

September 20, 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

BY ENERGY SAFETY E-FILING

SUBJECT: Southern California Edison Company's Response to Notice of Violation
- SCE_CAC20_20240619_1341

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_CAC20_20240619_1341 received on August 28, 2024 (Notice), based on Energy Safety field inspections conducted in SCE's service area on June 19, 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.

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: Completeness

Notice	Finding #	Structures
SCE_CAC20_20240619_1341	1	1601717E

Summary of Finding:

Energy Safety’s Notice states that in implementing 2024 WMP initiative 8.1.3.1 – Distribution Detailed Inspections and Remediations, SCE failed to completely remediate a damaged secondary neutral on pole ID 1601717E, Grid Hardening ID 413647057-1601717E, at coordinates 37.1972558377877 -119.201249924051.

Energy Safety considers this data accuracy violation “to be in the Moderate risk category.”³

Response:

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 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.

³ Notice, p. 1.

Energy Safety’s findings noted that a secondary wire was frayed and damaged, despite previous documentation of repairs to a broken distribution secondary cable/conductor.

The wire was initially damaged during a severe snowstorm on February 1, 2024, when a tree fell through the triplex cable, damaging both the wire and the secondary insulators, and pulling the secondary riser off the pole. Repairs to the riser were promptly made the same day in accordance with the notification requirements.

Given the challenging conditions during the snowstorm, including icing on the wires, the frayed condition of the secondary neutral wire was not apparent. During such snowstorms, it is difficult to strip off ice, and when the wire was tested, it appeared to be functioning properly.

On September 3, 2024, SCE contacted the regional manager regarding Energy Safety’s notice of violation. In response, a crew was dispatched the following morning to inspect and repair the secondary wire. Below is photographic evidence of the repairs confirming that the wire is properly secured.

Photograph 1:



Photograph 2:



Photograph 3:



