

September 17, 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\_LOK\_20250617\_1332

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\_LOK\_20250617\_1332 received on August 21, 2025 (Notice), based on the Office of Energy Infrastructure Safety's (Energy Safety) field inspections conducted in SCE's service area on June 18, 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 the facts below and further explain its position in subsequent procedural stages and/or proceedings.<sup>1</sup> 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.<sup>2</sup>

### **Finding: Completeness**

Notice	Violation	Structures
NOV_CAD_SCE_LOK_20250617_1332	1	4210234E

### **Summary of Findings:**

Energy Safety's Notice states that in implementing 2024 WMP initiative 8.1.3.1 - Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to complete the installation of wildlife covers on Pole ID 4210234E, Grid Hardening ID TD2052262-4210234E at 36.00702101948973, 118.94956843983366.

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

### **Response:**

The notification for structure ID 4210234E 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

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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.

a more comprehensive mitigation. The covered conductor was installed on December 8, 2024, obviating the need for the originally planned bird guard. Please refer to the photo evidence below of the installed covered conductor, as documented during a routine inspection conducted on January 9, 2025.

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 installed. This standard explicitly recognizes that covered conductor systems eliminate the need for additional wildlife mitigation equipment.

