

Docket #: 2024-IE

August 30, 2024

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

SUBJECT: Southern California Edison Company's Comments on the 2023 Wildfire Mitigation Plan Independent Evaluator Annual Report on Compliance

Dear Program Manager Doherty:

Pursuant to the Office of Energy Infrastructure Safety's ("Energy Safety") July 30, 2024 notice inviting comments on the 2023 Wildfire Mitigation Plan ("2023 WMP") Independent Evaluator ("IE") Annual Reports on Compliance, Southern California Edison Company ("SCE") submits the following comments on the IE Annual Report on Compliance ("IE Report") prepared by NuConsult Services, LLC ("NuConsult"), which was published on July 30, 2024.

Introduction

This IE review cycle is the first time that NuConsult has participated as an independent evaluator of an electrical corporation's WMP, and SCE appreciates the significant effort required of the NuConsult team to conduct this extensive review within the allotted timeframe. The IE concludes that "SCE has not only met but exceeded several of their target goals for field verifiable initiatives, demonstrating a strong commitment to wildfire mitigation."¹

Regarding the review of costs incurred to implement SCE's 2023 WMP, the IE concludes that the "information reviewed by the IE indicates that SCE did appropriately allocate, and release funds as approved per the terms of the approved 2023 WMP."² The IE also determines that "SCE has developed and implemented QA/QC programs to ensure consistent, high-quality execution of wildfire mitigation measures across its operations and initiatives, whether undertaken by SCE staff or contractors."³

¹ IE Report, p. 60.

² IE Report, p. 31.

³ IE Report, p. 55.

Despite these well-supported conclusions, the first-time IE Report prepared by NuConsult contains statements that exceed the scope of the IE review, makes certain erroneous findings, and speculates regarding the effectiveness of SCE’s WMP initiatives and processes.

SCE’s comments focus on correcting inaccuracies and erroneous findings in the IE Report. SCE respectfully requests that Energy Safety consider these comments when it evaluates SCE’s compliance with its 2023 WMP.

The Annual Report on Compliance Should Focus on SCE’s Compliance with Its 2023 WMP Rather than Inquiries that Are Unrelated to a Compliance Assessment

The IE Report contains certain unsupported statements that the IE itself acknowledges are outside the scope of its review,⁴ and those statements should not be the focus of the assessment of SCE’s compliance with its 2023 WMP. By statute, the IE is tasked with assessing an electrical corporation’s “compliance with its plan.”⁵ The compliance assessment includes verifying completion of WMP initiatives and determining “whether the electrical corporation failed to fund any activities included in its plan.”⁶ As the IE acknowledges, “[p]rogram effectiveness is not within the scope of this review.”⁷

Despite its acknowledgement that the effectiveness of initiatives in reducing wildfire risk is not within the scope of the IE’s compliance review, the IE Report repeatedly and erroneously opines on the “mitigation effectiveness of initiatives”⁸ and makes recommendations that are unrelated to the assessment of SCE’s compliance with its 2023 WMP. For example, the IE Report contains unsupported assertions about whether the IE unilaterally deems risk reduction goals to have been satisfied,⁹ opines without factual support on whether equipment design changes are likely to be beneficial to ratepayers,¹⁰ and offers unsolicited recommendations about how SCE should reallocate funding for WMP initiatives.¹¹

These assertions are outside the scope of work detailed in Section 3 of Energy Safety’s January 18, 2024, Request for Qualifications (RFQ) for independent evaluators which details the proper

⁴ See, e.g., IE Report, pp. 4, 9, 10, 11, 26, 27, 30, 31, 41.

⁵ Public Utilities Code § 8386.3(c)(2)(B)(i).

⁶ *Id.*

⁷ IE Report, p. 4.

⁸ IE Report, p. 9.

⁹ IE Report, p. 31 (listing criterion of “risk reduction deemed satisfied” as part of assessment of activity funding).

¹⁰ IE Report, p. 10 (“It is of note that the change from a pad mounted to a pole top conversion by SCEs [sic] own description is likely to be less beneficial to rate payers.”).

¹¹ IE Report, p. 45 (“it is recommended that a portion of the savings be used to have an independent third party assess the effectiveness of the vegetation inspections”).

parameters of the IE ARC. Moreover, during the IE review process, SCE did not receive data requests related to these unsubstantiated assertions and did not have an opportunity to address them before the final IE Report was published.

Consistent with the applicable statute, Energy Safety's RFQ, and by the IE's own statements in the IE Report, the IE's commentary on the purported *mitigation effectiveness* of SCE's WMP initiatives is outside the scope of this *compliance* review and should be given no weight when Energy Safety assesses SCE's compliance with its 2023 WMP.

Comments on the IE's Findings Relating to Completion of 2023 WMP Initiatives

The IE Report makes certain findings for "initiatives that the IE found were not completed per the plan, either because the IE was unable to document of [sic] completion the item, or because the plan was not clear."¹² Contrary to the IE's findings and consistent with SCE's own Annual Report on Compliance, SCE maintains that it met the target for all but 3 of its 2023 WMP initiatives.¹³ Below, SCE addresses the IE's findings for initiatives that are erroneously included in the list of initiatives the IE did not verify as completed.

SH-10 Tree Attachment Remediation

The Tree Attachment Remediation initiative was completed in 2023, and the IE's inclusion of this initiative in its list of findings is erroneous. As noted in the IE Report, SCE reported completion of 560 tree attachment remediations, more than 150 remediations above the target.¹⁴ The only reason that the IE offers to support its finding is that two poles did not appear to be fire wrapped.¹⁵ However, SCE explained to the IE that fire wrap is only required when installing a new structure to house equipment, and that SCE may use an existing pole that is not fire-wrapped when one is available nearby. The IE Report states that the clarifying information SCE provided "enhances the transparency of the Initiative's implementation and confirms adherence to established protocols and safety standards."¹⁶ There is no basis for the IE to find that SCE did not meet the target for SH-10.

SH-2 Undergrounding of Overhead Conductor

The IE's conclusion that it was unable to verify completion of undergrounding performed on two structures, and that a purported "lack of availability and uniformity in documentation may support" an adverse trend in recordkeeping, is erroneous.¹⁷ The IE Report acknowledges that

¹² IE Report, p. 9.

¹³ As explained in SCE's ARC, SCE only had additional work to complete the targets for three initiatives in the 2023 WMP: IN-8 (Inspection & Maintenance Tools InspectForce), SH-2 (Undergrounding Overhead Conductor), and SH-17 (REFCL Ground Fault Neutralizer).

¹⁴ IE Report, p. 25.

¹⁵ IE Report, p. 25.

¹⁶ IE Report, p. 25.

¹⁷ IE Report, p. 26.

SCE provided compliance evidence showing completed work for those two structures. Based on the timing of the work completion, the data was not yet available in SCE’s work management system. SCE explained to the IE that there are many steps that need to occur from the time that the actual work is completed in the field to when that work completion is formally reflected in SCE’s system of record. Given the timing of the IE Review shortly after the compliance year ends, completed work information from the prior year was not yet available in the specific format provided for the other items. The Work Order map documentation that SCE provided for the two referenced structures substantiated completion, and the completed work documentation has also since been populated in SAP for those two structures. There is no basis for the IE to conflate a timing issue with speculation about “lack of availability and uniformity in documentation.”

SH-8 Transmission Open Phase Detection

The IE acknowledges that SCE “installed TOPD at 5 locations that serve HFRA circuitry,” and that the “installed equipment is capable of alarm and trip functionality”¹⁸, which fulfills the target for this initiative. The IE comments that “It is not within the scope of this review to assess if the state of the trip functionality on 1 of 5 units would measurably impact the final analysis of the mitigation effectiveness. If this is of notable concern, a review of the underlying analytics that were used to arrive at the outcomes listed would be required to understand any gap in the mitigation effectiveness.” SCE agrees assessing mitigation effectiveness is out of scope of the review and clarifies that the alarm and trip functionality at the Big Creek 1-Eastwood location was wired and ready for in-service but could not be in-serviced due to the line being deenergized for an unrelated generation relay upgrade project. In other words, there was no wildfire risk at the time of the IE’s assessment because the line (and thus the TOPD device at that location) was de-energized and out of service. Because the IE acknowledges that SCE fulfilled the target and that an assessment of wildfire risk mitigation is “not within the scope of this review,” this finding provides no basis to include SH-8 in the list of incomplete initiatives.

SH-18 REFCL (Grounding Conversion)

SH-18 should not be included in the IE’s list of incomplete initiatives because SCE completed grounding conversion at the Eagle Crest pole top. The only reason for the IE’s finding is that equipment was not yet commissioned due to an assessment of potential overvoltage, and the IE determined that it is “unlikely that any mitigation benefit is achieved unless equipment is commissioned.”¹⁹ However, Energy Safety provided guidance on commissioning by email dated May 23, 2024. In that email, Energy Safety clarified that “If NuConsult determines that the construction was completed as indicated by SCE, although not commissioned, as long as the construction was completed, that would meet the target for 2023.” There is no question that

¹⁸ IE Report, p. 26.

¹⁹ IE Report, p. 27.

construction was completed, and SH-18 should therefore not be included in a list of incomplete initiatives.²⁰

IN-5 Generation Inspections and Remediations

The IE Report correctly concludes that generation inspections “are being performed as stated.”²¹ The only finding reported is that it was “not able to confirm...that the full lifecycle of the workflow” depicted in a flow chart in the 2023 WMP was completed.²² This finding is erroneous because the IN-5 Target, “Inspect 170 generation related assets in HFRA,” does not encompass the entire lifecycle of the workflow presented in Figure 8-1g of the 2023 WMP. The purpose of including the workflow in the WMP was to illustrate the end-to-end process for additional context and was not reflective of SCE’s 2023 IN-5 Target. The IN-5 Target only encompasses inspections, not resulting remediations. Furthermore, the IE did not request additional data concerning each component of the full lifecycle in the Generation Inspections workflow, and SCE did not have an opportunity to address any purported shortcomings in the evidence demonstrating completion of generation inspections.

SH-16 Vibration Damper Retrofit

SH-16 should not be included in a list of incomplete initiatives because SCE exceeded the target by 96 vibration dampers. The IE’s only finding is that one structure appeared not to have vibration dampers installed, but after communications with SCE regarding the applicable engineering standard, the IE concurred with SCE’s explanation that the structure in question had been properly remediated.²³ Thus, there is no basis to find that SCE did not meet the SH-16 target. Moreover, given that the IE agreed with the completion of all sampled vibration damper installations, its unsubstantiated observation regarding the adequacy of SCE’s paperwork and tracking systems has no basis in fact.

SA-1 Weather Stations

SA-1 should not be included in a list of incomplete initiatives because the IE found that “all stations inspected were installed.”²⁴ The only findings listed in the IE Report pertain to observations that the IE acknowledges are outside the scope of this compliance assessment regarding minor technical issues associated with two weather stations. The SA-1 target does not depend on all weather station data output to be perfectly transmitted 100% of the time. A weather station is a single tool used to assist with forecasting, and a disruption in data availability has minimal impacts to overall forecasting.

²⁰ The IE’s statement that a pole-top conversion “may not be as advantageous for ratepayers” is both out of scope for this compliance assessment and is unsupported by any facts. IE Report, p. 27.

²¹ IE Report, p. 28.

²² IE Report, p. 28.

²³ IE Report, p. 29.

²⁴ IE Report, p. 30.

The IE's observations are also factually inaccurate. The IE Report states that "[t]wo sites, 'Calle Pimiento and Calvin' had intermittent null values for wind speed and direction."²⁵ SCE was unable to identify or locate a weather station the IE references named "Calvin" and therefore could not verify the null values referenced. Regardless, null values are far less frequent on the vendor data source SCE uses to recall data. In fact, the "Calle Pimiento" data pulled directly from SCE's vendor showed zero null values.

Moreover, the IE's criticism of the configuration of the Brite Valley installation is incorrect.²⁶ The IE asserts that "while it does not appear that the vane is prevented from turning, it is clear that the pole and cross are shielding the device from the wind, which prevents it from measuring wind accurately." The metal mast the wind vane is installed on, and the cross arm attached to the pole are at a lower height than the wooden cross arm that the IE references. The wooden cross arm is not observed to cause any more interference than the power pole itself. The IE's claim that this circumstance "calls into question the validity of the data" is unsupported and should be disregarded.

Comments on the IE's Findings Concerning Verification of Funding

The IE's approach to verifying funding for 2023 WMP initiatives departs significantly from the established scope of the review, both as defined in Energy Safety's RFQ and as demonstrated by previous independent evaluator verifications of funding for WMP initiatives.

The RFQ provides that the "IE shall determine whether the electrical corporation failed to fund any initiatives included in its WMP" and directs the IE to "[d]ocument all instances in which WMP initiatives were funded less than 100 percent, as well as request and document electrical corporation explanations for all such finding discrepancies."²⁷ As a point of comparison, in the 2022 IE Report, the IE created a straightforward table²⁸ indicating the name and number of each initiative, the funding discrepancy, and a field explaining the reasons for such discrepancy. This evaluation was consistent with the actual scope of the review and provided an objective means for Energy Safety and other parties to assess each instance where actual funding was less than forecasted funding.

By contrast, the IE's approach in 2023 significantly departs from the intended scope in two ways. First, the IE unilaterally created three new evaluation criteria:

1. Did the finance and accounting team reasonably believe the funding request was for the purpose of fulfilling a step in the WMP?

²⁵ IE Report, p. 30.

²⁶ IE Report, p. 30.

²⁷ RFQ Section 3.3, Task 3.

²⁸ 2022 IE Report, Section 2.2, page 54.

2. Did the finance and accounting team release allocated funds per the plan?
3. Does the Underfunding indicate non-compliance with the plan?

The IE's creation of these three criteria inappropriately expands the scope of its review beyond the relevant question of whether SCE failed to fund an initiative, and if so, on what basis. The first two criteria are premised on an inaccurate understanding of SCE's budgeting and funding process, by suggesting that SCE's "finance and accounting team" must "believe" that funding is for the WMP and then must "release allocated funds." This portrayal is not accurate, as SCE's operational budgets are authorized by the senior management team and are not subject to "release" by a finance or accounting organization. SCE is not aware of how or why the IE created these novel criteria. Moreover, the IE used the third criterion to make subjective, and at times erroneous, determinations of supposed "non-compliance" based on speculation regarding the effectiveness of SCE's WMP initiatives.

The second major way in which the IE's review departed from the specified scope was by creating a red/yellow/green scoring methodology based on the IE's unsupported assessment of risk reduction.²⁹ Again, neither the Public Utilities Code nor the RFQ call for an assessment on this basis; as noted above, the IE's scope is defined as identifying instances in which funding was less than 100 percent, and documentation of the explanation for such instances. Although the IE Report acknowledges that it "is not within the scope of the financial review to assess the effectiveness or impact of the payments made in accomplishing the targets," the IE Report goes on to conflate the question of risk reduction with the question of funding. As SCE explains in further detail below, there are numerous reasons why actual spending for a program may be less than forecasted spending, which may have nothing to do with whether the expected risk was reduced. The IE did not perform an analysis of forecasted versus actual risk reduction and has no basis to make the determination implied by the green/yellow/red scoring criteria with respect to risk reduction.

Below, SCE provides examples of where the IE's comments on specific WMP programs either lack a basis in fact and/or otherwise depart from the proper scope of funding verification. As an example of the speculative comments in the IE Report, SCE notes the following statement on page 31: "The IE would however comment that relative to industry standard there was little evidence of a metric-based asset management system."³⁰ SCE notes that asset management systems were outside the scope of the RFQ, that the IE does not specify which "industry standard" it is referring to, and that the IE does not provide any factual support for this overbroad claim. Contrary to the IE's statement, SCE utilizes quantitative asset management practices in both its core utility operations and its wildfire-based risk prioritization and is an electrical utility industry leader in both areas.

²⁹ IE Report, p. 31.

³⁰ IE Report, p. 31.

6.2.1. 2023 WMP Identifier #7_Wildfire Mitigation Strategy Development

The IE correctly concludes that “it does not appear that there are any portions of this initiative that are incomplete due to underfunding,” but then goes on to make a vague recommendation “that the operational implementation of the funding be reviewed based on criteria such as the field analysis of the actual programs relied upon to execute the strategic plan.”³¹ This recommendation is based on unspecified “anecdotal evidence outside the scope of this review” and should be given no weight.

6.2.3. 2023 WMP Identifier #8.1.2.10.1_Other Grid Topology Improvements

The IE correctly concludes that the “variance in funding for the CAPEX portion of the project should be considered outside of SCE’s control and would not indicate a failure to fund this Initiative,”³² which is accurate and aligns with the explanation provided by SCE. The IE also correctly notes that the O&M variance is due to accounting reasons—namely, incurred costs largely being capital, as opposed to the forecast which had estimated a higher share would be O&M. The IE’s speculation regarding alternative explanations for budget variances is not supported by any facts or information provided by SCE and should be disregarded.

6.2.4. 2023 WMP Identifier #8.1.2.2.1 and SH-2_Undergrounding of Electric Lines and/or Equipment

The IE notes a 32% budget underrun for operational expenses associated with a study commissioned to examine potential alternative mitigations for transmission grid hardening.³³ Contrary to the IE’s conclusion that the underrun may be caused by SCE’s failure to sufficiently examine multiple grid hardening alternatives as part of the study, the level of funding is explained by the shorter-than-expected nature of the study, which SCE determined to be sufficiently completed. Not only is it beyond the scope of the IE’s verification of funding to opine on the effectiveness of SCE’s study, but the IE’s conclusions about this study are also incorrect.³⁴ SCE’s study did consider numerous transmission risk mitigations, including undergrounding, covered conductor, and three enhanced system design suites, which included but was not limited to increasing phase spacing, bird guards, covered jumpers, crossarm replacement with post-type insulators, wood pole replacement with steel poles, crossarm replacement with steel crossarms, eliminating the need for guy wires, alternative guy wires, and conductor replacement in-kind.

6.2.6. 2023 WMP Identifier #8.2.2.1_Vegetation Inspections

The IE Report errs by (1) speculating incorrectly about the variance in funding for vegetation inspections and (2) going far beyond the scope of funding verification by making uninformed

³¹ IE Report, p. 41.

³² IE Report, p. 43.

³³ IE Report, p. 43.

³⁴ IE Report, p. 44.

recommendations for SCE to reallocate funds. First, the IE is factually incorrect when it states that the budget underrun “may demonstrate a poorly executed inspection plan.”³⁵ SCE explained to the IE that SCE’s robust contract negotiation process allowed for favorable contract extension costs and a lower supplemental patrol find rate contributed to the underrun. The IE similarly has no factual basis to opine on the “effectiveness of [SCE’s] vegetation inspections”³⁶ as this was not part of the IE’s review. Consequently, the IE’s recommendation that SCE reallocate funds should be denied.

6.2.8. 2023 WMP Identifier #8.2.5_Quality Assurance/Quality Control (Vegetation)

The IE Report correctly concludes that “the funding variance here is not a failure to fund this initiative.”³⁷ SCE met its WMP target for QA/QC. SCE has maintained a robust QA/QC program that audits work on a sampling basis with pre-determined criteria designed to ensure conformance and mitigate risk. The reduced funding is not indicative of deferred work or misclassification, but rather is a result of increased efficiencies and cost-effective measures.

The IE Report’s speculative commentary and erroneous recommendation to institute “triggers” to cause additional reviews of funding variances should be disregarded. The budget underrun for the Quality Assurance and Quality Control (QA/QC) of Vegetation Inspections does not reflect a reduction in the scope of work completed, but a lower than anticipated mitigation work volume.³⁸ The variance from the projected budget was impacted by lower work volume as a result of adverse weather conditions.

6.2.11. 2023 WMP Identifier #8.4.4.1 Public Emergency Communication Strategy

The IE’s conclusion that SCE failed to fund the Public Emergency Communication Strategy activity is erroneous. The 30% capital expenditure and 9% operating expense funding underruns were due to reasons outside of SCE’s control, including:

- Unforeseen delays in the recruitment of additional data engineers to support the CDP project;
- Unforeseen delays in the development of other products (ADMS-OMS) on which the CDP project depended. Due to the ADMS product delay, SCE also paused on planned

³⁵ IE Report, p. 45.

³⁶ IE Report, p. 45.

³⁷ IE Report, p. 46.

³⁸ SCE’s QA/QC program is determined by vegetation mitigation work completed under SCE’s Routine Line Clearing, HTMP, Dead and Dying Tree Removal Program, and Structure Brushing. The volume of work completed in 2023 is approximately 3,000 remediations less than the total number of remediations completed in 2022. This decrease in completed remediation work volume impacted the number of remediations available for QA/QC review.

design work for the CDP itself to avoid duplicating efforts after ADMS was completed;
and

- Contractor delays in 2022 for work on the EONS that roll over to 2023.

In the IE Report, other initiatives that had budget underruns for reasons outside of SCE’s control, or roll-over of a project in progress for completion in the following year, were not considered a failure to fund the initiative. For example, the IE found that for line removals in HFTD that “[f]unding was not spent in 2023 for reasons outside of SCE’s control. It is allocated for spend in 2024 for the 2023 work and is not considered failure to fund this initiative.”³⁹ Similar findings were made for Fire-resilient Rights-of-Way.⁴⁰ Finally, although Public Outreach and Education Awareness Program had some roll-over to 2024 of a project in progress, the IE did not find this to be a failure in funding the initiative.⁴¹ The IE’s inconsistency here highlights the invalidity of its finding that this activity was not funded.

6.2.17. 2023 WMP Identifier #DEP-2 Emergency Preparedness Plan

The IE correctly concludes that the “funding variance for this initiative is not a failure to fund this initiative.”⁴² The IE’s extraneous statement that allocation of training time in SCE’s work management system “suggests there is no financial oversight to enforce planned operational activities in a timely fashion” is speculative and inaccurate. SCE has a well-established, rigorous, month-end financial reconciliation and reporting processes. This statement is not only inaccurate, but it is also outside the scope of funding verification and should be given no weight.

6.2.23. 2023 WMP Identifier #IN-5_Equipment Inspections, Maintenance, and Repair

The IE Report speculates incorrectly that a funding variance is “likely” the result of underfunding this initiative.⁴³ Actually, as explained to the IE and noted in the IE Report, the cost variance is explained by fewer remediations than forecast in the 2023 budget for this initiative, which led to reduced total cost.⁴⁴ SCE provided a comprehensive report listing the generation assets inspected, inspection dates, and inspector findings. During a conference call between SCE and the IE, the IE requested photographs of inspections, which were displayed electronically during the call. SCE did not receive a formal request for those photos. Additionally, the IE has no factual basis to opine on whether SCE reduced the probability of faults or potential ignitions through its inspections and remediations, and its speculative commentary in that regard is outside the scope of funding verification.

³⁹ IE Report, p. 44.

⁴⁰ IE Report, p. 45.

⁴¹ IE Report, p. 48.

⁴² IE Report, p. 49.

⁴³ IE Report, p. 51.

⁴⁴ IE Report, p. 51.

6.2.32. 2023 WMP Identifier #SH-17 and #SH-18_Emerging Grid Hardening Technology Installations and Pilots

The IE correctly concludes that SCE funded this initiative and that SCE “met the target of installing 2 GFNs (the second one completed Q2 2024)...and the target of the grounding conversion at one location.”⁴⁵ However, the IE goes on to state that while the grounding conversion has been installed and “the IE can state the installation was funded,” it has not been commissioned, and therefore the IE “cannot state that the installation alone meets the intent of the target plan.”⁴⁶ The IE’s speculation about whether the installation of a grounding conversion “alone meets the intent of the plan target” is unrelated to *verification of funding*, is outside the scope of review, and should be given no weight when assessing SCE’s compliance with its 2023 WMP.

Comments on the IE’s Findings Related to Verification of QA/QC Programs

In Section 7 of the IE Report, the IE concludes that “SCE has developed and implemented QA/QC programs to ensure consistent, high-quality execution of wildfire mitigation measures across its operations and initiatives, whether undertaken by SCE staff or contractors.” SCE agrees and appreciates the IE’s positive recognition of SCE’s QA/QC program.

While acknowledging the overall effectiveness of the program in identifying non-conformances through independent quality inspections, the IE Report goes on to observe that the non-conformance rate of 5.19% “appears high to the IE.”⁴⁷ But as the IE notes, “there is currently no established standard for what constitutes an acceptable level of non-conformance,” and the IE does not provide any objective standard or comparative analysis to support its observation.⁴⁸ To the contrary, the IE Report goes on to describe an example of how SCE addressed a top non-conformance by developing training materials specifically targeting the “Cotter Pin Not Properly Secured” issue, aligning with the WMP QA and QC goal of improving practices to prevent recurrence.⁴⁹ As a result of these efforts, the number of “Cotter Pin Not Properly Secured” non-conformances identified through July 2024 has dropped by more than 50 percent when compared to the same period last year.

The IE Report also expresses concern regarding certain “open work orders resulting from paperwork issues.”⁵⁰ Although the IE notes that eighteen non-conformances remained open

⁴⁵ IE Report, p. 53.

⁴⁶ IE Report, pp. 53-54.

⁴⁷ IE Report, p. 56.

⁴⁸ IE Report, p. 56.

⁴⁹ See IE Report, Section 7.4 Findings, pp. 56-58.

⁵⁰ IE Report, p. 56.

from the 2023 quality inspections,⁵¹all of those eighteen non-conformances were closed before the IE Report was published.

CONCLUSION

SCE appreciates the opportunity to submit these comments on the IE Report and respectfully requests that Energy Safety take these comments into account when assessing SCE's compliance with its 2023 WMP.

Please direct any questions or requests for additional information to Liz Leano (Elizabeth.Leano@sce.com), Johnny Parker (Johnny.Parker@sce.com), and Cynthia Childs (Cynthia.Childs@sce.com).

Sincerely,

//s//

Gary Chen
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⁵¹ IE Report, pp. 56, 58.