

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 Defect -
SCE GCA 20211209-01 (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 Defect - SCE GCA 20211209-01 received on May 11, 2022 based on Energy Safety field inspection conducted in SCE's service area in December 2021. SCE also 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 agrees to address each issue within the timeframe provided by Energy Safety, as explained in more detail below.

This finding identified by Energy Safety was 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 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 these Notices do not support referral.²
- 2) SCE does not necessarily believe the finding addressed in the response support a Notice of Defect.³

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 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 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.

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

SCE Response

Finding: Danger tree present

Notice	Finding #	Structures
Notice of Defect SCE_GCA_ 20211209-01	1	4748029E

Summary of Finding: “Danger Tree present near SCE pole numbered 4748029E. Energy Safety considers this defect to be in the minor risk category due to dying tree foliage, exposed roots, and location on an uphill slope above SCE assets.”

Response: SCE had previously recorded this condition in its Work Management System and on January 10, 2022 SCE removed the tree, see photos below.


Before

80405268-114, 12-24, Fir

Heavy Trees

80405268-114, 12-24, Fir

Control Number	80405268-114
180-day Expiration Date	January 14, 2022
Expiration Date with Constraints	February 13, 2022



The 'Before' section displays a screenshot of a work management system. It includes a search bar with the text '80405268-114, 12-24, Fir', a category 'Heavy Trees', and a list of items with details such as 'Control Number', '180-day Expiration Date', and 'Expiration Date with Constraints'. Below the list are three photographs of a large tree near a utility pole. A red arrow points to the tree in the middle photo.

Regulation) § 29302(b). SCE does not necessarily agree that all the finding addressed in this response demonstrate an increased ignition risk. SCE's response, and its agreement to remediate conditions identified by Energy Safety, shall not be construed as an admission that SCE believes a defect exists.


After



80405268-114, 12-24, Fir

Heavy Trees

80405268-114, 12-24, Fir

Tree Crew Status	Complete
Tree Removal	
Buck & Slash	Yes
Chip & Haul	Yes
Log Disposal	Yes
Leave Wood?	No
Work Completed Date	• January 10, 2022
Photos of Completed Work	
Work Type Completed	• Remove
Crew Comments	
Foreman Name	Eliziel Cornejo
Billing/Invoice Code	D40MOWD106778