

October 04, 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_20240722_1335

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_20240722_1335 received on September 13, 2024 (Notice), based on Energy Safety field inspections conducted in SCE's service area on July 22, 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_20240722_1335	1	1294218E

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 1294218E, Grid Hardening ID TD2021365-1294218E, at coordinates 36.06130120437438, -118.97198579343933.

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

Response:

The pole that is the subject of this Notice of Violation (1294218E) does not have covered conductor installed on its line because it is outside of the High Fire Risk Area

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.

("HFRA"), and SCE's Wildfire Covered Conductor Program is an activity generally focused on replacing existing bare wire with covered conductor in HFRA. The subject pole was designed to support pole 1294219E, which is an adjacent pole near the HFRA boundary where the line has covered conductor installed.

Pole 1294218E was included in the WMP Quarterly Data Report (QDR) due to the current reporting process, which includes all structures pertaining to the work order design for covered conductor installations. While the line on this particular pole does not have covered conductor installed, it is essential to support the adjacent covered conductor facilities. This pole was included in the QDR but is not reported as part of SCE's covered conductor mileage for purposes of meeting the WMP covered conductor installation target.

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