

May 02, 2025

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**

**SUBJECT:** Southern California Edison Company's Response to Notice of Violation  
- NOV\_ESD\_SCE\_MAZ\_20250325\_1004

Dear Ms. Bilbrey

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the finding identified in the Notice of Violation NOV\_ESD\_SCE\_MAZ\_20250325\_1004 received on April 23, 2025 (Notice), based on Energy Safety field inspections conducted in SCE's service area on March, 25, 2025. 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: Adherence to Protocol**

<b>Notice</b>	<b>Violation #</b>	<b>Structures</b>
NOV_ESD_SCE_MAZ_20250325_1004	1	Near 207593781

### **Summary of Finding:**

Energy Safety's Notice states that in implementing 2024 WMP initiative 8.2.3.3.1- Distribution Expanded Clearing, SCE failed to adhere to its protocol of wood and slash management at pole ID 207593781 at coordinates 33.955028374965, - 117.976980405418. Energy

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

### **Response:**

SCE dispatched a vegetation management Senior Specialist (ISA Certified Arborist) to the location on April 24, 2025. Discussions with an adjacent neighbor informed SCE the property owner had recently installed a new chain link fence (as seen in the photos provided by Energy Safety) and in preparation for the new fence install, the property

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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.

owner either trimmed the tree themselves or hired someone to trim the tree. Debris was left by the property owner or company who trimmed the tree prior to the installation of the fence.

SCE did perform maintenance on the tree on December 11, 2024, under work order R05635799003 but all debris was removed. Therefore, as SCE did not leave debris nor cause the debris identified by Energy Safety, SCE is not required to remove the debris and respectfully requests that this Notice of Violation (NOV) be removed.