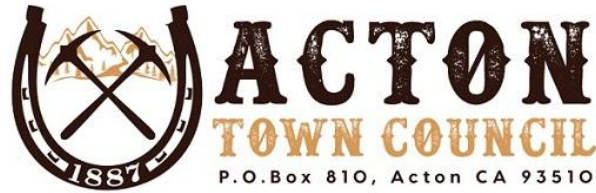


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| Docket Number: | 25-OPT-02 |
| Project Title: | Prairie Song Reliability Project |
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| Document Title: | The Acton Town Council Comments - Scoping Comments submitted by the Acton Town Council |
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*Comment Received From: The Acton Town Council
Submitted On: 3/4/2026
Docket Number: 25-OPT-02*

Scoping Comments submitted by the Acton Town Council

Additional submitted attachment is included below.



Lisa Worrall, Project Manager
California Energy Commission
715 P Street, MS-40
Sacramento, CA 95814

March 4, 2026

Subject: Scoping Comments From the Acton Town Council Regarding the Proposed
"Prairie Song" BESS Development.

Reference: California Energy Commission Docket Number 25-OPT-02.

Dear Ms. Worrall;

The Acton Town Council (Council) respectfully offers the following comments to the California Energy Commission (CEC) regarding potentially significant impacts that will be caused by the "Prairie Song" BESS project (PS project) as well as mitigation measures and alternatives that will reduce these impacts.

The Prairie Song BESS will Result in Wildfire Impacts

Acton is a very windy place, and residents frequently experience power shutoffs initiated by Southern California Edison (SCE) because the distribution system is believed to be vulnerable to wind driven wildfire ignitions and because Acton is a Very High Fire Hazard Severity Zone (VHFHSZ). Acton is also home to many high voltage electrical transmission lines; these include all three 500 kV lines that comprise the AC Pacific Intertie (also known as WECC path 26) in addition to approximately 15 other 500 kV and 230 kV lines. These transmission lines are concentrated closely together near the Vincent substation; Acton is traversed by more transmission lines than any other VHFHSZ community in California. None of these lines are de-energized during SCE's frequent power shutoffs. We point this out because our distribution lines are subject to the same General Order 95 (GO 95) CPUC standards as our transmission lines, and need not be designed to withstand windspeeds greater than 54 miles per hour; this is important, because windspeeds in the ridgeline areas where high voltage transmission lines are placed do exceed 54 mph. Yet, the transmission lines are not de-energized. Additionally, SCE's high voltage lines experience mechanical failures even when GO 95 design windspeeds are not exceeded. For example, the Saddleridge fire in 2019 was sparked by the failure of an insulator fixture on an SCE 220 kV line; the fixture was supposed to last 100 years, but failed in less than 50. The defect was not detected during SCE inspections; photographs of the broken fixture indicate that it rusted from the inside, so perhaps the defect was not visible from the outside. The Acton Town Council has articulated all of these concerns to both the CPUC and the Office of Electrical Infrastructure Safety (OEIS); for example, comments that we filed with OEIS in the recent SCE Wildfire Mitigation Plan proceeding are provided in Attachment 1.

These facts are relevant because the PS project will introduce yet another 500 kV transmission line entering Vincent substation from the west; thus, it will increase the local concentration of transmission lines in an area that is already so overconcentrated with transmission lines that none of them comply with SCE's transmission design standards. This fact came to light during weeks of CPCN hearings convened by the CPUC for the Tehachapi Renewable Transmission Project in which the Acton Town Council was an active participant (we are unable to provide these standards to the CEC because of NDA restrictions). And, because neither the Applicant nor SCE have engaged with the Acton Town Council regarding this project, we have not been given the opportunity to review SCE's construction design for the transmission line between the Vincent 500 kV busbar and the point of interconnection with the PS project. Nonetheless, we are having difficulty believing that the line will comply with SCE transmission design standards because the area where 500 kV lines enter the substation is already overcrowded and non-compliant.

The Acton Town Council understands that the PS project owner does not believe the project poses a wildfire risk even if a BESS were to ignite because the BESS facility will not have any combustible materials or vegetation and because it will be surrounded by a 12 foot high block wall. However, the PS project is located in Acton where "stiff breezes" are frequent and very high winds are not uncommon. These conditions result in flying debris that is carried a great distance. In fact, windblown debris is a key reason why SCE persistently shut off power in Acton and other Very High Fire Hazard Areas: there was concern that windblown vegetation and debris will create faults and spark wildfires¹. Windblown vegetation and debris will ignite if it flies through a BESS flame front and will spark a fire when it is carried off and then deposited in dry brush. This is not a hypothetical scenario; windblown debris *can* ignite and start a fire. For example, the "Thief" fire in 2019 was sparked when a tumbleweed blew by the exhaust port of a generator, ignited, and then landed near a home which promptly burned down².

The Acton Town Council is also concerned about how a BESS fire will behave in high winds because the wind will force the flames coming from the BESS to "lay down" and blow horizontally over adjacent BESS devices and cause them to overheat and ignite. This is not a possibility. It is an eventuality because the PS project has not been designed to provide any water resources to respond to a BESS fire. The Acton Town Council understands that a study prepared by "Fire & Risk Alliance" allocates no water for fighting a BESS fire; instead, they recommend the intermittent use of a small "handline" operating at 125 gallons per minute to cool surrounding BESS surfaces. It was very clear from testimony offered by

¹ This issue garnered significant debate in the CPUC proceeding convened to address both PSPS protocols and utility wildfire management plans, and it factors into utility the models that drive power shutoff decisions. See for example the power shutoff modeling description SCE provided to the CPUC in response to a Wildfire Mitigation Plan data request; it is in Cell D:218 in the spreadsheet found here: <https://www.sce.com/sites/default/files/AEM/Data%20Requests/Weekly%20Update%20List.xlsx>

² <https://www.turnto23.com/news/local-news/fire-officials-generators-pose-risks-for-residents-with-power-shutoffs>.

professional firefighters at the Scoping Meeting on February 24, 2026 that this plan will not work, that a “handline” cannot even reach most of the BESS from the perimeter, and that the 80,000 gallons of water will be gone in less than an hour if the BESS fire is properly addressed with at least 2 “deck guns” flowing 1,000 gallons per minute each. The project does not have a sufficient water supply, and because of this, the winds of Acton will ensure that each BESS fire event creates a chain reaction that results in multiple BESS fires.

Finally, the Acton Town Council points out that the Community of Acton does not have sufficient sources of municipal water to address a BESS fire. About half of Acton residents are served by the local waterworks district (WWD #37), and the WWD #37 customers near the project area are served by a water storage tank on the north side of the 14 Freeway (known as the “North Tank”). The Acton Town Council was just informed by WWD #37 that the storage capacity of the North Tank is only about one million gallons. This means that, even if the PS project owner agreed to construct a new 12 inch water line to connect the PS project to the North Tank (which is what is required to supply at least 2,000 gallons per minute), firefighters responding to a BESS fire will drain the entire tank in about 8 hours. BESS fires always last much longer than 8 hours, so a BESS fire will substantially disrupt water service to Acton residents; it will also prevent the delivery of sufficient water to fight a fire elsewhere in Acton if one should erupt. In other words, the PS project will result in significant impacts to both local water resources and public safety.

Toxics

Lithium ion BESS devices release very toxic compounds (such as HF) when they burn. The Acton Town Council has long been concerned about this, and in the first comment letter submitted into the PS project docket, we pointed out that the PS project Application does not address the health risks of such emissions. We appreciate that the CEC asked the Applicant to provide a health risk analysis that considered HF and other toxic compounds, and we have reviewed the analysis. For HF, the risk assessment shows no danger because the “Hazard Quotient” is only 0.6 and does not exceed the “significance” threshold of 1.0. We have looked closely at this health risk analysis and we have tried to review the data that was used to derive the 0.6 “Hazard Quotient” value, but could not make any sense of the report. For example, we could not ascertain the distance that was assumed for the nearest receptor. And, while we did find the HF emission assumption (approximately 38 pounds for a fire affecting the entire BESS container), we could not discern how this value was calculated. The same is true for the all toxics. Therefore, and frankly, the Acton Town Council does not find the risk assessment to be credible. The analysis refers to reports, publications, and burn test data and provides links to some documents, but it is not clear how these reports were used to calculate the toxic emission values that were used. It should be a very simple matter to show how these values were derived, and without such information, the Acton Town Council does not believe that the public or the CEC should accept the risk assessment results.

Cutting off access

The Acton Town Council is also concerned with how the PS project eliminates a secondary access route for at least one Acton family and also eliminates existing pedestrian trails. These concerns have been raised in prior correspondence and are now raise here as a potentially significant transportation impact. Secondary access is very important in VHFHSZs and trail preservation is an important General Plan policy. Moreover, and as we previously showed, the developer could easily mitigate such impacts by granting a public easement around the exterior of the project site. We ask that this mitigation measure be implemented. We also ask that the cement barriers which have been put up at the project site to block secondary access be removed.

The PS Project will result in Significant Visual Resource Impacts.

As the Acton Town Council has previously explained, the PS project will create significantly adverse scenic resource impacts. The unsightly BESS/substation facilities are more than a mile long and located between two mapped scenic drives which were established by the Antelope Valley Area Plan precisely for the protection of scenic viewsheds throughout the Community of Acton. These facilities will blight more than 15% of the scenic viewshed along the scenic 14 Freeway in Acton. Any project that blights a significant portion of a scenic drive within a community has significant aesthetic impacts, and the Council respectfully asks the CEC to recognize this and mitigate it by at least requiring the substation to be constructed as an indoor facility. Additionally, if a non-lithium battery chemistry were used by the project, the BESS facilities could be placed indoors, and the entire development could be constructed to look like a large riding arena or broken up into individual buildings that look like agricultural barns.

The Applicant Improperly Rejects Alternatives Just Because They Are Not Near the Vincent Substation.

The Acton Town Council appreciates that the Applicant developed an expanded suite of alternative project locations which included sites outside of Acton (the “Tierra Subida” alternative, the “Pearblossom” alternative, and the “Barrel Springs” alternative). However, the Applicant rejected all of them simply because they were not located near the Vincent substation. The Acton Town Council observes that locating the PS project near the Vincent substation is not necessary for successful project development or for achieving any green energy goals, so the lack of proximity to Vincent is not a legitimate basis for rejecting any project alternative. It became very clear from comments made at the Scoping Meeting that placement of the PS project in Acton is merely a convenience, not a necessity. And, while it saves the Applicant time and money, it also endangers Acton. As one commenter pointed out, this project “socializes the risks and privatizes the profit”. This, coupled with the proximity of the BESS to Acton residences, the lack of water resources, the high wind profile in Acton, the destruction of Acton’s visual character, and the blight brought by the PS project transmission line to our mapped Significant Ecological Area, are why the CEC should not reject less impactful alternative PS project locations outside of Acton.

The Acton Town Council greatly appreciate the opportunity to provide these scoping comments; please do not hesitate to contact us at atc@actontowncouncil.org if you have any questions or require clarifications regarding the comments provided above.

Sincerely;

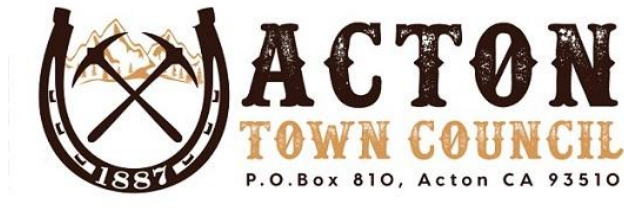
/S/ Jeremiah Owen

Jeremiah Owen, President

The Acton Town Council

ATTACHMENT 1

**ACTON TOWN COUNCIL COMMENTS SUBMITTED TO THE
OFFICE OF ELECTRICAL INFRASTRUCTURE SAFETY
(OEIS) REGARDING SCE'S MOST RECENT WILDFIRE
MITIGATION PLAN.**



January 12, 2026

Tony Marino, Deputy Director
Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814
Electronic Filing of 13 pages and 3 attachments
Copied to: tony.marino@energysafety.ca.gov

Subject: Acton Town Council Comments on the Draft Decision Issued by the Office of Electrical Infrastructure Safety to Approve Southern California Edison Company's 2026-2028 Base Wildfire Mitigation Plan.

Reference: Docket #2026-2028-Base-WMPs.

Dear Deputy Director Marino;

The Acton Town Council (Council) appreciates this opportunity to provide comments on the Draft Decision (Decision) issued December 23, 2025 by the Office of Electrical Infrastructure Safety (OEIS) to approve Southern California Edison's (SCE's) 2026-2028 Wildfire Mitigation Plan (WMP). Acton is a rural unincorporated community in the County of Los Angeles and is located in the northern foothills of the San Gabriel Mountains. The Acton Town Council is a volunteer organization comprised of Acton residents that are elected to represent the interests of the community. As set forth in the bylaws, the purpose of the Acton Town Council is to present community concerns to state, local, and federal agencies as well as gather and convey community views on issues that affect the Community of Acton.

The Council understands from the Decision that OEIS is approving the WMP but still requires SCE to complete additional tasks. The Acton Town Council would like to share with you some community insights regarding the elements of SCE's WMP pertaining to

Public Safety Power Shutoffs (PSPS) and powerline de-energization concerns. The Council regrets that we had neither the capacity nor the resources needed to participate in previous activities undertaken in the referenced Docket, but we trust that the information provided herein will be useful. In the interest of brevity, the community insights provided herein are presented in a list format and in no particular order.

SCE De-energization Decisions In Acton Do Not Comply with WMP PSPS Protocols.

Since 2019, the Community of Acton has routinely experienced the substantially adverse effects of SCE PSPS activities, and Acton is among the communities in California that are most affected by PSPS events. Because of this, the Council has actively participated in various PSPS-related proceeding initiated by the California Public Utilities Commission (Commission) and we have carefully analyzed PSPS protocols set forth in various SCE WMP documents that have been approved over the last 7 years. We have also expended considerable efforts in assessing SCE's PSPS activities and, in particular, evaluating the extent to which SCE's de-energization decisions conform with the PSPS decisionmaking protocols that SCE purports to follow; our findings are always summarized in formal comments which we file with the Commission in response to the "Post Event Reports" that SCE submits after each PSPS event. In every instance, the Council has found that SCE's PSPS de-energization decisions in Acton ***did not*** comply with the de-energization protocols that were set forth in SCE's WMP documents and as a result, Acton residents routinely experienced dangerous and entirely unwarranted power shutoffs *lasting for days*. Given that the WMP which OEIS is poised to approve will formally "codify" all the PSPS decision protocols that SCE will apply to the Community of Acton over the next several years, the Acton Town Council considers it essential that these protocols be examined and their efficacy weighed.

Toward this end, the Acton Town Council has analyzed the PSPS protocols in SCE's 2026-2028 WMP, and notes that they appear to be identical to SCE's previous PSPS protocols because they are based on two quantitative factors: wind levels, and the Fire Potential Index (FPI). Specifically, pages 56 and 227 of the WMP explain that the "de-energization thresholds" (i.e. the levels at which a power shutoff is supposedly triggered) for isolatable circuit segments that are fitted with covered conductor (i.e. "hardened") are windspeeds above 40 mph and wind gusts above 58 mph, and according to Table SCE B-01 on page 554, the "de-energization thresholds" for "hardened" circuits are 1) an FPI of 13 in all Fire Climate Zones other than "Zone 1 Coastal"; AND 2) sustained windspeeds > 40 mph OR wind gusts > 58 mph. Together, these statements constitute a commitment by SCE that

circuits will not be de-energized in communities like Acton which have covered conductor and are not located in a “Zone 1 Coastal” area until the FPI value exceeds 13 AND winds in the vicinity of the circuit exceed either a sustained speed of 40 mph or gusts of 58 mph. The power shutoff thresholds set forth in the 2026-2028 WMP are identical to the thresholds that SCE has ostensibly applied in all recent PSPS events. For example, SCE has claimed that it utilizes the 40 mph sustained and 58 mph gust wind thresholds for hardened circuits since at least 2022¹; SCE also claims that it has used the same equation to calculate FPI values since 2021². However, and as explained in more detail below, history shows that SCE does not apply the wind de-energization thresholds that were claimed in previous WMPs and reiterated in the 2026-2028 WMP; history also shows that SCE applies variable FPI thresholds in Acton which cannot be substantiated. As such, it would be imprudent for OEIS to accept without question the claims that are made in the 2026-2028 WMP regarding SCE’s de-energization decisionmaking processes.

SCE Does Not Apply the Windspeed Thresholds Claimed in the 2026-2028 WMP in Acton.

For many years, the Council has explained to the Commission that SCE routinely applies much lower wind thresholds than what is claimed in approved WMPs to de-energize circuits in Acton; these explanations were provided in Council comments on SCE Post Event reports (some of which are provided in Attachment 1). To illustrate this, Table 1 summarizes the peak wind data recorded on three of the four distribution circuits in Acton in the 12 hours before each power shutoff was initiated in January 2025; these data clearly show that SCE *does not* utilize the de-energization thresholds that are claimed in the 2026-2028 WMP.

The Council has endeavored to understand why SCE initiated so many power shutoffs in Acton in January, 2025 when windspeeds were well below the de-energization thresholds claimed by SCE WMPs, and at a community meeting on August 27, 2025, SCE indicated that thresholds were lowered because SCE understood that firefighting resources were limited. However, the Council has conferred with County officials who indicated that at no time was SCE ever informed that fire response resources in Acton were stretched or otherwise overtaxed; therefore, resources were not sufficiently limited to justify SCE’s unwarranted power shutoffs in Acton. SCE’s Post Event Reports state that FPI thresholds were lowered in January because the “Geographic Area Coordinating Center” (GACC) raised the

¹ See page 550 of SCE’s 2022 WMP Update found here: <https://www.sce.com/sites/default/files/custom-files/SCE%202022%20WMP%20Update.pdf>

² See Page 3 of SCE’s 2021 Publication “Quantitative And Qualitative Factors For PSPS Decision-Making” found here: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53515&shareable=true>.

Table 1. Wind data recorded Before Power Shutoff Events on Circuit Segments in Acton.

| Date | Circuit | Peak Winds recorded in 12 hours before shutoff | |
|------------------|------------|--|------------|
| | | Sustained (mph) | Gust (mph) |
| January 8, 2025 | Bootlegger | 32.3 | 49.1 |
| | Shovel | 29.2 | 46.1 |
| | Pick | 34.8 | 51.3 |
| January 9, 2025 | Bootlegger | 30.2 | 52.8 |
| January 11, 2025 | Bootlegger | 24.3 | 32.6 |
| January 13, 2025 | Bootlegger | 8.8 | 24.6 |
| January 20, 2025 | Bootlegger | 31.1 | 50.7 |
| | Shovel | 34.1 | 50.2 |
| | Pick | 34 | 56.9 |
| January 22, 2025 | Bootlegger | 7.3 | 18.8 |
| January 23, 2025 | Bootlegger | 31.2 | 41.3 |
| | Shovel | 29.3 | 41 |
| | Pick | 31.4 | 48 |
| January 25, 2025 | Bootlegger | 22.8 | 33.5 |

This table summarizes the tabulated information provided in the comments on SCE Post Event Reports prepared by the Acton Town Council; the source of the reported windspeed data is SCE weather stations.

“preparedness level” to 4, but SCE WMPs clarify that GACC data only informs FPI thresholds; thus, it has no effect on windspeed thresholds. In other words, SCE’s PSPS decisionmaking process remains a mystery. The only thing that is certain is that, at least in Acton, SCE does not implement the PSPS protocols described in the 2026-2028 WMP.

It is also important to point out that the substantially lower windspeed de-energization thresholds that SCE applied to Acton in January of 2025 are not unusual; in fact, Council comments submitted to the Commission (provided in Attachment 1) show that SCE has routinely applied substantially reduced windspeed de-energization thresholds in Acton for more than 5 years and therefore needlessly cut power in our community without explanation or justification. In the past, the Acton Town Council has observed that SCE de-energized distribution circuits in Acton based on wind measurements collected on transmission line towers that are located high on ridgelines and miles away from the de-energized circuits. This untoward practice may explain some of SCE’s inexplicable shutoff decisions and if so, then SCE clearly made power shutoff decisions based on non-representative wind data that did not reflect actual conditions on the circuits that are de-energized. Other anomalies observed in SCE’s power shutoff decisions and discussed in the comments provided in Attachment 1 include:

- SCE often shuts off power to residents in Acton that are served with 100% underground distribution lines from the Acton substation. The distribution circuits serving these residents pose no wildfire risk because they are all underground, but SCE de-energizes them anyway.
- SCE applies arbitrary and unsubstantiated FPI thresholds in Acton (as discussed in more detail below).
- SCE weather station data show that distribution facilities in Acton which are damaged during wind events did not experience particularly excessive wind levels and the fact that they were damaged indicates that the facilities were not being maintained in accordance with the Commission’s General Order 95 (GO 95).

Given SCE’s historically persistent failure to apply windspeed de-energization thresholds in Acton in accordance with previously approved WMPs, OEIS should not presume that SCE intends to comply with the PSPS procedures enumerated in its 2026-2028 WMP.

SCE Cannot Substantiate the Variable FPI De-energization Thresholds Applied to Acton.

As explained above, page 554 of SCE’s 2026-2028 WMP asserts that, in “hardened” areas with covered conductor, the de-energization threshold for the “Fire Potential Index” (FPI) parameter is 13 in all Fire Climate Zones other than “Zone 1 Coastal”; this would imply that the FPI de-energization threshold in Acton is 13. However, the actual FPI de-energization thresholds that SCE applies to Acton can be as low as 12, and SCE has cut power in Acton when FPI values were well below 12³. A footnote on page 554 states that “thresholds may be adjusted in an actual PSPS event based on the risks and complexities associated with the event and the specific risk factors associated with each circuit”; nonetheless, such adjustments must be made based on clear, specific, and quantitative factors and they must be defensible. The clear, specific, quantitative factors that determine SCE’s FPI de-energization thresholds are set forth by SCE’s 2026-2028 WMP in the equation depicted in Figure 10-05 as:

- Vegetation dryness.
- Energy Release Component of the vegetation.
- 10-hour dead fuel moisture time-lag (from bi-weekly vegetation sampling).

³ For example, SCE shutoff the Bootlegger circuit on January 8 when the FPI was only 11.14; for that PSPS event, half the circuits in Acton were assigned an FPI de-energization threshold of 12, and the other half were assigned an FPI de-energization threshold of 13. All of this is discussed on pages 13 and 14 of the Acton Town Council comments dated March 18, 2025 pertaining to SCE’s Post Event Report for the January 2 PSPS event; these comments are provided in Attachment 1.

- 100-hour dead fuel moisture time-lag (from bi-weekly vegetation sampling).
- Moisture content value of living vegetation (from bi-weekly vegetation sampling).
- The “degree of greenup” (from bi-weekly vegetation sampling).
- The fuel loading modifier (either 0.5, 0.75, or 1.0).
- The “weather component” which is determined from a “look up” table that considers windspeed and dewpoint depression (which is the difference between the actual temperature and the dewpoint temperature).
- The “circuit health”.
- The calculated “consequence analysis”.

Over the last six years, the Acton Town Council has asked SCE many times to provide data pertaining to these parameters so that we could substantiate the various FPI de-energization thresholds that SCE assigns to Acton and assess the actual FPI values that occurred when power shutoffs were initiated. These requests were made because the FPI thresholds assigned to Acton tend to vary across the community and over a very short period of time. These variations make no sense, because vegetation characteristics (fuel loading, dryness, energy release, etc.) and “weather component” characteristics are generally uniform across the Pick, Shovel, and Bootlegger circuits within the community of Acton. These requests were generally ignored, but SCE did explain several years ago that the parameters regarding which the Council sought information are actually inputs to a proprietary model that SCE does not own and because of this, SCE cannot provide the data needed to substantiate the FPI values reported for each de-energized circuit. This is odd, given that each component of the FPI equation is a discreet, quantitative value. At the very least SCE should be able to provide GACC preparedness level data and “Fire Science Area of Concern” maps which are allegedly used to determine FPI values; SCE should also be able to produce weather data and fuel data (because there are only 16 fuel sampling sites across SCE’s entire HFRA⁴). Nonetheless, and as the Acton Town Council understands it, SCE is unable to provide 1) the data used to establish FPI de-energization thresholds for each circuit; and 2) the data that is relied upon to shutoff power because of a claimed exceedance of an FPI de-energization threshold.

The Acton Town Council believes that the calculated FPI values which SCE utilizes to shutoff power should be reproducible and withstand scrutiny by the public and responsible agencies; this is important for both transparency and continuous improvement which, the

⁴ Page 389 of the 2026-2028 WMP.

Council understands, is also important to OEIS⁵. However, and insofar as the Council can determine, the FPI values that SCE relies upon to shutoff power cannot be verified, reproduced, or even justified. We consider this to be a substantial deficiency in SCE's PSPS protocols, and it can only be rectified by a directive from a responsible agency that compels utilities to maintain sufficient data and records to justify FPI values that are used to initiate power shutoffs *particularly when they are inconsistent with the FPI thresholds that are asserted in approved WMPs*.

SCE's Transmission Line De-Energization Protocols are Deficient.

SCE has developed protocols for de-energizing transmission lines which operate at or above 200 kV⁶ based on stakeholder input⁷, and while the Acton Town Council has tried diligently to obtain these protocols, SCE persistently refuses to provide them⁸. The Council understands that SCE is disinclined to de-energize transmission facilities because of the potential for "significant customer impacts and reliability issues"⁹. Nonetheless, SCE should initiate shutoffs on its transmission system when conditions warrant, and SCE's WMP should clearly set forth protocols that ensure transmission lines are de-energized when appropriate. The Council is both surprised and disappointed that we could not find any information pertaining to transmission de-energization protocols or criteria in SCE's 2026-2028 WMP.

Our concerns regarding the lack of transmission de-energization protocols in SCE's 2026-2028 WMP are not unfounded and they do not stem from idle anxieties. To the contrary, the matter is critical to the Community of Acton which has more transmission lines clustered in a Very High Fire Hazard Severity Zone than any other community in California¹⁰. These lines are so concentrated together that they do not comply with SCE's

⁵ Page 17 of the Decision suggests that OEIS wants SCE's model frameworks to produce reliable outputs and support transparency, reproducibility, and continuous improvement to ensure the models are consistently validated and verified.

⁶ General Order 131 issued by the California Public Utilities Commission defines "transmission" to mean facilities that operate at or above 200 kV.

⁷ SCE was required to prepare these protocols by the California Public Utilities Commission (see Page A26 of Commission Decision D.19-05-042).

⁸ The Acton Town Council submitted discovery requests to SCE and even filed a motion to compel with the Commission; the protocols were not disclosed.

⁹ See page 8 of SCE's Publication "Quantitative and Qualitative Factors for PSPS Decision Making" found here: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53515&shareable=true>

¹⁰ The Acton Town Council estimates that there are nearly 20 high voltage transmission lines concentrated around the Vincent substation in East Acton; some of these lines are owned by the Los Angeles Department of Water and Power, but most are owned by SCE.

transmission design standards¹¹ and, while some of these facilities are only 13 years old, the Council understands that many were constructed well before 1970. The high concentration and the advanced age of the transmission facilities in Acton pose unique and significant wildfire risks that SCE and responsible agencies have heretofore ignored despite our attempts to elevate these concerns in public meetings and in comments filed in Commission proceedings. The Acton Town Council is now taking this opportunity to convey these concerns to OEIS by providing the following excerpt from comments that the Acton Town Council filed with the California Public Utilities Commission on March 18, 2025 in response to SCE's PSPS Post Event Report filed for PSPS activities in January, 2025.

As the Council understands the application of General Order 95 (GO 95), the transmission facilities [in Acton] are designated as either "Class E" or "Class H" supply circuits (depending on voltage - Section 20.6) that must be constructed and maintained as "Grade B" equipment (Section 42). These facilities are all above a 3,000 foot elevation; some are cylindrical towers while others are lattice structures constructed with galvanized steel members. For the cylindrical towers, GO 95 requires a minimum design wind load of 6 pounds per square foot (psf) while the lattice steel towers probably have a minimum design wind load of 10 psf (Section 43.1). Both have a Safety Factor of 1.25 (Table 4); thus, GO 95 requires the cylindrical towers to be constructed to withstand a wind load of 7.5 psf (equivalent to 54 mph) and the lattice towers to be constructed to withstand 12.5 psf (equivalent to 69.9 mph). Additionally, GO 95 imposes design standards for transmission line conductors and hardware fixtures (conductor fastenings, pins, insulators, etc.); because they are typically rounded in shape, their base wind load design requirement is assumed to be 6 psf (Section 43.1) and they have a design safety factor of 2 (Table 4). This suggests that transmission line conductors and hardware fixtures in Acton are constructed to withstand a minimum wind load of 12 psf or 68.5 mph.

However, GO 95 does not require transmission facilities to be replaced until their safety factors are reduced to less than two-thirds of the original safety factors set forth in Table 4 (Section 44.3). In other words, the working Safety Factor for the conductors and hardware fixtures on SCE's transmission facilities in Acton is only 1.33, and SCE is not required to replace such equipment until the Safety Factor drops below this value. Applying this 1.33 working Safety Factor to the 6 psf design standard yields an **actual replacement wind load standard of 8 psf (or 56 mph)** for transmission fixtures.

The wind event that prompted SCE's January 2 PSPS activities was of great concern to the Council because winds were predicted to be greater than 70 mph (and therefore exceed all GO 95 design standards for transmission facilities in Acton). After all, the concentrated placement of so many transmission lines on the east side of the community ensures that any wildfire they spark during "Red Flag" conditions would quickly sweep west and engulf the entire

¹¹ This fact was revealed in evidentiary hearings convened by the California Public Utilities Commission for the Tehachapi Renewables Transmission Project. The Acton Town Council has SCE's transmission design standards, but cannot include them here because they are marked "CEII".

community. Given these risks, and the sheer magnitude of the winds that were projected to occur, the Council assumed that some consideration would be given to the de-energization of the transmission lines in Acton during the January 2 PSPS event. However, SCE's Post Event Report makes no mention of any arrangements to de-energize these transmission lines before the PSPS event (such as communicating with CAISO as required by the PSPS Guidelines). In fact, the Report omits any discussion of transmission line de-energizations other than a footnote which states 220 kV facilities in Eaton Canyon which were de-energized because of a wildfire and the PSPS event.

To assess whether the Acton transmission lines should have been within the scope of the January 2 PSPS event, the Council undertook an analysis of the weather conditions on the transmission circuits in Acton. Wind measurements recorded by SCE weather stations on transmission facilities and at the Hauser Mountain communication site located just south of four SCE 500 kV transmission lines are summarized in Table 4. The first set of columns list the peak wind measurements recorded at each transmission weather station in the 12 hours before SCE initiated power shutoffs on all distribution circuits in Acton and the second set of columns report peak winds measured throughout the wind event from January 7 at noon to January 14 at noon. These results demonstrate that several transmission weather stations registered wind gusts that exceeded 60 mph and were therefore considerably higher than 56 mph (8 psf) replacement standard imposed by GO 95 for transmission hardware fixtures (conductor fastenings, pins, insulators, etc.) One transmission line location (weather station 555SE) recorded a wind gust of nearly 68 mph (or 11.8 psf) which very nearly exceeded the 12 psf construction standard imposed by GO 95 for transmission hardware and fixtures!

Additionally, the peak wind measurements reported in Table 4 were not singular events; to the contrary, SCE's transmission weather stations show that winds exceeding 55 mph frequently occurred during the PSPS event. This fact alone should have prompted SCE to at least consider de-energizing the transmission lines in Acton; however, it appears that SCE did not do so.

Table 4. Wind Measurements from Weather Stations on SCE Transmission Facilities.

| Weather Station ID | | Peak Conditions in 12 Hours Before Power Shutoffs ^a | | | | | | Peak Conditions Throughout Power Shutoffs ^b | | | | | |
|--------------------|----------------------------|--|-----------|------|-----------|-----------|------|--|------------|------|-----------|-----------|------|
| | | Windspeed | | | Wind gust | | | Windspeed | | | Wind gust | | |
| | | mph | Date | Time | mph | Date | Time | mph | Date | Time | mph | Date | Time |
| 822SE | Arrastre Ridgeline | 17.3 | January 8 | 0020 | 34.8 | January 8 | 1300 | 17.6 | January 10 | 0420 | 34.8 | January 8 | 0000 |
| 804SE | Julian's Ridge | 42.8 | January 7 | 1200 | 61.5 | January 7 | 1200 | 46.4 | January 10 | 2200 | 61.5 | January 7 | 1200 |
| 764SE | Kentucky Springs ridgeline | 37.1 | January 8 | 1250 | 48.3 | January 8 | 1210 | 37.1 | January 8 | 1250 | 50.7 | January 9 | 2240 |
| 756SE | Rough Road ridgeline | 38.9 | January 8 | 1150 | 51.2 | January 8 | 1140 | 44.4 | January 9 | 2200 | 60.2 | January 9 | 2140 |
| 547SE | West Side AFH "Wolfie" | 24.8 | January 8 | 1220 | 46.7 | January 8 | 1220 | 24.8 | January 8 | 1220 | 48.9 | January 9 | 0740 |
| 555SE | East Side AFH "N3" | 26.6 | January 7 | 1420 | 67.8 | January 8 | 1230 | 49.3 | January 10 | 0550 | 67.8 | January 8 | 1230 |
| | | ^a The time frame is January 7 at 1200 PM to January 8 at 1 PM | | | | | | | | | | | |
| | | ^b The time frame is January 7 at 1200 PM to January 14 at 1200 PM | | | | | | | | | | | |

The Council's concerns regarding the wildfire risk posed by SCE's transmission facilities are not unfounded particularly in regard to the oldest transmission facilities (some of which we believe are approaching 70 years of age). We are fully cognizant of the circumstances surrounding the Saddle Ridge fire in 2019 in which a 220 kV transmission line that was

constructed in 1970 (and is thus younger than transmission facilities in Acton) ignited a wildfire during “Red Flag” conditions. According to the Commission’s Incident Investigation Report¹², the transmission towers were constructed in accordance with the applicable GO 95 wind load standard, but they were located in an area known to have wind loads that exceeded this standard (page 3). The Incident Report also noted that what triggered the wildfire was the failure of a fitting that held an insulator string in place; the fitting showed significant corrosion and fatigue (page 4 and figure 5). According to SCE, the expected service life of the fitting was 100 years (page 4) but it obviously did not even make it to 50 years. For reasons that are not clear, the Commission’s Incident Report does not consider or report wind speeds; it merely states “there is no evidence to suggest that loading conditions were abnormal or in any way greater than the maximum working load multiplied by the applicable safety factor” (page 8). However, the “Fire Investigation Report” prepared by the City of Los Angeles Fire Department (LAFD) indicates that there the Saddleridge Fire broke out during Red Flag conditions with winds in excess of 60 mph. The Saddleridge fire killed one person, injured 8, and threatened 23,000 homes, and according to the combined information from the LAFD and Commission reports, it was the result of a failed transmission fixture on a 50 year old transmission tower that did not even make it half way through its expected service life because it apparently failed when it encountered 60+ mph winds. The circumstances surrounding the transmission facilities in Acton during the January are equally worrisome: Acton’s transmission facilities are much older, they experienced wind conditions that exceeded Commission equipment replacement wind load standards, there are a lot more of them, and they are all packed together in the east side of the community where they will do the most damage if a wildfire is ignited. Yet, apparently SCE never even considered de-energizing them. All of this is intrinsically unreasonable.

The Council is also cognizant of the evidence that is mounting which indicates that SCE transmission facilities were involved in the Eaton Fire that broke out at 6:15 PM on January 7. The Council has reviewed wind data from weather stations in the vicinity of Eaton Canyon, and notes that a weather station located less than half a mile northeast of SCE’s transmission facilities (Station No. HNGC1 23) registered a wind gust of 68 mph at 5:58 (just 17 minutes before the Eaton Fire ignited). Additionally, in the four hours preceding the ignition, that same weather station recorded wind gusts ranging from 65 mph to 70 mph. These circumstances further support the Council’s contention that SCE should have at least considered de-energizing the transmission lines during the PSPS events in January.

Since writing these comments in March, 2025, the Acton Town Council has obtained additional data from weather stations in the vicinity of the Eaton Fire, and notes that the HNGC1 weather station just north of the ignition point recorded a peak wind gust of 85 miles per hour between 17:58 PM and 18:58 PM which is the window of time in which the

¹² This report is provided in Attachment 2.

Eaton fire ignited. For the SCE transmission facilities that ignited the Eaton Fire, GO-95 imposes a cylindrical wind standard of 8 psf, a safety factor of 2, and a replacement requirement when the structure strength is reduced to 2/3 of the safety factor standard. By reconciling these data, it must be concluded that GO-95 designates cylindrical structures on the transmission facilities that ignited the Eaton Fire to be structurally acceptable until they are incapable of withstanding 64 mile per hour winds. However, windspeeds in the vicinity of the transmission facilities that sparked the Eaton Fire substantially exceeded the 64 miles per hour standard imposed by GO-95; *therefore, these lines should have been de-energized.*

Regarding the Saddleridge fire and the Commission findings pursuant thereto, it is important to note that the fitting which broke appears to have been corroded from the inside (see Figure 5 in Attachment 2); it is assumed that this is why the weakness was not detected during the many inspections that SCE performs. SCE's WMP does mention the Saddleridge Fire (see page 34) but merely states "Los Angeles City Fire Department opined that the cause of the fire was undetermined". Incredibly, SCE fails to point out that the Commission also investigated the Saddleridge fire, and found that the transmission facilities where the fire ignited violated GO-95 in multiple ways.

The information provided above clearly demonstrates the need for transmission facility de-energization protocols and that responsible agencies should begin the difficult task of developing transmission de-energization protocols sooner rather than later. This effort must be undertaken in an open and public process, and the protocols must be incorporated in WMPs and made binding on utility actions. The Acton Town Council believes that this is the only way to ensure that our community is not devastated by a transmission-initiated wildfire event. Accordingly, we urge OEIS to begin this process at the earliest practicable moment.

SCE Commitment to Broad PSPS Community Outreach Isn't Genuine and Rings Hollow.

Acton is a rural community in which cellular communication and internet services are not particularly robust, and during SCE PSPS events, communication systems can and do fail¹³. Under such circumstances, the Acton Town Council actively monitors power shutoff events

¹³ As the Council has explained in comments to the California Public Utilities Commission, when internet systems fail, residents must obtain information from each other, so community interconnections are critical. This is particularly true given that SCE notifications to customer's cellphones are often inaccurate and untimely.

and councilmembers communicate events and schedules to affected residents via phone to keep them updated. This efforts were made possible because the Acton Town Council was placed on the distribution list for SCE notifications and, since 2020, SCE has sent the Acton Town Council all PSPS notifications¹⁴ for three of the four distribution circuits that are in Acton¹⁵ (though SCE would not provide notifications pertaining to the fourth circuit¹⁶). However, on or about September 7, 2025, the Acton Town Council was removed from all SCE PSPS Notification distribution lists and since that time, the Council has not received any PSPS notifications; we only know of the PSPS events in Acton that occurred in the Fall of 2025 because residents made inquiries regarding them. The Council has repeatedly asked SCE to add us to the list of entities that receive PSPS notices (our multiple email requests are provided in Attachment 3); these requests were ignored and no response was ever provided. The Acton Town Council mentions these difficulties because they belie the commitments expressed in SCE's WMP that SCE will help stakeholders "stay informed"¹⁷ and conduct broad outreach to communities during PSPS events particularly where (like Acton) "traditional communications might be restricted through a loss of power"¹⁸. These comments are not expected to make any difference in the approval of SCE's WMP; however, the Acton Town Council feels obligated to inform OEIS that SCE is not as committed to stakeholder outreach during PSPS events as the WMP suggests.

SCE Is Not Reducing PSPS and Even Expects PSPS to Increase In Acton By 40%.

The Council understands that SCE is obligated to continually improve its PSPS program in a manner that reduces the scope and frequency of PSPS events and, by extension, PSPS impacts on communities. It appears from the Decision that OEIS is satisfied that SCE's WMP will reduce the scope and extent of PSPS events¹⁹. However, information released by

¹⁴ The notifications that the Acton Town Council has received in the past include the 72-hour warning notice, the 24-hour warning notice, the 1-4 hour imminent shutoff notice, and the shutoff information notice.

¹⁵ These circuits are designated by SCE as Pick, Shovel, and Bootlegger.

¹⁶ SCE has informed the Acton Town Council that the Sand Canyon Circuit is not in Acton. SCE is mistaken. The Sand Canyon circuit because serves all residents in the southwest part of Acton within the Soledad Canyon area. The Acton Town Council has explained this repeatedly to SCE and provided SCE staff with maps showing Acton's boundaries and demonstrating that the Sand Canyon circuit is in Acton. SCE has ignored this information.

¹⁷ Page 213 of SCE's WMP states that SCE's outreach efforts "help customers and stakeholders stay informed and aware of impacts and potential impacts to SCE's electric service".

¹⁸ Page 446 of SCE's "2026-2028 Wildfire Mitigation Plan Revision 2" states that SCE will "Conduct broader PSPS education and outreach to customers, communities, and critical infrastructure/facilities to improve resiliency during PSPS events including those events where traditional communications might be restricted through a loss of power"

¹⁹ Page 37 of the Decision states that SCE's 2026-2028 Base WMP "may reduce the duration, frequency, and scope for PSPS events."

SCE to the public in the summer of 2025 indicates that SCE expects PSPS events to increase because “new criteria” will be applied to FPI values²⁰. And, at a community meeting convened in Acton on August 27, 2025, residents who are already overburdened by SCE PSPS events were informed that PSPS events in Acton could increase by 40% if weather conditions that occurred in 2024 are again repeated. Residents pushed SCE staff to explain what criteria could possibly increase PSPS events by 40% particularly after the extensive circuit “hardening” efforts that have been completed in Acton (at great ratepayer expense). SCE’s responses were very vague, and the Acton Town Council notes that the 2026-2028 WMP fails to shed any light on the matter. Worse yet, SCE appears to have convinced OEIS that its 2026-2028 WMP will reduce the scope and frequency of PSPS events when in fact SCE is informing communities that “new” FPI criteria will result in 40% more PSPS activation days and will also double the size of PSPS events²¹. This is particularly troubling given SCE’s persistent inability to provide supporting data for the variable FPI thresholds that it has assigned to Acton over the last few years (as described above). The Acton Town Council understands that these comments will not make a difference in the approval of SCE’s WMP. However, we feel obligated to notify OEIS that SCE is not intending to reduce the scope and scale of PSPS events (at least not in Acton); to the contrary, new PSPS criteria that SCE has devised will substantially increase PSPS events and impacts in future.

Conclusion.

The Acton Town Council respectfully requests that OEIS factor the comments and concerns presented above into the final decision on SCE’s 2026-2028 WMP. We regret not bringing these issues to your attention earlier, but time constraints and resource limitations prevented us from doing so. If you would like to discuss any of the information presented above, or require further clarifications, please do not hesitate to contact us at atc@actontowncouncil.org.

Sincerely;



Jeremiah Owen, President
The Acton Town Council

²⁰ Page 15 of the SCE presentation found here: https://www.sce.com/sites/default/files/custom-files/PDF_Files/2025%20Wildfire%20Safety%20Community%20Meeting%20Presentation_June%2017.pdf

²¹ Id.

ATTACHMENT 2.

**CPUC INCIDENT INVESTIGATION REPORT ON THE 2019
SADDLERIDGE FIRE.**

CALIFORNIA PUBLIC UTILITIES COMMISSION
Safety and Enforcement Division
Electric Safety and Reliability Branch

Incident Investigation Report

Report Date:

Incident Number: E 20191011-01

Utility: SCE

Date and Time of the Incident: 10/10/2019, 9:00:00 PM

Location of the Incident: Field located behind 14000 Saddle Ridge Road Sylmar, CA

County: Los Angeles

Summary of Incident:

On October 10, 2019, at 8:57 pm, an insulator Y-clevis end fitting installed on SCE tower M5-T2 (Mile 5-Tower 2) failed, causing the 220 kV transmission conductor that it had been supporting to fall onto an underbuilt steel arm. The contact between the 220 kV conductor and the steel arm created a phase to ground fault on SCE tower M5-T2. Consequently, the 220 kV circuit relayed to lockout. At approximately 9:00 pm, three miles upstream from tower M5-T2, burning occurred at the footings of two other SCE towers: M2-T4 and M2-T5. As a result of the burning, a fire ignited at the base of tower M2-T5. On October 31, 2019, LAFD fully contained the fire, which consumed 8,799 acres, damaged 88 structures, destroyed 19 structures, injured 8 personnel and civilians, and resulted in one fatality of a civilian due to a heart attack. My investigation found that SCE did not maintain the Y-clevis end fitting and a skyline jumper wire prior to them failing.

Fatality / Injury: 8 injuries and 1 fatality

Property Damage: More than \$50,000

Utility Facilities involved: 220 kV Gold-Sylmar Circuit

Witnesses:

| | <i>Name</i> | <i>Title</i> | <i>Phone</i> |
|----|---------------|-------------------------|--------------|
| 1. | Eric Ujiiye | CPUC Investigator | N/A |
| 2. | Paul Pimentel | SCE Senior Manager | [REDACTED] |
| 3. | [REDACTED] | SCE Claims Investigator | [REDACTED] |
| 4. | [REDACTED] | OWR Nursery Employee | [REDACTED] |
| 5. | [REDACTED] | LAFD Arson Investigator | |
| 6. | [REDACTED] | Resident Witness | |

Evidence:

| | <i>Source</i> | <i>Description</i> |
|-----|---------------|--------------------|
| 1. | SCE | Initial Report |
| 2. | SCE | Final Report |
| 3. | SCE | Data Request No. 1 |
| 4. | SCE | Data Request No. 2 |
| 5. | SCE | Data Request No. 3 |
| 6. | SCE | Data Request No. 4 |
| 7. | SCE | Data Request No. 5 |
| 8. | SCE | Data Request No. 6 |
| 9. | CPUC | Photographs |
| 10. | LAFD | Photograph |

Observations and Findings:

In 1970, SCE installed towers M5-T2, M2-T5, and M2-T4. “M” stands for mile and “T” stands for tower. For example, M5-T2 represents Mile 5, Tower 2. Figure 1 shows the location of the towers in Sylmar. Figure 2 shows the general configuration of each tower. In Figure 2, the left side of the tower supports the 220 kV Eaglerock-Sylmar circuit, with the pair of conductors on the top arm, the pair of conductors on the middle arm, and the pair of conductors on the bottom arm corresponding to the B, C, and A phases, respectively. Also in Figure 2, the right side of the tower supports the 220 kV Gould-Sylmar circuit, with the pair of conductors on the top arm, the pair of conductors on the middle arm, and the pair of conductors on the bottom arm corresponding to the A, B, and C phases, respectively.

On February 16, 2019, SCE performed detailed inspections on towers M2-T4, M2-T5, M2-T6, and M5-T2 that resulted in the following notifications:

- a.) Tower M2-T4: Right of way road need grading.
- b.) Tower M2-T5: Right of way road need grading.
- c.) Tower M2-T6: Right of way road need grading.
- d.) Tower M5-T2: Replace damaged insulator (a chipped insulator)

An explanation of SCE’s detailed inspection procedures is contained in Appendix A.

In June 2019, SCE patrolled towers M2-T4, M2-T5, M2-T6, and M5-T2. The patrols did not result in any new notifications. An explanation of SCE’s patrol procedures is contained in Appendix A.

On October 10, 2019, at approximately 8:57 PM, the insulator Y-clevis end fitting supporting the B phase conductor of the 220 kV Gould-Sylmar circuit failed. This caused the B phase conductor to fall onto the underbuilt steel arm supporting the C phase conductor of the 220 kV Gould-Sylmar circuit (see Figure 3). The contact between the B phase conductor and the steel tower caused a B-phase-to-ground fault on the 220 kV Gould-Sylmar circuit, which in turn caused the

circuit to relay to lockout (note: there is no evidence to suggest that the B phase conductor contacted the C phase conductor). The fault magnitude varied from 18,700 Amperes to 7,300 Amperes. The total fault clearing time was 3 cycles, or 0.05 seconds. The 220 kV Eagle Rock-Sylmar circuit did not relay or lockout.

On October 10, 2019, shortly after 9:00 PM, Robert Delgado, who resides at 14000 Saddle Ridge Road, observed from the window of his home that a fire had ignited near the base of SCE tower M2-T5, located in an open field approximately 2.1 miles upstream from M5-T2 (see Figure 3 for relative locations of SCE towers M2-T5 and M5-T2). This fire would later be named the “Saddle Ridge Fire”. The Saddle Ridge Fire eventually consumed 8,799 acres, damaged 88 structures, destroyed 19 structures, injured 8 personnel and civilians, and resulted in one fatality of a civilian due to a heart attack.

From October 10, 2019 to October 12, 2019, SCE completed the following repairs:

- Tower M2-T3: SCE replaced 2 broken insulator units on the bottom phase insulator.
- Tower M2-T6: SCE replaced skyline jumper loop (jumper wire)
- Tower M3-T5: SCE replaced 1 broken unit on the bottom phase insulator.
- Tower M4-T2: SCE replaced 8 broken insulator units on the bottom barreled insulator.
- Tower M5-T4: SCE replaced 1 broken unit on the top phase insulator.
- Tower M5-T2: SCE replaced three insulator strings on the Gould-Sylmar 220 kV circuit.
- SCE washed the insulators on the towers near Tower M2-T5.

On October 14, 2019, ESRB staff inspected towers M2-T5 and M5-T2. The location of Tower M5-T2 is shared with a landscaping business, OWR Nursery. According to Enrique Camacho, an employee of OWR Nursery, shattered pieces of insulator debris were discovered on the ground. The insulator debris is consistent with the B phase insulator on tower M5-T2 falling onto the C phase tower arm. A video recording from the surveillance camera located on the northside of the office building of OWR Nursery did not capture the event but recorded the weather condition at the time of the incident. The weather was windy but there is no indication that the wind was abnormal to the area based on known local conditions.

SCE Tower M5-T2 was constructed and designed in 1970 with a wind load of 8 pounds per square foot (psf) as defined in General Order (GO) 95, Rule 43.2: Light Loading. However, SCE provided a wind load map used for pole loading that indicated that tower M5-T2 was in a known 18 psf wind load area at the time of the incident (Figure 4). In its response to data request response no. 2, question 11, SCE stated, “Tower 5/2 is located in the Yellow = 18# - 84 mph wind loading tier. The yellow tier is the second highest of the five wind loading tiers.” While this wind load map was not used for towers, it should be noted that wind speeds generally increase with height above ground due to reduced friction with the ground. As a result, conductors installed on towers are usually exposed to higher wind speeds than conductors installed on poles.

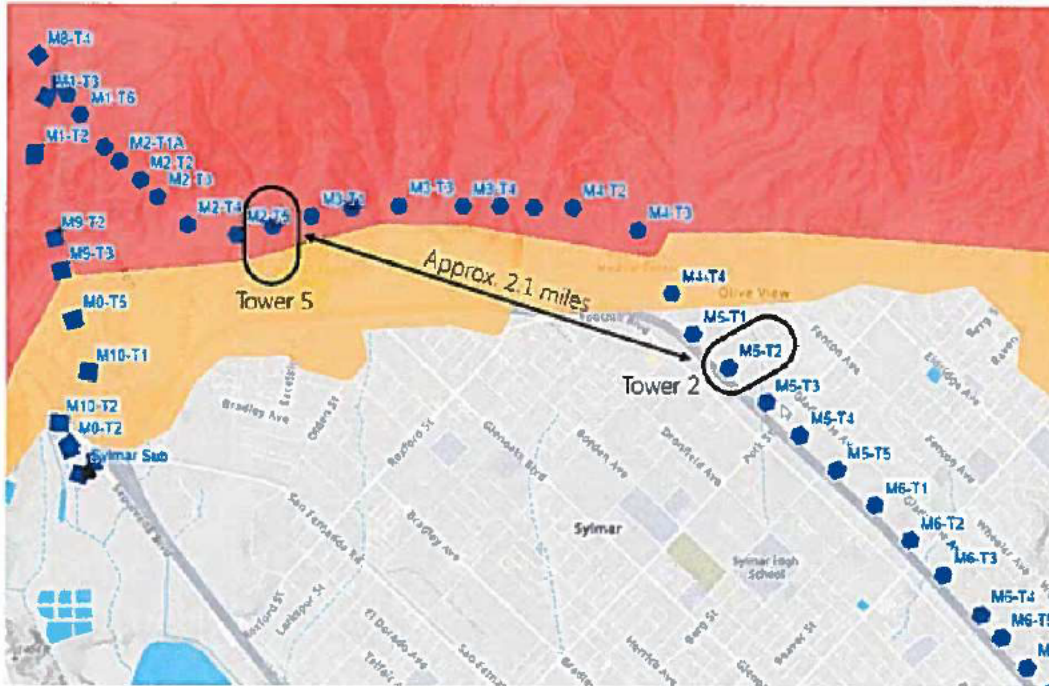
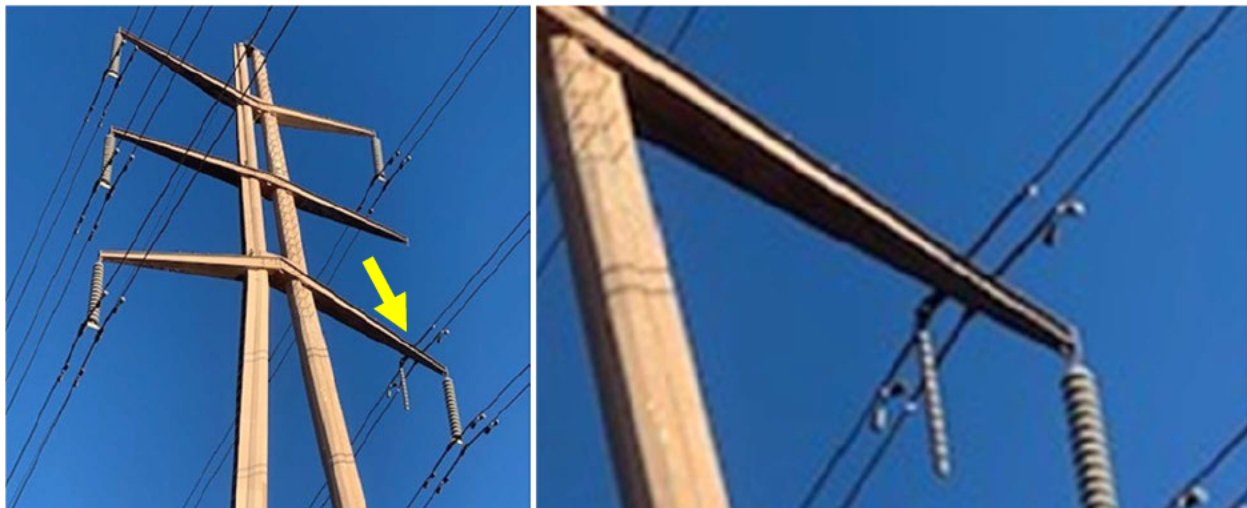


Figure 1: an illustration in SCE’s final report showing the locations of towers M2-T5 and M5-T2. We also see towers M2-T4 and M2-T6 located to the left and right of tower M2-T5, respectively.



Figures 2 and 3: A photograph of tower M5-T2 showing the middle B phase conductor that fell onto the lower supporting arm on October 11, 2019 (source: Enrique Camacho of OWR Nursery, 14220 Tyler Street, Sylmar). The yellow arrow was added to identify the contact location of the 220 kV conductor and the lower tower arm.

On October 25, 2019, ESRB inspected evidence at an SCE service yard. One of the items collected was the Y-clevis end fitting that was used to hold the ceramic string insulator onto the B-phase arm of tower M5-T2. The broken ends of the Y-clevis end fitting showed signs of fatigue, e.g., beach marks, and corrosion on the fracture surface (see Figure 5). SCE indicated that it believes that the Y-clevis end fitting, likely a Lindsey brand fitting forged from galvanized steel, was installed in 1970 and had an expected service life of 100+ years.

ESRB inspected three of the four wind dampers that were originally supported on the B phase conductor; however, one of the wind dampers was not inspected as SCE did not retrieve it.

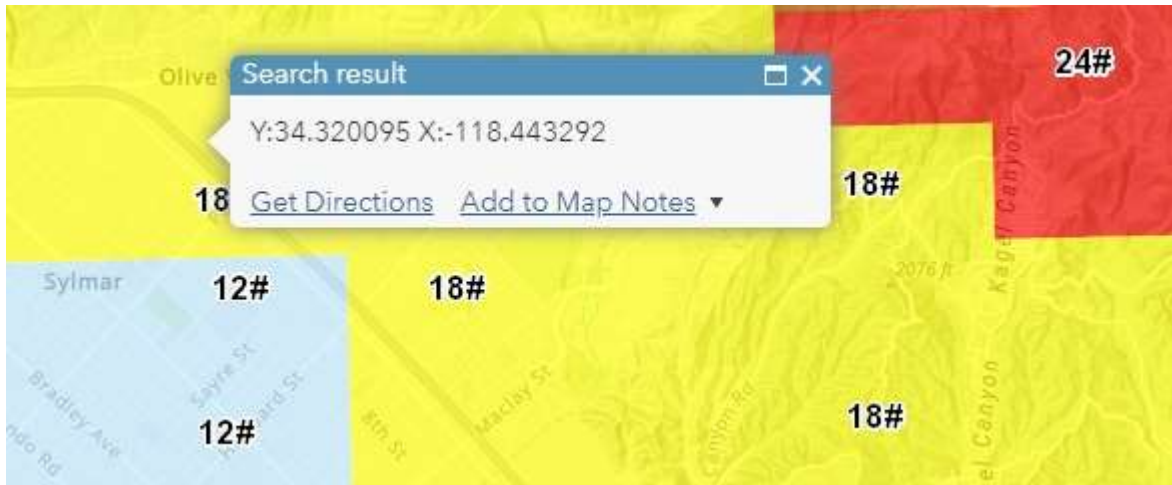


Figure 4: SCE wind loading map used for pole loading with GPS coordinates of tower M5-T2.



Figure 5: a photograph taken on October 25, 2019, at the evidence inspection at the SCE service yard, shows corrosion on the failed section of Y-clevis that supported the B-phase 220 kV conductor on tower M5-T2.

Another piece of evidence that ESRB considered from a photograph from the Los Angeles Fire Department (see Figure 6). The photograph shows unusual burning on the footing on Tower M2-T4, which is one tower away from Tower M2-T5¹.

¹ LAFD Fire Investigation Report No. 2019-10-0664 states, “additional towers were surveyed for damage. At Tower 2/4, I observed high heat burn patterns at its base including spalling of the concrete. These patterns did not appear to be consistent with the fuel load and fuel arrangement in this area. It is possible the damage may be related to the catastrophic failure at Tower 5/2.”



Figure 6: LAFD photograph showing evidence of unusual burning on one of the footings on Tower M2-T4.

On November 7, 2019, SCE performed a foundation resistance test on tower M5-T2 and obtained resistance values of 0.552 Ω , 0.611 Ω , and 0.799 Ω at 150 feet, 300 feet, and 450 feet from the base of the tower.

On November 25, 2019, SCE performed a foundation resistance test on tower M2-T5 and obtained resistance values of 0.704 Ω , 0.755 Ω , and 0.928 Ω at 150 feet, 300 feet, and 450 feet from the base of the tower.

On November 26, 2019, SCE performed a foundation resistance test on tower M2-T4 and obtained resistance values of 0.455 Ω , 0.488 Ω , and 0.641 Ω at 150 feet, 300 feet, and 450 feet from the base of the tower.

On November 3, 2023, ESRB obtained a copy of Los Angeles County Fire Department (LAFD) Fire Investigation Report No. 2019-10-0664 dated June 29, 2023. The report states in part:

Based upon the witness statements, fire pattern indicators and surveillance video, I formed the opinion the fire started near the base of Southern California Edison (SCE) Tower 2/5 along the Gould-Sylmar 220 kV transmission line. After finding no evidence of any criminal activity, I formed the opinion this is an accidental fire. About three minutes before the fire was reported, Tower 5/2, on the same transmission line, experienced a catastrophic failure of an idler insulator causing the B phase to ground fault during high winds. It is outside my expertise to opine if this catastrophic failure could cause high voltage to travel back through the conductors or lighting wire on the top of the towers and cause a fire, possibly through the tower's grounding system, at the base of Tower 2/5. Therefore, the cause of the fire will be undetermined.

GO 95, Rule 31.1: Design, Construction and Maintenance, states in part:

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

GO 95, Rule 44.3: Replacement, states in part:

Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1.

ESRB discovered two instances in which SCE was in violation of GO 95, Rules 31.1 and 44.3:

1. **Broken skyline jumper wire on M2-T6**: The photograph in Figure 7, taken on October 12, 2019, of tower M2-T6, located just east of M2-T5, showed a broken skyline jumper wire. The "skyline" (alternatively referred to as a "static line" or "shield wire") has multiple functions, including directing lightning strikes to ground, contributing to the grounding system during a fault event, and supporting communications cables. After the incident, SCE discovered and repaired the broken skyline jumper wire. SCE indicated that a skyline jumper wire provides an optimal path but is not necessary when there are no insulators on the skyline. However, because SCE chose to install a jumper wire on the skyline, SCE is required to ensure that the jumper is maintained. SCE is in violation of GO 95, Rule 31.1 for failing to design, construct, and maintain the skyline jumper wire so that it will not break under normal operating conditions. Additionally, SCE is in violation of GO 95, Rule 44.3 for failing to ensure that the skyline jumper wire maintained a minimum safety factor of 1.33.
2. **Broken Y-clevis end fitting on M5-T2**: In this incident, the Y-Clevis end fitting on tower M5-T2 failed, causing the B-phase conductor it was supporting to fall onto an underbuilt steel arm. SCE is also in violation of GO 95, Rule 31.1 for failing to design, construct, and maintain the Y-clevis end fitting for its intended use so that it will not break under normal operating conditions. Additionally, SCE is in violation of GO 95, Rule 44.3 for failing to ensure that the Y-clevis end fitting maintained a minimum safety factor of 1.33.

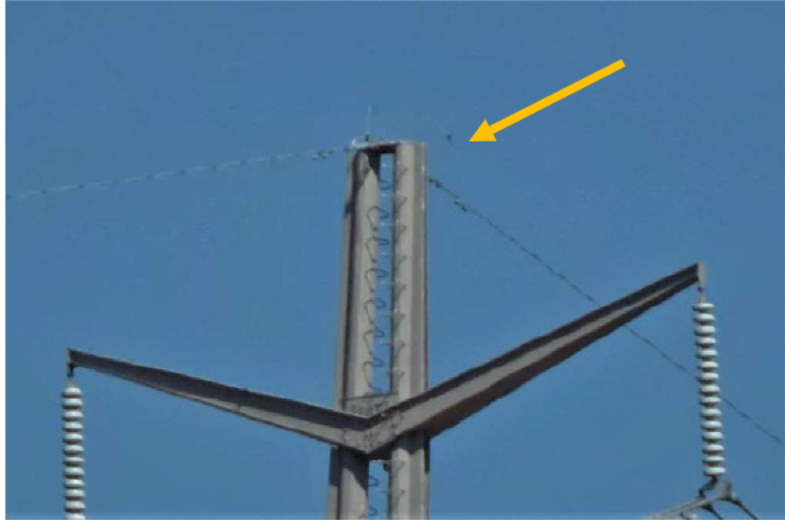


Figure 7: A photograph of Tower M2-T6 with an arrow pointing to the detached skyline on the top of the tower.

GO 95, Rule 48.2: Structural Material (other than wood) [revised March 30, 1968 by Decision No. 73813 and applicable to a structure installed in 1970] states in part:

Structural members and their connections, shall be designed and constructed so that the structures and parts thereof will not fail or be seriously distorted at any load less than the maximum working loads developed under the construction arrangement with loadings as specified in Rule 43) multiplied by the safety factors specified in Rule 44.

In this incident, the Y-clevis end fitting on tower M5-T2 failed, causing the B-phase conductor it was supporting to fall onto an underbuilt steel arm. The steel Y-clevis end fitting is a member of the tower structure. Together with other components, the Y-clevis end fitting is intended to provide the structural support needed to hold an overhead conductor safely and securely. The Y-clevis end fitting is one of the most vital members of the tower structure because it is the only component that attaches the string insulator and associated conductor to the steel arm (meaning there are no redundant components that can assume the structural load of the Y-clevis end fitting if the Y-clevis end fitting was to fail). Since tower M5-T2 was installed in 1970, the rule that governed the design and construction of steel structural members and their connections would have been GO 95, Rule 48.2: Structural Material, revised on March 30, 1968 by CPUC Decision No. 73813. This rule required utilities to design and construct structural members and their connections in such a way that the structure or parts thereof will not fail or become seriously distorted at any load less than their maximum working loads multiplied by the applicable safety factor. For the date and time during which the Y-clevis end fitting failed, there is no evidence to suggest that loading conditions were abnormal or in any way greater than the maximum working load multiplied by the applicable safety factor. Therefore, SCE is in violation of GO 95, Rule 48.2 [revised March 30, 1968 by Decision No. 73813 and applicable to a structure installed in 1970] for failing to design and construct the Y-clevis end fitting in such a way that it would not fail or be seriously distorted at any load less than the maximum working load multiplied by the safety factor in Rule 44.

Although the LAFD Fire Investigation Report states that the cause of the fire is undetermined, ESRB notes that the General Order 95 violations listed above, under certain circumstances, could have led to a fire ignition.

Preliminary Statement of Pertinent General Order, Public Utilities Code Requirements, and/or Federal Requirements:

| | <i>General Order</i> | <i>GO Rule</i> | <i>Violation</i> |
|----|----------------------|----------------|------------------|
| 1. | GO 95 | Rule 31.1 | Yes |
| 2. | GO 95 | Rule 44.3 | Yes |
| 3. | GO 95 | Rule 48.2 | Yes |

Conclusion:

ESRB's investigation discovered 5 violations on the part of SCE:

- SCE is in violation of GO 95, Rule 31.1 for not maintaining the skyline jumper wire on tower M2-T6 for its intended use.
- SCE is in violation of GO 95, Rule 44.3 for failing to ensure that the skyline jumper wire on tower M2-T6 maintained a minimum safety factor of 1.33.
- SCE is in violation of GO 95, Rule 31.1 for failing to maintain the Y-clevis end fitting on tower M5-T2 for its intended use.
- SCE is in violation of GO 95, Rule 44.3 for failing to ensure that the Y-clevis end fitting on tower M5-T2 maintained a minimum safety factor of 1.33.
- SCE is in violation of GO 95, Rule 48.2 [revised March 30, 1968 by Decision No. 73813 and applicable to a structure installed in 1970] for failing to design and construct the Y-clevis end fitting on tower M5-T2 in such a way that it would not fail or be seriously distorted at any load less than the maximum working load multiplied by the safety factor in Rule 44.

Appendix

In the Southern California Edison Company Grid Operations and Maintenance Division, “Maintenance Practices for Transmission Facilities under the Control of the California Independent System Operator (ISO)”, several of the versions provided in data request no. 2 mentioned the use of climbing for detailed inspections.

Original Version - December 23, 1997, Revision 1 - January 8, 2001, Revision 2 – January 3, 2002, Revision 3 – December 31, 2005, defines the term detailed inspection, and describes inspections methodologies as follows:

***3.3.1 – Detailed** – A definitive maintenance inspection to follow up abnormal conditions identified during a routine inspection of a Transmission Facility.*

***5.1.1.1 – Establishment of Inspection Frequency** - The nature, extent, and priority of the detailed inspection will be established and scheduled by the supervisor. The Detailed Inspection may incorporate climbing the transmission structure or the use of diagnostic assessments, such as infrared scanning, and provide an in-depth analysis of the suspected problem. Detail inspections are performed on an as-needed basis.*

***5.1.1.2 – Inspections Methodologies** –Detailed (climbing) inspections, such as checking lattice steel towers for loose steel or worn hardware, are performed on an as-needed basis.*

Revision 4 – January 2011, defines the term detailed inspection, and describes inspections methodologies stated in part as the following:

***3.6 – Detailed (Transmission)** – A systematic, technical appraisal or diagnostic testing of facilities*

***5.1.2.3 - Detailed Inspection** - often accomplished by climbing support structures or towers to identify broken, missing or worn hardware. Also includes, but is not limited to the excavation of soil, intrusive testing of wood poles and performing infrared scans.*

Revision 6 – February 7, 2018, mentioned the inspection frequency in addition to the ascending and descending of towers of detailed inspections in table 5.1.3 Frequency. Per row “Overhead Lines and Communication Circuits” and column “Detailed Inspections” of the table, detailed inspections are to be conducted every 36 months, with superscript 7 stating “*Lattice towers in high-wind areas are (to)be subject to additional Maintenance, including but not limited to ascending/descending towers, ringing steel members, and tightening hardware.*”.

***3.5 – Detailed** - A careful visual assessment performed in close proximity to or while upon a structure for the purpose of identifying, prioritizing, and recording discrepancies. This activity includes performing minor or temporary repairs during the inspection and special technical evaluation as needed.*

5.1.2.3 - Detailed Inspection - *A close proximity assessment to identify broken, missing or worn conductors, insulators, or hardware. This activity includes the excavation of soil, and testing poles and structures.*

Revision 7 effective: 06/01/2021. The procedure document was signed after the effective date but mentions under Section 7 Revision History a letter from CAISO that “confirms” implementation of Revision 7 to be effective as of 06/01/2019, prior to the date of the incident. Revision 7 defines detailed inspections and methodology as the following (and, as in Revision 6, defines the detailed inspections to 36 months):

3.5 - Detailed - *A careful visual assessment performed in close proximity to or while upon a structure for the purpose of identifying, prioritizing, and recording discrepancies. This activity includes performing minor or temporary repairs during the inspection and special technical evaluation as needed.*

5.1.2.3 - Detailed Inspection - *A close proximity assessment to identify broken, missing or worn conductors, insulators, or hardware. This activity includes the excavation of soil, and testing poles and structures*

On February 16, 2019, prior to the incident, SCE performed detailed inspections on towers M2-T4, M2-T5, M2-T6, and M5-T2. SCE inspectors performed detailed inspections while standing on the ground and using binoculars. No additional tools were used.

In June 2019, prior to the incident, SCE patrolled towers M2-T4, M2-T5, M2-T6, and M5-T2. The patrols consisted of visual inspections from ground level.

ATTACHMENT 3

**EMAILS FROM THE ACTON TOWN COUNCIL TO SCE STAFF
REQUESTING THAT THE COUNCIL BE ADDED TO THE
DISTRIBUTION LIST FOR PSPS NOTIFICATIONS.**



Fwd: Request for PSPS notices

1 message

Acton Town Council <atc@actontowncouncil.org>

Mon, Dec 1, 2025 at 3:55 PM

To: David A Ford <David.A.Ford@sce.com>, Rochelle K Silsbee <ROCHELLE.SILSBEE@sce.com>, Acton Town Council <atc@actontowncouncil.org>

Dear Mr. Ford and Ms. Silsbee;

The Acton Town Council is again asking SCE to add us to the distribution list for PSPS notices. Without such notices, the Acton Town Council is unable to fully and effectively participate in public comment opportunities that pertain to SCE PPS Post Event Reports

This request has been sent to you repeatedly over the last 10 months, and it is persistently ignored. You do not even bother to respond. What is the reason for this? Why is SCE deliberately and unreasonably interfering with the Acton Town Council's participation in the public process?

Regards

Jacqueline Ayer

Utilities Committee Chair

----- Forwarded message -----

From: **Acton Town Council** <atc@actontowncouncil.org>

Date: Wed, Nov 5, 2025 at 2:07 PM

Subject: Request for PPS notices

To: David A Ford <David.A.Ford@sce.com>, Rochelle K Silsbee <ROCHELLE.SILSBEE@sce.com>, Acton Town Council <atc@actontowncouncil.org>

Dear Mr. Ford and Ms. Silsbee;

The ATC has heard from residents that PPS notices were issued last week; the ATC did not receive any such notices, so it appears that we are still not on the notification list for SCE PPS events in Los Angeles County.

Can you please add us to the list so that we receive all PPS emails (including spreadsheets, imminent deenergization notices, imminent reenergization notices, and all shutdown notices) like we used to? This has been requested several times over the last 10 months, but no response is ever provided, and no notices are sent.

Sincerely;

Jacqueline Ayer

Utilities Committee Chair



Re: PSPS? Really?

1 message

Acton Town Council <atc@actontowncouncil.org>

Sun, Sep 7, 2025 at 1:47 PM

To: David A Ford <David.A.Ford@sce.com>, Acton Town Council <atc@actontowncouncil.org>, Rochelle K Silsbee <ROCHELLE.SILSBEE@sce.com>, Anuj Desai <Anuj.Desai@sce.com>

Incidentally, the Acton Town Council received no warning of this ongoing PSPS event; would you please put the ATC back on the distribution list for all PSPS notifications involving ALL FOUR CIRCUITS in Acton: Shovel, Bootlegger, Sand Canyon and Pick. Also, kindly forward to us all the warning emails that were sent out for this ongoing PSPS event with their original date and time stamps showing.

Thank you in advance for your time and attention

Jacqueline Ayer

Utilities Committee Chair

On Sun, Sep 7, 2025 at 1:23 PM Acton Town Council <atc@actontowncouncil.org> wrote:

Hello David;

I first want to let you know there are peaches at Bloom Ranch; I bought a bunch on Friday and they are delicious. Second, SCE issued PSPS warnings late last night to Acton residents and then issued new warnings again just 20 minutes ago. There appears to be no reason for it. Below is a screenshot of current and projected weather in the Western San Gabriels from the National Weather Service; nothing in it comes anywhere near the thresholds at which SCE is permitted to cut power in Acton. So why does SCE continue to threaten our community with power shutoffs? Every time SCE does this, it causes A LOT of problems and SCE is not permitted to create these problems without "good cause". Just what is the "good cause" this time?

Jacki

Western Angeles National Forest

TODAY...

Sky/Weather.....Sunny.
Max temperature.....87-94 low elevations to 77-85 higher elevations.
24 hr trend.....Little change.
Min humidity.....12-25 percent.
24 hr trend.....Little change.
20-foot winds.....
Valleys.....West 5-10 mph becoming southwest 10-20 mph with gusts to 30 mph in the afternoon.
Ridges.....West 5-10 mph becoming southwest 10-20 mph with gusts to 30 mph in the afternoon.
Marine layer.....None.
CWR (>0.10 in).....0 percent.

TONIGHT...

Sky/Weather.....Clear.
Min temperature.....56-65.
Max humidity.....30-50 percent.
20-foot winds.....
Valleys.....Southwest 8-15 mph with gusts to 25 mph.
Ridges.....Southwest 8-15 mph with gusts to 25 mph.
CWR (>0.10 in).....0 percent.

MONDAY...

Sky/Weather.....Sunny.
Max temperature.....84-91 low elevations to 76-82 higher elevations.
Min humidity.....20-30 percent.
20-foot winds.....
Valleys.....Southwest 8-15 mph with gusts to 25 mph.
Ridges.....Southwest 8-15 mph with gusts to 25 mph.
CWR (>0.10 in).....0 percent.

EXTENDED...

TUESDAY...Clear. Lows from the mid 50s to lower 60s at low elevations to the upper 30s to mid 40s in colder valleys and peaks. Highs from the mid 70s to mid 80s at low elevations to the mid 60s to lower 70s at high elevations. Northwest winds 10 to 20 mph with gusts to 30 mph.

WEDNESDAY...Clear. Lows from the 50s to around 60 at low elevations to the upper 30s to mid 40s in colder valleys and peaks. Highs from the 70s to around 80 at low elevations to the lower to mid 60s at high elevations. Northwest winds 10 to 20 mph with gusts to 30 mph.