

June 9, 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
NOV_CAD_SCE_CAC12_20250131_1121

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_CAC12_20250131_1121 received on May 13, 2025 (Notice), based on Energy Safety field inspections conducted in SCE's service area on January 31, 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	Violation	Structures
NOV_CAD_SCE_CAC12_20250131_1121	1	1987176E

Summary of Findings:

Energy Safety's Notice states 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 damaged wildlife cover on Pole ID 1987176E, Grid Hardening ID 413816950-1987176E at coordinates 35.086770, -118.651642..

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

Response:

SCE confirms that a wildlife cover for structure ID 1987176E was replaced on June 25, 2024, as reported in SCE's Quarterly Data Report.

SCE disagrees with the conclusion in the Notice of Violation that SCE "failed to complete replacement of a damaged wildlife cover." Woodpeckers accumulate acorns in wildlife covers, which can cause distortion. The internal pressure from the acorns expanded the cover, giving the appearance of being damaged. However, the cover remains functionally intact and continues to protect the exposed connector. Although

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.

the Notice describes the wildlife cover as “damaged”, the gap in the cover depicted in Photo #1 below is part of the wildlife cover design to allow ventilation and drainage, and its installation is consistent with SCE’s Distribution Overhead Construction Standards (DOH). Section 535 of SCE’s DOH (sheet 17 of 35) states 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 storing acorns inside wildlife covers, is difficult to control. SCE actively inspects and addresses such issues as they arise and continues to evaluate design improvements to better withstand animal interference.

Photo #1: Taken by Energy Safety during their field visit on January 31, 2025



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

4.0 Wildlife Protection Materials


Wildlife protection material is for incidental wildlife contact only. They are not rated for personal protection and should be treated as bare wires.

Bushing covers shall only cover top skirt of the bushing.

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).

 = For Reference Only

Approved by: 	Wildlife-Safe Power Line Construction	DC 535
Effective Date: 10-25-2024	What's Changed?	Sheet 17 of 35 DOH