

October 9, 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_1459

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_1459 received on September 15, 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_1459	1	4063880E

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 provide accurate data for the initiative on the pole ID4063880E, Grid Hardening ID 414050312-4063880E at coordinates 33.477834, -117.220148.

Energy Safety did not provide a severity or risk category.³

¹ At the time that SCE received this Notice, Government Code Section 15475.4 anticipated 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, at the time that SCE received the Notice, Section 8389(g) only provided for a possible enforcement action where "an electrical corporation is not in compliance with its approved wildfire mitigation plan," which is inapplicable here.

³ Notice, p. 1.

Response:

SCE confirms that wildlife covers are installed on structure ID 4063880E and that remediation to properly secure them was completed on November 13, 2024.

Below, SCE has added red arrows to the photos included in Energy Safety's Notice to indicate the locations of the wildfire covers. Additionally, a photo taken during a routine SCE inspection conducted on May 12, 2025, further verifies that the covers had remained in place at the time of that inspection. In response to this Notice, SCE's Field

Operations team also conducted an additional inspection on September 24, 2025 and confirmed that the wildfire covers were still in a secure position.

Please find the photo evidence below of the wildlife covers from both Energy Safety's inspection and SCE's May 12, 2025 inspection.

	
IA1img1: View showing no wildlife covers	IA1img2: View showing no wildlife covers
	
IA1img3: View showing no wildlife covers	



2025 360-Inspections
OH-4063880E_20250512_19.jpg

Delivered By: Conekt2
Capture Date: 2025-05-12 09:22:32

Lat/Lon: 33.477759, -117.220207
Folder: D2513-0001_KnownAssets_2025051