

May 03, 2024

Patrick Doherty, Compliance Program Manager
Compliance Assurance Division
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street 20th Floor
Sacramento, CA 95814

Docket # 2023-NOV

SUBJECT: Southern California Edison Company's Response to Notice of Violation
- SCE CAC12_20231213_0848

Dear Mr. Doherty:

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the finding identified in the Notice of Violation – SCE CAC12_20231213_0848 received on April 05, 2024 (Notice), based on Energy Safety field inspections conducted in SCE's service area in December 2023. 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 to prevent recurrence.

If you have any questions, or require additional information, please contact Liz Leano at 626-302-3662 or Elizabeth.Leano@sce.com.

Sincerely,

//s//

Shinjini C Menon
Senior Vice President of System Planning & Engineering
Southern California Edison

SCE Response

While SCE is not requesting a written hearing for the finding addressed in this response, SCE reserves the right to identify these facts and further explain its position in subsequent procedural stages and/or proceedings.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 such referral.²

Finding: Failure to Install Covered Conductor

Notice	Finding #	Structures
SCE_CAC12_20231213_0848	1	4679694E

Summary of Finding: “Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.1 - Covered Conductor Installation, Southern California Edison Company failed to install covered conductor on pole ID 4679694E at coordinates 34.0275893802089, -117.138890036749. Energy Safety considers this violation for failure to complete the initiative to be in the Minor risk category.”

Response:

SCE erroneously reported that covered conductor was installed at the particular location identified by Energy Safety because of a discrepancy in the specific work order associated with the relevant structure. The relevant work order covered a total of 0.29 circuit miles of covered conductor spanning six different structures. Although covered conductor was installed on five of those six structures, covered conductor was not installed on the last of the six structures. Given the discrepancy in the particular work order explained above, SCE has validated that 0.14 circuit miles as opposed to 0.29 circuit miles of covered conductor were installed on the structures included in the work order, for a difference of 0.15 circuit miles.

SCE plans to install covered conductor on the structure identified in the Notice by March 2025 within the required timeframe.

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.

² In the Notice, Energy Safety states that pursuant to Public Utilities Code section 8389(g), following receipt of SCE’s response to this Notice 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. Notice, p. 2. 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 Public Utilities Code Section 8389(g) in support of a potential enforcement action. However, Section 8389(g) only provides for a possible enforcement action where “an electrical corporation is not in compliance with its approved wildfire mitigation plan.” Public Utilities Code Section 8386.1 further specifies that penalties shall be assessed for failure to substantially comply with a WMP.