

January 22, 2025

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
- CADSCE_CAC12_20240821_1346

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_20240821_1346 received on December 24, 2024 (Notice), based on Energy Safety field inspections conducted in SCE's service area in August 2023. 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_20240821_1346	1	4858444E

Summary of Finding: “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 4858444E, Grid Hardening ID TD2021378-4858444E at coordinates 36.065657, -118.869283.1 Cal.

Response:

SCE installed covered conductor at the location specified in this Notice on October 21, 2024, two months after the date of the August 21, 2024, Energy Safety field verification. Please see below for photos of the covered conductor installation associated with structure ID 4858444E.

This pole was included in SCE’s WMP Quarterly Data Report (QDR) due to SCE’s current reporting process, which includes all structures pertaining to the work order design for covered conductor installations. The work related to structure ID 4858444E on work order TD2021378 was for guy anchor remediation to support adjacent poles

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 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.

with lines that have covered conductor. A different work order, TD2198437, was for covered conductor installation associated with structure ID 4858444E. Thus, the covered conductor work for structure ID 4858444E was not completed on work order TD2021378; rather, covered conductor was installed on October 21, 2024, under work order TD2198437.



