

June 10, 2022

Koko Tomassian, Compliance Program Manager **BY ENERGY SAFETY E-FILING**
Compliance Assurance Division
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street 20th Floor
Sacramento, CA 95814

SUBJECT: Southern California Edison Company's Response to Notice of Violation
 - SCE GCA 20211116-01 (No Written Hearing Requested)

Dear Koko Tomassian:

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the finding identified in the Notice of Violation - SCE GCA 20211116-01 received on May 11, 2022 based on Energy Safety field inspections conducted in SCE's service area in November 2021. SCE appreciates the Office of Energy Infrastructure Safety's (Energy Safety) 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 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 finding where appropriate and work to support clarification of the inspection process as Energy Safety expands the geographic scope of its inspection program in 2022.

Sincerely,

//s//
Shinjini C Menon
VP Asset Management & Wildfire Safety
Southern California Edison

SOUTHERN CALIFORNIA EDISON COMPANY INTRODUCTION

For the finding discussed in this response, SCE addressed this issue immediately, as explained in more detail below.

SCE has corrected/remediated this finding. Regarding prevention of recurrence, SCE's field inspections are a detective control used to identify items that need to be remediated. Additionally, SCE is performing quality control reviews of completed vegetation management grids 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 finding 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 finding in this Notice does not support referral.²

1 Government Code Section 15475.4 anticipates 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 notice, 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." 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 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.

SCE Response

Finding: Palm Frond Contact

Notice	Finding #	Structures
NOV_SCE_GCA_20211116-01	1	1473452E

Summary of Finding: “A queen palm frond was found in contact with conductors near pole 1473452E. Energy Safety considers this violation to be in the **severe** category due to the nature of increased ignition risk from vegetation contact with conductors.”

Response: Once SCE was notified by Energy Safety that the tree was in contact with an energized conductor it was remediated (topped and killed) in approximately 24 hours. The red arrow in the photo below shows that only the stem of the palm is remaining, which will prevent new fronds from growing.

1473452E Post Trim

