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July 22, 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

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 (ITEM 14-B, AGENDA OF JANUARY 22, 2013)

On January 22, 2013, the Board reviewed the California Public Utilities Commission (CPUC) 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 recommendations 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 second 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 CPUC 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 June 30, 2013, the second quarterly SCE Compliance Report reflects nine areas of completion and three areas still in progress. Please see the attached quarterly SCE Compliance Status Report for more details.

- A **Completed** status denotes SCE has complied with the findings or there is no further action required for the area that the CPUC has outlined.
- An **In Progress** status denotes SCE is still working to address the CPUC'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.

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 CPUC report.

If you have any questions or need additional information, your staff may contact Ronald Wade, OEM, at (323) 980-2270 or rwade@ceooem.lacounty.gov.

WTF:GAM:RW:llm

c: Executive Officer, Board of Supervisors
County Counsel

Attachment

OEM.SCE 2nd Qtr Compliance.Report.bm.072213

SOUTHERN CALIFORNIA EDISON COMPLIANCE QUARTERLY REPORT

Report for Activities through June 30, 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 1st Quarter	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 due of extenuating circumstances.
2)	21 of Edison's utility poles and 17 guy wires did not meet industry safety standards.	In Progress	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. As of June 30, 2013, SCE was still conducting assessments of their wood poles.
3)	Several conductors showed signs of pitting and deformation indicating they did not meet industry safety standards.	Completed 2nd Quarter	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 anyone 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 when installated. SCE does not have any plans to address this area of compliance at this time, but will continue to routinely monitor all its overhead conductors. SCE states that the CPUC rules provide that in-service conductors are held to lower safety factors than when they are installed to allow for deterioration over time. Thus, the fact that safety factors might have been less than when conductors were installed is accounted for in the CPUC's general orders. SCE advised no further action is planned.
4)	Lack of vegetation management by Edison may have contributed to utility pole failure.	Completed 1st Quarter	SCE 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/tree 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 1st Quarter	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. Advice Letter 2845-E, pages 6 – 7 was attached in the first Quarterly Report.
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. Also, SCE established an agreement in August 2012, with the Inland Regional Center (IRC) for special needs customers registered with IRC. SCE is currently working with personnel from the initial group of 71 cities/counties to establish the protocols necessary to partner on emergency communications.
7)	Edison provided the public inaccurate restoration time estimates.	Completed 1st Quarter	SCE indicated that they have implemented several changes to try to improve the accuracy of their estimated response times (ERT). 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 workload increases during storms. SCE also implemented a process to provide more general ERT information under certain types of emergency conditions until SCE can provide more specific, detailed information.
8)	Edison should implement in-person "door-to-door" outreach activities during emergencies.	Completed 1st Quarter	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. Advice Letter 2845-E, pages 6 – 7 was attached in the first Quarterly Report.
9)	Edison did not request mutual assistance from other utilities or the California Utility Emergency Organization (CUEO) which could have reduced restoration times.	Completed 2nd Quarter	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 meetings with emergency management staff that this corrective action is addressed in the revised Corporate Emergency Response and Recovery Plan.

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. The Corporate Emergency Response Plan was tested on May 30, 2013 and will be tested again on August 22, 2013.
11)	Edison representatives lacked specific operational knowledge and authority when contacted by the public and government entities.	Completed 2nd Quarter	As an organization, SCE has adopted the Incident Command System as a core emergency management tool and has trained 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. The training is ongoing and the staff was tested on May 30, 2013, via a functional exercise.
12)	Edison violated safety standards by failing to conduct all of its emergency training exercises.	Completed 2nd Quarter	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. In addition to participating in selected external drills, SCE is now including external observers and participants in many of their internal drills, such as the functional exercise held on May 30. Representatives from the Office of Emergency Management and other agencies including Cal OES and the California Energy Commission attended the event. SCE's next functional exercise is scheduled for August 2013 and will include participation by Riverside County.