

October 9, 2025

Patrick Doherty, Compliance Program Manager
Compliance Assurance 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 Violation
CAD_SCE_SIS_20250710_1247

Dear Mr. Doherty:

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the finding identified in the Notice of Violation-CAD_SCE_SIS_20250710_1247 received on September 19, 2025 (Notice), based on the Office of Energy Infrastructure Safety's (Energy Safety) field inspections conducted in SCE's service area on July 10, 2025. SCE appreciates Energy Safety's efforts to identify, communicate and work together to resolve potential wildfire risks. The enclosed response describes corrective actions taken or planned by SCE to remedy the finding identified in the above notice and to prevent recurrence.

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

Sincerely,

//s//

Shinjini C Menon
Senior Vice President of System Planning & Engineering
Southern California Edison

SCE Response

While SCE is not requesting a written hearing for the finding addressed in this response, SCE reserves the right to identify the facts below and further explain its position in subsequent procedural stages and/or proceedings.¹ Although Energy Safety may refer certain issues to the California Public Utilities Commission for an enforcement action, the finding in this Notice does not support such referral.²

Finding: Completeness

Notice	Violation	Structures
CAD_SCE_SIS_20250710_1247	1	2227580E

Summary of Findings:

Energy Safety observed that in implementing 2024 WMP initiative 8.1.3.1 - Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations (IN-1.1), SCE failed to complete the remediation of avian protection on Pole ID 2227580E, Grid Hardening ID 410894941-2227580E at coordinates 33.472045, -117.214765. Energy Safety considers this completeness violation to be in the Minor risk category.

Energy Safety considers this completeness violation to be in the Minor risk category.³

¹ At the time that SCE received this Notice, Government Code Section 15475.4 anticipated a hearing process, which traditionally implies an in-person hearing affording parties the right to present evidence and examine witnesses.

² In the Notice, Energy Safety states that pursuant to Public Utilities Code section 8389(g), following receipt of SCE's response to this Notice and resolution of any disputes, this matter may be referred to the California Public Utilities Commission (CPUC) for its consideration of a potential enforcement action, as the CPUC deems appropriate. Notice, p. 2. The Notice discussed herein does not meet the requirement for Energy Safety referral for enforcement action to the CPUC based on the statutory requirements that Energy Safety referral be based on substantial compliance with WMPs. Energy Safety cites Public Utilities Code Section 8389(g) in support of a potential enforcement action. However, at the time that SCE received the Notice, Section 8389(g) only provided for a possible enforcement action where "an electrical corporation is not in compliance with its approved wildfire mitigation plan," which is inapplicable here.

³ Notice, p. 1.

Response:

SCE confirms that it completed remediation of the avian protection on structure ID 2227580E as reported. The avian protection on the transformer bushings on structure ID 2227580E was remediated on December 5, 2024. Photo evidence from a routine

inspection conducted on May 16, 2025, confirms the avian protection was secured on structure ID 2227580E.

During a subsequent inspection conducted by SCE's Field Operations team on September 24, 2025 in response to this Notice, the avian protection was verified to be properly secured and found to be in compliance with SCE's construction standards.

Please find photo evidence below from SCE's May 16, 2025 and September 24, 2025 inspections, documenting the avian protection in its secured condition.







Group: 2025 360-Inspections
Filename: OH-2227580E_20250516_26.jpg

Delivered By: Conekt2
Capture Date: 2025-05-16 10:57:53

Lat/Lon: 33.472106, -117.214783
Folder: D2513-0001_KnownAssets_2025051