

September 19, 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_20250710_1119

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_20250710_1119 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 July 10, 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_YLO_20250710_1119 | 1 | 2075639E |

Summary of Findings:

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 connector cover on pole ID 2075639E, Grid Hardening ID 414050282-2075639E at coordinates 33.469537, -117.232231.

Energy Safety considers this completeness violation to be in the Minor Risk Category.³

Response:

SCE confirms that the wildlife connector cover on structure ID 2075639E was remediated on December 9, 2024. During a subsequent inspection in response to this Notice, SCE's Field Operations team identified that the previously-installed wildlife connector cover had become dislodged likely due to environmental exposure or other

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.

external factors. On September 15, 2025, SCE personnel installed a wildlife connector cover on structure 2075639E once again. Please find the photo evidence below of the most recently completed wildlife connector cover remediation.

