

November 12, 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
- NOV ESD_SCE_CAC23_20240828_0917

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_CAC23_20240828_0917 received on October 31, 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.

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: Adherence to Protocol

Notice	Violation #	Structures
NOV ESD_SCE_CAC23_20240828_0917	1	Near Pole 1413461

Summary of Finding:

Energy Safety’s Notice states that in implementing 2024 WMP initiative 8.2.3.3.1 - Expanded Clearing (VM-07), SCE failed to adhere to its protocol of maintaining vegetation clearance for distribution lines near pole ID 1413461 at coordinates 34.461689, -119.819312 in High Fire Threat District (HFTD) Tier 3.

Energy Safety considers this data accuracy violation “to be in the Moderate 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: SCE dispatched a Senior Specialist (ISA Certified Arborist) to the location on 11/1/24 and confirmed the condition identified by Energy Safety. See “as-found” photograph below.

SCE dispatched a Senior Specialist (ISA Certified Arborist) to the location on 11/1/24 and confirmed the condition identified by Energy Safety. See “as-found” photograph below.



The palm was trimmed on 11/4/24 and 6’ clearance was achieved. See “as-left” photos below.

