BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Energization Timelines.	Rulemaking 24-01-018

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) BIANNUAL ENERGIZATION REPORT PURSUANT TO DECISION 24-09-020 AND INITIAL ANALYSIS OF CURRENT AND FUTURE QUALIFIED STAFFING LEVELS PURSUANT TO CALIFORNIA PUBLIC UTILITIES CODE SECTION 935(A)

PUBLIC VERSION

ANNA VALDBERG
ELENA KILBERG

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (562) 491-2236
E-mail: Elena.Kilberg@sce.com

Dated: **September 30, 2025**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Order Instituting Rulemaking to Establish Energization Timelines.	Rulemaking 24-01-018

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) BIANNUAL ENERGIZATION REPORT PURSUANT TO DECISION 24-09-020 AND INITIAL ANALYSIS OF CURRENT AND FUTURE QUALIFIED STAFFING LEVELS PURSUANT TO CALIFORNIA PUBLIC UTILITIES CODE SECTION 935(A)

[PUBLIC VERSION]

In accordance with Ordering Paragraph 5 of California Public Utilities Commission (CPUC or Commission) Decision (D.) 24-09-020, issued September 17, 2024, Southern California Edison Company (SCE) submits as Appendix A hereto its Biannual Energization Report and accompanying Public Reporting Data Excel Spreadsheet (Attachment A to the Biannual Energization Report). SCE is also submitting as Appendix B hereto its Initial Analysis of Current and Future Qualified Staffing Levels pursuant to Cal. Pub. Util. Code Section 935(a).[1]

Respectfully submitted,

ANNA VALDBERG
ELENA KILBERG

/s/ Elena Kilberg
By: Elena Kilberg
Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (562) 491-2236
E-mail: Elena.Kilberg@sce.com

Dated: September 30, 2025

[1] SCE is submitting the annual Staffing Analysis together with its Biannual Energization Report in accordance with a September 23, 2025 email directive from the CPUC's Energy Division staff. SCE intends to supplement its preliminary Staffing Analysis by December 31, 2025.

Appendix A

SCE's September 2025 Biannual Energization Report

Southern California Edison
September 30, 2025
Bi-Annual Energization Target Report

1. REPORT SUMMARY

Senate Bill (SB) 410 and Assembly Bill (AB) 50 direct the California Public Utilities Commission (CPUC or Commission) to establish and enforce reasonable and maximum targets for connecting customers to the electrical grid and determine the criteria for timely energization. On September 12, 2024, CPUC adopted Decision (D.) 24-09-020,[1] which establishes average and maximum target energization time periods[2] and procedures for customers to report energization delays[3] to the Commission. This decision also directs utilities to file and serve biannual energization reports to the CPUC to demonstrate compliance with the statewide targets outlined in the decision.[4] This report provides data for all customer energization requests submitted from January 31, 2023, through June 30, 2025. Southern California Edison (SCE) is committed to meeting established energization targets and timelines to improve customer experience and satisfaction.

To ensure transparency and accountability in the delivery of timely energization services, and to provide consistent and reliable services to our customers. SCE has made significant efforts to address challenges in the deployment of electrical infrastructure. Since September 2024, SCE has established new processes and held developer forums to communicate the importance of early project meetings and forecasting. Collaboration between internal teams and external stakeholders has been enhanced to streamline energization project execution.

For the second bi-annual reporting period (January 31, 2023, through June 30, 2025), SCE utilized existing systems to track alignment with adopted energization targets which are based on utility-controlled energization steps/activities. SCE continues to face challenges in tracking energization timing with the requisite granularity, particularly in distinguishing between customer-controlled, third party-controlled, and utility-controlled activities (some of which occur in parallel), as well as the pauses that occur throughout the energization process. Nevertheless, SCE has made steady progress in refining data points and improving reporting accuracy since the Commission issued the Phase 1 Decision. In July 2025, SCE launched its new customer portal, the Building, Renovation, and Project Planning Portal | SCE (BRPPP),[5] which is intended to streamline the customer energization process experience, while providing enhancements that allow SCE to improve data tracking capabilities and increase data accuracy.

SCE also analyzed energization times for projects in Disadvantaged Communities (DAC), tribal, and Underserved Communities. DAC communities experienced shorter energization times compared to

---

1 D. 24-09-020, Decision Establishing Target Energization Time Periods and Procedure for Customers to Report Energization Delays (herein after Phase 1 Decision)

2 See Cal. Pub. Util. Code Section 934(a)(1).

3 See.Cal. Pub. Util. Code Section 934(a)(2).

4 This report uses the Energization Data Reporting Template, developed in consultation with the Energy Division (ED) and stakeholders.

5 Please see section 3. Efforts to Address Challenges for more details

non-DAC/tribal communities. While tribal communities had slightly longer times, the difference was not statistically significant.[6]

In summary, while SCE has made efforts to align its data collection and tracking systems with adopted energization targets and new reporting requirements, further refinement and enhancement of tracking tools and processes is necessary for more complete reporting in future periods. SCE's plans are discussed further in Section 9.

2. IDENTIFICATION OF CONSTRAINTS AND CHALLENGES TO INFRASTRUCTURE DEPLOYMENT

The deployment of electrical infrastructure faces several challenges that can significantly impact project timelines and resource allocation. These constraints include:

- Complex Designs: Infrastructure projects often involve intricate designs that require coordination and hand-offs between numerous internal organizations and external agencies, e.g., cities and counties, in addition to compliance with various regulatory requirements, requiring extensive collaboration and problem-solving.
- Material Procurement: Delays outside of SCE's control in obtaining essential materials such as switches, transformers, and cables can hinder project forward progress.
- Permitting Processes: Lengthy and nuanced local Authorities-Having-Jurisdiction (AHJ) permitting procedures for both upstream upgrades and tariff projects can extend the timeline for project completion. As each AHJ has differing requirements, and projects can require permits from multiple agencies, delays are often experienced with developing engineered traffic control plan requirements and additional utility coordination between multiple agencies, e.g., Caltrans, local AHJ, federal and state jurisdictions, Coastal Commission, CAISO, FERC.
- Easements and Land Rights: Lengthy easement negotiation, as well as internal and external agency processes, can extend the timeline for project completion.
- Large Scope Projects: Projects with a large scope, e.g., requiring on-boarding of large loads, in either singular or multiple phases, or including lengthy or complex civil needs, to name a few, resulting in the need for additional cross collaboration among multiple internal and external stakeholders. These additional project steps can impact design, engineering, and construction resources. These large scope/large load projects can affect the overall timing throughout the energization process beginning with internal coordination with engineering teams on scope and budget and ending with potentially extensive internal organizations and external agencies working together to coordinate construction-related activities such as customer outage notifications, traffic coordination, permitting, and electrical construction coordination needed to achieve successful project energization.
- Customer Engagement: Early engagement with customers, cities and counties is crucial for improving forecasted loading and timely energization. Customers who do not submit all requirements early in the design process can delay project forward progress.

[6] Please see Table 4 for details.

- Upstream Capacity Upgrades: In service areas with capacity constraints, upstream capacity upgrades may be required to meet the requested demand. These upstream capacity upgrades may also be subject to similar constraints noted above, such as easements, materials, permitting, etc.
- **Street Moratoriums:** Municipal restrictions on street excavation or construction, typically following recent paving or during seasonal events can delay trenching, conduit installation, and other civil work.

3. SCE EFFORTS TO ADDRESS CHALLENGES

Significant efforts have been made over the past year to address these challenges:

- Enhanced Customer Outreach: To increase transparency with customers on the newly adopted energization process and emphasize the value of early engagement, SCE has published helpful information about the energization process and timing on our external website, available at Power Requests and Upgrades | SCE. In January 2025, the Energization Process Steps and Process Timing document was made available. This document identifies the overall process, activities that occur within each step, and whether the step is under customer control, utility control or third-party control. Additionally, this document identifies the adopted energization timing targets for utility-controlled steps and activities, both average and maximum, for Rules 15, 16, 29, 15/16, 15/29, and Main Panel Upgrade (MPU) requests. Customers can also easily find on our website additional resources that provide support through each step of the energization process, including Energization Timelines Customer Journey Map and Energization Timelines Customer Fact Sheet, which were published in July 2025. Additionally, the Customer Fact Sheet provides a link to The Customer Project Energization Delay Reporting Form. Our Power Request site page already included helpful information such as the Distribution Resource Plan External Portal (DRPEP) which is an interactive web portal that shows comprehensive results of SCE's distribution planning processes. This includes the capacity of SCE's distribution circuits and substations. Furthermore, we have implemented Southern California Edison Power Site Search Tool (PSST) which allows commercial development customers to search for power information, with more capabilities than are available in DRPEP, including various filtering capabilities. In addition, our website includes informative energization process documents. These documents will provide our customers with even more helpful project information, all available in one convenient area. SCE also participates in industry and partner agency forums. Through these efforts, we aim to provide transparency and share information regarding our system planning and energization processes.
- New Customer Portal: In July 2025, SCE launched its new customer portal, the Building, Renovation, and Project Planning Portal | SCE (BRPPP), which is intended to streamline the customer energization process experience, while providing enhancements that allow SCE to improve both data tracking and accuracy. The launch of BRPPP will increase SCE's data tracking capabilities for Step 1-Customer Intake start and stop data points. It will also provide all future projects with a consistent data point to start Step 2-Engineering and Design. SCE anticipates future enhancements will continue to increase its data gathering

and reporting capabilities. SCE will begin reporting on BRPPP tracking enhancements progress in our third bi-annual report, anticipated to be filed in March 2026.

- New Processes: While work remains ongoing, SCE has continued to refine systems and practices with improvement initiatives by evaluating existing processes and identifying opportunities for greater efficiency. SCE has identified multiple process improvement initiatives, including Rule 15, Rule 16, Rule 29, Main Panel Upgrade (MPU), and cancellations to name a few, aimed at reviewing existing process for compliance with the 8 Step energization process, with the dual goals of enhancing efficiency and reducing overall internal timeframes. These process improvement initiatives will specifically evaluate activities, with the goal of eliminating outdated or redundant tasks, in light of new internal standards or system improvements. In the spirit of continuous improvement, SCE anticipates that additional process improvement opportunities will continue to emerge following the completion of those currently identified initiatives. Upon completion of the process improvement initiatives, SCE will gain a clearer understanding of the methods for data collection necessary to support reporting requirements. The projected timeframe for completion of the identified process improvement initiatives is November 2025.
- System Planning Awareness: Through the High Distributed Energy Resources (DER) proceeding, SCE is collaborating with stakeholders and the Commission to develop a proactive planning approach which will implement pending loads and scenario planning to better prepare for future customer load growth and system needs. SCE seeks to continuously improve the DRPEP Available Load Capacity layers by actively gathering and incorporating feedback from internal and external users. This supports enhanced transparency and provides customers with self-service access to high-level system capacity information.
- Collaboration: Cross-functional team leaders collaborate internally with Supply Chain/Procurement on issues related to materials such as transformers, switches, and cables. Cross-functional team leaders also interface with Engineering and external stakeholders (customers and consultants) regarding project timelines and phasing to better inform our internal processes.

These initiatives aim to streamline project execution and mitigate the constraints impacting infrastructure deployment.

4. DESCRIBE HOW TIMELINES ALIGN WITH ADOPTED ENERGIZATION TARGETS

SCE is continuing to improve its data gathering and reporting processes. However , for the second bi-annual reporting period beginning January 31, 2023 and ending June 30, 2025, SCE utilized existing systems, tracking tools, and processes to evaluate alignment with adopted energization targets for energization projects under Rules 15, 16, 29, 15/16, and 15/29.

The data collected during this reporting period is presented in two main categories: Tariff (Rule 15, 16, 29, 15/16, and 15/29) and MPUs. Each of these categories is broken down into three segments: in-progress work, completed work, and cancelled work. The business class categories are agricultural, commercial, residential, and Rule 29 (optional commercial electric vehicles). Please

see Tables 1, 2, and 3 below for Overall Dataset Aggregate, Tariff Aggregate, and MPU Aggregate information.

In the Excel section for MPU projects (see specifically the "Agg. Summary & Table Template" sheet in row 46) in relation to total number of main panel upgrades completed, the value for this reporting requirement is significantly lower on this September 2025 report compared to the March 2025 report. This is due to updating the value to reflect only the completed MPU data sheet, whereas in the March 2025 report, this value was reflective of all MPU projects across completed, in-flight, and cancelled.

Table 1 – Overall Dataset Aggregation

Product Type	Project Count	% of Associated Project Count
Tariff	28,366	25%
MPU	83,078	75%
Total	111,444	100%

Table 2 – Overall Dataset Aggregation – Tariffs Only

Product Status	Project Count	% of Associated Project Count
Completed	7,037	25%
In-flight	16,453	58%
Cancelled	4,876	17%
Total	28,366	100%

Table 3 – Overall Dataset Aggregation – MPUs Only

Product Status	Project Count	% of Associated Project Count
Completed	27,197	33%
In-flight[7]	52,010	62%
Cancelled	3,871	5%
Total	83,078	100%

Please note that the data points utilized to collect the information for this report had to be materially revised from the data SCE initially provided during Phase 1 of the Energization Timelines Order Instituting Rulemaking (Energization OIR) proceeding as part of the Joint Investor-Owned Utilities (Joint IOUs)-proposed 5 Step Energization process. The data presented in this report is based on the directives in the Commission's Phase 1 Decision and reflects the adjustment from the 5 Step Energization process proposed by the Joint IOUs to a set of data points that better represent the adopted more granular 8 Step Energization process. The two data sets cannot be directly compared because they were compiled using different methodologies, such as the change from

[7] SCE has identified system and process challenges in closing MPUs, as reflected in the large number of In-flight MPUs in Table 3. Challenges include incomplete record closure after service energization provided to customer which prevents SCE from reporting "completed" and delayed customer progress after Design approval. SCE is currently addressing this issue and anticipates that this issue will be resolved prior to the March 2026 report filing deadline. SCE expects a large volume of MPU projects to move from In-flight to either Completed or Cancelled status and will provide an appropriate update in the March 2026 report.

the proposed 5 Step Energization process to the adopted 8 Step Energization process and the segregation of MPUs into a separate project category, and not part of Rule 16.

Due to the data system limitations pre-existing the Phase 1 Decision and the retroactive cumulative nature of this second biannual report, SCE cannot provide a direct comparison against the energization targets at this time. SCE instead provides information for Steps 1-8 of Rules 15/16/29 energization processes that includes timing for potentially overlapping SCE, customer and third party-controlled activities within each of the 8 Steps. Because SCE is unable to exclude non-IOU time from available project data, SCE is not able to compare its timelines for these projects to CPUC-established targets which are based on IOU-controlled time.

For example, Step 1-Customer Intake (customer controlled), Step 2-Engineering and Design (utility controlled), and Step 3-Customer Dependencies (intake items and execution of outstanding documentation requirements, i.e., payment of invoice, sign and return contract and easement documents), could overlap or create a pause in utility timelines relevant for this report as described below:

- The customer may not have provided all application requirements in the Step 1-Customer Intake phase (customer may have provided a substantially complete application/submittal, e.g., enough information for SCE to begin Step 2, but not all information required to complete Step 2). This allows the customer to continue to gather information and documentation in parallel to SCE beginning work on Step 2-Engineering and Design. The length of time it takes the customer to provide the missing intake items should be captured in Step 3 (customer-controlled activities), but this time is currently reflected in SCE's overall timeline and measured against SCE targets.
- During the engineering activities, SCE may determine that an upstream capacity project is necessary to serve the customer's load requirements. The customer project should be paused while the upstream capacity project is designed, constructed, and energized. Pursuant to D.24-09-020, such projects need to be paused and tracked separately from typical energization projects that do not require upstream capacity upgrades.[8] This pause should be captured in the utility-controlled Step 2. Because SCE is currently unable to identify and remove from the dataset for this report energization projects that need capacity upgrades, the full upstream project timeline is reflected in SCE's overall timeline and measured against SCE targets.
- The customer may submit a project as applicant-designed (end of Step 1). In this scenario, SCE provides the customer with the required design specifications and should pause our timeline until the customer returns the applicant design for review, along with any outstanding items such as approved street improvement plans, approved address list, and the recorded tract map. The customer design time should be captured in Step 3, but due to existing data tracking limitations, the customer design time is currently reflected in SCE's overall timeline and measured against SCE targets.

The Step 3-Customer Dependencies, Step 4-Utility Dependencies, Step 5-Customer Site Readiness, and Step 6-SCE Site Dependencies have also proved challenging as these steps can occur in any order or occur concurrently. For example:

- The customer can choose to perform a portion of their site readiness activities (e.g., some excavation and installation of structures may need to be completed so that paving activities

[8] D.24-09-020, p. 48.

can occur early in the project life cycle), then pause site activities, pay their invoice and sign contracts, then finish their site readiness activities, return the signed easement, then again pause for several months until they request their project be scheduled and energized. It is highly likely that due to our current inability to track activity/step overlaps, as well as project pauses, that time is not being fully accounted for in the correct customer or utility step.

- Step 4 Utility Dependencies currently captures too much time due to the fact that SCE systems do not distinguish third-party time. Thus, after SCE completes our portion of the permit request paperwork and submits the request to the permitting agency, the third-party processing time currently counts against SCE's overall timeline and is measured against our targets due to our tracking limitations.

While Step 7-Construction and Step 8-Service Energization Provided to the Customer, are both utility-controlled steps, they still present tracking challenges. For example:

- Time necessary for third parties, such as cities and counties, to provide customer final inspections/panel releases currently impacts utility timelines.
- Time for the processing of traffic control permitting currently impacts utility timelines.
- Construction on a single project can occur in phases, with crews making multiple trips to the job site to complete. Currently, the full amount of time the project is scheduled, including customer-driven pauses, is reflected in SCE's timeline.

To be clear, SCE is moving projects forward in establishing processes that support the Commission directives in the Phase 1 Decision. However, separating out overall project timelines into the required customer, utility, and third-party categories remains a challenge. Continued refinement and enhancement of tracking tools and processes will be necessary and are planned to achieve better alignment and more granular reporting in future reporting periods.

5. INFORMATION/DATA COLLECTION IN EXISTING SYSTEMS VS. DECISION TARGETS

The Commission's Phase 1 Decision outlines specific targets and tracking requirements for energization projects under Rules 15, 16, 29, 15/16, and 15/29. For both the first and second bi-annual reports SCE utilized existing systems and tracking tools in place as of the issuance of the Phase 1 Decision to track energization project data. As discussed above, while SCE's existing systems align with each energization step start and end points, these systems have limitations in tracking granularity, particularly due to the inability to distinguish between customer-controlled and utility-controlled activities. This includes the inability to track the pauses that can stop a project's forward progress, as well as the inability to account for time efficiencies gained when customer and utility-controlled activities occur in parallel. These data tracking deficiencies, particularly for Rules 15, 16, and 15/16 projects, make it challenging to present a clear picture of SCE's performance during the reporting period ending June 30, 2025, relative to the energization targets adopted by the Commission in September 2024.

While the data presented in this report for MPU, Rule 15, Rule 16, and combination projects are based on system(s) queries, Rule 29 and Rule 15/29 combination projects contain data that are both systematically derived and derived from manual tracking. The additional manual tracking does not provide the necessary delineation between utility-, customer-, and third party-controlled work that is necessary to allow SCE to compare its performance to Rule 29 and Rule 15/29 Phase 1 Decision targets.

For Rule 29, between January 31, 2023, and June 30, 2025, SCE received 421 Rule 29 applications, an increase of 182 applications from the previous reporting period ending on December 31, 2024. Of the total applications received, 70 projects have been energized (equivalent to the completion of Steps 1-8), with 30 of the 70 energized projects pending financial closeout, 52 projects out of the total applications received have been cancelled, and 299 applications remain in-progress at various stages of the project lifecycle.

For the current reporting period, SCE can provide the following performance information for utility-controlled Steps 2, 4, 6, 7, and 8 (subject to the data tracking limitations noted above such as not being able to exclude time spent on customer- and third-party controlled activities) for completed Rule 29 and Rule 15/29 projects:

- Rule 29-only projects: Averaged 232 business days/338 calendar days vs. 257 business days/374 calendar days in the previous reporting period, a reduction of 25 business days/36 calendar days.
- Rule 29/Rule 15 combination projects: Averaged 264 business days/384 calendar days vs. 323 business days/470 calendar days in the previous reporting period, a reduction of 59 business days/86 calendar days.

SCE attributes the bulk of these reductions to communication process improvements between internal stakeholders, which has decreased the amount of time a project takes to complete Step 2-Engineering and Design. Improvements include pre-submittal stakeholder discussions, which have led to more efficient field visits and fewer redesign activities. Additionally, SCE has decreased the time it takes to complete Step 4-Utility Dependencies activities through increased internal collaboration in the areas of permitting and land rights.

For the current reporting period, SCE can provide the following information for customer-controlled steps 1, 3, and 5, for completed Rule 29 and Rule 15/29 projects:

- Rule 29-only projects: Averaged 359 business days/522 calendar days vs. 311 business days/455 calendar days in the previous reporting period, an increase of 48 business days/67 calendar days.
- Rule 29/Rule 15 combination projects: Averaged 392 business days/570 calendar days vs. 311 business days/453 calendar days in the previous reporting period, an increase of 81 business days/117 calendar days.

Currently, SCE systems do not have the granularity needed to determine what factors may explain the increase customer-controlled timelines.

For the current reporting period, end-to-end cycle time, Steps 1-8, for completed Rule 29 and Rule 15/29 projects are as follows:

- Rule 29-only projects: Averaged 387 business days/563 calendar days vs. 360 business days/523 calendar days in the previous reporting period, an increase of 27 business days/40 calendar days.
- Rule 29/Rule 15 combination projects: Averaged 416 business days/605 calendar days vs. 362 business days/527 calendar days in the previous reporting period, an increase of 54 business days/78 calendar days.

The end-to-end cycle time reflects a decrease in utility-controlled steps processing time, combined with an increase in customer-controlled steps processing time.

When reviewing the associated data spreadsheet, it is important to note the following:

- For in-flight projects, all data (Tariff and MPU) is based on available information and is subject to change. Cancelled projects fell out at various steps of the project lifecycle.
- Many activities include multiple sub-stages. Sub-stages are the distinct components or tasks that collectively define a broader project step. Each sub-stage represents a milestone or dependency that must be completed to move forward with the Utility Dependencies step. However, for Rule 29 and Rule 29/15 projects only, SCE is able to capture some sub-stage activities. For example, for the Rule 29 and Rule 29/15 projects during Step 2 (IOU-controlled Engineering and Design), SCE calculates the total business days for sub-stages under IOU control, excluding time for activities controlled by the customer, which is added to the Customer Dependencies step (Step 3).
- For Rule 29 and Rule 29/15 data points only the start and end dates are provided for each step, but the turnaround time might not align with the calendar or business days between these dates.[9]
- For all data (Tariff and MPU), SCE systems do not currently have the ability to track activities occurring simultaneously. Instead, tracking systems essentially assume that all activities occur sequentially, and all time is added together rather than making appropriate adjustments for activities that occurred concurrently. For example, due to overlapping IOU and customer-controlled steps, or IOU-controlled steps/activities occurring in parallel, mean that adding up the turnaround times for each step will exceed the total end-to-end turnaround time provided.
- Future improvements for all data (Tariff and MPU) to SCE's systems and tracking tools will provide a more accurate snapshot of what is driving both the customer-controlled and utility-controlled timelines and alignment to targets.

In summary, while SCE has made efforts to align its tracking systems with the adopted energization targets, the current systems and tracking tools do not fully support the granularity required for the 8 Step Energization process in the Phase 1 Decision. Continued refinement and enhancement of tracking tools and processes will be necessary and are planned to achieve better alignment and more accurate reporting in future periods.

6. DESCRIPTION OF ESJ (ENVIRONMENTAL AND SOCIAL JUSTICE) BARRIERS

For this report, SCE analyzed the energization times of projects located in disadvantaged (DAC), tribal, and underserved communities compared to the energization times of projects not located in these communities.

---

[9] This information is specific to Rule 29 and Rule 29/15 projects only. SCE is currently performing manual tracking of utility-controlled activities, and the data provided in the Excel section for Rule 29 reflects both the initial start of the utility step activities and the final stop of the final utility activity and removes the pauses between utility activities within the step. This calculation allows the utility to more accurately capture only that time within each utility step that is under SCE control.

DAC communities were identified as those geographic areas (census tracts) designated as DACs by the California Environmental Protection Agency (CalEPA) for the purpose of Senate Bill (SB) 535. SCE obtained this geographic area dataset from the California Office of Environmental Health Hazard Assessment (OEHHA) website.[10] In 2022, CalEPA designated all Federal tribal lands as DAC communities. Therefore, the DAC category that was analyzed in this report includes all projects that were developed on tribal lands. The tribal community category is a subset of the DAC category, and tribal projects are included in both the tribal community and the DAC category project count (Project Count). Tribal community projects include projects being developed by the tribe or with the tribe as a partner and projects being developed by third parties that are leasing tribal land. The OEHHA geographic area dataset was also used to identify tribal lands.

Underserved communities were identified as those geographic areas (census tracts) with median household incomes at or below 80 percent of the statewide median income or with a median household income at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted under Health and Safety Code Section 50093. SCE obtained this geographic area dataset from the California Energy Commission (CEC) website.[11]

In this second biannual energization report, SCE did not identify any energization barriers within the three ESJ community categories. Upon reviewing the energization times of all completed projects sorted by community, we found that DAC communities experienced energization times that were 22 days shorter on average for the IOU-controlled portions of the process (Steps 2, 4, 6, 7, and 8) than non-DAC/tribal communities. Similarly, underserved community energization times were 26 days shorter on average than for non-underserved communities. Although tribal communities experienced energization times that were 15 days longer on average (a 12.4% difference), there were only 33 tribal projects included in the dataset, and it does not appear that this constitutes a statistically significant difference in the energization times for tribal communities versus non-DAC/tribal communities.[12]

Table 4 – DAC/Tribal Communities - Average IOU Timeline

Community Type	Project Count	Average Length of IOU-Controlled Energization Steps (Business Days)
Non-DAC/Tribal Community	5,086	121
DAC	1,918	99
Tribal Community	33	136

[10] CEC website available.at https://oehha.ca.gov/calenviroscreen/sb535; ArcGIS Dataset, available.at https://services1.arcgis.com/PCHfdHz4GlDNAhBb/arcgis/rest/services/SB_535_Disadvantaged_Communities_2022/FeatureServer

[11] Low Income or Disadvantaged Communities designated by California, available.at https://cecgis-caenergy.opendata.arcgis.com/datasets/CAEnergy::low-income-or-disadvantaged-communities-designated-by-california-1/explore

[12] One-tailed and two-tailed p-value >0.05

Table 5 – Underserved Communities - Average IOU Timeline

Community Type	Project Count	Average Length of IOU-Controlled Energization Steps (Business Days)
Non-Underserved	3,222	129
Underserved	3,815	103

7. EFFORTS TO OVERCOME ESJ (ENVIRONMENTAL AND SOCIAL JUSTICE) BARRIERS AND DELAYS/STEPS FOR IMPROVEMENT

SCE did not identify any ESJ-specific barriers that need to be addressed at this time. SCE is still focusing on improving the overall energization timeline process to decrease the time needed to complete the IOU-controlled portion of the energization process for all projects. As explained in the Customer Engagement and Communication Plan, SCE will engage with both tribal and non-tribal communities to provide education on energization and solicit feedback on opportunities for improvement. This should reduce any delays and improve satisfaction for all communities.

8. REMOVAL OF OUTLIER DATA AND REASONING FOR EXCLUSION

Of the 115,798 projects in this reporting period, SCE removed certain outlier data (project level data) from the dataset that were inconclusive, missing, or incoherent resulting in data discrepancies. SCE will research outlier issues, and if determined that errors were due to system or process challenges, we will address those issues. Overall, there were 4,354 projects that were identified as outliers and omitted from the dataset and analysis completed, representing only 4% of overall data available (see Table 6). There was a slight increase in outliers from the March 2025 report to this second biannual report due to a more accurate methodology and analysis used for this report. In the March 2025 report, SCE provided the data through manual research due to time constraints. In an effort to provide more accurate reporting and analyses, in this September 2025 report, SCE has implemented a systematic, formula-based method of analyzing and reporting the data.

Table 6 – Analysis of Outliers Excluded and Impact from Overall Dataset

Included/Excluded Projects	Project Count	% of Associated Project Count
Included	111,444	96%
Excluded (Outliers Omitted)	4,354	4%
Total	115,798	100%

Tables 7 and 8 provide an overview of the available Tariff and MPU populations respectively aggregated by the projects to be included and excluded (identified as an outlier).

Table 7 – Analysis of Outliers Excluded and Impact from Tariff Dataset

Included/Excluded Projects	Project Count	% of Associated Project Count
Included	28,366	95%
Excluded (Outliers Omitted)	1,589	5%
Total	29,955	100%

Table 8 – Analysis of Outliers Excluded and Impact from MPU Dataset

Included/Excluded Projects	Project Count	% of Associated Project Count
Included	83,078	97%
Excluded (Outliers Omitted)	2,765	3%
Total	85,843	100%

Of the 4,354 outlier projects, 1,589 projects were Tariff projects (R15, R16, R29/45, and combined tariff projects) and 2,765 projects were MPU projects (see Table 9 below).

Table 9 – Outliers Removed from Dataset by Product Type

Product Type	Project Count	% of Associated Project Count
Tariff	1,589	36%
MPU	2,765	64%
Total	4,354	100%

The 1,589 Tariff projects identified as outliers omitted from the dataset and analysis had inconclusive or incoherent data in the "Costing Components" section and/or Energization Data Points (Steps 1-8 data) of the "Data" sheets in the Excel file. Specifically, 1,050 of the 1,589 Tariff projects were identified as having a data discrepancy and omitted due to not being able to produce coherent and valid data for the following columns within the "Tariff Data Completed" sheet in the Excel file.

- Total Cost ($$$) to Complete All Energization Requests (Column AL)
- Total Staffing, Labor, and Material Cost ($$$ - Capital and Expense) (Column AM)
- Project Costs ($$$) for anything else IOU covers (Column AP)
- Actual Costs ($$$) at Time of Energization (Column AT)

The remaining 539 Tariff projects identified as having a data discrepancy were omitted due to not being able to produce coherent and valid data for the Energization Steps 1-8 start and stop dates and step timing calculations due to missing and/or erroneous data. The 539 Tariff projects included projects that were Completed, In-flight, and Cancelled.

Table 10 below provides an overview of the type of data that was available or missing for the four Costing Components columns and Energization Data Points (Steps 1-8) indicated above. The 1,589 Tariff projects omitted contained either one or multiple instances of incoherent data for one or multiple columns of the Costing Component columns and/or Energization Data Points (Steps 1-8) identified. Due to this data discrepancy, these 1,589 projects were omitted to ensure that the data utilized and analyzed for this report did not impact the validity of overall results.

Table 10 – Analysis of Outliers Excluded for Tariffs

Outlier Criteria	Project Count	% of Associated Project Count
Negative Cost Component (-$)	963	61%
Blank Cost	87	5%

Energization Data Points (Step 1-8)	539	34%
Total	1,589	100%

The 2,765 MPU projects identified as outliers omitted from the dataset and analysis had inconclusive or incoherent data in the "MPU Costing Components" and/or "MPU Specific End to End Data" section of the "Data" sheets of the Excel file. Specifically, the 2,765 MPU projects were identified as having a data discrepancy and omitted due to not being able to produce coherent data for the following columns within the "MPU Data" sheets in the Excel file.

- Estimated Costs ($$$) at Time of Design (Column R)
- Main Panel Upgrade - Initial Schedule Date (Date) (Column K)
- Timing to Complete Main Panel Upgrade (Calendar Days) (Column H)
- Timing to Complete Main Panel Upgrade (Calendar Days) (Column I)

Table 11 below provides an overview of the type of data that was inconclusive for the Costing Components column and three MPU Energization Data Point columns indicated above, causing the 2,765 projects to be identified as outliers and omitted. The 2,765 MPU projects omitted contained either one or multiple instances of incoherent data for one or multiple columns of the four MPU columns identified above. The majority of MPU outliers, specifically 2,746 projects, were identified as outliers and omitted due to missing or inconclusive/incoherent data for one or more of the MPU Energization Data Points (approximately 99% of all MPU projects that were omitted as outliers). The remaining 19 MPU projects (approximately 1% of all MPU projects that were omitted), were impacted due to data discrepancies in relation to Costing Components. Due to this data discrepancy, these 2,765 projects were omitted to ensure that the data utilized and analyzed for this report did not impact the validity of overall results.

Table 11 - Analysis of Outliers Excluded for MPUs

Outlier Criteria	Project Count	% of Associated Project Count
MPU Energization Data Point	2,746	99%
Costing Component	19	1%
Total	2,765	100%

9. REPORTING GAPS DUE TO CURRENTLY UNAVAILABLE DATA

Since the issuance of the Phase 1 Decision, SCE has been working diligently to update processes and identifying data tracking solutions to comply with the new reporting requirements going forward. In this second bi-annual report, which covers a time period predating the Phase 1 Decision, SCE is currently able to report on about 73 of the required 115 reporting data points, utilizing information pulled from our existing systems and tracking tools.

Of the remaining 42 data points (see Table 12 – Tariff Data and Table 13 – MPU Data below), in the March 2025 bi-annual report, SCE had scoped and estimated the following data availability and reporting dates:

- 8 Data Points, available to track 9/1/25, available to report 3/31/26
- 4 Data Points, available to track 1/01/26, available to report 9/30/26
- 5 Data points have been determined to be not applicable (N/A)

As an update to the anticipated data availability noted above, on July 24, 2025, SCE's customer portal, Building, Renovation, and Project Planning Portal (BRPPP) became available for customer use. This online tool provides customers with the ability to locate information about how to submit their new and/or upgrade construction project requests, as well as track their accepted application throughout the energization process, and communicate with their assigned utility main point of contact. BRPPP is in addition to the previously posted 8 Step Energization Fact Sheet and Customer Journey Map, which are available to assist customers with navigating the energization process.

With the launch of BRPPP for applications received on or after July 24, 2025, SCE will now be able to collect 7 of the 8 unavailable data points noted above, which will be reported in the next bi-annual report (March 31, 2026). Please see Tables 12 and 13 below for updates. Additionally, SCE remains on-track for the four previously noted data points to begin tracking on 1/1/26.

Of the 5 data points determined to be not applicable, all are related to MPU cost categories. The Commission has defined a MPUs as limited to only those projects that do not require the utility to complete any front-of-the-meter upgrades or upgrades to a service line.[13] SCE accounts for this type of work as meter only functional work. To derive costs, SCE invoices the customer based on estimated meter and labor costs minus allowances, if applicable. This category of work is not financially reconciled at completion. Thus, for the five MPU costing categories, SCE data will reflect N/A on the data spreadsheet file.

Lastly, for the remaining 25 currently unavailable data points that are identified as status to be determined (TBD), SCE continues to seek out solutions to capture this required data. SCE is collaborating with our internal NextGen Enterprise Resource Planning (ERP) team to establish a long-term solution for addressing these data requirements. In the interim, SCE is exploring the implementation of an SAP Business Technology Platform (BTP) solution, which could be deployed in the near future and later integrated with NextGen ERP. The estimated launch period for the new data tracking system is early 2026.

Table 12 – Summary and Plan for Missing Data related to Tariff Projects

Data Point	Column Letter	Data Sheet	Delay Cause	Est. Date Available	Est. Reporting Date
AHJ (Authority Having	H	Tariff Data	Tracking not available	TBD	TBD

[13] See D.24-09-020, p.37 n.52.

Jurisdiction) for permitting based off Project's location (AHJ)			within current systems of record		
Total Site Capacity at Time of Customer's Application for Service (kW)	I	Tariff Data	Tracking not available within current systems of record	TBD	TBD
Total Site Capacity Requested (kW)	J	Tariff Data	Building, Renovation and Project Planning Portal(BRPPP)	07/24/25 (date tracking began)	03/31/26

Data Point	Column Letter	Data Sheet	Delay Cause	Est. Date Available	Est. Reporting Date
Capacity Request Category: <1MW,1MW to 2M, >2MW	L	Tariff Data	Building, Renovation and Project Planning Portal (BRPPP)	07/24/25 (date tracking began)	03/31/26
Project triggered for upstream capacity project (Yes/No)	M	Tariff Data	Systems do not fully capture all customer projects that contribute to specific capacity upgrades	01/01/26	09/30/26
Date IOU identifies the need for an upstream capacity project and alerts customer of need for upstream capacity project (Date)	N	Tariff Data	Systems do not fully capture all customer projects that contribute to specific capacity upgrades	01/01/26	09/30/26
Date IOU completes the upstream capacity project (Date)	O	Tariff Data	Systems do not fully capture all customer projects that contribute to specific capacity upgrades	01/01/26	09/30/26
Time to complete upstream capacity project (Calendar Days)	P	Tariff Data	Systems do not fully capture all customer projects that contribute to specific capacity upgrades	01/01/26	09/30/26
Customer Desired Energization Date (Date)	Q	Tariff Data	Building, Renovation and Project Planning Portal (BRPPP)	07/24/25 (date tracking began)	03/31/26
Difference from Customer Desired Energization Date and Final Energization Date (Calendar Days)	R	Tariff Data	Building, Renovation and Project Planning Portal (BRPPP)	07/24/25 (date tracking began)	03/31/26
Difference from Customer Desired Energization Date and Final Energization Date (Business Days)	S	Tariff Data	Building, Renovation and Project Planning Portal (BRPPP)	07/24/25 (date tracking began)	03/31/26
Did the customer install additional capacity to support future load growth? (Yes or No)	T	Tariff Data	Tracking not available within current systems of record	TBD	TBD
Identify when in the energization process the customer requested a change	U	Tariff Data	Tracking not available within current systems of record	TBD	TBD

Data Point	Column Letter	Data Sheet	Delay Cause	Est. Date Available	Est. Reporting Date
in design or scope (Date)					
Identify when in the energization process the customer requested a change in design or scope (Energization Step)	V	Tariff Data	Tracking not available within current systems of record	TBD	TBD
Customer cancelled/delayed project (as needed) (Yes or No)	W	Tariff Data	Tracking not available within current systems of record[14]	TBD	TBD
Customer elected to install additional capacity to anticipate associated future load growth as indicated on customer's application (Yes or No)	X	Tariff Data	Tracking not available within current systems of record	TBD	TBD
Estimated timing for when customer anticipates additional capacity necessary as indicated on customer's application (Date)	Y	Tariff Data	Tracking not available within current systems of record	TBD	TBD
Total additional kW capacity for the necessary future upgrade as listed on customer's application (kW)	Z	Tariff Data	Tracking not available within current systems of record	TBD	TBD
If full energization of applicant site not feasible in a timely manner, explanation	AA	Tariff Data	Tracking not available within current systems of record	TBD	TBD

[14] SCE tracks and is currently able to report on all cancelled projects. Information on cancelled projects is included in the accompanying data spreadsheet. However, SCE is not currently able to track whether the customer or SCE initiated the cancellation as provided in the data prompt. SCE expects to provide an update on when this information will be available to track, and report will occur in the March 2026 Biannual Report.

Data Point	Column Letter	Data Sheet	Delay Cause	Est. Date Available	Est. Reporting Date
whether load management/flexible service options were installed/utilized to provide the applicant with timely service					
For R15/R16 tariffs, project was delayed due to customer requested change in design or change in project scope (Yes or No)	AJ	Tariff Data	Tracking not available within current systems of record	TBD	TBD
For R15/R16 tariffs, the time the project was delayed due to customer requested change in design or change in project scope (Calendar Days)	AK	Tariff Data	Tracking not available within current systems of record	TBD	TBD
Total upstream capacity project cost ($$$)	AN	Tariff Data	Tracking not available within current systems of record	TBD	TBD
Project Costs ($$$) for all IOU equipment for upstream capacity projects: Electric Rule 15, Electric Rule 16, and Electric Rule 29/45	AO	Tariff Data	Tracking not available within current systems of record	TBD	TBD
IOU assigned account/project manager for initial application (within 10 days) (Yes/No)	AV	Tariff Data	Tracking not available within current systems of record[15]	TBD	TBD

[15] SCE has updated its internal processes to communicate to internal stakeholders that the account/project manager should be assigned to energization projects within 10 days of application approval. SCE is currently working to determine where and how this information will be tracked for reporting purposes and expects to provide an update as to when tracking and reporting will become available in the March 2026 Biannual Energization Report.

Data Point	Column Letter	Data Sheet	Delay Cause	Est. Date Available	Est. Reporting Date
Date of IOU rejection of application (Date)	AW	Tariff Data	Building, Renovation and Project Planning Portal (BRPPP)	07/24/25 (date tracking began)	03/31/26
IOU reason for rejection of application (Reason)	AX	Tariff Data	Building, Renovation and Project Planning Portal (BRPPP)	TBD	TBD
Energization Steps Completed Concurrently (Energization Step(s) Listed)	CK	Tariff Data	Tracking not available within current systems of record	TBD	TBD
Total time for Energization Steps Completed Concurrently (Calendar Days)	CL	Tariff Data	Tracking not available within current systems of record	TBD	TBD
Total time for Energization Steps Completed Concurrently (Business Days)	CM	Tariff Data	Tracking not available within current systems of record	TBD	TBD
R15/R16/R29 Energization Reasoning as to why exceeded average/maximum Energization Target (Reasoning)	CP	Tariff Data	Tracking not available within current systems of record	TBD	TBD

Table 13 – Summary and Plan for Missing Data related to MPU Projects

Data Point	Column Letter	Data Sheet	Delay Cause	Est. Date Available	Est. Reporting Date
Customer Desired Energization Date (Date)	B	MPU Data	Building, Renovation and Project Planning Portal (BRPPP)	07/24/25 (date tracking began)	03/31/26
AHJ (Authority Having Jurisdiction) for permitting based off Project's location (AHJ)	E	MPU Data	Tracking not available within current systems of record	TBD	TBD

Size of Installed Main Panel Upgrade (Amps)	F	MPU Data	Tracking not available within current systems of record[16]	TBD	TBD
Reason why upgrade was cancelled and/or rescheduled (Reason)	I	MPU Data	Tracking not available within current systems of record	TBD	TBD
Data Point	Column Letter	Data Sheet	Delay Cause	Est. Date Available	Est. Reporting Date
Main Panel Upgrade Rescheduled Date (as needed) (Date)	K	MPU Data	Tracking not available within current systems of record	TBD	TBD
Additional Time from Initial Scheduled Date to Rescheduled Date (Calendar Days)	L	MPU Data	Tracking not available within current systems of record	TBD	TBD
Additional Time from Initial Scheduled Date to Rescheduled Date (Business Days)	M	MPU Data	Tracking not available within current systems of record	TBD	TBD
Total Staffing, Labor, and Material Cost ($$$ - Capital and Expense)	N	MPU Data	Not Applicable	N/A	N/A
Project Costs ($$$) for anything else IOU covers	O	MPU Data	Not Applicable	N/A	N/A
Total Construction/Overhead Costs ($$$)	P	MPU Data	Not Applicable	N/A	N/A
Actual Costs ($$$) at Time of Energization	S	MPU Data	Not Applicable	N/A	N/A
Difference of Estimated and	T	MPU Data	Not Applicable	N/A	N/A

[16] Although the information regarding panel size is requested on project applications and provided by customers, it is not tracked within SCE systems of record. SCE expects to provide an update on when tracking and reporting of this data metric will become available in the March 2026 Biannual Energization Report.

Actual Costs at Time of Energization ($$$)					

10. DATA AND REPORTING INSIGHTS

Due to current system tracking limitations, SCE is reporting on the following end use categories: Rules 15, 16, and 15/16 agricultural, commercial, residential, and Rules 29 and 15/29 dedicated commercial electric vehicle load. MPUs are delineated by different community types of: DAC, Tribal, and Underserved & Not Underserved Communities. If a project is neither DAC, Tribal, nor Underserved, and/or any combination thereof, it will be marked as "not applicable (N/A)."

While the spreadsheet reflects all categories of work (in-progress, completed and cancelled work), for illustrative purposes, the following tables reflect only financially COMPLETED projects, i.e., those projects that have both completed Step 8-Service Energization Provided to Customer, and where project costs have been financially reconciled[17], Tariff and MPU projects.[18]

Table 14 – Completed R15 Projects Cost Analysis by Business Class

Tariff	Business Class	Sample Size	Average Cost per Project
R15	Agricultural	0	N/A
	Commercial	34	$90,568
	Residential	83	$110,221
	Overall	117	$104,510

Table 15 – Completed R16 Projects Cost Analysis by Business Class

Tariff	Business Class	Sample Size	Average Cost per Project
R16	Agricultural	60	$20,269
	Commercial	610	$16,800
	Residential	5,199	$3,413
	Overall	5,869	$4,977

Table 16 – Completed R29/45[19] Projects Cost Analysis by Business Class

Tariff	Business Class	Sample Size	Average Cost per Project

[17] SCE considers an energization project to be financially complete when all work in energization steps 1-8 has been completed and.all costs associated with the project have been reconciled and recorded. SCE tracks both the energization date and the financial completion date.

[18] Utilizing data from: Narrative Tables sheets in FINAL Narrative Tables_EET September 2025 Report file.

[19] Please note that Rule 29 projects are funded entirely by ratepayers, including costs for excavation/site restoration, the purchase and installation of conduits and structures, structure protection such as block walls and/or bollards, risers, rights checks, easements, and permits on the utility-side of the meter. For Rule 15, 16, and 15/16 projects these aforementioned costs are the responsibility of the individual customer and are unknown to the utility/not reflected in utility-side costing data.

R29/45	Agricultural	0	N/A
	Commercial	17	$255,228
	Residential	0	N/A
	Overall	17	$255,228

Table 17 – Completed Combo (R15 & R16) Projects Cost Analysis by Business Class

Tariff	Business Class	Sample Size	Average Cost per Project
Combo (R15 & R16)	Agricultural	50	$24,694
	Commercial	248	$58,638
	Residential	730	$17,742
	Overall	1,028	$27,946

Table 18 – Completed Combo (R29/45 & R15) Projects Cost Analysis by Business Class

Tariff	Business Class	Sample Size	Average Cost per Project
Combo (R29/45 & R15)	Agricultural	0	N/A
	Commercial	6	$81,757
	Residential	0	N/A
	Overall	6	$81,757

Table 19 – Completed MPU Projects Cost Analysis [20] for DAC/Tribal Communities

Project Type	Community Type	Sample Size	Average Cost per Project
MPU	DAC	5,997	$257
	Tribal Community	309	$248
	N/A	20,891	$250
	Overall	27,197	$251

Table 20 – Completed MPU Projects Cost Analysis for Underserved Communities

Project Type	Community Type	Sample Size	Average Cost per Project
MPU	Underserved	13,069	$250
	Not Underserved	14,128	$253
	Overall	27,197	$251

[20] For MPU projects, SCE is providing estimated costs based on the average cost of the meter and associated labor. SCE does not reconcile this type of work category, and site level recorded costs are not available.

Attachment A to September 30, 2025 Biannual Energization Report

SCE PUBLIC Reporting Data

Due to the size of this appendix, the public version will be posted on sce.com and will also filed via mixed media with the Commission's Docket Office.

Appendix B

SCE's Initial Analysis of Current and Future Qualified Staffing Levels

Pursuant to Cal. Pub. Util. Code Section 935(a)

INITIAL ANALYSIS OF CURRENT AND FUTURE QUALIFIED STAFFING LEVELS PURSUANT TO CAL. PUB. UTIL. CODE SECTION 935(a)

Pursuant to Section 935(a) of the California Public Utilities Code and Energy Division (ED) Staff's e-mail directive dated September 23, 2025,[1] Southern California Edison Company (SCE) respectfully submits this abridged annual analysis of its current and future qualified staffing levels for job classifications that support energization process activities. SCE intends to supplement this preliminary analysis by December 31, 2025.

I. SCE WORKFORCE

As of September 2025, across four key job groups which include project management, design/planning, distribution field crews and meter operations, that support utility-controlled energization process activities, SCE's current staffing level totals 2,137 employees.[2] This work analysis report focuses on these four main work groups, as the positions on these teams have the most direct impact on the execution of utility-controlled activities within steps 2, 4, 7, and 8 in the 8-step energization process established in D.24-09-020. Please reference Tables 1, 2 and 3 below. As SCE continues to refine processes and system updates that support energization activities, additional relevant information may become available that could be included in future annual staffing analysis reports.

---

[1] The e-mail from ED staff, dated September 23, 2025, stated in relevant part: "Energy Division's expectation is that every IOU will submit the annual workforce report required by section 935(a) with their September 30, 2025 biannual energization report." On September 26, 2025, SCE and San Diego Gas & Electric Company jointly submitted to the Commission's Executive Director a Rule 16.6 request for an extension of the September 30, 2025 deadline for Section 935(a) staffing analysis reports that was communicated to the Investor Owned Utilities (IOUs) via ED Staff's September 23, 2025 email The extension request was still pending as of the time of filing, and SCE is submitting this preliminary staffing analysis to ensure compliance with the September 30, 2025 reporting deadline set by ED Staff. D.24-09-020 did not provide guidance, make any mention of, or otherwise address the annual staffing analysis requirement in Section 935(a).

[2] Please note that these employees do not in all cases exclusively support energization activities.

Table 1: 2025 SCE Overall Workforce

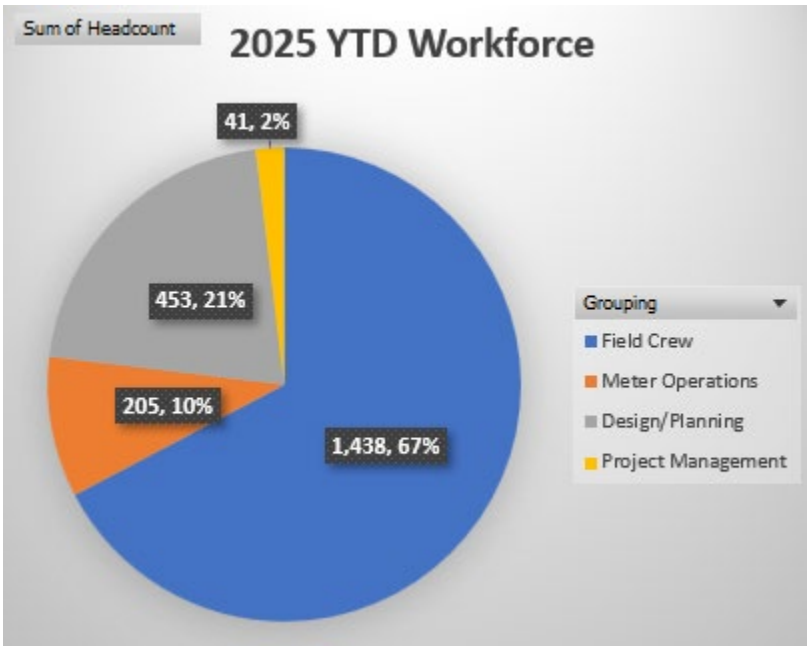

Table 2: 2025 SCE Workforce by Key Job Group

Line No.	Job Group	YTD 2025
1	Field Crew	1,438
2	Meter Operations	205
3	Design/Planning	453
4	Project Management	41
	Grand Total	**2,137**

Table 3: 2025 SCE Workforce by Job Position

Line No.	Grouping by Job	YTD 2025
	Field Crew	**1,438**
1	Form Electl Crew	169
2	Splcr Sr Cble	12
3	Journeyman Lineman	674
4	Lineman, Apprentice	237
5	Groundman	346
	Meter Operations	**205**
6	Meter Technician 5	53
7	Meter Technician 6	8
8	Repr Fld Srvce 2	104
9	Repr Supvg Fld Srvce	40
	Design/Planning	**453**
10	Planning, Advisor	49
11	Planning, Sr Spec	168
12	Planning, Specialist	236
	Project Management	**41**
13	Elec Trans &/Or Distrib Prj Mgr	24
14	Proj Mgmt Support - Const, Sr Spec	13
15	Proj Mgmt Support - Const, Specialist	4
	Grand Total	**2,137**

II. SCE KEY JOB WORKFORCE ROLE DESCRIPTIONS

SCE is focusing this staffing analysis report on four key work groups that support energization process activities. The first two, Project Management and Design/Planning, have the most significant involvement in Step 1-Customer Intake, Step 2-Design and Engineering, and Step 4-Uitility Dependencies, although customer engagement is active in all 8 Steps. The following is a high-level description of the various project management and design/planning energization process responsibilities, including the various activities for which those roles are responsible.

Project Management:

Project Management roles support larger residential, commercial, and electric vehicle projects (including Rule 29), customers in Transmission and Distribution across SCE service territory. Project Managers guide customers through every stage of their project, from concept and initiation, through design, scheduling, construction, and energization,

with the goal to keep customers informed and projects on track to meet milestones and energization timelines. Project Managers coordinate with internal stakeholders to resolve challenges and advance projects. They also work with external stakeholders, including cities and government agencies, as needed. Project Managers coordinate with customers to ensure all requirements are met throughout the energization process, including contracts, invoices, city and civil releases, environmental clearances, and easements. Typical positions include Distribution Project Managers, who focus on larger, more complex customer requests, managing and coordinating projects of varying complexity, and Project Management support staff such as Construction Senior Specialists and Construction Specialists who assist customers with applications submitted through the Building, Renovation, and Project Planning Portal (BRPPP), as well as assisting Project Managers with overall customer/project support.

Design/Planning:

The Design/Planning team is responsible for developing and preparing work orders, drawings, and construction plans for residential, commercial and electric vehicle customer requests. They determine the scope of work, method of service, and construction methods for overhead and underground facilities, ensuring compliance with SCE standards. The team manages and coordinates projects of varying complexity and scope, often interfacing with internal departments, external organizations, and governmental agencies. Senior staff provide leadership, direction, and mentoring to junior team members, and are influential in operational and financial decisions. In addition to designing work orders, Design/Planning employees (e.g. Planners) within the District and New Business disciplines take on main point of customer contact responsibilities, such as explaining the 8 Step energization process to the customer, clarifying customer and utility roles and responsibilities, and communicating various project milestones as described in SCE's approved Energization Communication Plan. Typical positions include Planning Advisors, Planning Specialists, and Planning Senior Specialists.

Distribution Field Crews:

The Field Crew job group positions have the most significant impact in Step 7-Construction and Step 8-Service Energization. The following is a high-level description of the field construction energization roles and process responsibilities, including the various activities for which those roles are responsible.

Field Crew responsibilities are focused mainly on performing and completing activities associated with Step 7-Construction, focusing on the installation of electrical material and equipment on the utility-side of the customer meter panel. Field Crew activities include

delivering material to job sites, staging material, installing cable and/or wire and equipment including switches, transformers, etc., as well as performing equipment outages and associated energizing/re-energizing of newly installed material, all in a manner that keeps both the public and the field crews safe. Projects can range in size from Main Panel Upgrades[3] (MPUs) to large load, multiple phase residential and commercial customers, including electrical vehicle requests. As energization work varies in complexity, SCE field crews also range in complexity, requiring a variety of field crew-member resources to support. Typical positions include Electrical Crew Foreman, Groundmen, Journeymen Linemen, and Senior Cable Splicers to name a few.

Meter Operations:

The Meter Operations job group primarily supports Step 8-Uitility-Service Energization activities, the final step in the energization process. Meter Operations Technicians are responsible for both the installation and, if needed, removal of meter equipment in the customer panel. As with field crews, there is a range of complexity, from installing/removing self-contained plug-in meters, to more complex installations, which include highly technical wire and equipment installations into customer panels, to serve large distribution and primary voltage level customer requested load, all in a manner that keeps both the public and the meter operations technicians safe. Typical positions include Meter Technicians, level 2 and Field Service Representatives for the less complex work, and Meter Technicians level 5 and 6 for the more complex work.

III. 2026 SCE WORKFORCE FORECAST

To support the timely completion of energization projects, the four key job groups have taken responsibility for most of the additional work associated with the energization process requirements and CPUC-established targets and timelines. These four key job groups have been instrumental in maintaining project timelines and ensuring compliance with regulatory requirements. However, as the scope and volume of energization-related activities continue to evolve, SCE recognizes that its current staffing levels may not be sufficient to sustain long-term operational efficiency and regulatory compliance and will adjust as necessary. SCE will continue to evaluate its future staffing needs and will supplement this preliminary staffing analysis report by the end of 2025.

[3] D.24-09-020 defines a Main Panel Upgrade as a project that does not require any front-of-the-meter upgrades or upgrades to a service line. D.24-09-020, p. [37].

For 2026, for the four Distribution position categories identified above, SCE has forecast for a total of 2,482 positions[4] reflecting SCE's commitment to meeting operational needs and regulatory requirements. This results in a forecasted headcount of 2,482 for 2026, assuming all budgeted vacancies are filled.

Table 4: 2026 SCE Workforce Forecast by Key Job Group

Line No.	Job Group	Total Budgeted Positions
1	Field Crew	1,762
2	Meter Operations	199
3	Design/Planning	476
4	Project Management	45
	Grand Total	**2,482**

Table 5: 2026 SCE Workforce Forecast by Job Group Position

Line No.	Grouping by Job	Total Budgeted Positions
	Field Crew	**1,762**
1	Form Electl Crew	178
2	Splcr Sr Cble	15
3	Journeyman Lineman	696
4	Lineman, Apprentice	327
5	Groundman	546
	Meter Operations	**199**
6	Meter Technician 5	54
7	Meter Technician 6	8
8	Repr Fld Srvce 2	98
9	Repr Supvg Fld Srvce	39
	Design/Planning	**476**
10	Planning, Advisor	61
11	Planning, Sr Spec	186
12	Planning, Specialist	229
	Project Management	**45**
13	Elec Trans &/Or Distrib Prj Mgr	26
14	Proj Mgmt Support - Const, Sr Spec	12
15	Proj Mgmt Support - Const, Specialist	7
	Grand Total	**2,482**

[4] Please note that these employees do not in all cases exclusively support energization activities.

Currently, there are 345 vacancies to be filled to reach the 2026 staffing target. This proactive workforce planning ensures SCE is positioned to maintain service reliability and regulatory compliance in the coming year. The forecast headcount for 2026 aligns with these budgeted positions, indicating a planned increase in staffing to meet operational needs.

Table 6: 2025 to 2026 SCE Workforce Adjustments

Line No.	Job Group	# of Budgeted Positions in 2026	Current Staffing as of 9/24/25	Remaining Vacancies as of 9/24/25
1	Field Crew	1,762	1,438	324
2	Meter Operations	199	205	0
3	Design/Planning	476	453	23
4	Project Management	45	41	4
	Grand Total	**2,482**	**2,137**	**345**

Notably, the headcount for Design/Planning positions remains relatively flat between 2025 and 2026. This stability is supported by anticipated efficiency gains from recent internal reorganization, the adoption of new technology and processes, and other productivity improvements. SCE has forecast the largest resource increase in the Field Crew job category. Please see table 6 below.

Table 6: 2026 SCE Workforce Forecast Field Crew Increase

Line No.	Linecrew Job Group	Total Increases in 2026
	Field Crew	
1	Journeyman Lineman	48
2	Lineman, Apprentice	72
3	Groundman	156
	Grand Total	**276**

IV. CONCLUSION

SCE is committed to maintaining sufficient staffing levels to meet the energization targets established by the Commission in D.24-09-020. Accordingly, while SCE has managed the increased workload associated with the regulatory requirements with available resources to date, SCE recognizes that it may need to evaluate and pursue additional staffing to adequately support future demands and meet regulatory requirements.