

October 30, 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_CAD_SCE_YLO_20240618_0914_Revision 1

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_CAD_SCE_YLO_20240618_0914_Revision 1 received on October 7, 2024 (Notice), based on Energy Safety field inspections conducted in SCE's service area in June 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	Violation	Structures
NOV_CAD_SCE_YLO_20240618_0914_Revision 1	1	X8485E
	2	4617117E

Summary of Findings:

Energy Safety’s Notice states that in implementing 2023 WMP initiative number 8.1.2.1.1 regarding installation of covered conductor, SCE misreported installation of covered conductor on the following two poles:

- pole ID X8485E at coordinates 33.66801439418881, -117.56562608196106
- pole ID 4617117E at coordinates 33.667179818333864, -117.5669496338174.

Energy Safety considers the three data accuracy issues “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: Energy Safety states that this Notice supersedes NOV_CAD_SCE_YLO_20240618_0914, which SCE previously received on August 12, 2024 and responded to on September 11, 2024. Please refer to SCE's September 11, 2024 response to NOV_CAD_SCE_YLO_20240618_0914 ("September 11, 2024 Response"), which addressed the two findings described in this Notice.

In NOV_CAD_SCE_YLO_20240618_0914, Energy Safety alleged that SCE had misreported installation of covered conductor at three locations, including the same two structures that are the subject of this superseding Notice, as well as a third structure (pole 4882983E). SCE's September 11, 2024 Response disputed one of the three alleged violations because SCE did not report covered conductor installation on pole 4882983E in its fourth quarter 2023 Quarterly Data Report. In this superseding Notice, Energy Safety has not included its previous finding relating to pole ID 4882983E.