMT activations. During the exercise, evaluators observed that some positions (OSC, PSC & IC) could have benefitted from additional cross team coordination and collaboration with the ES IMT.
2. Some surge team members demonstrated the need for additional training and hands-on experience with core PSPS applications, such as CDP and iPEMS. To mitigate this, the dedicated IMT provides hands-on guidance during events, ensuring smooth operations and reducing the impact of any knowledge gaps. However, it would still be beneficial to provide additional training and user groups for the surge team members to further enhance their skills and confidence.
3. For the Functional Exercise, Player Briefing at start of day one was rushed and may not have provided enough detail for players and external observers to start exercise smoothly. The External Observer Briefing wasn't sufficiently planned ahead of time and was executed at the last minute. Exercise planner needs to ensure roles and responsibilities of Players, Controllers, Evaluators and External Observers are clearly defined and understood, how to use the Meeting Schedule TEAMS Links as channels during the exercise, so external observers could listen in to the discussions and actions being taken in between established meetings during Player Briefing and External Observer Briefing at start of exercise. Ensure External Briefing is planned out ahead of exercise and conducted to ensure external observers are led through the exercise layout and can interface with players effectively.

## **Appendix A: Improvement Plan**

Priority	Issue/Area for Improvement	Corrective Action	Category	Owner(s)	Due Date
High	The exercise scenario was specifically designed to test interoperability between an ES IMT activated to respond to a wildfire and a PSPS IMT. In most instances, the PSPS IMT operates independently and rarely with concurrent IMT activations. During the exercise, evaluators observed that some positions (OSC, PSC & IC) could have benefitted from additional cross team coordination and collaboration with the ES IMT.	During events with multiple IMT's activated, the PSPS Planning Section should assign representatives from Ops, Planning, Customer Care and Incident Command to attend daily Incident Action Planning Meetings to ensure integration across IMTs. Depending on complexity, BRDM should consider activating an IST IC.	Planning	[REDACTED]	Q3 2025
Medium	Some surge team members demonstrated the need for additional training and hands-on experience with core PSPS applications, such as CDP and iPEMS. To mitigate this, the dedicated IMT provides hands-on guidance during events, ensuring smooth operations and reducing the impact of any knowledge gaps. However, it would still be beneficial to provide additional training and user groups for the surge team members to further enhance their skills and confidence.	Provide surge team members with additional opportunities for hands-on experience via shadow opportunities during real-world events.	Training	[REDACTED]	Q3 2025
		Consider enhancements to CDP & iPEMS training modules in annual refresher training. Add specific objectives to evaluate system proficiency in future exercises.	Exercises	[REDACTED]	Q3 2025

Priority	Issue/Area for Improvement	Corrective Action	Category	Owner(s)	Due Date
Low	For the Functional Exercise, Player Briefing at start of day one was rushed and may not have provided enough detail for players and external observers to start exercise smoothly. External Briefing wasn't sufficiently planned ahead of time and was executed at the last minute.	Ensure roles and responsibilities of Players, Controllers, Evaluators and External Observers are clearly defined and understood.	Planning	██████████	Q3 2025
		Provide guides and agenda ahead of time to observers, so they are aware of what elements of play are accessible, how to access, and the timeline of exercise play and key exercise elements.	Planning	██████████	Q3 2025
		Ensure External Observer Briefing is planned out ahead of exercise and conducted to ensure external observers are led through the exercise layout and can observe play effectively.	Planning	██████████	Q3 2025