

August 22, 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 ATJ 20220406-01, SCE ATJ 20220414-01, and SCE ATJ
20220622-01¹

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 ATJ 20220406-01, SCE ATJ 20220414-01, and SCE ATJ 20220622-01 received on July 22, 2022 based on Energy Safety field inspection conducted in SCE's service area in April and June 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 address the findings 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

¹Findings addressed by Notices: SCE ATJ 20220406-01 #1, SCE ATJ 20220414-01 #1 and #2, and SCE ATJ 20220622-01 #1, #2, and #3.

SOUTHERN CALIFORNIA EDISON COMPANY INTRODUCTION

For the findings discussed in this response, SCE agrees to address each issue within the timeframe provided by Energy Safety, as explained in more detail below.

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-informed 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 findings addressed in this response, SCE reserves the right to raise these points in subsequent procedural stages and/or proceedings.²

- 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.³
- 2) SCE does not necessarily believe the findings addressed in the response support a Notice of Defect.⁴

² 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.

³ Energy Safety includes language in this Notice 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." This Notice 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 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.

⁴ "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: Avian Protection Cover Loose

Notice	Finding #	Structures
NOD SCE ATJ 20220406-01	1	4719578E

Summary of Finding: “Pole number 4719578E had a triangular wildlife guard that was dislodged and hanging from the crossarm. Energy Safety considers this defect to be in the Minor risk category.”

Response: SCE had previously identified this condition in its work management system, and it will be addressed within the prescribed timeframe.

Finding: Loose/Missing Connector Cover

Notice	Finding #	Structures
NOD SCE ATJ 20220414-01	1	4483794E

Summary of Finding: “Pole numbered 4483794E had a dead-end cover that was upside down and did not have anti-rotational clip installed.”

Response: SCE agrees the condition exists as identified by Energy Safety and will be added to SCE’s work management system for corrective action within the prescribed timeframe.

Finding: Missing Anti-rotational Clip

Notice	Finding #	Structures
NOD SCE ATJ 20220414-01	2	4483794E

Summary of Finding: “Pole numbered 4483794E showed six dead end covers not having anti-rotational clips. Energy Safety considers these findings to be in the Minor risk category.”

Response: SCE agrees the condition exists as identified by Energy Safety, which will be added to SCE’s work management system for corrective action within the prescribed timeframe.

Finding: Loose Anchor/Span Guy

Notice	Finding #	Structures
NOD SCE ATJ 20220622-01	1, 2	2344930E 4003373E

Summary of Findings: “Pole numbers 2344930E and 4003373E had loose down guy wires and span guy wires. Energy Safety considers these defects to be in the Minor risk category.”

Response: SCE agrees the two condition exists as identified by Energy Safety and will be added to SCE’s work management system for corrective action within the prescribed timeframe.

Finding: Buried Anchor Guy

Notice	Finding #	Structures
NOD SCE ATJ 20220622-01	3	1564552E 4003373E

Summary of Findings: “Pole numbered 1564552E and 4003373E had buried guy anchors. Energy Safety considers this defect to be in the Minor risk category.”

Response: SCE agrees the condition exists as identified by Energy Safety for pole 1564552E has been recorded in SCE’s work management system and will be addressed in accordance with OEIS defect correction timeline.

The condition for pole 4003373E was remediated on August 4, 2022, see photos below.

