

April 15, 2026

Patrick Doherty, Program Manager
Performance Assessment Division
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street 20th Floor
Sacramento, CA 95814

BY ENERGY SAFETY E-FILING

SUBJECT: Southern California Edison Company's Response to Notice of Non-Performance (NON_PAD_SCE_AXS_20260128_0957)

Dear Mr. Doherty:

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the finding identified in the Notice of Non-Performance – **NON_PAD_SCE_AXS_20260128_0957** which SCE received on **March 18, 2026 (Notice)**, based on the Office of Energy Infrastructure Safety's (Energy Safety) field inspections conducted in SCE's service area on **January 28, 2026**. SCE appreciates Energy Safety's efforts to identify, communicate and work together to resolve potential wildfire risks.

If you have any questions, or require additional information, please contact Liz Leano at 626-302-3662 or Elizabeth.Leano@sce.com.

Sincerely,

//s//
Brandon Tolentino
Vice President of Wildfire and Business Resiliency
Southern California Edison

SCE Response

Finding:

Notice	#	Structures
NON_PAD_SCE_AXS_20260128_0957	1	1884993E

Summary of Findings:

Energy Safety’s Notice states that in implementing 2025 WMP initiative 8.1.3.1 - Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations (IN-1.1), SCE failed to validate the remediation of sagging communication down guy wire prior to closing the work order on Pole ID1884993E, Grid Hardening ID 414749115-1884993E at coordinates 34.2394618615618, -117.193960227401.

Energy Safety states that it “considers this non-performance to be in the Minor risk category.”¹

Response:

As explained below, SCE disagrees with the Notice’s finding that SCE did not perform in accordance with section 8.1.3.1 of SCE’s approved 2025 Wildfire Mitigation Plan (WMP).

Notification #414749115 on structure #1884993E was created in response to a sagging communication down guy owned by a third-party communication infrastructure provider (CIP), not SCE. General Order (GO) 95, Rule 18 provides the applicable remediation for SCE to perform when the equipment at issue belongs to a third-party communication company. Under General Order 95, Rule 18(A)(2), SCE was required to notify the third-party CIP of the condition, and the third-party CIP is responsible for remediating its communication down guy. Rule 18(A)(2) specifies that SCE’s required “remedial action” under these circumstances is to “transmit a single documented notice of identified potential violations to the communications company.”² As the Notice appears to acknowledge,³ SCE notified the CIP of the issue via email on July 9, 2025, and that

¹ Notice, p. 1.

² See General Order 95, Rule 18(A)(2).

³ See Notice, p. 7 (“SCE personnel apparently communicated the condition to a communications company, but has not confirmed that work was done to address the condition.”).

email to the CIP fulfilled SCE's remedial obligation under General Order 95, Rule 18(A)(2).

The Notice's citation to Figure 8-1a in SCE's 2025 WMP—a high-level distribution detailed inspections and remediations workflow diagram—does not support the finding of nonperformance in this instance. As explained above, SCE's required remediation under these circumstances is to transmit a single documented notice to the third-party CIP, which SCE completed.⁴ Neither GO 95 nor the workflow diagram in Figure 8-1a of SCE's 2025 WMP requires SCE to take additional measures to attempt to confirm that the third-party CIP performed its own obligations.

⁴ See SCE's 2023-2025 WMP (Nov. 6, 2024) at p. 757 ("A 'notify third party' notification occurs when SCE finds that a third party (either customer or a communication infrastructure provider) has created an issue that requires remediation on an SCE asset, most commonly a pole. Although SCE cannot force the third party to remediate, SCE notifies them of the outstanding issue.")