

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 Notice of Violation
- SCE ATJ 20220405-01, SCE ATJ 20220406-01, SCE ATJ 20220411-
01, and SCE ATJ 20220420-01¹ (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 Notices of Violation - SCE ATJ 20220405-01, SCE ATJ 20220406-01, SCE ATJ 20220411-01, and SCE ATJ 20220420-01 received on July 22, 2022 based on Energy Safety field inspections conducted in SCE's service area in April 2022. 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

¹Findings addressed by Notices: SCE ATJ 20220405-01 #2, SCE ATJ 20220406-01 #2, and #3, SCE ATJ 20220411-01 #1, #2, and #3, and SCE ATJ 20220420-01 #1, #2, and #3. The additional findings are addressed in SCE's response to NOV's that are subject to a request for written hearing.

SOUTHERN CALIFORNIA EDISON COMPANY INTRODUCTION

For the findings discussed in this response, SCE agrees to address certain issues 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 Violations (NOV) into a single response by type of finding. This response includes findings from the following NOVs: SCE ATJ 20220405-01, SCE ATJ 20220406-01, SCE ATJ 20220411-01, and SCE ATJ 20220420-01.²

As shown in the detail below, SCE will correct/remediate certain findings. 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 is performing quality control reviews of completed construction 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.³

Although Energy Safety has the right to refer certain issues to the CPUC for an enforcement action, the findings in this Notice do not support referral.⁴

² This response addresses the following NOV findings: SCE ATJ 20220405-01 #2, SCE ATJ 20220406-01 #2, and #3, SCE ATJ 20220411-01 #1, #2, and #3, and SCE ATJ 20220420-01 #1, #2, and #3. The additional findings are addressed in SCE's response to NOVs that are subject to a request for written hearing.

³ 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.

⁴ Energy Safety includes language in the notices 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 notices discussed herein do 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: Loose/Missing Connector Cover

Notice	Finding #	Structures
NOV SCE ATJ 20220405-01	2	4477480E 4843041E
NOV SCE ATJ 20220406-01	2	4362869E

Summary of Findings: “Energy Safety observed structure numbered 4477480E that did not have bolted wedge connector cover Installed and structure numbered 4843041E had a split open pothead cover.” “Energy Safety observed structure numbered 4362869E that showed a pothead cover on the ground next to the structure with an uncovered splice on one phase of covered conductor.” Energy Safety considers these findings to be in the Minor risk category.

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

Finding: Missing Anti-rotational Clip

Notice	Finding #	Structures
NOV SCE ATJ 20220406-01	3	4477345E 4465129E

Summary of Finding: “Pole numbered 4477345E and 4465129E did not have anti-rotational clips installed in dead-end covers.” 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: Covered Conductor Data Accuracy

Notice	Finding #	Structures
NOV SCE ATJ 20220411-01	1	683849E

Summary of Finding: “Per SCE's 2021-Q2 quarterly data report (QDR), covered conductor was installed and terminated one structure over from structure numbered 683849E. However, upon inspection, it was found that covered conductor work terminated at this structure. Energy Safety considers this violation for data accuracy to be in the Minor risk category.”

Response: On March 14, 2022, SCE submitted 2021 covered conductor (CC) point data to Energy Safety. The point data included four quarter layers, to reflect SCE’s 2021 CC field installations.

SCE validated that the data submitted to Energy Safety does not include structure number 683849E. After further analysis it was confirmed that the work order design called for CC to be installed between structures 683848E and 683849E.

SCE will reevaluate how data is collected for completed CC work and will modify its processes for identifying structures impacted by covered conductor installation prior to submitting future QDR data sets.

Finding: Missing Fuse Cover

Notice	Finding #	Structures
NOV SCE ATJ 20220420-01	1	4346696E

Summary of Finding: "Pole number 4346696E had a fuse cover that fell off and was found approximately 50 feet from the pole. Energy Safety considers this a violation for failure of adhering to protocol and in the Minor risk category."

Response: SCE agrees the condition existed as identified by Energy Safety, which has already been corrected in the field on August 1, 2022. Please see photo below reflecting the corrected condition.

STR 4346696E FUSE COVER INSTALLED



Finding: Missing Anti-rotational Clip

Notice	Finding #	Structures
NOV SCE ATJ 20220420-01	2	4071366E

Summary of Finding: “Pole numbered 4071366E did not have an anti-rotational clip installed in a dead-end cover.” Energy Safety considers these findings to be in the Minor risk category.

Response: SCE agrees the condition existed as identified by Energy Safety, which has already been corrected in the field on August 1, 2022. Please see photos below reflecting the corrected condition.

**STR 4071366E ANTI ROTATION CLIPS INSTALLED
JUMPER RE-ROUTED TO CORRECT POSITION**



Finding: Incorrect Connection/Tap Configuration

Notice	Finding #	Structures
NOV SCE ATJ 20220420-01	3	4071366E 4135843E

Summary of Findings: “Poles numbered 4071366E and 4135843E had jumpers not connected in the direction that the conductor was routed. Energy Safety considers this violation for failure of adhering to protocol to be in the Minor risk category.”

Response: SCE agrees the conditions existed as identified by Energy Safety, which have already been corrected in the field on August 1, 2022.

Please see photos above for 4071366E reflecting the corrected conditions.

Please see photo below for 4135843E reflecting the corrected conditions.

STR 4135843E JUMPER RE-ROUTED TO CORRECT POSITION

