SOUTHERN CALIFORNIA EDISON®
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Koko Tomassian, Compliance Program Manager
Compliance Assurance Division
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street 20th Floor
Sacramento, CA 95814

BY OEIS E-FILING

SUBJECT: Southern California Edison Company's Response to Notices of Defect - SCE ATJ_20211116-01, SCE ATJ 20211202-01, and SCE ATJ 20211208-01 (No Written Hearing Requested)

Dear Koko Tomassian:

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the findings identified in the Notices of Defect received on March 23, 2022 based on Energy Safety field inspections conducted in SCE's territory in November and December 2021. SCE also appreciates the Office of Energy Infrastructure Safety's (OEIS) 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 findings identified in the above notices and prevent recurrence.

If you have any questions, or require additional information, please contact Liz Leano at 626-302-3662 or Elizabeth.Leano@sce.com. SCE is looking forward to address findings where appropriate and work to support clarification of the inspection process as OEIS expands the geographic scope of its inspection program in 2022.

Sincerely,

//s//
Erik Takayesu
VP Asset Strategy and Planning
Southern California Edison

SOUTHERN CALIFORNIA EDISON COMPANY
INTRODUCTION

For the findings discussed in this response, SCE agrees to address each issue within the timeframe provided by Energy Safety, as explained in more detail below. To simplify the response, SCE has consolidated similar findings from multiple Notices of Defect (NOD) into a single response by type of finding. This response includes findings from the following NODs: SCE ATJ_20211116-01, SCE ATJ 20211202-01, and SCE ATJ 20211208-01.

As shown in the detail below, several of the findings identified by Energy Safety were previously identified by SCE field inspections and already have repair notifications in SCE's maintenance work management system. Regarding prevention of recurrence, SCE's field inspections (both ground and aerial) are a detective control used to identify items that need to be remediated. Additionally, SCE performs quality reviews of completed distribution Overhead Detail Inspections in High Fire areas using a risk-based approach, which includes higher levels of sampling in higher risk areas. These quality reviews help drive continuous improvement by identifying non-conformances with SCE standards, determining causes of non-conformance, and/or driving corrective actions to improve performance. If performance falls below certain thresholds, SCE will require corrective actions.

While SCE is not requesting a written hearing for the findings addressed in this response, SCE reserves the right to raise these points in subsequent procedural stages and/or proceedings.[1]

1) Although Energy Safety has the right to refer certain issues to the CPUC for an enforcement action, the findings in these Notices do not support referral.[2]

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[1] Government Code § 15475.4 anticipated a "hearing" process, which traditionally implies an in-person hearing affording parties the right to present evidence and examine witnesses. The statute establishes that Energy Safety is the successor to the Wildfire Safety Division at the Public Utilities Commission, which, notably, does not have a written hearing process. Rather, parties may request an in-person hearing to address contested issues of fact. In this instance, it seems logical to assume that the statutory intent of Government Code § 15475.4 was to establish an in-person hearing process, similar to Energy Safety's predecessor agency. While Energy Safety characterizes the process as an "appeal" in California Code of Regulations, Title 14, Division 17 (Emergency Regulation) § 29104, the statute affords electrical corporations a hearing. The Regulations should be expanded to allow the electrical corporations to request oral hearings when warranted.

[2] For each of the notices, Energy Safety includes language stating that "Pursuant to Public Utilities Code § 8389(g), following receipt of SCE's response to this NOD and resolution of any disputes, this matter may be referred to the California Public Utilities Commission (CPUC) for its consideration of potential enforcement action, as the CPUC deems appropriate." None of the notices referenced herein meets the requirement for OEIS referral for enforcement action to the CPUC based on the statutory requirements that OEIS referral be based on substantial compliance with WMPs. Energy Safety cites Public Utilities Code § 8389(g) in support of a potential enforcement action. However, Section 8389(g) provides for a possible enforcement action where "an electrical corporation is not in compliance with its approved wildfire mitigation plan." Public Utilities Code § 8386.1 further specifies that penalties shall be assessed for failure to *substantially* comply with a WMP.

2) SCE does not necessarily believe the findings addressed in the response support a Notice of Defect.[3]

[3] "Notices of defect" are defined as "identifying a deficiency, error, or condition increasing the risk of ignition posed by electrical lines and equipment requiring correction." California Code of Regulations, Title 14, Division 17 (Emergency Regulation) § 29302(b). SCE does not necessarily agree that all the findings addressed in this response demonstrate an increased ignition risk. SCE's response, and its agreement to remediate conditions identified by OEIS, shall not be construed as an admission that SCE believes a defect exists.

SCE Response

Finding: Bird Nest Within Dead-end Bolted Wedge Connector Cover

Notice	Finding #	Structures
NOD_SCE_ATJ_20211116-01	1	1922654E

Summary of Findings: "Pole numbered 1922654E has a bird nest within a dead-end bolted wedge connector cover. The primary purpose of an equipment cover is to prevent contact between the equipment and foreign objects. The presence of wildlife and nests inside a cover increases the risk of ignition if wildlife or wildlife-related debris contacts an energized portion of the circuit. This situation will also shorten the lifespan of the covered conductor installation. Energy Safety considers this defect to be in the Minor risk category."

Response: On April 4, 2022, SCE field personnel went to Pole ID 1922654E to review the concern. SCE did not observe the presence of a wildlife nest or debris inside any of the dead-end covers. Aerial and ground inspections were also conducted on July 23, 2021 and March 11, 2021, respectively and there was no wildlife nest or debris present. While SCE does not dispute the finding, as a general matter, given that SCE's inspection records prior to and subsequent to OEIS's inspection do not show evidence of a wildlife nest, such findings should not be considered a "defect" because this condition is normally captured during SCE's inspection process. It is possible for nests and debris to appear and resolve in between SCE's scheduled inspections. SCE's inspection surveys include assessment of wildlife nests in contact with energized components. If wildlife nests are found, SCE consults with district field supervisors or project general supervisors and/or Environmental group and may create a notification based on their assessment.

Finding: Three Splices Found on One Phase Single Span

Notice	Finding #	Structures
NOD_SCE_ATJ_20211208-01	3	4920022E

Summary of Findings: "Pole numbered 4920022E had three or more splices in a single-phase conductor. Energy Safety considers the presence of three or more splices along a single phase of conductor to be excessive and require assessment for potential corrective action. Splices are used to connect two strands of conductor. Excessive splicing is indicative of potential issues with electrical loading, physical weakening of the line, or a pattern of repeated failures. Therefore, a span with an excessive number of splices is an indicator of increased the risk of conductor failure and potential ignition. Energy Safety considers this defect to be in the Minor risk category."

Response: On April 6, 2022, SCE field personnel went to pole ID 4920022E to review the concern. SCE has recorded the above condition in SCE's Work Management System and will address the condition in accordance with Energy Safety's defect correction timeline.

Finding: Vegetation Touching Guy Wire Above Insulator

Notice	Finding #	Structures
NOD_SCE_ATJ_20211208-01	2	453043E

Summary of Findings: "Pole numbered 453043E had vegetation contacting guy wire above the insulator. Guy wires can cause wildfires if energized while in contact with vegetation. Energy Safety considers this defect to be in the Minor risk category."

Response: On April 6, 2022, SCE field personnel went to pole ID 453043E to review the concern. SCE has recorded the above condition in SCE's Work Management System and will address the condition in accordance with Energy Safety's defect correction timeline.

Finding: Down Guy Within Six Inches of 12kV Conductor

Notice	Finding #	Structures
NOD_SCE_ATJ_20211208-01	1	1008927E

Summary of Findings: "Pole numbered 1008927E showed a guy wire within six inches of a 12kV primary conductor. Energy Safety considers energized conductors that are in close radial proximity of a guy wire to be a potential ignition driver. Guy wires that may slap energized conductors may cause arcing, increasing an electrical corporation's ignition risk. Energy Safety considers this defect to be in the Moderate risk category."

Response: SCE had previously identified this condition in its work management system. SCE will address the condition in accordance with Energy Safety's defect correction timeline.

Finding: Conductor Shows Evidence of Birdcaging

Notice	Finding #	Structures
NOD_SCE_ATJ_20211202-01	1	4568486E

Summary of Findings: "Pole numbered 4568486E showed evidence of bird caging on one conductor. Bird-caging refers to the separation of the wires of a stranded conductor. When a conductor is not clamped, tensioned, or terminated properly, the outer wires can open spirally away from the center. Bird-caging on a supply conductor can weaken its strength and lead to a wire down event and ignition. Energy Safety considers this defect to be in the Minor risk category."

Response: On April 4, 2022, SCE field personnel went to pole ID 4568486E to review the concern. SCE field personnel did not observe any evidence of bird caging; however, there was evidence of a bend in the line that SCE will address in the timing outlined by Energy Safety.