

July 15, 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 Notices of Defect -
SCE GCA 20220404-01 and SCE GCA 20220412-01 Revised (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 – SCE GCA 20220404-01 and SCE GCA 20220412-01 Revised, received on June 15, 2022 based on Energy Safety field inspection conducted in SCE's service area in April 2022. 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 findings 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 addressing the findings where appropriate and working 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 findings discussed in this response, SCE either has already addressed or 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 GCA 20220404-01 and SCE GCA 20220412-01 Revised.

As shown in the detail below, one finding identified by Energy Safety was previously identified by SCE field inspections and already had a repair notification in SCE's maintenance work management system. Regarding prevention of recurrence, SCE's vegetation pre-inspections, hazard tree assessments, and high fire risk informed inspections are detective controls used to identify issues 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 requires 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

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.

- 2) SCE does not necessarily believe all 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 Energy Safety, shall not be construed as an admission that SCE believes a defect exists.

SCE Response

Finding: Danger tree present

Notice	Finding #	Structures
Notice of Defect SCE_GCA_ 20220404-01	1	710167E

Summary of Finding: “Danger Tree present near SCE pole numbered 710167E. 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: This condition was previously identified in SCE’s work management system and on 07/05/22 SCE removed the subject tree, see photos below.



Finding: Vegetation Near Supply Conductor

Notice	Finding #	Structures
Notice of Defect SCE_GCA_ 20220412-01 Revised	1	4495329E
Notice of Defect SCE_GCA_ 20220412-01 Revised	3	1603964E

Summary of Findings: “Vegetation was breaking the minimum clearance distance from conductors. Energy Safety considers vegetation breaking minimum clearance requirements as a Moderate defect.”

Response: On 07/01/2022, SCE pruned the Oak limb for greater radial clearance from conductor at structure 4495329E, see photo below. As mentioned above, SCE is continuing to improve its vegetation management and quality control activities to help prevent recurrence.

On 06/27/2022, SCE removed the vine from structure 1603964E, see photo below.



Finding: Vegetation contacting guy wire above insulator

Notice	Finding #	Structures
Notice of Defect SCE_GCA_ 20220412-01 Revised	2	1603964E

Summary of Findings: “Pole numbered 1603964E had vegetation (vine) contacting guy wire above the insulator. Energy Safety considers this risk to be in the Minor category.”

Response: On 06/27/2022, SCE removed the vine from structure 1603964E contacting guy wire above insulator, see photo above.