SOUTHERN CALIFORNIA EDISON®
An EDISON INTERNATIONAL® Company

Erik Takayesu
VP Asset Strategy and Planning
erik.takayesu@sce.com

April 25, 2022

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 Notice of Violation - SCE ATJ 20211116-01, SCE ATJ 20211117-01, SCE ATJ 202111201-01, SCE EDC 20211116-01, SCE EDC 20211117-01, and SCE IAG 20211116-01 and Request for Written Hearing Under Government Code Section 15475.4 & California Code of Regulations, Title 14, Division 17 (Emergency Regulation) § 29104

Dear Koko Tomassian:

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the findings identified in the Notices of Violation - SCE ATJ 20211116-01, SCE ATJ 20211117-01, SCE ATJ 202111201-01, SCE EDC 20211116-01, SCE EDC 20211117-01, and SCE IAG 20211116-01 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.

Consistent with Government Code § 15475.4 & California Code of Regulations, Title 14, Division 17 (Emergency Regulation) § 29104, SCE requests written hearing on the following specific findings within these Notices of Violations - SCE ATJ 20211116-01 #1, SCE ATJ 20211117-01 #1, SCE ATJ 202111201-01 #1, SCE EDC 20211116-01 #1, SCE EDC 20211117-01 #1, and SCE IAG 20211116-01 #1.

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

SCE requests written hearing for the findings addressed in this response.[1] The bases for requesting written hearing are set forth in the individual responses below. In addition, SCE notes the following:

1) That SCE may have deviated from its own standards and protocols is not in and of itself a basis for a Notice of Violation or defect; such a deviation does not necessarily mean the requirements for such notices have been met under Government Code Sections 15474.2 or 15475.4 or California Code of Regulations, Title 14, Division 17 (Emergency Regulation) § 29302. For example, not adhering to internal construction or design standards should not necessarily be considered a basis for "violations" or "defects" (see SCE's responses regarding missing fiberglass guy strain insulators and vibration dampers).
2) 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]
3) SCE does not believe any of the findings addressed in the response support a Notice of Violation.[3]

---

[1] 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. 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 Section 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 NOV 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 these notices 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 PUC Section 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." PUC Section 8386.1 further specifies that penalties shall be assessed for failure to substantially comply with a WMP.

[3] "Notices of violation" are defined as "identifying non-compliance with an approved Wildfire Mitigation Plan or any law, regulation, or guideline within the authority of the Office." California Code of Regulations, Title 14, Division 17 (Emergency Regulation) § 29302(b). Energy Safety has not demonstrated how the findings addressed in this Response show "non-compliance with a WMP or any law, regulation or guideline with the authority of the office". "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). Although SCE does not necessarily agree that all the findings addressed in this response demonstrate an increased ignition risk, the findings at most should be characterized as "defects" rather than "violations".

SCE Response

Finding: Missing Vibration Dampers

Notice	Finding #	Structures
NOV_SCE_EDC_ 20211117-01	1	382960E, 732562H, 4315280E, 1401817E, 1401818E, 1500596E, 2091458E, 1147448E, 4881031E, 1441491E, 4434920E
NOV_SCE_ATJ_ 20211116-01	1	1922866E, 1922670E, 4477226E, 1922666E, 4477224E, 1922663E, 4477219E, 4477216E, 1922654E, 4476903E, 4429437E, 1922649E, 1922903E
NOV_SCE_IAG_ 20211116-01	1	4194272E, 4244431E, 1922865E, X11396E, 4477220E, 4477213E,1922868E,
NOV_SCE_EDC_ 20211116-01	1	4194273E, 4194270E, 4706494E, 1922867E, 1922864E, 4477212E, 4477225E, 1922664E, 4477223E, 4477222E, 4477218E, 4477214E, 4477211E, 1922653E, 4476901E, 1922869E,
NOV_SCE_ATJ_ 20211201-01	1	1121374E, 1219492E, 1219493E, 2093435E, 4622656E, 1309679E, 2058723E, 4191310E, 4147040E, 2139296E, 4278547E, 4278546E, 4278545E, 676783E, 4373743E, 4373744E, 4373745E
NOV_SCE_ATJ_ 20211117-01	1	732561H, 984012E, 4315279E, 1401819E, 2170090E, 4651152E, 1437878E, 1147445E, 1159657E, 2168563E, 4217177E

Summary of Findings: “Poles…had covered conductor installed but failed to install vibration dampers. Energy Safety considers this violation for failure of adhering to protocol to be in the Minor risk category.”

Response: SCE does not agree with the findings identified by Energy Safety regarding vibration dampers. “Vibration dampers” are hardware attached to the conductors to inhibit conductor abrasion and fatigue from vibration. SCE undertook further assessment of vibration dampers for covered conductor application in 2020. The assessment involved working with manufacturers to develop vibration damper design for covered conductors and evaluating and testing the new vibration damper design. SCE published vibration damper design and construction standards for covered conductor application in the fourth quarter of 2020 focusing on improving installation

that may be susceptible to Aeolian vibration. The following requirement for vibration dampers was put into effect on October 30, 2020 for covered conductor:

- Light loading areas (3,000 ft. and below in elevation)
    - All full tension spans (dampers are not required in reduced tension spans)
- Heavy loading areas (above 3,000ft.)
    - If conductor is 336 (30/7) ACSR Covered Conductor
    - If vibration is observed through inspections

Due to a significant shortage of dampers from SCE's supplier, SCE issued an interim deviation from the Standards. The initial deviation was published and made effective May 18, 2021. The purpose of vibration dampers is to prevent long-term degradation of covered conductor, potentially shortening its useful life. Accordingly, in the *near term*, not installing vibration dampers does not pose any general or wildfire safety risks. As dampers become available from SCE's supplier, SCE plans to analyze these installations and retrofit vibration dampers in high or medium vibration susceptibility areas.

SCE communicated these issues to Energy Safety during SCE's supplemental response to Energy Safety-DR-030 submitted on November 19, 2021 and the Biweekly Meeting discussions on November 9, 2021 and February 15, 2022. Our responses and discussions reflect that we have been working to address the vibration dampers that were not in scope (prior to October 2020) or where we experienced supply chain issues that impeded our ability to install the vibrations dampers as part of our covered conductor installation process and therefore should not be subject to a violation.

Further information for some of the structures is included below:

Structures 2091458E, 1147448E, 1121374E, 4278547E, 4278546E, 4278545E, 4651152E, 1437878E, and 1147445E were all completed after the bulletin was published. Therefore, SCE appropriately followed the bulletin guidelines when these structures were constructed.

SCE's records and field validation indicate bare wire is present on structure 1922903E and therefore is not required to adhere to the covered conductor vibration damper standard.

Currently, the work orders for structures 676783E, 4373743E, 4373744E, and 4373745E are still open and these structures are not considered field complete. Consequently, the bulletin guidelines apply. Though included in SCE's 2021-Q1 and 2021-Q2 quarterly data reports (QDRs), they did not accurately reflect where SCE had actually installed covered conductor. The covered conductor data discrepancies were due primarily to an issue identified when translating covered conductor point spatial data, which is how SCE tracks and records its work, to line spatial data, which is how Energy Safety requests this information.