

December 17, 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 Non-Performance NON_CAD_SCE_LOK_20250617_1137

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_CAD_SCE_LOK_20250617_1137, which SCE received on November 10, 2025 (**Notice**), based on the Office of Energy Infrastructure Safety's (Energy Safety) field inspections conducted in SCE's service area on June 17, 2025. 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//

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

SCE Response

Finding:

Notice	Deficiency #	Structures
NON_CAD_SCE_LOK_20250617_1137	1	4022820E

Summary of Findings:

Energy Safety's Notice states 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 installing wildlife covers on Pole ID 4022820E, Grid Hardening ID 409837801-4022820E at 35.98584646688619, - 118.9218473827965.

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

Response:

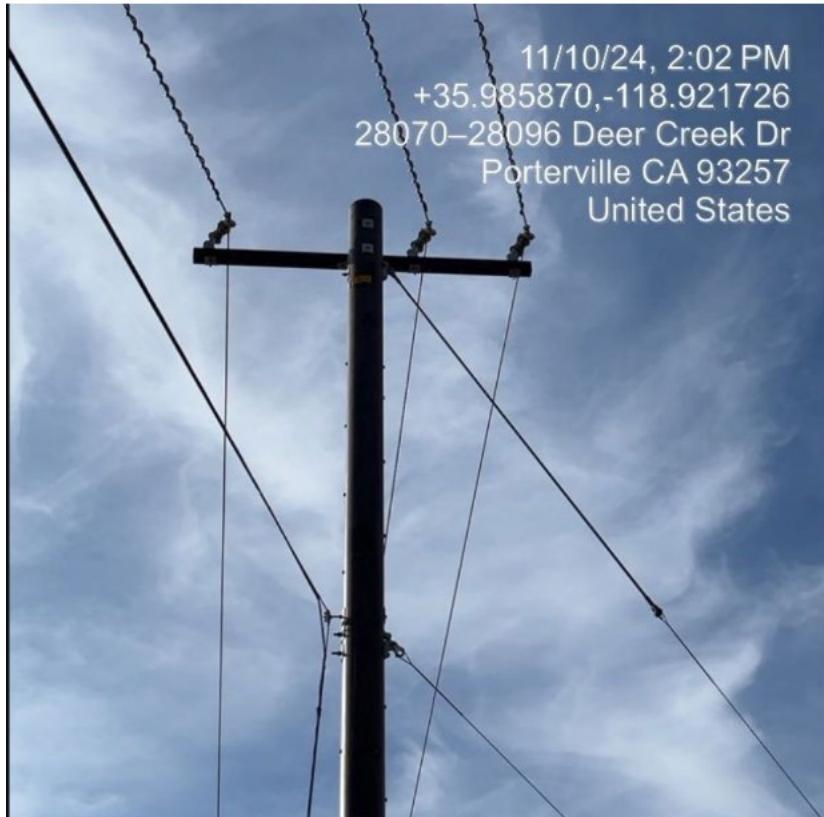
SCE disagrees with this Notice of Nonperformance for failure to install wildlife covers because covered conductor was installed at the location at issue, and wildlife covers were not required under SCE's construction standards when covered conductor is installed.

The subject notification (409837801) for structure ID 4022820E was created on January 12, 2019, as a Priority 3 notification to install a bird guard on bare conductor. At that time, Priority 3 notifications had no required due date. Structure 4022820E was later included in a grid hardening project, and covered conductor was installed on November 10, 2024. Per Section DC 535, Sheet 1 of 35 of SCE's Distribution Overhead Construction Standards (DOH), wildlife hoods were not required when covered

¹ Notice, p. 1.

conductor is installed because covered conductor mitigates the risk of avian contact. Installing covered conductor therefore obviated the need to install a bird guard.²

Photo of Covered Conductor Installation:



DOH DC 535

² Please note that the reference in the long text in the subject notification that "work was performed" and "complete" refers to the covered conductor installation. Please also note that the long text consists of internal notes intended for background and reference purposes only and may not reflect all steps taken to address a notification.



DC 535 Wildlife-Safe Power Line Construction

Scope DC 535.1 Wildlife-Safe Power Line Construction

1.0 General Information

These standards are intended to protect lines from wildlife by constructing sufficient phase-to-phase and phase-to-ground clearances and by installing approved protective materials on high voltage distribution lines and equipment. In addition, installing wildlife protection on all phases will mitigate other contact-related faults, such as incidental contact of trees and metallic balloons at the pole. Should it be determined at the time of design or construction that undertaking such efforts would compromise public or worker safety, reasonable efforts will be made to construct with the best possible clearances and/or protective materials. For questions or concerns regarding environmental requirements in specific areas or types of environmental risks, contact the Environmental Services Department by phone at (833) 723-2362 or via email at environmentalrequirements@sce.com.

Wildlife protection material is for incidental wildlife contact only. They are not rated for personal protection and should be treated as bare wires.

1.1 New poles, bare and covered conductor lines, equipment, apparatus, and pole replacements shall be constructed per this standard.

A. Standard Construction

- Horizontal phase-to-phase/ground separation of 36 inches and vertical phase-to-phase/ground separation of 36 inches (Measured center of pin to center of pin on a wood/composite arm) (see [Figure DC 535-1](#)).

For new construction and during maintenance work, wildlife protection material shall be used in bare wire and covered conductor systems. Spacing and covers shall be constructed per [Figure DC 535-13](#).

- Covered conductor systems will be an all-covered system. This includes exposed dead-ends, exposed connectors and splices. Apparatus terminations shall be covered as they would in bare wire systems, by utilizing the appropriate covers listed in [Table DC 535-1](#). See [CC 150](#) for additional details.



NOTE

Covered Conductor systems do not require use of wildlife hoods, wildlife hood extenders, and/or protective tubing.

- All overhead taps, leads, and jumper wires shall utilize covered conductors (that is, covered conductor or Protected ground wire used as equipment taps). If covered conductors cannot be utilized in a bare wire system, split-tubes may be used as an alternative option.
- See [Section 3.0](#) and [Section 4.0](#) for additional details on wildfire covers on terminations and various apparatus.
- All new overhead switches shall be inverted.

Approved by: 	Wildlife-Safe Power Line Construction	DC 535
Effective Date: 10-25-2024	What's Changed?	Sheet 1 of 35 DOH