

July 18 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\_YLO\_20250506\_1044

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\_YLO\_20250506\_1044 received on June 27, 2025 (Notice), based on Energy Safety field inspections conducted in SCE's service area on May 6, 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](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_YLO_20250506_1044	1	4491293E
	2	4491289E
	3	4491295E

### **Summary of Findings:**

**Violation 1.** Energy Safety's Notice states that in implementing 2024 WMP initiative Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to complete the installation of wildlife covers on pole ID 4491293E, Grid Hardening ID 413415665-4491293E at coordinates 33.8727452541626, -117.048218670861.

**Violation 2.** Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to complete the installation of wildlife covers on pole ID 4491289E, Grid Hardening ID 410930023-4491289E at coordinates 33.8745356685382, -117.050241481947.

**Violation 3.** Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to complete the installation of wildlife covers on pole ID4491295E, Grid Hardening ID 410903713-4491295E at coordinates 33.8715293838639, -117.046899720344.

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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.

Energy Safety considers these completeness violations to be in the Minor “risk category.”<sup>3</sup>

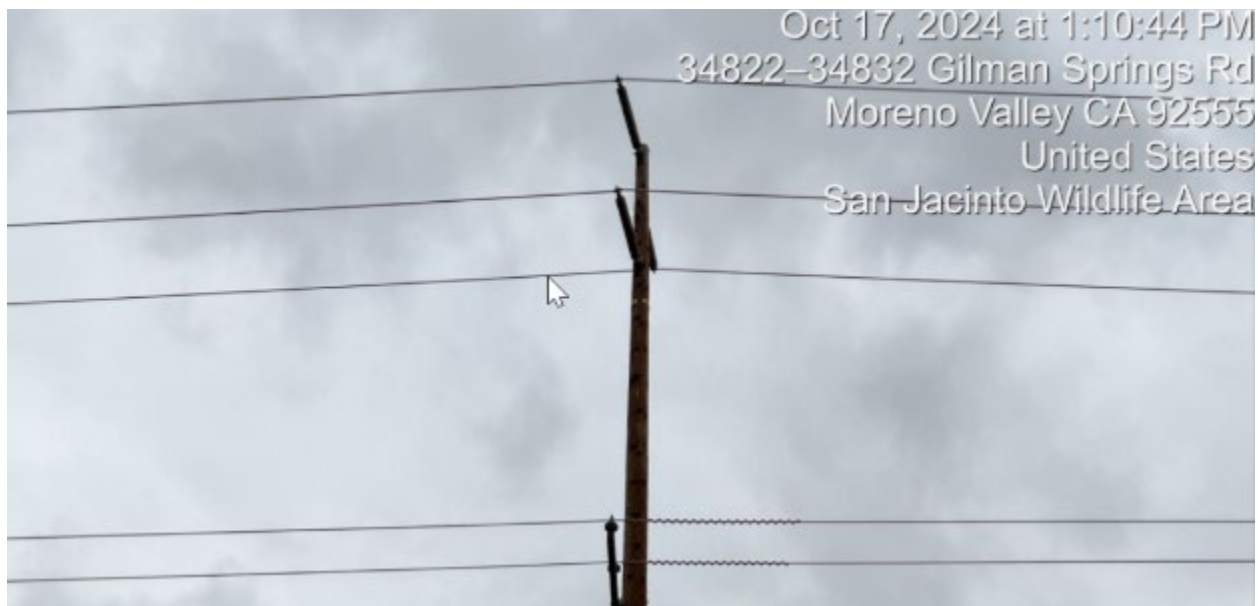
**Response:**

The notification for structure IDs 4491293E, 4491289E, and 4491295E specified the installation of bird guards 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 photos below, the covered conductor was installed in October 2024 in place of the originally planned bird guards.

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 planned 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 eliminate the need for additional wildlife mitigation equipment.

**Photo 1 – Covered Conductor Installation Structure ID 4491293E**



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<sup>3</sup> Notice, p. 1.

**Photo 2 – Covered Conductor Installation Structure ID 4491289E**



**Photo 3 – Covered Conductor Installation Structure ID 4491295E**



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

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:	Wildlife-Safe Power Line Construction	<b>DC 535</b>
Effective Date:	What's Changed?	Sheet 1 of 35
10-25-2024		<b>DOH</b>