

September 27, 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
Docket# 2023-NOV

SUBJECT: Southern California Edison Company's Response to Notice of Violation
- CADSCE_SIS_20240716_1411

Dear Mr. Doherty:

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the finding identified in the Notice of Violation CADSCE_SIS_20240716_1411 received on August 30, 2024 (Notice), based on Energy Safety field inspections conducted in SCE's service area on July 16, 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
CADSCE_SIS_20240716_1411	1	1314070E

Summary of Finding:

Energy Safety’s Notice states that in implementing 2023 WMP initiative 8.1.2.1.1 - Covered Conductor, SCE failed to provide accurate data in reporting that covered conductor was installed on pole ID 1314070E, Grid Hardening ID TD1817317-1314070E, at coordinates 33.92305484850949, -117.8295863630241.

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

Response:

SCE confirms that the pole in question is a guy stub pole, designed solely to provide structural support to an adjacent pole line that has covered conductor. The guy wires on this pole are for anchoring purposes and do not carry electrical current or load, so they

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.

do not require covered conductor. A secondary cable is attached to this guy stub pole, but it is not energized primary line.

This pole was included in the WMP Quarterly Data Report (QDR) due to SCE's current reporting process, which includes all structures pertaining to the work order design for covered conductor installations. Structures like guy stub poles are necessary for the safe construction of overhead facilities like covered conductor. While they do not have covered conductor installed, they are necessary to support the adjacent covered conductor facilities. Although this pole was included in the QDR, it is not reported as part of SCE's covered conductor mileage and target.

SCE is reviewing its process to determine whether all structures pertaining to the work order without covered conductor, such as guy stub poles, should be included with an identifier or excluded from future QDR reporting.