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**Shinjini C Menon**
SVP of System Planning
& Engineering
shinjini.menon@sce.com

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_ATJ_20240702_0752

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_ATJ_20240702_0752 received on August 28, 2024 (Notice), based on Energy Safety field inspections conducted in SCE's service area on July 02, 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: Data Accuracy**

| Notice | Finding # | Structures |
|---|---|---|
| SCE_ATJ_20240702_0752 | 1 | 4179230E |

**Summary of Finding:**

Energy Safety's Notice states that in implementing 2023 WMP initiative Rapid Earth Fault Current Limiter (REFCL) Grounding Conversion (2023 WMP initiative 8.1.2.6.2), Southern California Edison Company failed to provide accurate data in reporting that REFCL Grounding Conversion was installed on structure ID 4179230E, Grid Hardening ID TD2100529, at coordinates 34.44441856776136, -118.54160303972672.

Energy Safety considers this data accuracy violation "to be in the Minor risk category"[3]

**Response:**
Energy Safety's findings noted inaccurate data provided on a REFCL grounding conversion installation. SCE has determined that the issue stemmed from a

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[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.

typographical error in the reported pole number, where two digits were inadvertently transposed. The correct pole number is 4719230E, not 4179230E. As a result, the Energy Safety inspector examined the incorrect pole.

SCE confirms that the correct pole—number 4719230E—has the REFCL grounding conversion equipment installed. Please find the photographic evidence below, which shows that the necessary equipment has been properly installed at the correct location.

To prevent this error in the future, SCE is implementing an additional step in its data collection process. Going forward, SCE will review and verify pole numbers in their Circuit Viewer tool prior to submittal. This will validate that each pole number corresponds correctly to the circuit where work is being performed.

Photograph 1:

Photograph 2:

Photograph 3:

Photograph 4: