

September 11, 2024

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

**BY ENERGY SAFETY E-FILING**

**SUBJECT:** Southern California Edison Company's Response to Notice of Violation  
- SCE\_YLO\_20240618\_0914

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\_YLO\_20240618\_0914 received on August 12, 2024 (Notice), based on Energy Safety field inspections conducted in SCE's service area in June 2024. 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](mailto: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.<sup>1</sup> 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.<sup>2</sup>

### Finding: Data Accuracy

Notice	Finding #	Structures
SCE_YLO_20240618_0914	1	4882983E
	2	X8485E
	3	4617117E

### Summary of Findings:

Energy Safety’s Notice states that in implementing 2023 WMP initiative number 8.1.2.1.1 regarding installation of covered conductor, SCE misreported installation of covered conductor on the following three poles:

- pole ID 4882983E at coordinates 33.66831158065607, -117.56514540812104
- pole ID X8485E at coordinates 33.66801439418881, -117.56562608196106
- pole ID 4617117E at coordinates 33.667179818333864, -117.5669496338174.

Energy Safety considers the three data accuracy issues “to be in the Minor risk category.”<sup>3</sup>

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<sup>1</sup> 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.

<sup>2</sup> 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 a 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.

<sup>3</sup> Notice, p. 1.

**Response:**

SCE disputes the first alleged violation relating to pole ID 4882983E because SCE did not report covered conductor installation on that pole in its fourth quarter 2023 Quarterly Data Report (QDR).

SCE mistakenly included poles X8485E and 4617117E in its QDR as locations where covered conductor was installed.<sup>4</sup> The two poles are part of a single work order associated with the installation of covered conductor. However, when crews were sent to the field, they determined that the line extending through these two poles were idle—i.e., the line does not serve load for a customer, meter, or SCE equipment and has been determined to not have a future use. Consequently, the poles were topped, meaning SCE's primary conductor and other equipment were removed, the line is not currently energized, and risk was mitigated by way of removal of facilities as opposed to the installation of covered conductor. Below are photos of X8485E and 4617117E dated 4/29/2024, verifying that the poles were topped. Due to a failure to update the work order to reflect that the poles were topped, poles X8485E and 4617117E were inadvertently included in the QDR.

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<sup>4</sup> In total, approximately 0.24 circuit miles of covered conductor was not installed at the locations associated with those two poles.

**X8485E**







Group: 2024 360-Inspections Delivered By: Conekt2 Lat/Lon: 33.667959, -117.565617  
Filename: OH-X8485E\_20240429\_5.jpg Capture Date: 2024-04-29 12:13:48 Folder: D2401-0047\_KnownAssets\_202404



Group: 2023 360-Inspections Delivered By: Conekt2 Lat/Lon: 33.667952, -117.565608  
Filename: X8485E\_20230526\_10.jpg Capture Date: 2023-05-26 07:19:11 Folder: D2306-0023\_KnownAssets\_202305

**4617117E**



Group:	2024 360-Inspections	Delivered By:	Conekt2	Lat/Lon:	33.667109, -117.566964
Filename:	OH-4617117E_20240429_7.jpg	Capture Date:	2024-04-29 12:15:04	Folder:	D2401-0047_KnownAssets_202404



Group:	2024 360-Inspections	Delivered By:	Conekt2	Lat/Lon:	33.667206, -117.567017
Filename:	OH-4617117E_20240429_2.jpg	Capture Date:	2024-04-29 12:14:44	Folder:	D2401-0047_KnownAssets_202404



Group:	2023 360-Inspections	Delivered By:	Conekt2	Lat/Lon:	33.667157, -117.566988
Filename:	4617117E_20230526_9.jpg	Capture Date:	2023-05-26 07:23:36	Folder:	D2306-0023_KnownAssets_202305