

May 21, 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
- CAD_SCE_CAC12_20250131_1111

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_CAC12_20250131_1111 received on April 22, 2025 (Notice), based on Energy Safety field inspections conducted in SCE's service area in January 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 the facts set forth below and further explain its position in subsequent procedural stages and/or proceedings.¹ Although Energy Safety may refer certain issues to the California Public Utilities Commission (CPUC) for an enforcement action, the finding in this Notice does not support such referral.²

Finding: Completeness

Notice	Finding #	Structures
CAD_SCE_CAC12_20250131_1111	1	4574904E

Summary of Finding: “Energy Safety observed that in implementing 2024 WMP initiative 8.1.3.1 - Distribution Detailed Inspections and Remediations (IN-1.1), SCE failed to complete the replacement of a wildlife cover on Pole ID 4574904E, Grid Hardening ID 413816921-4574904E, at coordinates 35.087024, -118.651570. Energy Safety considers this violation for failure to complete the initiative to be in the Minor risk category.”

Response:

A new wildlife cover for pole ID 4574904E was installed on August 8, 2024, as reported in SCE’s Quarterly Data Report, and consistent with SCE’s Distribution Overhead Construction Standards (DOH). Photo #1 below was taken on July 12, 2024 and shows

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.

³ Notice, p. 1.

the previous wildlife cover. Photo #2 below was taken during Energy Safety's inspection on January 31, 2025 and shows the current wildlife cover that was installed on August 8, 2024.

SCE disagrees with the conclusion in the Notice of Violation that the "wildlife cover was not properly secured" according to SCE's Distribution Overhead Construction Standards.³ Although the Notice describes the wildfire cover as "loose," the gap in the cover depicted in Photo #2 below is part of the wildlife cover design to allow ventilation and drainage, and its installation is consistent with the DOH. For example, Section DC 535 of SCE's DOH (sheet 17 of 35) provides that "[s]ome wildlife covers have small gaps or seams as part of the covering design. Installation of the cover should be considered in order to allow moisture to drain through said gaps or openings." A screenshot of the relevant section of the DOH is pasted below.

Wildlife behavior such as woodpeckers accumulating acorns in and around wildlife covers is difficult to control. SCE actively inspects its equipment and addresses such issues as they arise. SCE is also pursuing new designs that may protect better against wildlife behavior. In this case, SCE's Field Operations team was made aware of the accumulation of acorns near the wildlife cover on structure ID 4574904E on April 22, 2025, on the same day that the Notice was issued. SCE personnel removed the acorns from the wildlife cover the next day on April 23, 2025. Please see photos #3 and #4 below for the before and after images confirming removal of the acorns.

³ Notice, p. 8.

Photo #1: Taken on 7/12/2024



Photo #2 from Energy Safety's inspection on January 31, 2025



Screenshot #1: Excerpt of SCE's Distribution Overhead Construction Standards

<p>4.0 Wildlife Protection Materials</p> <p>Wildlife protection material is for incidental wildlife contact only. They are not rated for personal protection and should be treated as bare wires.</p> <p>Bushing covers shall only cover top skirt of the bushing.</p> <p>Some wildfire covers have small gaps or seams as part of the covering design. Installation of the cover should be considered in order to allow moisture to drain through said gaps or openings. Additionally, orientation of the gap/seam should be pointed away from other energized or grounded parts in the immediate vicinity (typically 18 inches).</p> <p>= For Reference Only</p>		
<p>Approved by:</p> <p><i>BSL</i></p>	<p>Wildlife-Safe Power Line Construction</p>	<p>DC 535</p>
<p>Effective Date:</p> <p>10-25-2024</p>	<p>What's Changed?</p>	<p>Sheet 17 of 35</p> <p>DOH</p>

Photo #3: Before photo from April 23, 2025



Photo #4: After photo from April 23, 2025

