

May 13, 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
- CAD_SCE_ATJ_20250116_0928

Dear Mr. Doherty:

Southern California Edison Company (SCE) appreciates the opportunity to provide this response to the finding identified in the Notice of Violation CAD_SCE_ATJ_20250116_0928 received on April 14, 2025 (Notice), based on Energy Safety field inspections conducted in SCE's service area on January, 16, 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.

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: Completeness

Notice	Finding #	Structures
CAD_SCE_ATJ_20250116_0928	1	4263497E

Summary of Finding:

On January 16, 2025, SCE's representatives accompanied Energy Safety personnel during an Energy Safety field inspection, and during that inspection, Energy Safety identified degradation of the guy anchor on structure ID 4263497E. SCE reported the condition to its Field Operations team on the same day to ensure prompt remediation of the guy anchor. SCE completed remediation of the guy anchor on April 4, 2025 after resolving certain access issues with the homeowner at the relevant location. Please find photo evidence of the guy anchor installation on structure ID 4263497E below.

Response:

On January 16, 2025, SCE's representatives accompanied Energy Safety personnel during an Energy Safety field inspection, and during that inspection, Energy Safety identified degradation of the guy anchor on structure ID 4263497E. SCE reported the condition to its Field Operations team on the same day to ensure prompt remediation of the guy anchor. SCE completed remediation of the guy anchor on April 4, 2025 after resolving certain access issues with the homeowner at the relevant location. Please find photo evidence of the guy anchor installation on structure ID 4263497E below.

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.

The Notice of Violation notes that SCE reported in a quarterly data report that “remediation of a buried anchor was completed in the field on May 9, 2024.”³ This remediation is in reference to debris removal around the guy anchor. The relevant notification for the referenced condition was created on March 7, 2024—ten months before Energy Safety’s January 16, 2025 inspection—to clear debris around the guy anchor. Work to clear the debris was completed in the field on May 29, 2024.

³ Although the Notice of Violation states that SCE reported the remediation as completed on May 9, 2024, SCE actually reported the remediation as complete on May 29, 2024.



