

May 23, 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 IAG 20211117-01, SCE IAG 20211117-02, SCE IAG 20211117-03, SCE IAG 20211117-04, SCE IAG 20211117-05, SCE CAC7 20220224-01, and SCE MYU 20220224-01 (Request Written Hearing)

Dear Koko Tomassian:

Southern California Edison Company (SCE) appreciates the revisions to Notices of Violation - Notices of Violation - SCE IAG 20211117-01, SCE IAG 20211117-02, SCE IAG 20211117-03, SCE IAG 20211117-04, SCE IAG 20211117-05, SCE CAC7 20220224-01, and SCE MYU 20220224-01 received on April 22, 2022 based on Energy Safety and their compliance consultant (Green Grid) field inspections conducted in SCE's territory in November and December 2021 and February 2022. 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 IAG 20211117-01 #1, SCE IAG 20211117-02 #1, SCE IAG 20211117-03 #1, SCE IAG 20211117-04 #1, SCE IAG 20211117-05 #1, SCE CAC7 20220224-01 #1, and SCE MYU 20220224-01 #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
SVP 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 be considered “violations” or “defects” (see SCE’s responses to the missing 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.¹
- 3) SCE does not believe any of the findings discussed in the response support a Notice of Violation.²

¹ 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.

² “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
SCE_IAG_ 20211117-01	1	382961E, 1603388E, 4920630E, 2170089E
SCE_IAG_ 20211117-02	1	946809E, 4651151E, 946808E
SCE_IAG_ 20211117-03	1	1147447E, 1147443E, 4831822E
SCE_IAG_ 20211117-04	1	X6067E
SCE_IAG_ 20211117-05	1	4205199E
SCE_CAC7_ 20220224-01	1	1896712E, 1896711E
SCE_MYU_ 20220224-01	1	1896709E, 1896708E

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 946809E, 4651151E, 946808E, 1147447E, 1147443E, and 4831822E were field completed with covered conductor after the interim deviation was published. Therefore, SCE appropriately followed the interim deviation guidelines when these structures were constructed.