

October 7, 2024

Patrick Doherty, Compliance Program Manager  
Compliance Assurance Division  
Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street 20<sup>th</sup> Floor  
Sacramento, CA 95814

**BY ENERGY SAFETY E-FILING**  
**Docket# 2024 NOV**

**SUBJECT:** Southern California Edison Company's Response to Notice of Violation  
- NOV ESD\_SCE\_RGA\_20240828\_1504

Dear Mr. Doherty:

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the finding identified in the Notice of Violation NOV ESD\_SCE\_RGA\_20240828\_1504 received on September 30, 2024 (Notice), based on Energy Safety field inspections conducted in SCE's service area on August 28, 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](mailto: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.<sup>1</sup> 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.<sup>2</sup>

### **Finding: Data Accuracy**

<b>Notice</b>	<b>Finding #</b>	<b>Structures</b>
NOV ESD_SCE_RGA_20240828_1504	1	Near Pole 205829E

### **Summary of Finding:**

Energy Safety’s Notice states that in implementing 2024 WMP initiative 8.2.3.4.2- Dead and Dying Tree Removal Program (VM-4), SCE failed to provide accurate data regarding a tree removal near pole ID205829E at coordinates 34.452687, -119.707193.

Energy Safety considers this data accuracy violation “to be in the Minor risk category”<sup>3</sup>

### **Response:**

No action required – The tree was initially inspected by SCE tree crews on November 15, 2023, and identified for removal under work order number H0324441300. The tree crew returned on April 23, 2024, to remove the tree, but identified it had already fallen.

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<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> Notice, p. 1.

See photo below taken by tree crews on April 23, 2024. The work was marked as complete because the customer indicated to the tree crew, he wanted the tree left behind. Notes from the tree crew are shown in the work order notes which state: *“customer wants wood left on hillside just below tree for environmental protection.”* SCE was not billed by the tree removal contractors because no work was performed.

Work Completion Information	
Primary Service Territory (Contractor)	Pacific Coast Tree Experts
Completed Mitigation	No work required
Type of Work Completed Formula	No work required
Completed Billing Unit	No Work Required
Completion Date	4/23/2024
Completed Quantity	0
Work Completion Date	8/12/2024
Tree Work Notes	No work required. We didn't remove this tree
Completed Enhanced Clearance	
Enhanced Clearance Quantity	
Completed Overhang	

Service Territory	<a href="#">Pacific Coast Tree Experts</a>
Tree	<a href="#">T15112023-1717</a>
Tree ID	
Tree Inventory Quantity	1.00
Notes	Customer wants Wood left on hillside just below tree for environmental protection
Species	Cedar-Deodara
Height (in ft)	32
Dbh ⓘ	20
WOLI Coordinate Latitude	34.452687
WOLI Coordinate Longitude	-119.707193
Pole Number ⓘ	205829E

