QUANTITATIVE AND QUALITATIVE FACTORS FOR PSPS DECISION-MAKING

Revision: June 2026

The severity and frequency of wildfires in California continues to grow, with 15 of the 20 most destructive fires occurring since 2015 and eight of those occurring in this decade alone.[1] In response, SCE has implemented Public Safety Power Shutoffs to reduce the risk of electrical infrastructure igniting a significant wildfire. PSPS is an important "measure of last resort"[2] that is authorized by the California Public Utilities Commission, with the CPUC acknowledging that "proactively de-energizing power lines can save lives."[3]

The quantitative and qualitative factors that inform de-energization decisions for distribution, transmission and sub-transmission circuits are the subject of this technical paper.

PSPS OBJECTIVES

SCE's core objective is to keep the maximum number of customers safely energized, while de-energizing only when and where necessary for community safety. We establish thresholds for dangerous wind speeds, low humidity and dry fuels as the basis of our decision-making. For each event, to protect community safety, these baseline thresholds are refined using information specific to the forecasted weather and to the circuits in scope, including: event size and complexity, environmental factors, circuit health and fire suppression availability.

We reduce customer impacts, when feasible, by de-energizing only when and where necessary, based on real-time weather reporting; isolating those distribution circuits or circuit segments that present significant risk; and, when possible, moving customers between circuits and turning off specific segments while keeping other segments of the same circuit energized. Simultaneously, grid hardening efforts (see box, right) help reduce wildfire risk.

IMPROVING GRID RESILIENCY

We use grid hardening measures to reduce the chance of equipment causing wildfires, while increasing system reliability. These measures help reduce the impact of PSPS events.

Since 2018, SCE has replaced more than 7,800 circuit miles of bare wire with covered conductor in high fire risk areas, with additional miles in progress. Covered conductor significantly reduces the possibility of the power line arcing or sparking from contact with objects, vegetation or other wires.

Additional grid hardening activities since 2018 include the installation of more than 160 sectionalizing devices, more than 7,500 fire-resistant poles and more than 14,200 fast-acting fuses.

More information about our grid hardening activities are in our Wildfire Mitigation Plan. This plan can be found at sce.com/wildfire-safety.

GEOGRAPHY OF PUBLIC SAFETY POWER SHUTOFFS

Most PSPS events occur on circuits that are located within or adjacent to an SCE High Fire Risk Area (HFRA). These areas generally align with the CPUC High Fire-Threat Districts. Addresses outside HFRA boundaries may experience PSPS if they are adjacent to or downstream from an HFRA circuit or are fed by a circuit that traverses HFRA. In rare circumstances, if we must de-energize at the transmission level, a PSPS event will have a larger footprint.

DECISION-MAKING CADENCE

During times when fire weather conditions, including low humidity and dry vegetation are present, SCE identifies the potential to exceed wind speed thresholds up to seven days prior to a possible period of concern (POC), using twice daily output from four supercomputers. In some cases, weather patterns emerge within seven days of an event, which will shorten the timeline. Rarely, "rogue circuits" will hit de-energization wind speeds without advance forecasting and will need to be de-energized immediately to protect community safety.

Prior to the start of the POC, the PSPS team moves from forecasting to real-time weather monitoring, using SCE's pole-top weather stations, public (third-party) weather stations and data from extendable handheld weather stations operated by SCE field crews. Every 10 minutes, SCE weather station readings are updated for each circuit. The team monitors actual conditions to confirm if wind speeds are meeting de-energization criteria.

HIGH RISK DECISION-MAKING

Most de-energization decisions are based on real-time weather observations within the POC. However, there are two categories of PSPS decision-making that are based on forecasting, in which de-energization of a circuit or segment could occur near the start of the POC, before real-time wind speeds have reached the de-energization threshold for the circuit.

1. **High Risk Status Events** (Urban Conflagrations)
   Through updated risk modeling, SCE has identified a subset of HFRA circuits that have a heightened potential to generate an urban conflagration at sustained wind speeds in excess of 40 mph for distribution and 56 mph for sub-transmission and transmission lines. If wind speeds in excess of these thresholds are forecast, distribution circuits or segments may be de-energized when wind speeds have reached 25 mph sustained or 35 mph gusts and are trending upward. For high-risk status transmission lines, those lines will be de-energized near the start of the POC.

2. **High Risk Status Equipment**
   Certain distribution circuit segments and transmission lines may undergo review for potentially susceptible system configurations that could sustain damage at sustained wind speeds in excess of 40 mph for distribution and 56 mph for sub-transmission and transmission lines. On a temporary basis, until those issues can be appropriately assessed and, if necessary, remediated, if wind speeds in excess of these thresholds are forecast, the affected distribution circuit or segment could be de-energized when wind speeds have reached 25 mph sustained or 35 mph gusts and are trending upward. For high-risk status transmission lines, those lines will be de-energized near the start of the POC.

In both categories, these circuits or segments of lines will remain de-energized until after patrol and inspection at the end of the event.

FORECASTING

SCE forecasts fire weather conditions using both wind speeds and a Fire Potential Index (FPI), which estimates the likelihood of a spark turning into a major wildfire.

WIND SPEEDS

SCE supercomputers run custom weather models that produce forecasts optimized for localized conditions within our service territory. These models have lower predictive errors than public models. The models are calibrated using historical wind events and data from our network of more than 1,950 weather stations, as well as public weather stations. SCE weather stations are located on or near most circuits. As the number of SCE weather stations recording point-specific weather data increases, we improve the accuracy and granularity of our forecasts. Real-time readings from these weather stations are publicly available.[4]

FIRE POTENTIAL INDEX

The FPI for a given day and circuit is calculated from forecast wind speed, humidity and vegetation dryness (see appendix for formula — Figure 5). The variables used to generate the FPI score come from the Weather Research and Forecasting[5] and machine learning forecast models run by SCE, which have been optimized to reflect our specific geography and weather conditions. FPI is calculated using a whole-number scale with a range of 1 to 17.

Individual components of the FPI score are forecast hourly for each 2 km-by-2 km grid cell. The model is run twice a day and provides an hourly forecast for five days. The forecasts associated with each of the FPI components for each grid cell are then summarized by circuit in three-hour intervals. The 2-kilometer square resolution allows the models to assess weather in California's microclimates.

The forecast FPI is further refined and calibrated by integrating model guidance from proprietary data. These refined FPI values are used to determine which circuits are reasonably forecast to breach PSPS thresholds during the event. The values for these circuits are recorded on SCE's monitored circuit list (MCL).

Due to the relatively static nature of the fuels component of the FPI, when a circuit or circuit segment is assigned a POC, the circuit is considered to be meeting FPI criteria for the duration of the POC. The real-time FPI continues to be calculated, however, and is compared to the forecast FPI. For decision-making, we use the higher of the two values (forecast FPI or real-time FPI). This allows us to account for emergent weather conditions when real-time fire potential exceeds forecast conditions, which would prompt a recalculation of wind speed triggers.

FUEL MOISTURE DATA

Two measures of vegetation dryness are included in the FPI formula: live fuel moisture and dead fuel moisture.

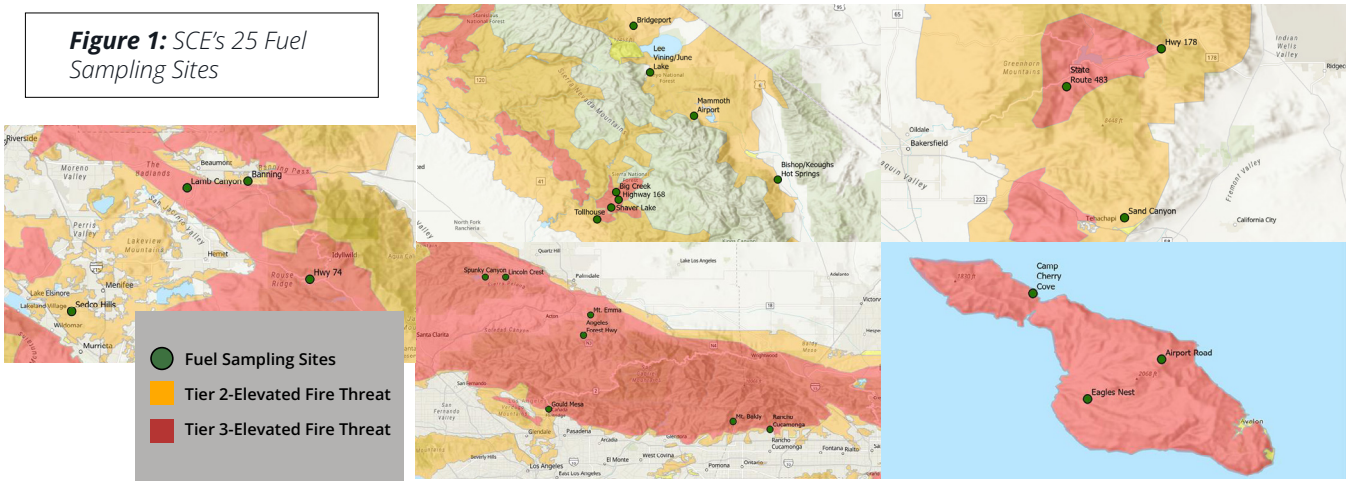
Standardized data used to model **live fuel moisture** is provided by fire agencies and SCE (data can be seen on the Fire Environment Mapping System [FEMS] website[6]). SCE samples at 25 sites in seven fire-prone areas to augment fire agency data (Figure 1).

Samples of native vegetation from each of the sites are weighed, dried, and then weighed again to determine the vegetation's moisture content. The resulting data is one of the inputs into the FPI.

SCE also uses this data to adjust the FPI if observed values significantly deviate from forecast values.

Twice daily forecasts of **dead fuel moisture** are generated using mathematical algorithms that account for the effects of precipitation, temperature, and relative humidity on the vegetation.

Figure 1: *SCE's 25 Fuel Sampling Sites*



DECISION-MAKING CRITERIA

FIRE POTENTIAL INDEX

FPI thresholds for de-energization are consistent across distribution, transmission and subtransmission circuits.

FPI thresholds are set individually for each of SCE's 14 Fire Climate Zones. (Figure 2) The baseline FPI threshold for most Fire Climate Zones is set at 13, based on a risk analysis of historical fire data.Circumstances when the baseline FPI is set below 13 include:

- **Fire Climate Zone 1 (FCZ1) (Coastal region)** The threshold for FCZ1 is set at 12 because probability calculations indicated a significantly higher ignition risk factor at an FPI threshold of 13 for this FCZ than for the other FCZs. On Catalina Island, the baseline FPI is set at 11 because of its extremely limited egress and constrained fire suppression capability.

- **Circuits located in an active Fire Science Area of Concern (AOC)**
  These are areas that Fire Sciences has identified where a heightened potential for fires poses a significant threat to life and property. AOCs are identified based on fire history, fuel type and amount, terrain, drought, egress, and potential community impact.

Circumstances under which FPI thresholds may be reduced

When broader fire weather concerns are identified, or when the circumstances of the event in certain areas or regions suggest additional risk, SCE may reduce the FPI threshold at which circuits would be de-energized. These threshold reductions are part of overall planned improvement efforts, as described in the SCE Wildfire Mitigation Plan to integrate FPI 2.0.[7]

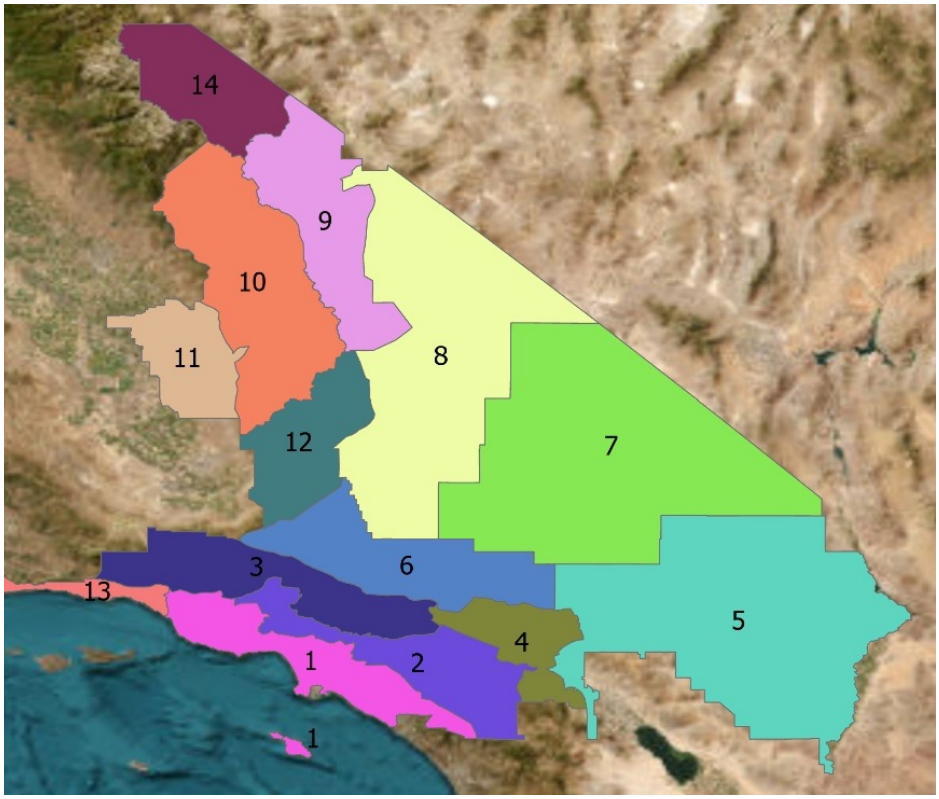


Figure 2: *SCE Fire Climate Zones*

WIND SPEEDS FOR DISTRIBUTION CIRCUITS

The **baseline criteria** for distribution circuits is the starting wind speed for determining when to de-energize, based on circuit construction and conductor type (bare wire or covered conductor). SCE sets baseline activation limits for each circuit or fully isolatable circuit segment (see box, page 9). For bare wire distribution circuits, these consider the lower of the National Weather Service's Wind Advisory level defined as 31 mph sustained wind speed and 46 mph gust wind speed.[8] This is the wind speed at which debris or vegetation may become airborne, as described by the Beaufort Wind Scale.[9] In some cases the baseline activation is the 99th percentile of historical wind speeds for the circuit which represents extreme and unusual wind activity for the area. For distribution circuits in which 100% of the wires have covered conductor, this baseline limit is set at 40 mph for sustained winds and 58 mph for gusts. This aligns with the NWS high wind warning level for wind speeds at which infrastructure damage might occur. Finally, there are a handful of outage-informed circuits that have legacy thresholds below the NWS advisory level because they have a history of local circuit outages at lower wind speeds.

Circuit-specific factors are used to adjust baseline criteria to determine **activation windspeed thresholds.** These factors include:

- Environmental impacts such as forecasted peak FPI during the period of concern
- Circuit health conditions based on existing documented potential hazards and findings from patrols within the seven days leading up to the period of concern
- Fire consequences, as determined by fire spread simulations

Event-specific factors are used to determine **de-energization wind triggers.** These factors include:

- Anticipated fire suppression resource availability
- Event size, including the number and type of circuits in scope for the event
- Event complexity, including resource availability and operational requirements to manage the event
- Declarations by NWS of Particularly Dangerous Situation (PDS) Red Flag Warning
- High Risk Status Events that include risk of urban conflagration or potentially susceptible system configurations (see high risk decision-making)

Starting three days out from the forecast event, actual FPI and wind speeds are continuously monitored. The PSPS Operations Team initiates actions to de-energize the applicable circuits when circuits either meet criteria or reach a percentage of wind speed triggers and are trending upward.

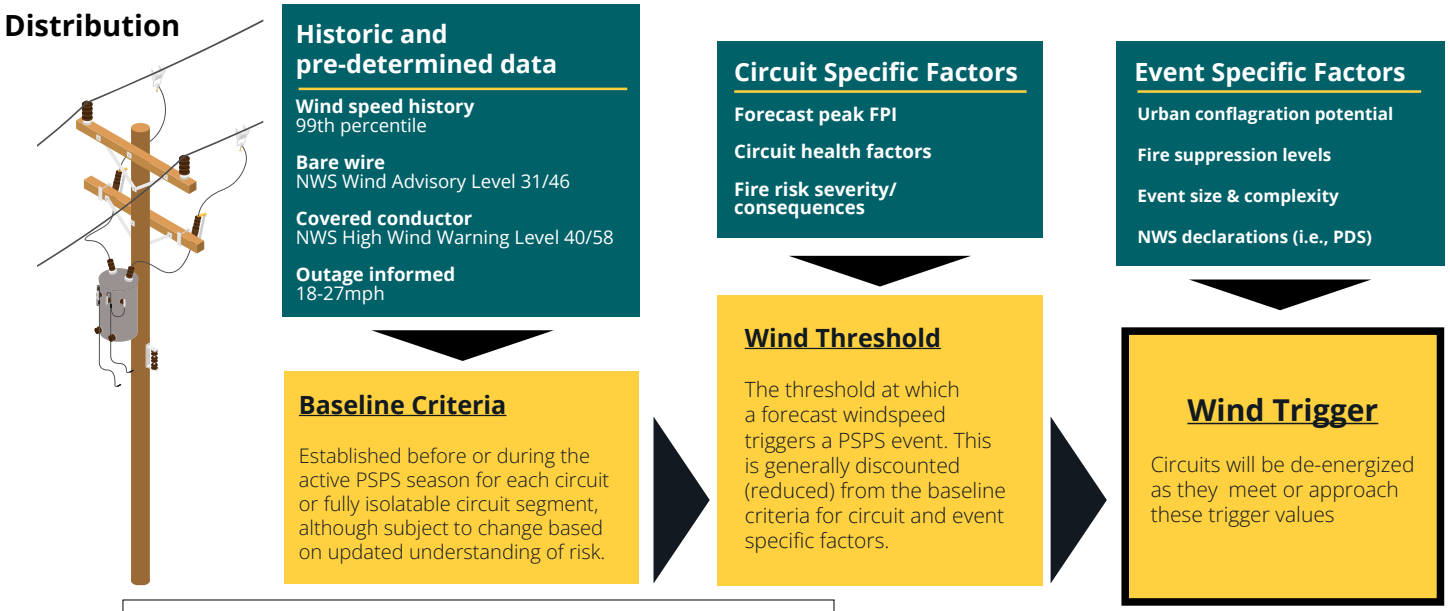


Figure 3: *Flowchart of Decision Criteria for Distribution Lines*

WINDSPEEDS FOR TRANSMISSION AND SUB-TRANSMISSION CIRCUITS

For transmission and subtransmission circuits, the baseline criteria is informed by the engineering and structural design ratings for each circuit. For subtransmission lines, the baseline wind criteria is 56 mph for sustained winds and 68 mph for gusts. For transmission lines, the baseline wind criteria is 68 mph or higher for sustained winds and 82 mph or higher for gusts, based on structural design standards.

After discounts, the minimum baseline activation criteria are forecast 42 mph sustained wind speed and 58 mph gust wind speed for subtransmission, and 51 mph sustained wind speed and 62 mph gust wind speed for transmission circuits, although these are subject to review, based on environmental factors and circuit health.

Circuit-specific factors are used to adjust baseline criteria to determine **activation windspeed thresholds** for transmission and sub-transmission. These factors include:

- Environmental impacts such as forecast peak FPI during the period of concern
- Circuit health conditions based on existing documented potential hazards and findings from patrols within the seven days leading up to the period of concern

Event-specific factors are used to determine **de-energization wind triggers** for transmission and sub-transmission circuits. These factors include:

- Anticipated fire suppression resource availability.
- Declarations by NWS of Particularly Dangerous Situation (PDS) Red Flag Warning.
- High Risk Status Events that include risk of urban conflagration or potentially susceptible system configurations (see high risk decision-making).

Subtransmission and transmission monitoring are similar to distribution monitoring; once the PSPS IMT is activated for the event, actual FPI and wind speeds are continuously monitored, and the PSPS operations team initiates actions to de-energize the applicable circuits when circuits either meet criteria or reach a percentage of wind speed triggers and are trending upward. Refer to Figure 4 for flowchart of decision-making criteria for transmission and subtransmission.

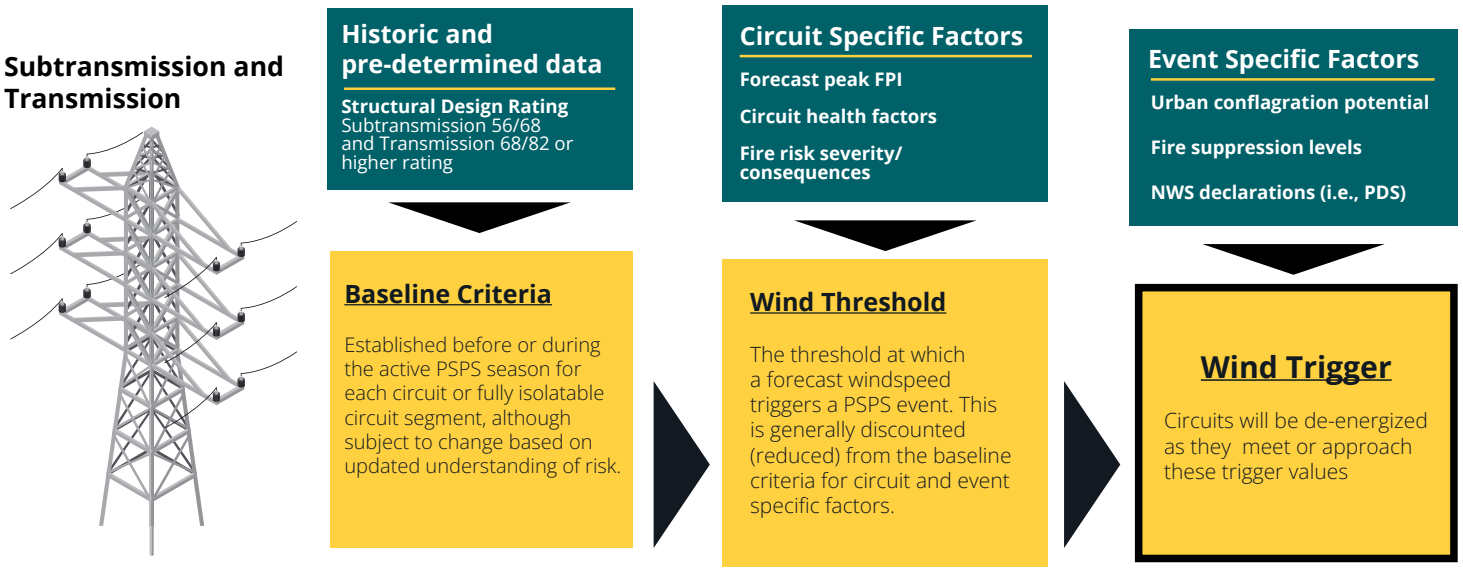


Figure 4: *Flowchart of Decision Criteria for Subtransmission and Transmission Lines*

MONITORING AND DECISION-MAKING IN EVENTS

SCE monitors circuits automatically around the clock, and typically will activate for a PSPS event up to three days in advance of the start of the POC. (In cases of unexpected, emergent conditions meeting PSPS thresholds, this period could be shortened, or de-energization could be immediate.) At the beginning of this pre-event period, the incident management team (IMT) is activated to manage operations, notifications, customer mitigations and communications, and the following activities commence:

ESTABLISHING EVENT SCOPE AND TIMING

The meteorologists produce a monitored circuit list (MCL) and an associated POC table. The table includes a specific forecast start and end time for each circuit, broken down into three-hour time blocks. Initial notifications are sent to all customers and public safety partners.

The initial MCL and POC table are validated by the meteorologists and the fire science team once daily, beginning three days before the start of the POC. Starting one day before the POC, they are validated twice daily. Raw model data is refined using forecasting experience, other weather models and pattern recognition.

IN-EVENT RISK CALCULATION

The wildfire risks that are reduced through PSPS must be balanced against the potential public safety risks that are introduced by a temporary loss of power. An event-based quantitative comparison of risk scores (the in-event risk calculator) is used to inform de-energization decision-making. The calculation is produced 24 hours out from the start of the period of concern. The PSPS risks and the benefits of de-energization (wildfire risk) are modeled independently. These calculations are provided in SCE's post-event reports.

PRE-PATROLS IN THE FIELD

Where possible, every circuit in scope is patrolled before the arrival of the forecast POC, unless it was already patrolled within the previous seven days. Crews visually inspect the entire length of each circuit to find any imminent hazards and provide additional intelligence on field conditions. If maintenance concerns are discovered on a circuit in scope, repairs are expedited before the impending wind event. If repairs are not possible, the circuit thresholds will be discounted to reduce risk.

PUBLIC SAFETY COORDINATION

SCE communicates with public safety partners, including state agencies, emergency management agencies at the county level, and first responders, to inform them about the event. This includes providing details on the location of circuits within their jurisdictions and discussing any public safety concerns that need to be considered.

Priority notifications are sent to local and county jurisdictions, public safety partners and critical infrastructure providers starting at three days out, when possible.

The Liaison Officer (LNO) manages deployment of AREPs (Area Representatives) to emergency management partner emergency operations centers (EOCs), upon request.

Information is provided to public safety partners through a notification sequence and enhanced by access to Public Safety Partner Portal resources. The online portal provides these partners with enhanced and simplified access to event information.

Starting on the first full day of activation, SCE also provides dedicated daily briefings to:

- State agencies
- County and tribal representatives
- Critical infrastructure and critical facilities, and public sector agencies
- Community-based organizations

CUSTOMER NOTIFICATIONS

Notifications begin 72-48 hours ahead of the POC, when possible. Because initial notifications are based on three-day-ahead forecasting at the circuit level, they lack the precision of in-event notifications. Circuits might be removed or added to the monitored circuit list as the POC gets closer and forecast certainty increases.

LIVE FIELD OBSERVATIONS

Live field observers are stationed in the field at least two hours before the forecasted start of the event (when feasible). Observers are trained SCE employees who monitor circuits for any possible signs of failure and for environmental conditions that could accelerate the need to turn off power, such as potential for damage from wind gusts, airborne vegetation or other flying debris. Crews use handheld weather stations to provide readings to supplement information from fixed weather stations and assist with switching operations.

PSPS OPERATIONS TEAM DECISION-MAKING PROCESS

Real-time weather station and electric grid information is gathered by the Integrated PSPS Event Management System (iPEMS) and compared with the de-energization triggers. This information is auto-populated every 10 minutes with updated wind speed and weather information. Field conditions are provided to the operations team in real time. As a circuit, or segment approaches its de-energization trigger, it is de-energized.

The PSPS Operations team executes circuit switching plans, when possible, to reduce the number of customers impacted.

ADDRESSING PUBLIC SAFETY CONCERNS

Requests to delay de-energization or reenergize circuits are addressed on a case-by-case basis. Potential reasons to delay the de-energization of a circuit could include the need to power water pumps for fire suppression or evacuations in progress. These requests may come from fire agencies or from other emergency management officials during an event. SCE maintains a full-time team of fire managers who are deployed to fire agency emergency operations centers as requested to assist in collaboration during wildfires.

Given that PSPS de-energization involves entire circuits or circuit segments, it is not possible to isolate individual customers or locations.

PATROL AND RE-ENERGIZATION

The PSPS Operations team monitors all circuits that are de-energized as well as circuits that have not met the de-energization triggers throughout the event. On a circuit-by-circuit basis, when winds decrease below criteria, the operations team, in consultation with weather services, will recommend re-energization after the line is patrolled.

As the winds abate, field crews begin restoration patrols. Restoration is typically accomplished within eight hours. However, some circuits require foot or helicopter patrol and can only be safely patrolled in daylight. As such, these circuits might remain de-energized overnight, especially in the fall and winter months. When possible, helicopters are staged nearby, prior to the start of the POC to start restoration patrol early in the morning. And whenever possible, customers on difficult-to-patrol circuits are switched to more accessible circuits for restoration, so that circuits with no customers on them will be the last in line for restoration.

For multiday events, with gaps of several hours or more, field crews will attempt to restore customers before the subsequent POC begins, even if this is temporary and will require a repeat de-energization. This is only possible when there is enough time between local POCs for a complete patrol and restoration effort.

POST EVENT REPORTS

After the conclusion of every PSPS event, SCE files a post-event report with the CPUC. These reports are required under CPUC Resolution ESRB-8 and use a CPUC-mandated template. Post-event reports identify the reasons for any PSPS shutoffs, the areas affected, the number of customers impacted, the actual weather conditions, and the methods used to notify the public. All post-event reports are available on the CPUC's Utility PSPS Reports: Post-Event, Pre-Season and Post-Season webpage, and are typically filed 10 business days after the conclusion of the event. Each report includes after-action recommendations, if there are any, and categorizations of any customer complaints received during the event.

PSPS PREPAREDNESS

PSPS preparedness activities take place year-round. Pre-planning work includes reviewing circuits for fuel risk and developing process and tool enhancements, such as updating circuit switching plans for circuits in high fire risk areas.

CIRCUIT SEGMENT REVIEWS

Circuit segments are removed from consideration for PSPS when the wildfire risk is temporarily or permanently abated, using an exception review process. Circuit segment exceptions are identified when SCE begins preparing detailed designs for grid hardening activities or through specific feedback received from field teams with knowledge of changing conditions in specific areas. An example of a circuit segment that is removed from consideration would be a segment traversing a recent burn scar where there is little or no vegetation posing an ignition risk. Segments that are upstream from segments at risk and that cannot be switched to other circuits might still be in scope for PSPS.

SWITCHING PLAN DEVELOPMENT

SCE develops switching plans for all circuits in scope for each specific event, to determine whether circuit segments could be transferred to other circuits not in scope using field isolation devices. Customers can be switched either before or during events. In some cases, switching is not possible. For example, adjacent segments could also be in scope for PSPS, or the segment could be at the end of the circuit, reducing options for switching.

Switching plans can be used in some situations to remove critical infrastructure from circuits under consideration for shutoff (if the infrastructure is not located on a segment at immediate risk).

SCE PSPS TERMINOLOGY

California Public Utilities Commission (CPUC): California regulatory agency with oversight responsibilities for California's investor-owned utilities (IOUs).

Consequence score: Used to quantify risk in decision-making.

Emergency Operations Center (EOC): Command center for emergency management. For PSPS, SCE typically uses a virtual EOC based in Microsoft Teams.

Fire Climate Zone (FCZ): SCE has 14 Fire Climate Zones, which are areas with similar vegetation, weather, topography and fire history. These zones are helpful in relating weather and fuels with fire activity as these types of datasets are more useful when aggregated over larger areas.

Fire Potential Index (FPI): A formula using inputs on wind speed, humidity, fire potential and vegetation dryness to estimate fire risks.

High Fire Risk Area (HFRA): A region in our service area where the risk of significant wildfires is elevated. These areas are identified and monitored to inform decision-making. The map is reviewed annually and circuits can be added or removed.

Incident Management Team (IMT): Team structure to carry out PSPS and other emergency operations. Used by all government agencies and most leading utilities to ensure common terms, structures, processes and forms.

In-Event Risk Calculator: A decision-making tool that assesses and compares potential public safety risk (PSPS risk) and the benefits of de-energization (wildfire risk).

In scope: Circuits at risk are deemed to be in scope when they have a reasonable chance of de-energization.

Monitored circuit list (MCL): List of all in scope circuits including a specific timeframe for when they are expected to meet de-energization criteria.

Period of concern (POC): The timeframe when a circuit is forecast to meet de-energization criteria.

Post event report: CPUC-mandated report filed after the conclusion of each event and available for viewing on the CPUC website.

Urban conflagration: Urban conflagrations are destructive fires that spread from structure to structure in urban areas, rather than primarily through wildland fuels.

APPENDIX

CALCULATING FPI

FPI is calculated using the following inputs (Figure 5)

- **Wind speed:** Sustained wind velocity at 6 meters above ground level.
- **Dew point depression:** The dryness of the air, as represented by the difference between air temperature and dew point temperature at 2 meters above ground level.
- **Energy release component (ERC):** "The available energy (BTU) per unit area (square foot), within the flaming front at the head of a fire; reflects the contribution of all live and dead fuels to potential fire intensity."[10]
- **10-hour dead fuel moisture:** A measure of the amount of moisture in quarter-inch diameter dead fuels, such as small twigs and sticks.
- **100-hour dead fuel moisture:** A measure of the amount of moisture in 1- to 3-inch diameter dead fuels, i.e., dead, woody material such as small branches.
- **Live fuel moisture:** A measure of the amount of moisture in living vegetation.
- **Normalized Difference Vegetation Index (NDVI):** "Used to quantify vegetation greenness and is useful in understanding vegetation density and assessing changes in plant health."[11]

Dryness Level is a function of ERC and the 10-hour/100-hour dead fuel moisture time-lag.

Fuel loading modifier associated with low, moderate, and heavy fuel loading corresponding to 0.50, 0.75 and 1.00, respectively. This represents a measure of the amount of vegetation on the ground.

$$FPI = \left(\frac{DL}{LFM} + G\right) FLx + Wx$$

Moisture content of the living vegetation.

Degree of green-up of the annual grass based on the NDVI.

Weather component of the FPI, also known as the weather score, and references a lookup table of paired sustained wind speed and dew point depression values as in the figure below. The value range is 0 to 6.

Figure 5: *Fire Potential Index Equation*

FPI Weather Component (Wx)

Dew Point Depression	Wind Speed (mph) <=5	6-10	11-16	17-22	23-28	>=29
>=50	2	3	3	4	5	6
40-49	2	2	3	3	4	5
30-39	1	2	2	3	3	4
20-29	1	1	2	2	3	3
10-19	0	0	1	1	1	1
<10	0	0	0	0	0	0

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Online appendix (including previous drafts) is available at SCE.com/PSPSDecisionmakingAppendices

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