Application No.:	A.24-10-002
Exhibit No.:	SCE-12 Vol. 04
Witnesses:	R. Daffern

(U 338-E)

Woolsey Fire Cost Recovery Application – Rebuttal Prudence of Operations – Telecommunications Testimony

PUBLIC VERSION

Before the

Public Utilities Commission of the State of California

Rosemead, California
July 15, 2025

SCE-12, Vol. 04: Woolsey Fire Cost Recovery Application – Rebuttal Prudence of Operations – Telecommunications Testimony

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I.

EXECUTIVE SUMMARY

In this volume, Southern California Edison Company (SCE) responds to Intervenors' testimony and further demonstrates that SCE reasonably managed its telecommunications (TTC) network, including the communication lines near the Woolsey Fire origin area.

In particular, Part II discusses SCE's inspection and maintenance of its telecommunications network, including its vegetation management practices, in the years preceding the Woolsey Fire. Cal Advocates affirms that SCE's telecommunications inspection and maintenance policies were consistent with GO 95 requirements. SCE's vegetation management practices also were consistent with GO 95 rules. Due in part to the lower risk of ignition presented by communication lines, GO 95 does not mandate minimum clearances for vegetation around communications lines and requires remediation only when vegetation causes strain or abrasion on communication lines. As set forth in SCE-02, no strain or abrasion was present on the communication lines on the secondary span at the time of the Woolsey Fire. Cal Advocates' testimony also acknowledges that SCE used qualified personnel, had post-work verification processes, and drafted guidance documents for the construction and inspection of communication lines; its testimony simply quibbles with SCE's word choices of how it described its quality control practices in its opening testimony, not with the actual substance of SCE's practices.

With respect to the communication lines at the secondary span, although SCE did not inspect the 06051 Line due to the inadvertent omission of this line from its inspection list, SCE inspected other adjacent communication lines supported on the same poles on an annual basis. The record clearly demonstrates that SCE was not on notice of any safety or compliance issues associated with the communication lines on the secondary span at the time of the fire.

Part III addresses Cal Advocates' criticisms of SCE's recordkeeping process pertaining to its telecommunications network. These criticisms are unfounded. Specifically, Cal Advocates faults SCE for "using spreadsheets and area-specific checklists" to track inspections of communication lines, and claims that this "de-centralized" and "manual" method of recordkeeping was "more subject to errors."[1] However, SCE's recordkeeping was not "de-centralized" and its use of "manual" spreadsheets and detailed Area Studies during the early years of the TTC inspection and maintenance program allowed SCE to get its TTC inspection and maintenance program off the ground quickly and was not imprudent.

[1] CA-10, pp. 8–9.

As the program matured, SCE refined and improved its recordkeeping processes. These improvements included the adoption of Survey123, a data collection field tool integrated with ArcGIS, and continuous updates to SCE's telecommunications asset data based on observations in the field. Although the 06051 Line was initially omitted from SCE's master list of communication lines in the relevant Area Study (but not the detailed schematic), it was subsequently added to the list by April 2020. In any case, this single inadvertent error does not rise to the level of imprudence; indeed, reducing employee error to zero is impossible regardless of the recordkeeping system used, and adopting a standard of perfection would not be cost effective.

II.

CAL ADVOCATES AFFIRMS THAT SCE'S TTC INSPECTION AND MAINTENANCE PROGRAM WAS CONSISTENT WITH GO 95 REQUIREMENTS

Cal Advocates' testimony regarding SCE's TTC inspection and maintenance program does not show any imprudence on SCE's part. Indeed, Cal Advocates' testimony affirms that SCE's TTC inspection and maintenance program met regulatory requirements, both as to the frequency of inspections and minimum clearance around communication lines.[2]

With regard to inspections, SCE's 2017 Transmission Telecom Outside Plant Communication Inspection and Maintenance Guidelines (2017 TTC Guidelines)[3] prescribed inspection cycles that met the Commission's requirements. For communication lines located in high fire-threat areas in Southern California, utilities were required to conduct patrol-type inspections annually and detailed-type inspections every five years.[4] From 2018 onward, for communication lines located in HFTD Tier 3, utilities were likewise required to conduct patrol-type inspections annually and detailed-type inspections every five years.[5] As noted in Cal Advocates' testimony, SCE's 2017 TTC Guidelines prescribed patrol-type inspections every year and detailed-type inspections every five years for overhead communications lines in fire-threat areas, which the guidelines defined as those areas "[a]s described in SCE's Fire Prevention Plan or General Order 95."[6]

SCE's 2017 TTC Guidelines also set forth the scope and objectives of inspections and included information regarding both patrol and detailed inspections, inspection cycles, and specific conditions and priorities related to communication lines.[7] Cal Advocates acknowledges that SCE used qualified and experienced contractors to perform inspection work.[8] These contractors took photos of conditions requiring remediation work, which were reviewed by experienced SCE employees.[9] Cal Advocates speculates that SCE's testimony stating that "inspections *typically* performed by experienced

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2 CA-07, pp. 5–6.

3 The 2017 TTC Guidelines were in effect at the time of the Woolsey Fire.

4 D.12-01-032, p. B-15.

5 GO 95, Rule 80.1A(1).

6 CA07SA-0011 (2017 TTC Guidelines, at p. 6, Table 4.1).

7 CA07SA-0009-0015 (2017 TTC Guidelines, pp. 4–10).

8 CA-10, p. 12.

9 *See* SCE-03, p. 78.

contractors . . . implies that some lines might have been left unchecked."[10] Cal Advocates' quibble about the use of qualifiers in SCE's testimony does not put forth evidence of imprudence in SCE's practices for its TTC inspection and maintenance program. While SCE did not have a formal quality control process, its use of experienced contractors and its process for requiring and reviewing photo-documentation of identified issues were reasonable, in the context of a still-maturing program.

SCE's policies on maintaining horizontal, vertical, and radial clearances around telecommunication lines also met the Commission's requirements.[11] SCE's 2017 TTC Guidelines required inspection crews to check during inspections for clearances of communication lines from electric lines and non-SCE communication lines. SCE defined "clearance" of communication lines from non-SCE communication lines as those consistent with the requirements set forth in GO 95, Rule 38.[12]

Cal Advocates' testimony also recognizes that SCE had oversight processes for construction work on its telecommunications network. As explained in SCE's opening testimony, the foreman of any construction project was responsible for validating the quality of the construction work.[13] SCE project managers reviewed the work performed by contractors.[14] And, depending on the nature of the project, internal and external experts also provided review and oversight.[15] Again, as with its testimony regarding SCE's TTC inspection and maintenance program, much of Cal Advocates' testimony on SCE's quality assurance of construction work focuses on the semantics of how SCE described its processes in its opening testimony, rather than provide a substantive critique of SCE's actions.[16]

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[10] CA-10, p. 12 (emphasis in CA-10).

[11] CA-07, p. 6.

[12] *See* CA07SA-0030 (SCE's response to CalAdvocates-SCE-A2410002-041, Question 5(c)).

[13] *See* SCE-03, p. 75.

[14] *Id.*

[15] *Id.*

[16] Notably, Cal Advocates' testimony did not address SCE's testimony regarding how its design and construction processes for communication lines were consistent with regulatory requirements. As explained in SCE's opening testimony, these design and construction standards were set forth in formal manuals and ensured that communication lines had sufficient clearance from other lines and were properly grounded and bonded. *See* SCE-03, p. 74.

In sum, Cal Advocates' testimony supports a finding that SCE's TTC inspection and maintenance policies were prudent.[17]

A. SCE Prudently Inspected and Maintained Its Communication Lines

As set forth in SCE-03, SCE prudently focused its inspection and maintenance efforts in the years preceding the Woolsey Fire on communication lines located in high fire areas, consistent with the Commission's rulemaking priorities. In the early years of SCE's TTC inspection and maintenance program, SCE identified communication lines in high fire areas requiring inspection using a master list of lines in each geographic area of SCE's vast telecommunications network. As SCE acknowledged in SCE-03, the 06051 Line was inadvertently omitted from the inspection list because it did not appear in the master list of lines in the relevant Area Study.[18] As discussed further below, SCE's process for creating the list was reasonable and the omission of one line due to inadvertent error does not show imprudence. Moreover, although the 06051 Line was not separately inspected in the years leading up to the Woolsey Fire, SCE inspected the 06137 and 06123 Lines numerous times between 2014 and 2018, most recently prior to the Woolsey Fire in February and March 2018, respectively. As shown in Figure II-1, these lines were directly adjacent to the 06051 Line and supported on the same poles at the secondary span. Because of the proximity of all three lines, vegetation or other issues on the 06051 Line would likely have also been identified by inspectors during the inspections of the 06137 and 06123 Lines.

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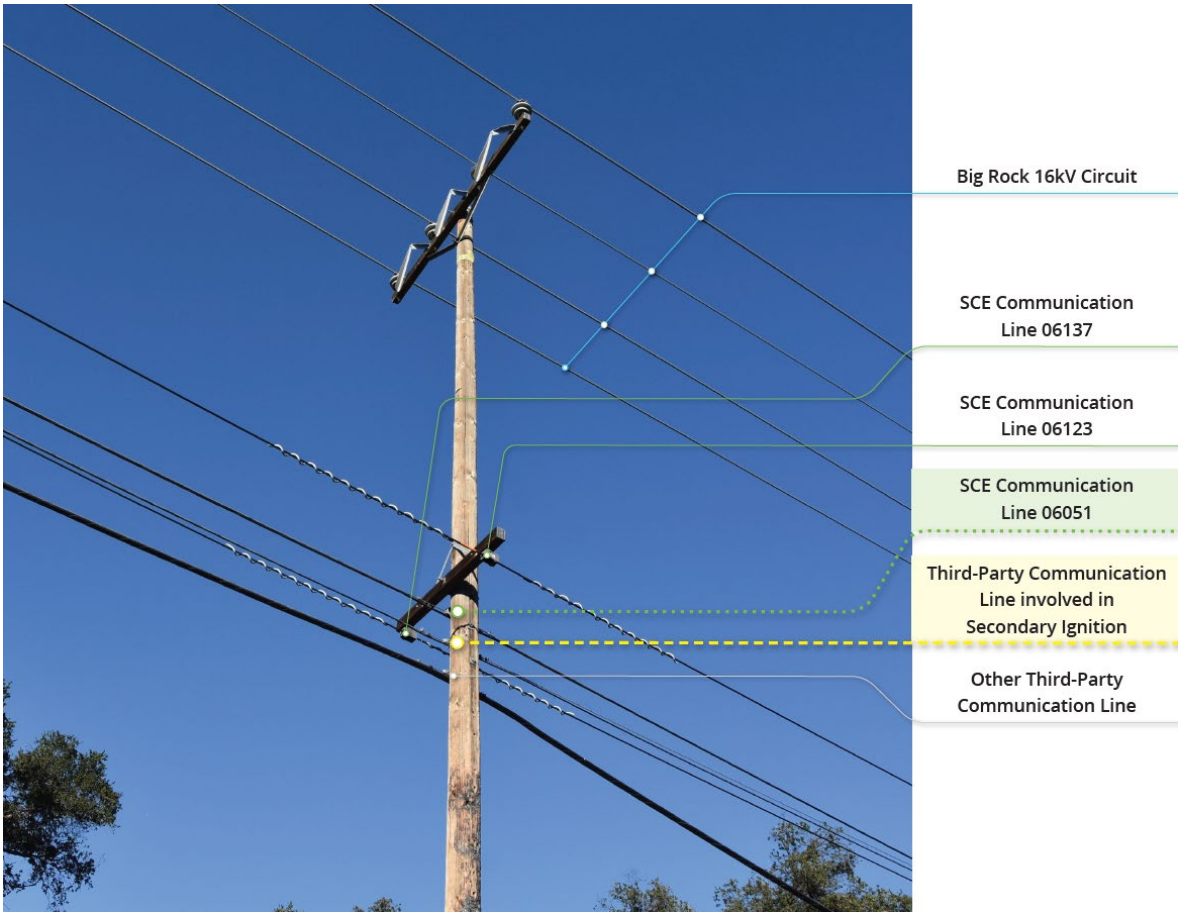
[17] Cal Advocates also faults SCE for not having a formal, documented standard for removing idle communication lines. There was only one communication line in the area—the 06044 Line—that was inactive at the time of the fire. As explained in SCE's opening testimony, the presence of this line was not causal to the Woolsey Fire. *See* SCE-02, p. 26 n.66. And in any case, SCE had a process for the removal of lines it identified as permanently abandoned. Those lines would be included in a list of cables maintained in IT Digital Grid Services to be turned into a removal project.

[18] The 06051 Line was inadvertently omitted from only the master list of communication cable names on the Area Study. It was included and labeled in the detailed schematic map.

Figure II-1
Facilities at Secondary Span (Annotated Photo of Pole 012E)



SCE also inspected the 06044 Line, which ran adjacent to the 06051 Line near the Subject Pole, most recently in May 2018. These inspections were conducted pursuant to SCE's 2017 TTC Guidelines, which were consistent with GO 95 requirements.[19] These inspections identified repairs on these lines, which SCE addressed. At the time of the Woolsey Fire, only one maintenance item—a broken cable near the Subject Pole on the 06044 Line—remained open, which was not yet past due. In sum, SCE was not on notice of any safety or compliance issues or overdue repairs on the communication lines near the area where the Woolsey Fire originated.

Cal Advocates' testimony regarding SCE's lack of vegetation management work on the 06051 Line also does not show that SCE acted imprudently. As the Commission has recognized, there is "much lower fire risk associated with aerial [communication infrastructure provider] facilities compared to

[19] CA-07, pp. 5–6.

overhead power lines."[20] Because of this lower ignition risk and the absence of high-voltage electricity on communication cables, GO 95's requirements for vegetation management around these lines are substantially less stringent than those applicable to high-voltage electric conductors. GO 95, Rule 35 states that "[c]ontact between vegetation and [communication] conductors, in and of itself, does not constitute a nonconformance with the rule."[21] Rather, vegetation remediation is required only where an owner of a communication line "has actual knowledge . . . that its [communication line] shows strain or evidences abrasion from vegetation contact."[22] As defined in Rule 35, "strain" is when "vegetation contact significantly compromises the structural integrity of supply or communication facilities" and "abrasion" means "damage to the insulation resulting from the friction between vegetation and conductor."[23]

Although the 06051 Line was observed to be in contact with nearby tree branches after the fire, this incidental contact did not violate GO 95, Rule 35. As set forth in SCE-02, SCE's metallurgical expert observed no sign of strain or abrasion on the 06051 Line when he examined the cables after the fire.[24] Moreover, the record clearly shows that SCE had no "actual knowledge" of any strain or abrasion prior to the fire, which means there was no remediation obligation under Rule 35. Accordingly, Cal Advocates' testimony regarding SCE's inspection and maintenance and vegetation management practices with respect to the communication lines near the secondary span does not show any imprudence on SCE's part.

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[20] *See, e.g.*, D.12-01-032, p. 77.

[21] GO 95, Rule 35.

[22] *Id.*

[23] *Id.*

[24] SCE-02, p. 20.

III.

SCE'S RECORDKEEPING PROCESS DURING THE EARLY YEARS OF THE TTC PROGRAM WAS PRUDENT

Cal Advocates' criticism of SCE's recordkeeping for its TTC inspection and maintenance program does not show any imprudence on SCE's part. In the years preceding the Woolsey Fire, the TTC group used detailed Area Studies and Excel spreadsheets to manage the inspection and maintenance of its telecommunications infrastructure. The TTC group inputted information regarding the lines in high-fire areas into the Excel spreadsheets, which were then used to schedule and track inspection and maintenance work. This was a reasonable approach as the company prioritized getting a telecommunications inspection and maintenance program off the ground after the Commission issued revised rules in 2012[25] related to inspections of communication lines within high-fire areas.[26] Using the Area Studies and spreadsheets to identify and track inspections of communication lines allowed SCE to start scheduling and performing inspections quickly and efficiently. As shown in Appendix A, the Area Studies contained detailed schematics of SCE communication facilities and a master list of communication lines in a given area.[27] These detailed studies provided SCE with a comprehensive view of its vast telecommunications network in relation to other facilities in its electric system.

Cal Advocates characterizes the recordkeeping process for the TTC inspection and maintenance program as "fragmented" and "decentralized."[28] Not so. Cal Advocates' critique primarily focuses on SCE's use of 12 individual Area Studies that each covered a different geographic area in SCE's telecommunications network. Given the network's scale, division into 12 geographic zones for purposes of creating an overview and detailed visual representation of the network was not only prudent, but practically necessary. Moreover, these Area Studies were drafted by and managed through SCE's TTC group, which also coordinated the design, construction, inspection, and maintenance of SCE's

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[25] *See* D.12-01-032, pp. B-15 to B-19.

[26] In CA-04, Cal Advocates speaks favorably of SDG&E's weather station network as a situational awareness tool. *See* CA-04, pp. 1–3. As set forth in SDG&E's responses to Cal Advocates' data requests, SDG&E used an Excel spreadsheet to "keep track of its weather stations for maintenance, inspections, and troubleshooting," the same manual recordkeeping process for which Cal Advocates criticizes SCE in its testimony regarding SCE's management of telecommunications facilities. CA04SA-0177 (SDG&E's response to CALPA-SDGE-A2410002-004, Question 6).

[27] The 06051 Line runs between the Chatsworth and Santa Susana substations and is shown as "51" on the Area Study for Area 06.

[28] CA-10, p. 13.

communications lines. In other words, there was nothing "de-centralized" or "fragmented" about the Area Studies. A single business unit within SCE oversaw the company's transmission telecommunications infrastructure, including recordkeeping related to inspection and maintenance of this network.

As Cal Advocates' testimony acknowledges, SCE further improved its recordkeeping practices as the TTC inspection and maintenance program matured. In 2020, the TTC group switched to using Survey123, a digital data collection tool integrated with ArcGIS mapping software with visible layers of high fire area boundaries and all cable numbers, for its regular inspection and maintenance of communication lines. Survey123 allowed telecommunications inspectors to capture inspection data and create notifications directly in the software program. Cal Advocates suggests that SCE could have adopted the tool as soon as it was introduced in 2016, but the prudence standard does not require utilities to adopt all the latest technological advancements right away. In any case, SCE incorporated the tool into its inspections soon after it became available, by approximately February 2019 for wildfire inspections of transmission and telecommunications facilities and by 2020 for regular inspection and maintenance inspections of communication lines.

Furthermore, contrary to Cal Advocates' suggestion, any system presents the possibility of error, including Survey123, and Cal Advocates cannot show that SCE's earlier method was unreasonably prone to error. When inspections of telecommunications facilities transitioned to Survey123, SCE built the asset database in that tool using existing data sources of telecommunications facilities such as circuit maps. Since the transition, the TTC group has continued to refine the asset data contained within Survey123, based on observations in the field. Rather than demonstrating imprudence, this process of ongoing updates and refinement shows SCE's prudent management of its telecommunications network.

Indeed, as described in Dr. Aron's testimony in SCE-01, Vol. 02, it is impossible and prohibitively expensive for a utility to attempt to eliminate all instances of human error, regardless of the diligence and rigor of a utility's systems and oversight.[29] Although unfortunate, the inadvertent omission of the 06051 Line from SCE's master list of communication lines on the relevant Area Study provides a helpful illustration. The risk of this type of human data entry error exists in any database system, including Survey123, and does not evidence any imprudence in SCE's recordkeeping in the early years of the TTC inspection and maintenance program. As shown in appendix A, the 06051 Line was included

[29] *See* SCE-01, Vol. 02, p. 30.

and identified in the detailed schematic map, but was inadvertently omitted from the master list of communication cable names, shown in green on the left side of Appendix A. As Cal Advocates acknowledges,[30] SCE subsequently added the 06051 Line to its list of communication cables after the omission was discovered.

[30] CA-10, p. 10.

Appendix A

PUBLIC-Area of Study for Area 06 and Detail Showing 06051 Line

Appendix A has been redacted in its entirety.

Appendix B

Confidentiality Declaration

Southern California Edison Company's Declaration of Confidential Designation Pursuant to General Order 66-D and Related California Public Utilities Commission Precedent

I, Jennifer Shigekawa, declare and state:

1. I am an Assistant General Counsel at Southern California Edison Company (SCE). Jennifer Hasbrouck, Senior Vice President and General Counsel of SCE, delegated authority to me to sign this declaration. I have responsibility for overseeing the individuals who compiled the appendix containing confidential information (SCE-12 Vol. 04, Appendix A) that is being submitted concurrently herewith as part of SCE's rebuttal testimony in support of Application (A.) 24-10-002.

2. I am making this declaration in accordance with General Order 66-D of the California Public Utilities Commission (Commission) and related Commission precedent that govern the submission of confidential information to the Commission.

3. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

4. Listed below are the data for which SCE is seeking confidential protection and the basis for SCE's confidentiality request.

Location of Confidential Data	Pages	Description of Information that is Confidential	Basis for SCE's Confidentiality Claim
SCE-12 Volume 4, Appendix A	All	Area study detailing the schematics and locations of communications facilities in relation to other facilities in SCE's electric system	Protected under Cal. Public Util. Code § 364(d); Cal. Gov. Code §§ 7922.000, 7927.300, 7927.705, 7929.205; 6 C.F.R. §§ 29.2, 29.8; 18 C.F.R. § 388.113(c); FERC Orders 630, 643, 649, 662, 683, & 702; 6 U.S.C. §§ 671(3), 673(a)(1)(E).

5. Basis for Confidentiality: Appendix A to SCE-12 Volume 4 details specific schematics and locations of communications facilities in relation to other facilities in SCE's electric system. This includes information that is not visible with the naked eye or available publicly online or in print and could allow a bad actor to attack, compromise, or incapacitate

physically or electronically a facility providing critical utility service. Because it would pose a security threat to the public if disclosed, it is protected under Cal. Public Util. Code § 364(d). *See also* Cal. Government Code §§ 7927.300, 7927.705, 7929.205 (adopting disclosure exemption for "critical infrastructure information, as defined in Section 131(3) [transferred to Section 671(3)] of Title 6 of the United States Code, that is voluntarily submitted to the Office of Emergency Services for use by that office"). For the same reason, it is not in the public interest to disclose this information. *See* Cal. Government Code § 7922.000. SCE asks the Commission to treat this information as confidential for the same reasons that the federal government would treat such information as confidential pursuant to 18 C.F.R. § 388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702 (defining Critical Electric Infrastructure Information (CEII); 6 U.S.C. §§ 671(3), 673(a)(1)(E); 6 C.F.R. §§ 29.2, 29.8.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on July 15, 2025 at Rosemead, California.

/s/ Jennifer Shigekawa
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