

October 4, 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_CAC12_20240808_1514

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_CAC12_20240808_1514 received on September 6, 2024 (Notice), based on Energy Safety field inspections conducted in SCE's service area on August 8, 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_CAC12_20240808_1514	1	4583938E

Summary of Finding:

On August 8, 2024, Energy Safety conducted an inspection of SCE’s WMP initiatives in the vicinity of the city of Lake Isabella, California. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed 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 4583938E, Grid Hardening ID TD1827254-4583938E, at coordinates 35.644931, -118.460862.

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

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.

Response:

The work order that is the subject of this Notice of Violation (TD1827254) included both Distribution and Transmission-related tasks. The Transmission tasks were completed by an SCE contractor. However, that contractor inadvertently initiated the work order closure process following completion of the Transmission work while the planned covered conductor installation on the Distribution equipment was still pending. SCE mistakenly reported that the covered conductor installation was completed because of the inadvertent closure of the work order prior to the covered conductor installation. The covered conductor mileage associated with this structure is 0.2 circuit miles.

Upon receiving this Notice of Violation, SCE reviewed the work order, and on September 19, 2024, SCE reopened the work order to complete the covered conductor installation on structure 4583938E. Subject to obtaining a required permit, the covered conductor installation is scheduled to be completed by the end of the first quarter of 2025. SCE plans to exclude the 0.2 circuit miles of covered conductor associated with this structure when it reports on the progress of its completion of its future covered conductor installation target in 2025 quarterly data reports.