

September 19, 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-FILEING**

**SUBJECT:** Southern California Edison Company's Response to Notice of Violation  
NOV\_CAD\_SCE\_SIS\_20250708\_1348

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\_20250708\_1348 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 8, 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**

<b>Notice</b>	<b>Violation</b>	<b>Structures</b>
NOV_CAD_SCE_SIS_20250708_1348	1	2064582E

### **Summary of Findings:**

Energy Safety observed that in implementing 2024 WMP initiative 8.1.3.1 - Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations (IN-1.1), SCE failed to complete the remediation of avian protection on Pole ID 2064582E, Grid Hardening ID 413885139-2064582E at coordinates 33.470833, -117.299352.

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

### **Response:**

SCE confirms that the unhinged avian protection on the transformer bushings on structure ID 2064582E was remediated on October 7, 2024. During a subsequent inspection in response to this Notice, SCE's Field Operations team identified that the previously installed avian protection on the transformer bushings had become dislodged

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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.

likely due to environmental exposure or other external factors. On September 18, 2025, SCE personnel secured the avian protection on the transformer bushings on structure

064582E once again. Please find the photo evidence below of the most recently completed avian protection on the transformer bushings remediation.



