

August 1, 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_YLO_20250507_1048

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_20250507_1048 received on July 15, 2025 (Notice), based on Energy Safety field inspections conducted in SCE's service area on May 7, 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: Data Accuracy

Notice	Violation	Structures
NOV_CAD_SCE_YLO_20250507_1048	1	4491254E
	2	4491255E
	3	4409334E
	4	4491252E
	5	4491253E

Summary of Findings:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk- Informed (HFRI) Inspections and Remediations, SCE failed to provide accurate data for the initiative on pole ID4491254E, Grid Hardening ID 410903686-4491254E at coordinates 33.8924261093468, -117.079745617984.

Violation 2. Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk- Informed (HFRI) Inspections and Remediations, SCE failed

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.

to provide accurate data for the initiative on pole ID4491255E, Grid Hardening ID 410903687-4491255E at coordinates 33.8920208848202, -117.079111135204.

Violation 3. Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk- Informed (HFRI) Inspections and Remediations, SCE failed to provide accurate data for the initiative on pole ID4409334E, Grid Hardening ID 410902961-4409334E at coordinates 33.8917967942612, -117.078374286702.

Violation 4. Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to provide accurate data for the initiative on pole ID4491252E, Grid Hardening ID 410903684-4491252E at coordinates 33.893433561885, -117.080986133899.

Violation 5. Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to provide accurate data for the initiative on pole ID4491253E, Grid Hardening ID 410903685-4491253E at coordinates 33.8927718583486, -117.080268679126

Energy Safety did not give these data accuracy violations a “risk category.”³

Response:

SCE inadvertently reported bird guard installation under WMP initiative Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations on structures 4491254E, 4491255E, 4409334E, 4491252E, and 4491253E. These structures were included in the initiative due to how the notifications were bundled under the work order package. The poles were originally combination (EZ) poles that supported both transmission and distribution equipment. However, as part of a relocation project, the distribution equipment was removed in December 2024 due to inactivity, converting these poles into transmission-only (ET) structures.

Although no distribution load remains on these poles - and bird guard installation is no longer applicable - the original notifications tied to the broader work order remained in place. As a result, bird guard installation was unintentionally listed as part of the completed scope. The notifications were subsequently closed by the contractor, when they should have been cancelled based upon the change in the construction.

SCE will work with its contractors to prevent similar discrepancies in future reporting. Please see below for photos of the relevant structures prior to the removal of the distribution equipment.

³ Notice, p. 1.

Photo 1: Structure ID 4491254E

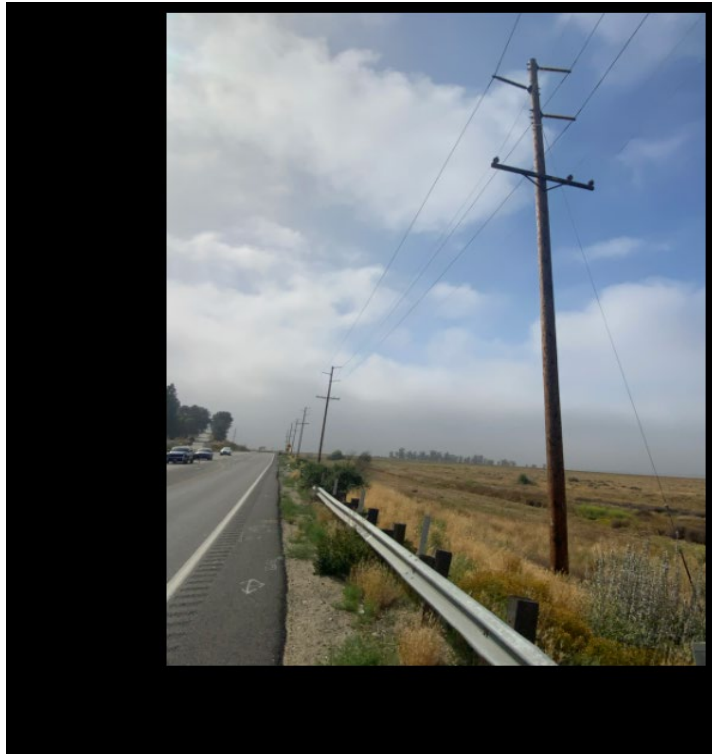


Photo 2: Structure ID 4491255E

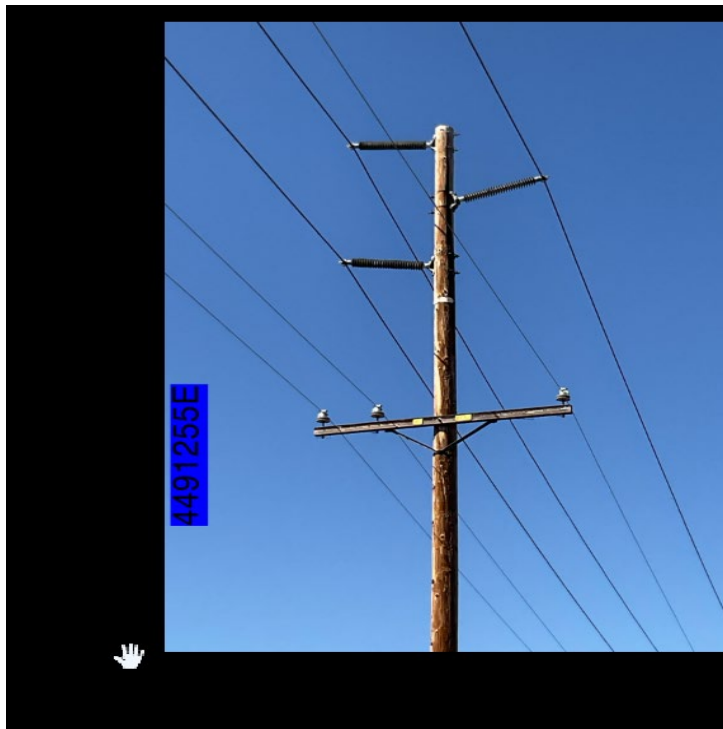


Photo 3: Structure ID 4409334E

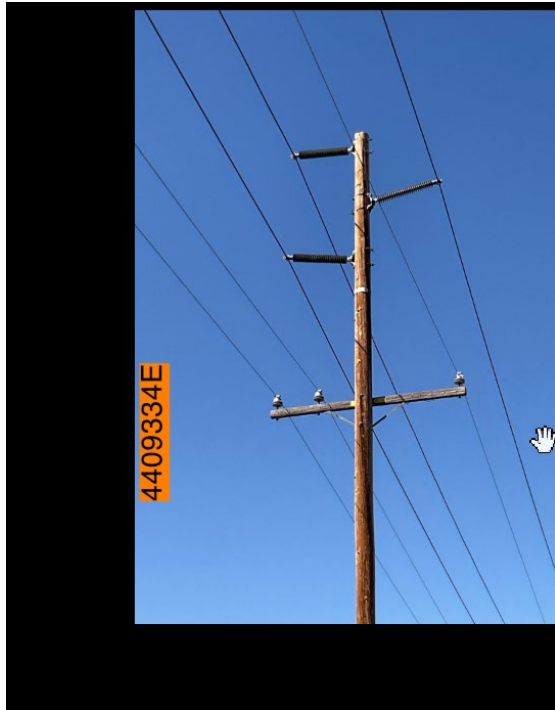


Photo 4: Structure ID 4491252E



Photo 5: Structure ID 4491253E

