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WILLIAM T FUJIOKA
Chief Executive Officer

April 25, 2013

To: Supervisor Mark Ridley-Thomas, Chairman
Supervisor Gloria Molina
Supervisor Zev Yaroslavsky
Supervisor Don Knabe
Supervisor Michael D. Antonovich

From: William T. Fujioka
Chief Executive Officer

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STATUS REPORT ON SOUTHERN CALIFORNIA EDISON COMPLIANCE EFFORTS RELATED TO THE 2011 SAN GABRIEL VALLEY WINDSTORMS PUBLIC UTILITIES COMMISSION CONSUMER PROTECTION AND SAFETY DIVISION REPORT

On January 22, 2013, the Board reviewed the Public Utilities Commission (PUC) Consumer Protection and Safety Division report pertaining to Southern California Edison's (SCE) response to the 2011 windstorms that swept through the San Gabriel Valley. The report investigates the cause of the outages and SCE's communication with customers during and after the incident, restoration efforts, and its preservation of evidence. Additionally, the report makes recommendation for improvements to SCE's system infrastructure. After reviewing the report and subsequent discussion, the Board requested the Chief Executive Office (CEO) Office of Emergency Management (OEM) provide quarterly reports on SCE's efforts to address and correct the 12 compliance findings. This is the first quarterly report of SCE's compliance efforts.

METHODOLOGY FOR TRACKING ACTIVITIES

OEM and the CEO Real Estate Division staff met with SCE to discuss their efforts to address and correct the findings outlined in the PUC report. OEM developed a quarterly report template that will address the 12 compliance findings and track the progress of SCE's compliance and corrective action efforts.

SUMMARY OF COMPLIANCE FINDINGS

As of April 24, 2013, the first quarterly SCE Compliance Report reflects five areas of completion, six areas still in progress, and one area with an inconclusive status.

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- A **Completed** status denotes SCE has complied with the findings or there is no further action required for the area that the PUC has outlined.
- An **In Progress** status denotes SCE is still working to address the PUC's findings or is waiting for review and response to their corrective action efforts.
- An **Inconclusive** status denotes there was not an agreement on the finding.

Please see the attached Quarterly Compliance Status Report for more details.

CONCLUSION

As directed in the January 22, 2013, Board motion, we will continue to keep the Board apprised of SCE's progress towards addressing and implementing all 12 compliance findings identified in the PUC report.

If you have any questions or need additional information, your staff may contact Ashu Palta, OEM, at (323) 980-2268 or apalta@ceooem.lacounty.gov.

WTF:GAM:RW
AP:ap/llm

c: Executive Officer, Board of Supervisors
County Counsel

Attachments

B100293.OEM.SCE 1st Qtr Compliance.bm.042513

SOUTHERN CALIFORNIA EDISON COMPLIANCE QUARTERLY REPORT

Report for Activities through April 19, 2013

AREAS OF COMPLIANCE	SCE Status	COMMENTS/NEXT STEPS
1) Edison failed to preserve evidence for inspection by the Consumer Protection and Safety Division that proved their actions led to unnecessary damage and prolonged outages.	Completed	SCE stated that they cooperated with CPUC personnel to retain materials such as damaged poles and other equipment for investigative purposes. However they felt it was not feasible to retain all damaged items because their top priority was to safely restore service and the collection of damaged materials related to each equipment failure would have detracted from safe restoration of service. This is in conflict with GO 95, Rule 17 which requires all contributing causes such as pole failures be internally investigated and GO Rule 19 that requires evidence collected as part of the utility's investigation be retained and made available upon request to the CPUC. SCE plans to discuss these requirements/issues with CPUC in the future. Our recommendation is that in the future SCE collect and preserve all damaged equipment as described in GO 17 and 19 unless the CPUC gives them a waiver because of extenuating circumstances.
2) 21 of Edison's utility poles and 17 guy wires did not meet industry safety standards.	In Progress	SCE has stated that they have implemented an inspection and maintenance program that complies with requirements established by the CPUC. Safety factors for poles are determined by calculations that SCE conducts when it first installs a pole or when it adds equipment to an existing pole. However, safety factors change during the useful life of wood poles and conductors and depend on a number of variables outside of SCE's control. The CPUC has ordered SCE to conduct a statistically valid assessment of its wood poles to determine compliance with safety standards and to be completed by no later than July 31, 2013. The CPUC will then make recommendations about what steps, if any, are necessary to assure that SCE's poles are not overloaded.
3) Several conductors showed signs of pitting and deformation indicating they did not meet industry safety standards.	Inconclusive	SCE responded by stating that it has approximately 53,000 miles of overhead conductors on its system. While SCE conducts an overhead conductor inspection program as required by the CPUC, at any one time there will be some conductors having signs of pitting or deformation. This fact, by itself, does not mean that the conductors examined by the CPUC no longer met the CPUC's safety standards. However, the CPUC stated that the safety factor would have been lower than at installation time. SCE does not have any current plans to address this area of compliance any further at this time, but will continue to routinely monitor all its overhead conductors.

AREAS OF COMPLIANCE	SCE Status	COMMENTS/NEXT STEPS
4) Lack of vegetation management by Edison may have contributed to utility pole failure.	Completed	SCE's indicated that their Vegetation Management Program complies with CPUC requirements. SCE concluded that there is no indication that lack of vegetation management contributed to the pole failures that occurred during the windstorm. However, the CPUC investigative report indicated that vegetation was the cause of 170 circuit outages. However, due to the challenges with preserving evidence, the investigators were unable to conclusively determine the exact configurations of the circuit/free branch positions prior to the incident. As a result, CPUC cannot conclude that SCE violated GO 95, Rule 35.
5) Edison did not dispatch dedicated staff to contact its 397 critical care customers during the incident.	Completed: Phase 1: Feb 2012 Phase 2: June 2012	SCE policies and procedures do not require them to have direct contact with medically sensitive customers, in the field, during power outages. SCE did not dispatch dedicated staff specifically to contact critical care customers during the event. However, SCE indicated they have developed and implemented in February 2012 an automatic notification approach to communicate with all medical baseline customers, including critical care customers, affected by an outage projected to last more than 12 hours. If efforts to contact a customer by telephone are not successful, SCE field personnel will be dispatched to contact the customer. In June 2012, all 67,000 medical baseline customers were enrolled in SCE's new communication protocol, and must actively opt-out of the program if they do not want to participate in this type of notice. See Advice Letter 2845 E, pages 6 – 7 (attached).
6) Edison should deploy a reverse-911 system to automatically contact its customers of an outage in a particular area.	In Progress	SCE responded that there are no current plans for SCE to purchase and deploy a reverse 911 system. SCE did indicate that they are committed to explore the use of cities' Reverse 911 system and in 2012 completed a survey of all cities and counties in the SCE territory. Impacted San Gabriel Valley cities and others (71 cities in all) have expressed willingness to use their Reverse 911 systems for distribution of SCE messages during emergencies. SCE is following up with the remaining 120 cities to see if similar arrangements can be made. Also, SCE established an agreement in August 2012, with the Inland Regional Center (IRC) for special needs customers registered with IRC. See Advice Letter 2845-E, page 7 (attached).

	AREAS OF COMPLIANCE	SCE Status	COMMENTS/NEXT STEPS
7)	Edison provided the public inaccurate restoration time estimates.	Completed: Phase 1: Mar 2012 Phase 2: June 2012	SCE indicated that they have implemented several changes to try to improve the accuracy of their estimated response times (ERTs). SCE developed a method to use historical ERT data based on device type (circuit breaker, branch line fuse, etc.) and geographic location to provide more accurate information prior to a repair crew being dispatched to the job. Additionally, SCE has developed several methods to improve situational awareness of the magnitude of events and has increased the number of personnel who can update SCE's Outage Management System so that updated information, which is used to develop ERTs, is available when work load increases during storms. SCE also implemented a process to provide more general ERT information under certain types of emerging conditions until SCE can provide more specific, detailed information.
8)	Edison should implement in-person "door-to-door" outreach activities during emergencies.	Completed	During this initial reporting period, SCE developed and implemented a new outreach campaign, which highlights an updated social media strategy that is designed to provide more accurate power outage information, in a systematic manner, to the general public as well as emergency responders. SCE indicated that they have implemented an in-person outreach for medical baseline customers who are impacted by an outage that is expected to last more than 12 hours and who cannot be reached via phone. See Advice Letter 2845-E, pages 6 – 7 (attached).
9)	Edison did not request mutual assistance from other utilities or the California Utility Emergency Organization (CUEO) which could have reduced restoration times.	In Progress	SCE stated that they considered requesting mutual assistance from other utilities at several times during the windstorm event, but believed that augmenting SCE's own resources with contractors who had previously worked with SCE would be the most expeditious restoration process. They also used SCE personnel from other parts of the service territory that were not affected by the windstorm. SCE's contractors have considerable expertise with various types of SCE's circuits and equipment and are also familiar with SCE's procedures. In addition, SCE's contractors generally have their own safety personnel, supervisors, and equipment; whereas SCE may need to provide these resources to work crews provided by mutual assistance agreements and this would have depleted the available SCE resources. Thus, SCE did not conclude that requesting mutual assistance would have shortened the outage duration. However, SCE does agree that it can facilitate future use of mutual assistance by improved agreements to speed mobilization time and self-sufficiency of assisting crews and is in the process of developing these agreements. SCE also indicated in meeting with emergency management staff that this corrective action will be addressed in the revised Corporate Emergency Response and Recovery Plan, which is currently in the process of being updated.

AREAS OF COMPLIANCE	SCE Status	COMMENTS/NEXT STEPS
10) Edison's Corporate Emergency Response and Recovery Plan is outdated, and some of its points of contact included retired PUC staff.	In Progress	During this initial reporting period, SCE indicated that they are in the process of updating their Corporate Emergency Response and Recovery Plan. SCE will provide opportunities for Cities and Counties within their service territory to review the plan's elements and to provide SCE with feedback. The revised Corporate Emergency Response Plan will be tested through an exercise on May 30, 2013. The results will be submitted to the CPUC on June 30, 2013 and the revised plan will be submitted on October 31, 2013. As of March 31, 2013, OEM and the cities within the County has yet to be offered the opportunity to review or comment on the revised plan.
11) Edison representatives lacked specific operational knowledge and authority when contacted by the public and government entities.	In Progress	As an organization, SCE has adopted the Incident Command System as a core emergency management tool and is working towards training their public relations representatives and other key staff on emergency management principles and priorities. Additionally, SCE has developed a training program designed to improve the operational knowledge of representatives who are in contact with public and government entities. Since the training is still ongoing and the staff have not been tested via exercises the compliance effort is still in progress.
12) Edison violated safety standards by failing to conduct all of its emergency training exercises.	In Progress	SCE has conducted several internal trainings and exercises, as well as participated in standard emergency drills to test their protocols with more than 190 Cities and 14 Counties in their service area. SCE continuously trains their staff in all aspects of the Incident Command System (ICS). ICS is a key component of the National Incident Management System and is a best practice for emergency management. Whenever notified, SCE regularly provides staff to participate in City, County and Regional emergency management exercises.

January 30, 2013

ADVICE 2845-E
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Report on Progress Made on Windstorm-Related Initiatives in
Compliance With Decision 12-11-051

In compliance with the California Public Utilities Commission (Commission or CPUC) Decision (D.)12-11-051, Southern California Edison Company (SCE) hereby submits the following information on the progress SCE has made on initiatives based on internal and external assessments following the windstorm that occurred November 30 and December 1, 2011.

PURPOSE

Pursuant to Ordering Paragraph 26 of D.12-11-051, this Advice Letter provides a report on the progress SCE has made on windstorm-related initiatives identified by SCE in letters SCE sent to the Commission on February 7, February 27, and April 2, 2012.

BACKGROUND

During SCE's 126-year history, we have encountered hundreds of small and large storms of varying intensity. Our storm response efforts have evolved over time and SCE has generally responded effectively. In the evening hours of November 30, 2011, high winds struck Southern California. Although much of SCE's service territory experienced some damage, the San Gabriel Valley area was most impacted. Wind speeds were measured between 80 and 100 miles per hour, with some gusts at higher speeds. Large, mature trees were blown down in many places, taking down SCE wires and poles. Across the service territory, more than 400,000 customers lost power for at least a few minutes. At the peak of the storm – at 4:00 a.m. on December 1, 2011 – more than 220,000 SCE customers were without power. Of those 220,000 customers, power was restored to approximately 50 percent within 24 hours and more than 95 percent within four days of the peak of the storm. Over time, each repair completed restored service to fewer customers. Overall, the restoration effort continued for seven and a half days.

The storm was unlike most in that its hurricane force winds resulted in significant damage in a concentrated area. In the San Gabriel Valley, the storm interrupted service to more than three out of every four customers. Moreover, the average sustained interruption for this storm was more than four times longer than those experienced in other large storms. The unique, concentrated nature of the damage hampered our ability to safely access impacted areas and overwhelmed our restoration estimating processes. As a result, SCE communicated inaccurate restoration estimates that frustrated customers and local officials. Additionally, SCE used a standard order-based restoration approach for the first two days of the event, until we were able to fully comprehend the extent of the damage. SCE has since learned from other utilities that routinely respond to hurricane-type events that a circuit-based restoration approach at the onset of the event would have been more effective. Therefore, we modified our processes to incorporate the circuit-based approach for any future large-scale events.

On January 26, 2012, the Commission held a public participation hearing (PPH) in Temple City, a central site in the storm damage area. Among other issues, members of the public criticized customer service at SCE's call centers for a lack of accurate outage information. Local government representatives complained about insufficient access to SCE representatives and to accurate information about SCE's response to the windstorm damage.

At the close of the PPH, SCE was directed by the Administrative Law Judge (ALJ) to provide additional public information to the Commission in response to the concerns raised. SCE responded to the Commissioners and the ALJ through three letters:

- February 7, 2012 – Addressed (1) customer outreach activities regarding processing customer claims after the windstorm, particularly for minority communities; (2) long-term outreach plans for processing windstorm-related claims; and (3) the status of previously submitted customer claims and the estimated processing time.
- February 27, 2012 – Addressed questions regarding (1) a separate dedicated telephone number for local government officials to improve access to outage information affecting their communities; (2) customer service training at call centers; (3) methods for communicating with medical baseline customers and the status of technology improvements; (4) integration of SCE's Corporate Emergency Response Plan and storm response plan; and (5) mobilization of tree-trimming crews in advance of anticipated wind events.
- April 2, 2012 – Provided summaries of, and links to, two reports on SCE's response to the windstorm. One report was prepared internally and provided an extensive root cause evaluation of the difficulties SCE encountered in its storm response, as well as an evaluation of best practices from two utilities familiar with hurricane-type events. The second report was prepared externally and presented an independent assessment of SCE's preparedness for, and effectiveness in, responding to the events of November 30 and December 1, 2011.

On November 29, 2012, the Commission issued SCE's 2012 General Rate Case Decision, D.12-11-051. Among other things, D.12-11-051 required "SCE to provide a report to the Commission via a Tier 2 Advice Letter by January 31, 2013, which describes the progress made by the utility in each of the internal and external initiatives SCE documented in its two February 2012" letters.¹

During this particular storm, SCE's performance fell short of our expectations, as well as those of our customers, local elected officials, and the Commission. Many important opportunities for improvement were identified based upon the results of SCE's internal assessment, an independent evaluation performed by Davies Consulting, feedback secured through our involvement in public participation hearings, and a preliminary report by the CPUC's Consumer Protection and Safety Division (CPSD).

As a result, SCE established a program to strengthen service restoration and communication performance during storms by bolstering key technology systems, and by increasing the scalability and integration of our storm response plan.

SUMMARY OF PROGRESS ON INITIATIVES IDENTIFIED IN SCE's TWO FEBRUARY LETTERS

The following table summarizes commitments made by SCE to the Commission in letters dated February 7 and February 27, 2012, as well as their status. We will complete our Corporate Emergency Response Plan pursuant to General Order (G.O.) 166 by October 31, 2013.

Letter Date	Commitment	Completion Date
2/7/12	Implementation of geographically-targeted, foreign language online display advertisements and search engine marketing (distribution to be updated based on results) used to reach customers and increase their awareness of how to file a claim by February 10, 2012.	2/9/12
2/7/12	A press release (general, ethnic media, and local on-line publications) that will be issued to leverage media communications to reach customer informing them of how to file a claim. The press release will also be shared with cities in the targeted outreach plan to expand awareness. The press release is planned for the week of February 6, 2012.	2/9/12
2/7/12	SCE will respond to all customer windstorm-related claims (over 1,300) no later than February 17, 2012.	2/17/12

¹ D.12-11-051, p. 319, also Ordering Paragraph 26.

Letter Date	Commitment	Completion Date
2/7/12	As of February 1, 2012, for each claim received, SCE will send the customer an acknowledgement letter within five business days.	Various dates – all completed within five days of claim receipt
2/7/12	Community Outreach: SCE will work with various San Gabriel Valley community partners to make customers aware of how to file a claim. Focus will be on the six most impacted cities (Altadena, Arcadia, San Gabriel, Temple City, Sierra Madre, and La Canada) and information will be distributed via electronic-mail and hard copy materials. SCE will also deploy Employee Resource Group volunteers to staff information tables at local ethnic markets and events to speak to customers and distribute flyers and claims forms.	2/22/12
2/7/12	Print advertisements will target weeklies and local newspapers in the areas affected by the windstorm. General market and African American papers will begin running the ad the middle of the week of February 6, 2012, and Asian press will begin running the ad the following week.	2/13/12
2/7/12	Call centers: Customer Service Representatives will receive additional training and FAQs to assist customers who want to file a claim. Customer Service Representatives will continue to be available to speak in the customer's preferred language and will assist in submitting claim forms.	1/31/12
2/27/12	SCE Local Public Affairs Department will develop and deliver draft language for outbound messages to San Gabriel cities that have "Reverse 911" systems by May 1, 2012.	5/1/12
2/27/12	SCE Local Public Affairs Department will conduct a practice conference call exercise with San Gabriel Valley cities before July 1, 2012.	4/6/12
2/27/12	SCE will determine the feasibility of providing circuit-related information such as number and location of circuits and restoration estimates for critical city services to city managers during emergencies.	12/31/12
2/27/12	In 2012, our Call Center will implement a new call monitoring and scoring tool focused on customer engagement and employee soft skills that will enhance customer interaction skills and issue resolution. Customer Service Representatives will be monitored and scored on several call components such as tone, empathy, perceived customer effort, likelihood of customer escalation, and first contact resolution. The new Quality Management processes will be fully rolled out by mid-2012.	7/10/12
2/27/12	Submit internal and external root cause reports to the Commission following completion.	3/12/12
2/27/12	Evaluate industry best practices in the area of vegetation management that go beyond the compliance and reliability that may enhance SCE's performance in similar windstorms.	Mid-2012
2/27/12	Identify changes made to the 2013 Corporate Emergency Response Plan and file them in a compliance statement to the Commission by October 31, 2013, pursuant to G.O. 166.	10/31/13

HIGHLIGHTS OF ACTIONS TAKEN TO IMPROVE PERFORMANCE DURING STORMS

In addition to working to satisfy commitments made to the Commission with respect to storm response, SCE has made other improvements to its service restoration and communication practices. The progress on some of those efforts – both commitments and incremental improvement initiatives – is highlighted below.

Customer Claims Processing

Some of the earliest actions SCE implemented following the windstorm were to improve and expedite our customer claims processes. SCE made the claims process more customer-friendly by training Call Center representatives with additional language capabilities in Spanish, Cambodian, Mandarin, Cantonese, Vietnamese, and Korean to assist customers in filing claims. Seven distribution centers were staffed with Consumer Affairs personnel to provide emergency supplies and to answer customer inquiries on claims processing. With respect to outreach, 498,574 notices were distributed to customers in communities impacted by the windstorm, advising them of public participation hearings and the availability of Customer Service Representatives to assist with claims and answer questions. Other efforts to promote the public participation hearings included the publication of notices in local newspapers, postings on SCE.com in English and Spanish, and providing toll-free telephone numbers to facilitate easy access to SCE's multi-language call center claims and information services.

Following proactive outreach and response efforts, SCE customers filed 1,300 claims in the period between the windstorm and the public participation hearing on January 26, 2012. All customers promptly received acknowledgement letters with a commitment for a response from SCE by February 17, 2012. All claim responses were delivered within that timeframe.

An additional 782 customer claims were received by SCE after January 26, 2012, and all of these customers received acknowledgement letters from SCE within five days. SCE responded to all 782 claims within 30 days of the date of acknowledgement letters.

Call Center Customer Service and Culture

Part of SCE's commitment to improved storm response is ensuring that our Call Center representatives exemplify SCE's culture with respect to their interactions with customers. As such, SCE developed and implemented a new training regimen delivered during three-day workshops and two half-day reinforcement sessions to improve customer interaction skills. These skills included active listening, demonstrating empathy, creating rapport, and issue resolution. To date, approximately 700 SCE employees and nearly all Call Center operations staff have completed the new training. The first round of training for all staff was completed in July 2012 and this training is being incorporated into required new-hire and refresher training requirements.

SCE implemented a new process to provide ongoing, structured and real-time coaching to reinforce desired behaviors. A newly adopted quality management process uses a call monitoring and scoring tool that is focused on customer engagement, employee soft skills, customer interaction, and issue resolution techniques.

Customer Communication

The Outage Center on SCE's website, SCE.com, was redesigned for better access via mobile devices, as many customers use cell phones during an outage. This included a new mobile application for iPhone and Droid smart phones to afford customers the opportunity to access outage information, report an outage, or track outage status via their mobile devices. These improvements were completed in August 2012.

In addition, in response to customer requests, SCE added Facebook as a social media channel for customer communications. The SCE Facebook page was launched in December 2011.

Communication with Medical Baseline Customers

To improve the effectiveness of communication with Medical Baseline (MBL) customers, SCE committed to consider new, alternate forms of communication to ensure MBL customers receive timely and accurate outage information. As a quick improvement after the windstorm, SCE immediately augmented the list of available vehicles for communicating with MBL customers by adding their home telephone as the primary contact method while maintaining their preferred alternate method of contact (text, e-mail, TTY, and mobile telephone).

In February 2012, we further improved the communication process to ensure that all MBL customers impacted by an outage projected to last longer than 12 hours are contacted by telephone. If we are unable to contact the customers via telephone, then we dispatch a field representative to the customer's residence to communicate with the MBL customer in-person. If the customer is not at home, then the SCE representative leaves a written notice outlining outage and safety information to enable the customer to take appropriate action.

SCE's process prior to the windstorm was to mail a postcard to all registered MBL customers asking them to identify their preferred method of contact from SCE during a storm. This approach yielded responses from approximately 65 percent of MBL customers. As an improvement, in mid-June 2012, SCE moved from an "opt-in" post card approach to an "opt-out" approach. The "opt-out" approach enrolled all MBL customers (approximately 67,000) in the new communication protocol unless they actively chose to be excluded by opting out. This approach provided SCE with greater confidence that we would now notify those MBL customers who wanted to be contacted without relying on a post card "opt-in" response.

In addition, in August 2012, we established an agreement with the Inland Regional Center (IRC) to use its Reverse 911 system to contact special needs customers who are registered with IRC. SCE will look for opportunities to establish similar agreements with other regional centers across SCE's service territory.

Communication with Local Government Officials

To improve communication with local government officials, SCE committed to explore the use of cities' Reverse 911 systems. All five supervisorial districts in Los Angeles County and 13 affected cities in the San Gabriel Valley were contacted with the intent to (i) validate the feasibility of such an approach in storms and then, if confirmed, (ii) pursue similar arrangements with the remaining cities and counties across SCE's service area. Working with cities in the San Gabriel Valley, we confirmed their willingness to use their Reverse 911 systems in this manner, provided outbound messages, and secured interest and verbal agreements from 71 cities. The remaining 120 cities contacted by SCE either declined to participate, required payment, were otherwise unwilling to commit to the effort, or have not responded.

SCE will follow-up with those cities that have not responded (a subset of the remaining 120) to determine their interest in sharing their Reverse 911 capabilities. SCE also will formalize agreements with all interested cities via a Memorandum of Understanding on the use of their Reverse 911 systems. These measures will allow SCE an additional channel to communicate through cities and counties with their residents – our customers – in the event of a significant storm.

SCE has taken steps to improve communication with elected officials and their staff members in the San Gabriel Valley. This was achieved through the establishment and testing of a dedicated, toll-free number and "Flash Communication" process through which SCE can coordinate conference calls with elected officials to provide information about outage status and restoration activities. The system has been tested through nine drills with 191 cities and 14 counties across SCE's service area. Through feedback from elected officials, the effort has been expanded to include mass electronic-mail blasts that further strengthen communication. Regular Flash Communication drills will be held as part of normal emergency preparation activities.

In addition to the planned improvements to communication practices with local government officials, SCE will use the liaison role as identified in the National Incident Management System (NIMS) Incident Command System (ICS) emergency response management framework. This framework provides a core set of concepts, principles, terminology, and organizational processes that enables effective, efficient and collaborative communication and incident management. The liaison role adds an SCE representative who is available to city and county officials via SCE's Incident Command Center during events. Role-specific training will be provided to those who will assume liaison responsibilities, such that the level of expertise available from SCE to the city

and county Emergency Operations Centers is increased. Full deployment is expected by the end of June 2013.

SCE also elected to conduct Community Emergency Response Team (CERT) outreach to enhance emergency response and interaction with the communities we serve. The goal is to provide first responders and city representatives with a better understanding of SCE's approach in responding to emergency events so that we can work more collaboratively during storms and earthquakes. It also enhances their knowledge of the electric utility business so that they are in a better position to respond and answer general questions. From February 28, 2012, to November 28, 2012, SCE conducted 25 CERT educational sessions throughout the service area, reaching 665 stakeholders. The sessions covered topics such as safely responding to downed power lines, the restoration process, and how to get involved in your community's emergency response efforts.

Enhanced Restoration Processes

During the windstorm, one of the bottlenecks in our restoration process was our inability to quickly split jurisdiction at switching centers so that areas not impacted by the storm could provide additional resources to direct and support field crews involved in restoration efforts. While a procedure was developed during the windstorm, a more rigorous review was performed to ensure the procedure could be quickly and safely completed. The new procedure identifies pre-established secondary and tertiary back-up switching centers which will assume jurisdictional control of field switching activities as well as the necessary 900 MHz radio communication channels and protocols in the event that the primary switching center requires additional support. In October 2012, SCE successfully completed a test of the revised split jurisdiction procedure by transferring jurisdictional control of the grid and related radio communication between two switching centers in two hours. In comparison, it took 12 hours to split jurisdiction during the 2011 windstorm. Additional improvement is expected as we continue to exercise this new procedure.

Early Damage Assessment Teams

One of the challenges during the November 2011 windstorm was SCE's ability to efficiently deploy Damage Assessment Teams (DATs) into the affected area to quickly determine the extent of the damage. At the time of the windstorm, our process called for the deployment of DATs only after Troublemakers had gone into the field and determined that a more detailed work order was needed to make the repair. As an improvement, SCE is adding the use of Early Damage Assessment Teams (EDATs). The process will allow for the immediate field deployment of EDATs so that a high-level assessment of damage can be performed. This quick assessment of the magnitude and location of damage will then be used as input to help determine the appropriate restoration strategy and resource requirements.

Improving Situational Awareness

To help predict the potential impact of various storm types (such as wind, heat, and rain), a model was developed based on data from SCE's storm history. The model will help us better predict the number of resources – both people and material – and the likely location where those resources will be needed prior to the arrival of a storm. As a result, we will have the ability to pre-stage crews and materials, thereby enhancing our ability to respond as expeditiously as possible. An interim version of this model was effectively used to predict field crew needs during a heat storm in August 2012. A more comprehensive model was launched at the end of December 2012. In addition to the model, a dashboard has been created to capture and report the actual impact of the storm so that adjustments can be made to SCE's response.

Staging Areas

In preparation for future storm response efforts, we have identified more than 40 potential staging sites within our service territory that can be used as command posts and locations for crew gathering and dispatch, as well as to store materials. Such new sites are intended to allow for more staging areas, particularly in response to storms that result in extensive damage in concentrated areas.

SUMMARY OF PROGRESS

As stated above, all storm response commitments made by SCE to the Commission in SCE's February letters have been satisfied except for revisions to SCE's G.O. 166 submittal providing the updated Corporate Emergency Response Plan. The revised Corporate Emergency Response Plan will be tested using table-top exercises and drills, and will be implemented by mid 2013. Consistent with normal business practices and timeframes, changes made to SCE's Corporate Emergency Response Plan will be filed in a compliance statement to the Commission by October 31, 2013, pursuant to G.O. 166.

On January 11, 2013, the CPSD issued its final report on the windstorm, which is under review by SCE. Any new recommendations from the CPSD that have not yet been incorporated into SCE's action plans will be carefully evaluated as we continue to address outstanding corrective actions throughout the first half of 2013.

TIER DESIGNATION

Pursuant to Ordering Paragraph 26 of D.12-11-051, this Advice Letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

In accordance with G.O. 96-B, General Rules Section 7.3.4(1), this Advice Letter will become effective on March 1, 2013, 30 calendar days after the date filed.

NOTICE

Anyone wishing to protest this Advice Letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be mailed to:

California Public Utilities Commission, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
Electronic-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this Advice Letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Akbar Jazayeri
Vice President of Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Facsimile: (626) 302-4829
Electronic-mail: AdviceTariffManager@sce.com

Leslie E. Starck
Senior Vice President
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5540
Electronic-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

In accordance with Section 4 of G.O. 96-B and D.12-11-051, SCE is serving copies of this Advice Letter to the interested parties shown on the attached G.O. 96-B and A.10-11-015 service lists, as well as the Directors of the Commission's Energy Division, Consumer Service and Information Division, and Safety Enforcement Division. Address change requests to the G.O. 96-B service list should be directed by electronic-mail to AdviceTariffManager@sce.com or at (626) 302-2930. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic-mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the Advice Letter at SCE's corporate headquarters. To view other SCE Advice Letters filed with the Commission, log on to SCE's web site at <http://www.sce.com/AboutSCE/Regulatory/adviceletters>.

For questions, please contact me by telephone at (626) 302-3630 or by electronic-mail at Akbar.Jazayeri@sce.com.

Southern California Edison Company

Akbar Jazayeri

AJ:sq
Enclosures

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Darrah Morgan

Phone #: (626) 302-2086

E-mail: Darrah.Morgan@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

(Date Filed/ Received Stamp by CPUC)

ELC = Electric GAS = Gas
 PLC = Pipeline HEAT = Heat WATER = Water

Advice Letter (AL) #: 2845-E

Tier Designation: 2

Subject of AL: Report on Progress Made on Windstorm-Related Initiatives in Compliance With Decision 12-11-051

Keywords (choose from CPUC listing): Compliance

AL filing type: Monthly Quarterly Annual One-Time Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.12-11-051

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: _____

Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement.

Name and contact information to request nondisclosure agreement/access to confidential information:

Resolution Required? Yes No

Requested effective date: 3/1/13 No. of tariff sheets: -0-

Estimated system annual revenue effect (%): _____

Estimated system average rate effect (%): _____

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed¹: _____

Pending advice letters that revise the same tariff sheets: NA

¹ Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Akbar Jazayeri
Vice President of Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

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SCE's Post-Windstorm Improvement Update: 1Q13

Since the damaging San Gabriel windstorm in November of 2011, many important opportunities for improvement were identified based upon the results of SCE's internal assessment, an independent consultant's evaluation, feedback secured through our involvement in CPUC public participation hearings, best practices from other utilities, and the report by the CPUC's Consumer Protection and Safety Division (CPSD).

As a result, SCE established a program to strengthen service restoration and communication performance during storms by bolstering key technology systems, and by increasing the scalability and integration of our storm response plan. The following items highlight progress internally and across our service territory.

Public Agency Communications

- **Flash Communication** – Established email and conference call drills conducted regularly with 191 cities and 14 counties (started 1Q12)
- **900 MHz Radios** – Installed SCE radio equipment in county Emergency Operation Centers to facilitate emergency communications (installation completed, testing started 1Q13)
- **Incident Command System (ICS)** – SCE adopted NIMS ICS as the company's emergency response management framework company-wide (2011 adopted, company-wide deployment 2013)
- **CERT Electric Safety Education** – SCE regularly conducts electric safety education to first responders and CERT organizations
- **SCE Local Government Field Guide** – Began distribution of a new tool that provides quick access to important SCE contact information and communication channels helpful to local elected officials during emergencies (1Q13)

Customer Communications

- **Web** – Redesigned SCE's outage web page for ease-of-use and to expanded information (3Q12)
- **Mobile Outage App** – Released a smartphone-friendly tool customers may report and monitor planned and unplanned outages (iPhone and Android platforms, August 2012)
- **Social Media** – In December 2011, responding to customer requests, SCE added a Facebook page and expanded our use of Twitter as additional emergency communication channels
- **Call Center Customer Service and Culture** – Implemented a new training (three day workshops and half-day reinforcement sessions) to improve customer interaction skills; added real-time coaching process (3Q12, ongoing)
- **Customer Claims Processing** – Put in place an improved and expedited customer claims process including additional language support for Spanish, Cambodian, Mandarin, Cantonese, Vietnamese and Korean (completed in 1Q12)

Internal Process Changes

- **Operations and Logistics** – Established new and enhanced internal processes designed to improve response capabilities, ranging from integration of ICS into company response processes and procedures to identification of more than 40 potential staging areas for field crews and equipment during storms
- **Situational Awareness** – Devised new processes and tools, such as a new storm modeling tool to help with pre-storm planning and staging to enhance accuracy of storm information that is used internally and shared externally
- **'One Voice' Communications** – Established a new internal communication protocol to support more accurate and consistent information provided to local governments, media and customers