

May 15, 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_CAC15_20231219_0851

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_CAC15_20231219_0851 received on April 19, 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 proceedings¹. 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 referral².

Finding: Failure to achieve required clearance

Notice	Finding #	Structures
SCE_CAC15_20231219_0851	1	1248323E

Summary of Finding: “Energy Safety observed that in implementing 2023 WMP initiative number 8.2.3.3.1 – Expanded Clearance, Southern California Edison Company failed to adhere to a required protocol for vegetation clearance near primary conductors, near pole ID 1248323E at coordinates 33.9724233305095, -116.992083439283. Energy Safety considers this violation for failure to adhere to protocol to be in the Minor risk category.

Response:

SCE has addressed the issue, see actions taken:

SCE received notification of the 12/19/23 Energy Safety finding on 4/19/24.

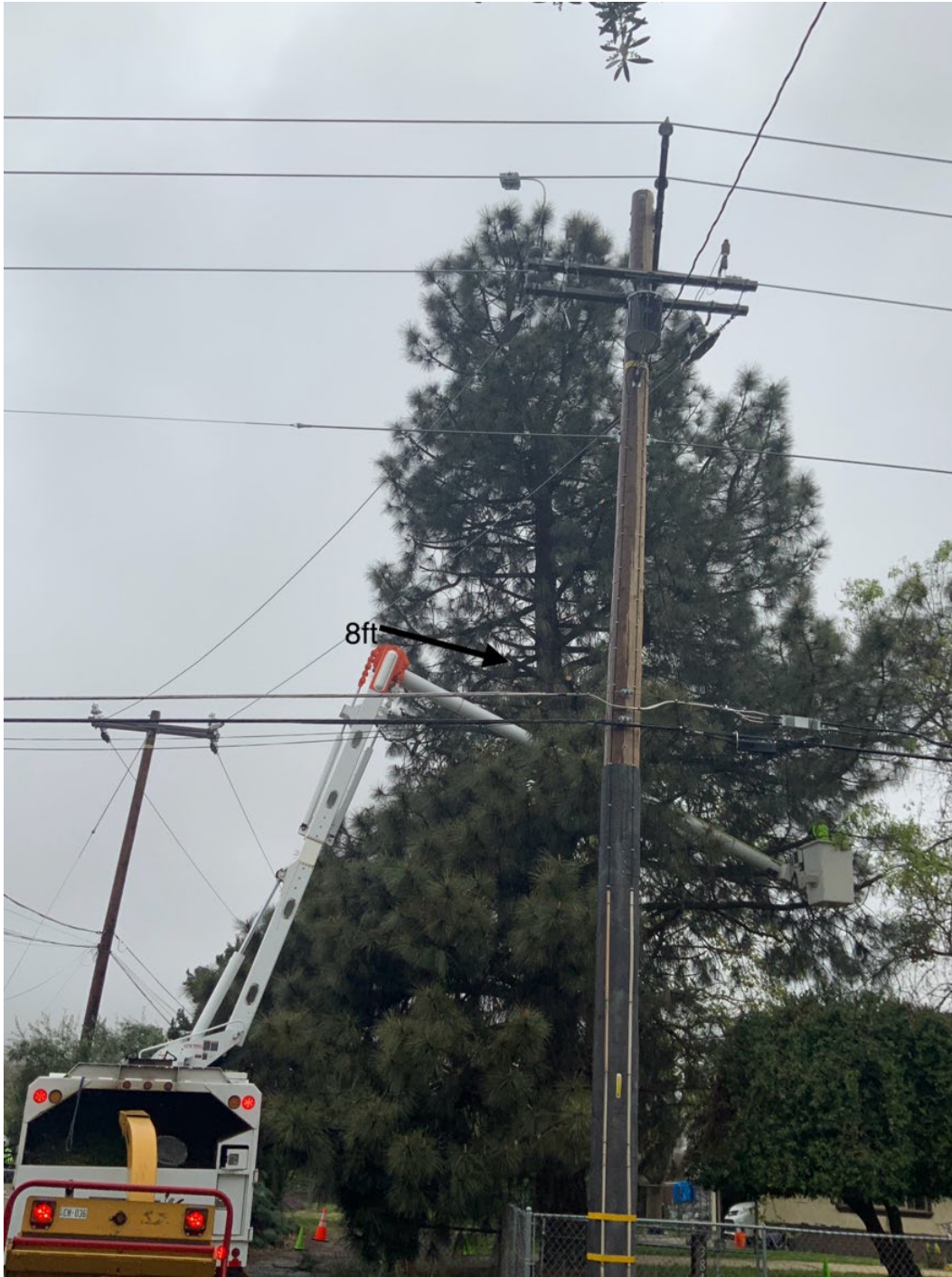
On 4/22/24, SCE dispatched a Vegetation Management Senior Specialist (SSP) who is an ISA Certified Arborist to review the status of the tree. The SSP confirmed the tree had approximately 3 feet of clearance. The tree was last trimmed by SCE on 6/2/2023 and clearance achieved was RCD (minimum 4 feet) plus expected tree growth to maintain clearance for up to 12 additional months. It should also be noted that this is a sensitive customer who typically only allows minimal prunes to be performed on his property.

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.

On 4/24/24, the SCE SSP met with the homeowner and received approval to trim the tree to an enhanced clearance of 8 feet beyond the conductors. Customer would not allow additional clearance. The minimum clearance required per regulation is 4 feet.

On 4/26/24, trimming was performed and achieved a clearance of 8 feet to the conductors. Please see photographs of tree trimming crews performing trimming on 4/26/24.



Tree Trimming Crews Performing Trimming on 4/26/24



Photograph showing tree limbs removed on 4/26/24



Post trim clearance established at 8 ft