

June 10, 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\_CAD\_SCE\_CAC20\_20250312\_0949

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\_CAC20\_20250312\_0949 received on May 13, 2025 (Notice), based on the Office of Energy Infrastructure Safety's (Energy Safety) field inspections conducted in SCE's service area on March 12, 2025. SCE appreciates Energy Safety's 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: Completeness**

| <b>Notice</b>                   | <b>Violation</b> | <b>Structures</b> |
|---------------------------------|------------------|-------------------|
| NOV_CAD_SCE_CAC20_20250312_0949 | 1                | 1827781E          |

### **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 installation of wildlife covers on Pole ID 1827781E, Grid Hardening ID 410891934-1827781E, at coordinates 37.619692, -118.841513.

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

### **Response:**

SCE acknowledges the finding from Energy Safety's inspection on March 12, 2025, which identified a missing wildlife cover on structure ID 1827781E. After further review,

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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.

notification #410891934 for the wildlife cover installation was created in error, and the closure of the notification was inadvertently reported as a completed remediation in SCE's Quarterly Data Report. Wildlife covers are not required on structures equipped with KPF switches, such as structure 1827781E. Wildlife covers are neither required nor designed for KPF switches.