

July 08, 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_SIS_20250129_1132

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_SIS_20250129_1132 received on June 10, 2025 (Notice), based on the Office of Energy Infrastructure Safety's (Energy Safety) field inspections conducted in SCE's service area on January 29, 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.

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 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 for an enforcement action, the finding in this Notice does not support such referral.²

Finding: Completeness

Notice	Violation	Structures
NOV_CAD_SCE_SIS_20250129_1132	1	4381032E

Summary of Findings:

Energy Safety's Notice states that in implementing 2024 WMP initiative 8.1.2.1.1 - Covered Conductor (SH-1), SCE failed to provide accurate data in reporting covered conductor installation on Pole ID 4381032E, Grid Hardening ID TD1966279-4381032E, at coordinates 34.463617, -119.711308

Energy Safety did not provide a severity or risk category."³

Response:

SCE mistakenly reported the installation of a covered conductor at the specific location identified as structure ID 4381032E. This structure was included in the Wildfire

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.

Mitigation Plan (WMP) Quarterly Data Report (QDR) due to SCE's current reporting process, which encompasses all structures related to the work order design for covered conductor installations. Despite its inclusion in the WMP QDR, this structure was not part of the WMP covered conductor scope, as it was previously designated under the Overhead Conductor Program (OCP). However, the OCP initiative for this structure was halted due to significant redesign changes. The condition of structure ID 4381032E has been documented in SCE's Work Management System and will be scheduled for covered conductor installation in accordance with SCE's maintenance program.