SOUTHERN CALIFORNIA EDISON®
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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_20250116_1227

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_20250116_1227 received on May 13, 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	Violation	Structures
NOV_CAD_SCE_CAC12_20250116_1227	1	1509159E

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 remediation of the missing wildlife cover on Pole ID 1509159E, Grid Hardening ID 409812406-1509159E at coordinates 34.28342246244922, -119.28556739695176.

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

Response:

The notification for structure ID 1509159E specified the installation of a bird guard to address potential avian contact risks. Upon further evaluation, SCE personnel determined that the installation of covered conductor on the center phase would provide a more effective solution. As shown in the photo below, the covered conductor was installed on June 25, 2024 in place of the originally planned bird guard.

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[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.

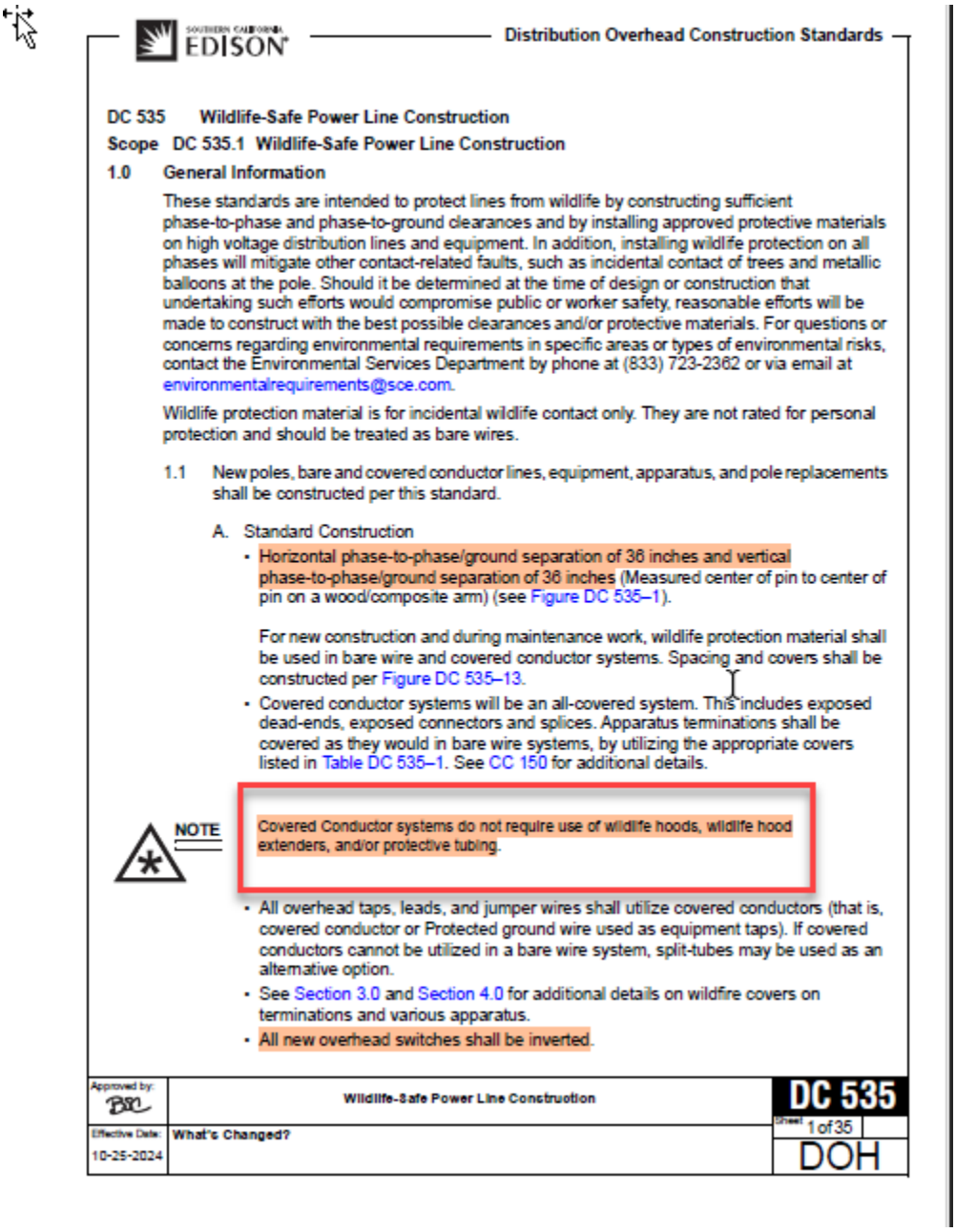
[3] Notice, p. 1.

Covered conductor serves the same core function as a bird guard - preventing wildlife contact and mitigating avian related outages- but it does so by fully insulating the energized conductor, rather than shielding a localized jumper connection. This continuous insulation offers enhanced protection by eliminating exposed energized surfaces along the span, thereby exceeding the original scope and intent of the bird guard remediation.

Additionally, per Section DC 535, Sheet 1 of 35 of SCE's Distribution Overhead Construction Standards (DOH), wildlife hoods are not required when covered conductor is used. This standard explicitly recognizes that covered conductor systems inherently eliminate the need for additional wildlife mitigation equipment.

Photo – Covered Conductor Installation

Screenshot – DC 535, Sheet 1 of 35 from SCE's DOH, indicating wildlife hoods are not required with covered conductor



SOUTHERN CALIFORNIA EDISON — Distribution Overhead Construction Standards

DC 535 Wildlife-Safe Power Line Construction

Scope DC 535.1 Wildlife-Safe Power Line Construction

1.0 General Information

These standards are intended to protect lines from wildlife by constructing sufficient phase-to-phase and phase-to-ground clearances and by installing approved protective materials on high voltage distribution lines and equipment. In addition, installing wildlife protection on all phases will mitigate other contact-related faults, such as incidental contact of trees and metallic balloons at the pole. Should it be determined at the time of design or construction that undertaking such efforts would compromise public or worker safety, reasonable efforts will be made to construct with the best possible clearances and/or protective materials. For questions or concerns regarding environmental requirements in specific areas or types of environmental risks, contact the Environmental Services Department by phone at (833) 723-2362 or via email at environmentalrequirements@sce.com.

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

1.1 New poles, bare and covered conductor lines, equipment, apparatus, and pole replacements shall be constructed per this standard.

A. Standard Construction

- Horizontal phase-to-phase/ground separation of 36 inches and vertical phase-to-phase/ground separation of 36 inches (Measured center of pin to center of pin on a wood/composite arm) (see Figure DC 535–1).

  For new construction and during maintenance work, wildlife protection material shall be used in bare wire and covered conductor systems. Spacing and covers shall be constructed per Figure DC 535–13.
- Covered conductor systems will be an all-covered system. This includes exposed dead-ends, exposed connectors and splices. Apparatus terminations shall be covered as they would in bare wire systems, by utilizing the appropriate covers listed in Table DC 535–1. See CC 150 for additional details.

NOTE

Covered Conductor systems do not require use of wildlife hoods, wildlife hood extenders, and/or protective tubing.

- All overhead taps, leads, and jumper wires shall utilize covered conductors (that is, covered conductor or Protected ground wire used as equipment taps). If covered conductors cannot be utilized in a bare wire system, split-tubes may be used as an alternative option.
- See Section 3.0 and Section 4.0 for additional details on wildfire covers on terminations and various apparatus.
- All new overhead switches shall be inverted.

Approved by: BSC	Wildlife-Safe Power Line Construction	DC 535 Sheet 1 of 35
Effective Date: 10-25-2024	What's Changed?	DOH