BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Authority to Recover Costs Related to the 2018 Woolsey Fire Recorded in the Wildfire Expense Memorandum Account and Catastrophic Event Memorandum Account.	)	**Application 24-10-002**

[PUBLIC]

Rebuttal Testimony of

Michael P. Gorman

On behalf of

Energy Producers & Users Coalition

July 15, 2025

BRUBAKER & ASSOCIATES, INC.

Projects 11754

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Rebuttal Testimony of Michael P. Gorman

I. INTRODUCTION

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Michael P. Gorman. My business address is 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017.

Q ARE YOU THE SAME MICHAEL P. GORMAN WHO PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING ON BEHALF OF EPUC?

A Yes.

Q ARE YOU SPONSORING ANY EXHIBITS IN CONNECTION WITH YOUR REBUTTAL TESTIMONY?

A Yes, Exhibits MPG-2 and Confidential MPG-3.

Q WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A I respond to the Testimony of the Public Advocates Office of the California Public Utilities Commission ("Cal Advocates") filed on June 3, 2025.

Q DID CAL ADVOCATES' TESTIMONY OUTLINE SOUTHERN CALIFORNIA EDISON COMPANY'S ("SCE" OR "COMPANY") PROPOSED RELIEF IN THIS PROCEEDING?

A Yes. Cal Advocates Exhibit No. CA-01 notes SCE's requested relief to recover approximately $5.4 billion in costs incurred as of August 20, 2024, to resolve third-party claims and related legal costs against SCE in connection with the 2018 Woolsey Fire ignition.[1] Cal Advocates mentions that SCE is also seeking recovery of $84 million in restoration-related costs recorded in the Catastrophic Event Memorandum Account ("CEMA").[2]

II. SUMMARY

Q DID CAL ADVOCATES TAKE A POSITION ON WHETHER SCE'S REQUESTED RECOVERY SHOULD BE APPROVED?

A Not explicitly. Under the Commission's longstanding Prudent Manager Standard, SCE "has the burden to affirmatively prove that is reasonably and prudently operated and managed its system."[3] Therefore, SCE bears the burden to prove its prudence and reasonableness in incurring the costs requested to be recovered from customers in this Application. Cal Advocates' testimony outlines material factors establishing that SCE's operation and management of its system leading up to the Woolsey Fire was not reasonable and prudent, and contributed to the Woolsey Fire ignition. Specifically, Cal Advocates' evidence makes the following findings and conclusions:

- SCE operated its electrical system in an area with known wildfire risk and a history of wildfires ignited by SCE's infrastructure.[4]

[1] CA-01 at 1:3-6.
[2] *Id.* at 1:6-7.
[3] D.18-07-025 at 3, citing D.87-06-021.
[4] *See generally* CA-02.

- SCE knew that its infrastructure igniting a wildfire could cause significant damage to property and possible loss of life in its service territory.[5]

- SCE knew that the Commission prioritized mitigating wildfire ignition risk, implementation of wildfire infrastructure hardening investments, and operating procedures including Public Safety Power Shutoffs ("PSPS").[6]

- SCE's development of fire prevention protocols like PSPS, and installation and effective development of operating weather stations to monitor wind speeds that indicate dangerous weather conditions, was limited. This limitation hindered SCE's ability to make informed PSPS decisions.[7]

- The Big Rock Circuit, the source of the Woolsey Fire ignition, was known to be an at-risk circuit prone to faults and fire ignition risk, especially during Red Flag Warnings or strong windstorm events. Despite knowing this fire ignition risk, SCE asset management, operating, and design oversights failed to comply with GO 95 regulatory safety requirements intended to mitigate fire ignition risk.[8]

- SCE's procedures to design, construct, and maintain its infrastructure in compliance with GO 95 requirements for safety design were deficient.[9]

- SCE did not adequately inspect and maintain its communication assets prior to the Woolsey Fire ignition, in compliance with GO 95.[10]

- SCE's Overhead Conductor Inspection ("ODI") use of visual patrol inspections were found to be an unreliable method of identifying circuits that were out of compliance with GO 95 safety clearances. The issues include minimum clearances between guy wires and electrified cable, vegetation management obstructions to circuits, and proper record keeping needed to schedule timely corrections to circuits that were not in safety compliance.[11]

[5] *See generally* CA-03.
[6] *See generally* CA-04.
[7] *Ibid*.
[8] *See generally* CA-03.
[9] *See generally* CA-06.
[10] *See generally* CA-07.
[11] *See generally* CA-08, CA-09, and CA-10.

III. FIRE RISK AND CIRCUIT OUTAGES

Q DOES CAL ADVOCATES' TESTIMONY OUTLINE THE RECURRING NATURE OF WILDFIRES IN SCE'S SERVICE TERRITORY?

A Yes. Cal Advocates identifies 31 utility-related wildfires that occurred within SCE's service territory between 1998-2018.[12] Cal Advocates' geospatial analysis shows that nine wildfire ignitions occurred within a 25-mile radius of the Subject Pole (pole 4534353E, also known as Ignition Site 2), with one wildfire occurring eight miles away from Ignition Site 2.[13]

Q DOES CAL ADVOCATES' TESTIMONY OUTLINE THE RECURRING NATURE OF FAULTS ON THE BIG ROCK CIRCUIT?

A In the years preceding the Woolsey Fire, Cal Advocates identified a fire and an outage on the Big Rock Circuit that were caused by GO 95 violations resembling the Safety Enforcement Division's ("SED") noted violations that caused the Woolsey Fire ignition.

On December 26, 2015, Ventura County Fire Department ("VCFD") responded to a brush fire under the Subject Pole communication lines.[14] It took one hour to suppress and contain the fire.[15] Cal Advocates included photographic evidence provided by VCFD from the scene that suggests vegetation (a tree branch) came in contact with communication lines.[16] Vegetation coming into contact with communication lines is an identical cause of the Woolsey Fire.[17] VCFD's photographs

[12] CA-01 at 2:2-4; *see also* CA-02 at 3-4, Table 1.
[13] CA-02 at 8-10, Figure 1 and 2.
[14] CA-05 at 10:9-10.
[15] *Id.* at 10:11-12, citing Ventura County Fire Protection District (2015 VCFD Report), Internal Incident Report No. 150089467, December 26, 2015 at 1.
[16] CA-05 at 12, Figure 1.
[17] CA-01 at 11.

from after the December 2015 fire resemble the conditions after the Woolsey Fire at the same site.[18]

On January 20, 2017, the Big Rock Circuit relayed three times and experienced an outage.[19] The outage was caused by a slack guy wire that came in contact with an electrified distribution jumper at the Subject Pole.[20] The sub-transmission down-guy and the distribution jumper involved in the January 20, 2017 incident was similar to the events that caused the November 8, 2018 Woolsey Fire at Ignition Site 2.[21]

Cal Advocates noted that SCE should have recognized the 2017 outage as evidence of elevated fire ignition risk on the Subject Pole, but SCE did not make any changes to its equipment at the Subject Pole and its associated wires—except to tighten the slack guy wire.[22] Had SCE adequately identified and addressed the ignition risk following the outage, the contact between the sub-transmission down-guy and the distribution jumper that caused an ignition on November 8, 2018 might have never occurred.

Q DOES CAL ADVOCATES DESCRIBE WILDFIRE RISKS RELATED TO THE BIG ROCK CIRCUITS?

A Yes. Exhibit CA-03 describes the local geography and environmental risk factors in the area where the Woolsey Fire ignited.

In response to catastrophic wildfires in 2007 caused by electric utility infrastructure, the Commission adopted a High Fire Threat District ("HFTD") map. Tier 2 districts have an elevated risk of fire, and Tier 3 districts have an extreme wildland

[18] CA-05 at 11:1-3.
[19] CA-05 at 14:5-7, citing SCE-02 at 10.
[20] *Ibid.*
[21] *Id.* at 14:7-10.
[22] *Id.* at 16:7-9.

fire risk. The entire Big Rock Circuit, including the Subject Pole Ignition Site 2, was in a HFTD Tier 3.[23] Similarly, as a precursor to the Commission's HFTD map, the California Department of Forestry and Fire protection ("Cal Fire") prepared a Fire Resource and Assessment Program ("FRAP") that demarcated fire threat zones as "Very High" and "Extreme" Fire Threat Zones.[24] The Woolsey Fire Subject Pole Ignition Site 2 traverses Very High and Extreme Fire Threat Zones.[25] Cal Advocates Figure 3A highlights that "nearly all of the Woolsey Fire burn scar had previously burned at least once" and "most of the Woolsey Fire burn scar had experienced a wildfire three or more times in the past."[26]

Cal Advocates' testimony summarized its wildfire risk factor for the area near the Woolsey Fire ignition as:

> "The data on risk events shows that outages and overhead equipment failures regularly occurred on the Big Rock Circuit during Red Flag Warnings. On average, one of every 12 days in the pre-Woolsey period with a Red Flag Warning led to a problem on the Big Rock Circuit.
>
> In sum, Exhibit CA-03 shows that the geographical area where the Woolsey Fire ignited was characterized by elevated or extreme risk of wildfires, and this was knowable to SCE before the Woolsey Fire. The area surrounding the Chatsworth substation and the Big Rock Circuit was designated as risky on the Commission's fire-threat maps starting in 2009. The areas around the Woolsey ignition sites had been affected by previous wildfires, while nearby areas east of the Big Rock Circuit had been affected more frequently. The Big Rock Circuit was also frequently affected by Red Flag Warnings and was designated as a high-wind area on SCE's 2014 wind map. Finally, SCE's records show that the Big Rock Circuit experienced seven outages and one wire-down incident during Red Flag Warnings in a five-year period prior to the Woolsey Fire."[27]

[23] CA-03 at 5:1-3.
[24] *Id.* at 5:5-8.
[25] *Id.* at 6, Figure 2A.
[26] *Id.* at 10:5-9, Figure 3A.
[27] SCE-01 at 5:20-31.

Q DOES CAL ADVOCATES' TESTIMONY OUTLINE THE HISTORY OF SCE RELATED WILDFIRE IGNITIONS THAT WERE KNOWN TO SCE PRIOR TO THE WOOLSEY FIRE?

A Yes. Cal Advocates offered Exhibit CA-02, which provided details of 31 historical wildfire ignitions from 1998 through 2018 where either SCE or a fire agency determined that SCE's equipment was likely responsible for igniting the fire, among other criteria.[28] In these previous instances, slack guy wire made contact with electrified cable that caused faults on the Big Rock Circuit. SCE patrol inspections failed to identify the slack guy wires before the faults.

Further, Cal Advocates' evidence finds that SCE's circuits experienced other safety violations that, like the Woolsey Fire ignition, resulted in faults and fire ignitions on other circuits. These fire ignitions include the Malibu Canyon Fire, the Rye Fire, and the Thomas Fire, all of which were attributable to SCE violations in complying with General Order 95 ("GO 95") safety regulations. These were similar to the violations that SED noted caused the Woolsey Fire ignition.[29]

In particular, Cal Advocates outlines the following information known to SCE:

- SCE infrastructure ignited, or was likely the source of, ignition of 31 wildfires occurring in in SCE's territory during the period 1998-2018. In total, these fires destroyed around 2,470 structures and burned an estimated 458,750 acres.[30]

- Cal Advocates' evidence indicates that many of these fires occurred when Red Flag Warnings and SCE's System Operating Bulletin 32 were in effect.[31] Cal Advocates noted that during this historical period, nine wildfires occurred within a 25-mile radius of the Woolsey Fire ignition location, and one wildfire occurred around 8 miles from the Woolsey Fire ignition.[32]

[28] CA-02 at 2:15-16.
[29] CA-02 at 11:6-14, 14:6-10, 18:4-7.
[30] CA-01 at 2:1-5; *see also* CA-02 at 2:16-17.
[31] *Id*. at 2:6-14; *see also* CA-02 at 6-7, Table 2.
[32] *Id*. at 2:11-14; *see also* CA-02 at 10:1-5.

- Cal Advocates presents evidence of three large fires occurring before the Woolsey fire—the Malibu Canyon, Rye, and Thomas Fires. Cal Advocates opines that these fires are relevant because they bear resemblance to the Woolsey Fire.[33] Cal Advocates states that all three of these fires caused material damage to property that occurred during Santa Ana windstorms, or during Red Flag Warning events. All three of these fires were ignited by SCE infrastructure and were within 25 miles of the Woolsey Fire. Cal Advocates asserts that the Malibu Canyon and Rye fire ignitions involved similar failures of SCE structural support components, such as guy wires which were identified as the source of ignition for the Woolsey Fire.[34]

- SCE admitted violations of GO 95 safety factor requirements in settlements with the Safety Enforcement Division ("SED") that were approved by the CPUC for damage claims related to the Malibu Canyon Fire in 2007.[35]

- In the December 2017 Rye Fire, Cal Advocates noted that SED alleged two violations related to guy wires which became detached and were noted as a source of the wildfire ignition. In the Rye Fire, SCE contested one violation noted by the SED, but did not contest the allegation that it failed to meet safety factor requirements for the guy wire.[36]

- In the December 2017 Thomas Fire, Cal Advocates negotiated a settlement of SCE's requested damage claim cost recovery, which was approved by the Commission. Through the settlement, SCE and Cal Advocates agreed that the Koenigstein ignition resulted from a down powerline arcing in a receptive fuel bed—but settling parties did not agree on the origin location cause, and time of the ignition. In the Thomas Fire, the SED alleged that SCE violated GO 95 by failing to maintain adequate clearances between conductors at the ignition site.[37]

These events led Cal Advocates to the conclusion that the Woolsey Fire ignition was neither unprecedented nor unforeseeable.[38] These three fires indicated SCE's equipment had failed in similar ways as during the Woolsey Fire. The Malibu Fire was caused by overloading of SCE distribution poles, and subsequent pole loading assessment showed that this was not an isolated problem.[39] All three of

[33] *Id*. at 2:17.
[34] *Id.* at 2:15-21.
[35] *Id*. at 2:22-30; *see also* CA-02 at 11:6-14.
[36] *Id.* at 3:1-6; *see also* CA-02 at 14:6-10.
[37] *Id*. at 3:15-21; *see also* CA-02 at 18:4-7.
[38] CA-01 at 3:22-23.
[39] *Id.* at 3:24-26.

these fire ignitions occurred during Santa Ana windstorms when Red Flag Warnings and SOB 322 were in effect, and all three involved either overloading of distribution poles or guy wires coming in contact with electrified cable.[40]

Q KNOWING THIS HISTORY, DID CAL ADVOCATES COMMENT ON MODIFICATIONS SCE MADE TO ITS PRACTICES TO COMPLY WITH GO 95 ON THE BIG ROCK CIRCUIT PRIOR TO THE WOOLSEY FIRE?

A Yes. Cal Advocates' testimony finds that SCE did not change its procedures to enhance its fire ignition risk mitigation in its design and construction practices and inspections of the Big Rock Circuit before the fire ignition. Cal Advocates stated:

> "Cal Advocates shows that SCE's design and construction decisions increased the wildfire risk associated with the Subject Pole and SCE's adjacent equipment. SCE could have designed its facilities at and around the Subject Pole to be more resilient against severe weather conditions and the normal deterioration of aging equipment. For example, SCE designed the sub-transmission down-guy (G2) on the Subject Pole to have only three inches more clearance from the distribution jumper than the regulatory minimum, under ideal conditions and tautness. A prudent utility would have allowed adequate clearance to account for the known risk of a down guy becoming slack."[41]

> "The sub-transmission down-guy (G2) had an inadequate clearance from the distribution jumper cable on the Subject Pole. After the Woolsey Fire, the clearance was measured at 7 inches. Had the down-guy been fully taut, SCE estimates that the clearance would have been approximately 12 inches. However, General Order 95 requires this clearance distance to be at least 9 inches. Therefore, SCE designed and installed the down-guy with little allowance for wind, aging, expansion, and contraction in weather, or other reasons that the guy wire might move. Meanwhile, SCE states that it is 'not uncommon' for guy wires to become slack and it identifies hundreds of such conditions each year."[42]

> "SCE has failed to explain why it designed the clearance to be only three inches greater than the minimum requirement. SCE has not provided any evidence that it examined alternative designs before deciding on this design. By comparison, none of the other sub-transmission down-guys on the Subject Pole came closer than 4.8 feet to an energized conductor."[43]

[40] *Id.* at 3:23-29.
[41] *Id.* at 12:21-29; *see also* CA-06 at 4:4-8.
[42] *Id*. at 13:2-9; *see also* CA-06 at 3:11-15 – 4:1-3.
[43] *Id.* at 13:10-13; *see also* CA-06 at 4:4-8.

> SCE states that its patrol inspections look for slack down-guys. However, from 2014 through 2018, SCE's distribution patrol inspections identified only 124 total findings potentially related to guy wires on SCE's entire distribution system. Cal Advocates identified these 124 inspection findings by using keywords related to guy wires and clearances. Not all of the findings necessarily pertained to down-guys or slack guy wires. If slack down-guys are a "not uncommon" problem on SCE's system, it is unclear why SCE's annual patrol inspections identified so few conditions of this type.[44]
>
> "In comparison, SCE's more comprehensive and less frequent overhead detailed inspections of distribution assets identified over 175,000 notifications potentially related to guy wires during the same period, which is more than a thousand times as many as identified during the patrol inspections. This suggests that SCE's patrol inspections are insufficient to reliably identify slack down-guys."[45]

IV. SCE'S PATROL INSPECTIONS AND WILDFIRE PREVENTION

Q DID CAL ADVOCATE STATE AN OPINION ABOUT SCE'S ABILITY TO IDENTIFY GO 95 VIOLATIONS USING ITS PATROL INSPECTIONS?

A Yes. Cal Advocates found SCE patrol inspections could not reliably identify slack guy wires. Cal Advocates stated:

> "SCE's patrol inspections did not reliably detect slack down-guys. Over five years (2014-2018), SCE's patrol inspections identified only 124 conditions related to guy wires on SCE's entire distribution system. Moreover, during the 2014-2018 period, no distribution patrol inspection identified *any findings of any kind* on SCE's Big Rock Circuit, although SCE performed patrols annually. By comparison, SCE's overhead detailed inspections of distribution assets identified over 175,000 notifications related to guy wires (that is, more than 1,400 times as many findings as the patrol inspections). This is a large disparity in the quality and rigor of SCE's inspection types, which means that slack down-guys can easily remain undetected for up to five years between detailed inspections (even assuming that the detailed inspections are perfect)."[46]

[44] *Id.* at 13:14-16.
[45] CA-06 at 6:3-7.
[46] CA-01 at 13:14-23; *see also* CA-06 at 5:11-20 – 6:1-11.

Cal Advocates noted that in 2017, about two years before the Woolsey Fire, the same Subject Pole guy wire became slack and contacted the distribution jumper, causing an outage. The slack guy wire in this 2017 incident was found to have been slack only because of the outage; the slack guy wire was not identified in the patrol inspection that was conducted on the Big Rock Circuit.[47]

Cal Advocates questioned SCE's prudence in designing and managing the Big Rock Circuit due to GO 95 violations concerning guy wire management, stating:

> "SCE's decision to route sub-transmission guy wire G2 through an oak tree increased the risk of the design. Photographic evidence shows that G2 appears to have been deflected over the top of a large branch. Movement of the tree therefore could have directly affected the tension in the guy wire, which could contribute to the guy wire becoming taut or slack. SCE contends that "good utility practice" does not preclude "incidental contact" between down-guys and trees. However, a prudent utility would have recognized that contact with the oak tree could affect the tension of the down-guy and would have either installed the down-guy in a different location or trimmed the tree."[48]

> SCE has not provided records to show that it measured clearances for compliance with GO 95 during (or immediately after) the installation of the Subject Pole and subsequent installation of distribution conductors in 2008. SCE did not perform quality control for either the pole installation in March 2008 or the installation of the distribution conductors on it in May 2008. It is therefore impossible to verify that the installation crews performed a rigorous or even cursory examination of the construction for compliance with GO 95. Likewise, SCE has provided no evidence that SCE's crew or contractors examined the completed construction work to verify that the actual construction conformed to SCE's designs for the Subject Pole."[49]

Q DID CAL ADVOCATES OPINE THAT THE WOOLSEY FIRE COULD HAVE BEEN PREVENTED UNDER PRUDENT UTILITY MANAGEMENT PRACTICES?

Y Yes. With respect to the Woolsey Fire, Cal Advocates concluded:

> "Cal Advocates shows that the secondary ignition was preventable. SCE's claim that it was the result of "an improbable chain of events" lacks merit.

[47] *Id.* at 13:24-29; *see also* CA-06 at 24:5-11.
[48] *Id.* at 13:30-31-14:1-6; *see also* CA-06 at 9:5-9.
[49] *Id.* at 14:7-14; *see also* CA-06 at 12:15-20-13:1-2.

> The crucial events in the chain – including the initial contact at Site 2, the secondary contact between down-guy G7 and the Telecom Pole, and the tertiary contact between two communications messenger wires at Site 1 – could have been prevented through prudent management practices. The remaining events in the chain were direct physical consequences of the aforementioned events and thus were foreseeable."[50]

Cal Advocates mentions SCE's Testimony, which describes the "improbable chain of events" as:

> 1. Contact between sub-transmission down-guy G2 and the Big Rock Circuit distribution jumper created fault current;
>
> 2. Fault current traveled up the sub-transmission guy wire to energize the Subject Pole;
>
> 3. Fault current traveled from the energized pole to the other guy wires on the Subject Pole;
>
> 4. Fault current traveled from distribution down-guy G7 to a through-bolt attaching an SCE communication line messenger to the Telecom Pole;
>
> 5. Fault current traveled along the communication line messenger to Site #1; and
>
> 6. Fault current arced between the energized messenger and a nearby third party communication line messenger, resulting in an ignition at Site #1.[51]

Cal Advocates points to specific items in the chain of events that were preventable through prudent management practices:

- The initial contact between down-guy G2 and the distribution jumper could have been prevented had SCE designed and constructed the Subject Pole to allow a larger clearance, and maintained the clearance above the requirements of General Order 95.
- Conditional upon item 1 occurring, items 2 and 3 were foreseeable due to the design of the Subject Pole, including the absence of guy strain insulators.
- The secondary contact between down-guy G7 and the equipment on the Telecom Pole (item 4) could have been prevented had SCE designed and constructed the Subject Pole with a compliant clearance

[50] *Id*. at 12:4-9, emphasis added; *see also* CA-05 at 19:16-18 ["the 'unusual' nature of the ignition can be attributed to a series of construction, inspection, and management failures, rather than dismissed as merely a 'complex and improbable series of events'."].

[51] CA-05 at 18:6-18.

between G7 and the Telecom Pole, and maintained the clearance at a compliant distance.

- Item 5 flows directly from item 4, because the messenger wire was physically attached to the through-bolt.

- The tertiary contact between the two messenger wires (item 6) could have been prevented had SCE inspected and managed the vegetation along communications line 06051 prior to the Woolsey Fire.[52]

The secondary ignition mattered because it occupied limited fire suppression resources and thereby made the initial fire suppression response less effective. A security and fire specialist named Walsh at the Boeing facility responded to the outage immediately, and began to patrol the facility. Walsh judged the fire at Site 2 to be "lazy." The facility had only one fire engine, which went to Site 1. Had there been only one fire to attack (especially a "lazy" one), it is possible that the Boeing facility's fire engine could have contained the fire or slowed its spread until fire agencies arrived on the scene with more suppression resources. However, with two simultaneous fires and only one truck, the Boeing facility personnel were overmatched."[53]

Q DID YOU INVESTIGATE CAL ADVOCATES' POSITION RELATED TO THE RELIABILITY OF SCE PATROL INSPECTIONS?

A Yes. EPUC requested copies of SCE internal Audit Services Department's audits of its Distribution Inspection and Maintenance Program (DIMP) Overhead Detailed Inspections.[54] SCE provided a confidential copy of its 2015 DIMP Overhead Detailed Inspections (Y15-5303) audit report[55], but would not provide the 2018 General Order 165 Annual Report and ODI Program Review (Y18-51095) audit, asserting it is protected by the attorney-client privilege and the attorney work product doctrine. SCE

[52] *Id.* at 18:20-32-19:1-8.
[53] CA-01 at 12:10-17; *see also* CA-05 at 20-3-16.
[54] *See* SCE Response to Data Request Set EPUC-SCE-004, Question 01.a-b, Question 02.a-e, and Question 03.a-b, attached in Exhibit MPG-2.
[55] *See* SCE Response to Data Request Set EPUC-SCE-004, Question 01.a.1., CONFIDENTIAL copy of SCE's Distribution Inspection and Maintenance Programs – Overhead Detailed Inspections (Y15-53003) audit report, attached in Confidential Exhibit MPG-3.

has not disclosed details needed to assess and confirm the reliability of its Overhead Detailed Inspections.

Q DID CAL ADVOCATES STATE AN OPINION ON THE RELIABILITY OF SCE PATROL INSPECTIONS?

A Yes, Cal Advocates concluded that SCE inspections of the Big Rock Circuits were inadequate.[56]

Specifically, Cal Advocates opined that SCE's inspections failed to identify design and construction issues found in the sub-transmission down-guy wire G2 and distribution down-guy wire G7.[57] This was the infrastructure that contributed to the Woolsey Fire ignition. Cal Advocates opined that the inspection, inadequacy, and maintenance issues exacerbated the risk inherent in SCE's design choices, and allowed the wildfire hazards to persist without remediation in the years between the installation of the Subject Pole in 2008 and the ignitions of the Woolsey Fire in 2018.[58]

In addition, Cal Advocates comments on the following:

- The down guy wire G7 of the Subject Pole was not identified as slack in inspections between 2015 and 2018. Photographic evidence showed that in 2015 the distribution down guy wire (G7) was slack and in contact with the through-bolt on the crossarm of the adjacent telephone pole. Cal Advocates commented that SCE acknowledged that this condition was not identified for remediation during the course of inspection and maintenance of these facilities in the years preceding the Woolsey Fire.[59]

- Cal Advocates also commented on SCE's observation or representation that it checked the tautness of the sub-transmission down guy (G2) on the Subject Pole six weeks before the Woolsey Fire. Cal Advocates stated that SCE provided no records to demonstrate that they performed any inspection of the Subject Pole, and did not have any records showing that SCE made a specific measurement of the tautness or tension of the individual guy wires on the Subject Pole prior to the Woolsey Fire. Cal Advocates opined that SCE referenced an inspection following the replacement of a pole near the Subject Pole that included

[56] CA-01 at 15:2-4.
[57] *Ibid.*
[58] CA-06 at 16:15-18.
[59] CA-01 at 15:8-12; *see also* CA-06 at 19:4-19.

a patrolman performing a visual inspection of the Subject Pole; but SCE had no records to substantiate this claim, nor any evidence that the Subject Pole was confirmed to be in GO 95 compliance after the inspection.[60]

- Cal Advocates stated that visual inspections did not require a patrolman to measure distances between guy wires and conductors, the patrolman was not directed how to examine clearances, nor was he given guidelines on how to conduct the examination, including the use of any measurement devices. Cal Advocates opines that the distinction in a visual inspection to identify required clearance would be difficult to detect, noting that from the ground more the cables could be 40 feet away.[61]

V. SCE'S GO 95 ASSET MAINTENANCE

Q DID CAL ADVOCATES COMMENT ON SCE'S RECORD KEEPING IDENTIFYING CIRCUITS THAT MAY NOT BE IN CONFORMANCE WITH GO 95 SAFETY REGULATIONS?

A Yes. Cal Advocates commented on SCE's asset notifications indicating where SCE personnel have identified the need for asset maintenance, but SCE failed to make timely safety repairs. Cal Advocates explains that GO 95 defines three priority levels of asset notifications: Priority 1 – most severe and urgent; Priority 2 – needs to be repaired for a specified time period; and Priority 3 – not a significant risk.[62] These priority levels factored HFTD tier rankings, and Cal Advocates noted that the entire Big Rock Circuit is within a Tier 3 HFTD.[63] Cal Advocates' records indicate that on the date of the Woolsey Fire, SCE reported 413 open notifications on the Big Rock Circuit, which included 107 Priority 2 notifications and 304 Priority 3 notifications.[64] SCE records indicate that Priority 2 notifications on the Big Rock Circuit had due dates ranging from

[60] CA-06 at 20:3-19 – 21:1-3.
[61] *Id*. at 21:6-17.
[62] CA-08 at 3:8-18 – 4:1-2.
[63] *Id*. at 6:15-17.
[64] *Id*. at 7, Table 1.

2014 through 2023.[65] Cal Advocates indicated that at the time of the Woolsey Fire ignition, several Priority 2 notifications were more than a year overdue for remediation. In addition, 17 notifications had due dates in 2014 and 2015.[66] Despite being located in HFTD Tier 3, and SCE's procedures calling for remediation within six months, Cal Advocates show that as of November 8, 2018, there were 39 Priority 2 asset notifications having due dates in 2020 or later.[67]

Indeed, Cal Advocates' testimony shows that at the time of the Woolsey Fire, SCE had 52 overdue priority 2 asset notifications on the Big Rock Circuit.[68] These notifications were, on average, overdue by 705 days.[69]

VI. SCE'S PUBLIC SAFETY POWER SHUTOFF PROGRAM

Q DID CAL ADVOCATES DISCUSS SCE'S PUBLIC SAFETY POWER SHUTOFF ("PSPS") PROGRAM AVAILABLE AT THE TIME OF THE WOOLSEY FIRE?

A Yes. Cal Advocates concludes that SCE was slow to develop effective operational fire ignition risk mitigation tools like PSPS. Cal Advocates opined that implementing an effective PSPS for fire risk mitigation is enhanced by situational awareness measures that inform the utility of severe weather conditions increasing the risk of fire ignition. Enhanced situational awareness allows the utility to make informed operational decisions like implementing a PSPS.[70] Cal Advocates concludes that a prudent manager would have learned from the situational awareness and PSPS practices that SDG&E implemented to mitigate fire ignition risk over the period 2008-2017. However, SCE only began to learn from SDG&E's situational awareness experiences on

[65] *Id*. at 8, Figure 1.
[66] *Id*. at 8:7-8.
[67] *Id*. at 9:3-5.
[68] CA-01 at 20:4-6.
[69] *Ibid.*
[70] CA-04 at 1:12-18.

operational fire risk mitigation in 2017, and began to implement an awareness response after that time.[71]

Cal Advocates asserts that SCE's delayed situational awareness efforts to develop an operational fire ignition risk program impacted its ability to reduce fire ignition risk at the time of the Woolsey Fire ignition. Cal Advocates noted that a prudent utility manager would have emulated SDG&E's situational awareness and PSPS practices, particularly after the devastating wildfires that occurred in Southern California in 2007. Instead, SCE didn't actively implement a situational fire risk program until 2017.

SDG&E executed its first PSPS in 2013, which ultimately evolved into a mature proactive de-energization plan supported by over 177 utility-owned weather stations, and resulted in the implementation of 12 power shutoffs prior to November 2018 by SDG&E.[72] In contrast, while SCE was aware of SDG&E's actions in this regard, SCE did not begin to develop a proactive situational awareness and a PSPS program until November 2017.[73] SCE's implementation of this program only occurred after the fires described above, including the Thomas Fire, Malibu Canyon Fire, and the Rye Fire.

Cal Advocates noted that SCE's situational awareness efforts were impaired by problems with weather station buildout in fire risk areas, and in developing protocols to implement PSPS. Due to these restrictions, SCE encountered significant obstacles during its late rollout in 2017-2018 which impacted its ability to initiate an effective PSPS protocol.[74]

[71] CA-01 at 6:17-21.
[72] CA-04 at 19:2-8.
[73] CA-01 at 6:18-19; *see also* CA-04 at 21:4-5.
[74] CA-01 at 6:14-16.

Q DO YOU AGREE WITH CAL ADVOCATES' CONCLUSIONS AND FINDINGS THAT YOU DISCUSS ABOVE?

A Yes.

Q DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A Yes, it does.

APPENDIX A

Southern California Edison
A.24-10-002 – Woolsey Fire Cost Recovery

DATA REQUEST SET E P U C - S C E - 0 0 4

To: EPUC
Prepared by: Michelle Olavides
Job Title: Audit, Sr Mgr
Received Date: 7/2/2025

Response Date: 7/11/2025

Question 01.a-b:
1. Exhibit No. SCE-03, page 43, lines 13-15 states "SCE's internal independent Audit Services Department performed audits to evaluate whether SCE's programs provided reasonable assurance that inspections adhered to DIMP procedures and complied with regulations."

a. Please provide a true and complete copy of all audits and related documentation memorializing evaluations conducted, including but not limited to reports, findings, and conclusions performed between 2013-2018 by SCE's internal independent Audit Services Department, as referenced in Exhibit No. SCE-03, page 43, lines 13-15.
b. Provide a detailed explanation with supporting documentation of the criteria, benchmarks, standards or requirements SCE's internal Audit Service Department used to "evaluate whether SCE's programs provided reasonable assurance that inspections adhered to DIMP procedures and complied with regulations" discussed in Exhibit No. SCE-03, page 43, lines 13-15.

Response to Question 01.a-b:

CONFIDENTIAL
The Attachment(s) Are Marked Confidential In Accordance With Applicable Law and Regulation.
Basis for Confidentiality In Accompanying Confidentiality Declaration.
Public Disclosure Restricted.

a. The Audit Services Department completed two internal audits related to the Distribution Inspection and Maintenance Program (DIMP) Overhead Detailed Inspections for the period 2013-2018.
    1. A copy of the Distribution Inspection and Maintenance Programs – Overhead Detailed Inspections (Y15-53003) audit report is attached.
    2. The General Order 165 Annual Report and ODI Program Review (Y18-51095) audit is protected by the attorney-client privilege and the attorney work product doctrine, therefore a copy will not be provided.
b. The "Work Performed" section of the Distribution Inspection and Maintenance Programs – Overhead Detailed Inspections (Y15-53003) audit report provides a summary of the test work performed during the audit. In addition, the "Regulation/Policy/Procedure Reference (Criteria)" relevant to the finding is included on the observation forms (see pages 5, 7, and 11) of the Distribution Inspection and Maintenance Programs – Overhead Detailed Inspections (Y15-53003) audit report.

Southern California Edison
A.24-10-002 – Woolsey Fire Cost Recovery

DATA REQUEST SET E P U C - S C E - 0 0 4

To: EPUC
Prepared by: Michelle Olavides
Job Title: Audit, Sr Mgr
Received Date: 7/2/2025

Response Date: 7/11/2025

Question 02.a-e:
Exhibit No. SCE-03, page 43, lines 15-18 states "[i]n 2015 and 2018, for example, the SCE's internal Audit Service Department conducted audits of the ODI program and found it satisfactory with only limited exceptions that led to recommended improvements to reporting, pending record correction notifications, and follow-up procedures for inspections with access issues."

a. Please provide a true and complete copy of all audits of the ODI program and related documentation memorializing evaluations conducted, including but not limited to reports, findings, and conclusions performed between 2013-2018 by SCE's internal independent Audit Services Department as referenced in Exhibit No. SCE-03, page 43, lines 15-18.

b. Provide the specific findings in the 2015 and 2018 audits of the ODI program discussed in Exhibit No. SCE-03, page 43, lines 17-18 that "led to recommended improvements to reporting, pending record correction notifications, and follow-up procedures for inspections with access issues." In addition, provide other audit findings that recommended improvements to the ODI program for years 2013, 2014, 2016, and 2017.

c. Describe and define the meaning of "satisfactory" referenced in Exhibit No. SCE-03, page 43, line 17.

d. Describe and define all other labels similar to "satisfactory" used by SCE's internal Audit Service Department to gauge and evaluate the ODI program.

e. Describe and define the meaning of "access issues" referenced in Exhibit No. SCE-03, page 43, lines 18 and 21.

Response to Question 02.a-e:

a. Please see response to EPUC-SCE-004 Question 01.a.

b. Please see the observation forms on pages 5-13 of the Distribution Inspection and Maintenance Programs – Overhead Detailed Inspections (Y15-53003) audit report provided in response to EPUC-SCE-004 Question 01.a for details on the specific findings.

   Observation forms for the General Order 165 Annual Report and ODI Program Review (Y18-51095) audit are not being provided as the audit is protected by the attorney-client privilege and the attorney work product doctrine.

   There were no other audit findings that recommended improvements to the ODI program for the years 2013, 2014, 2016, and 2017.

c. "Satisfactory" refers to the audit report category that was in use at the time the audit was performed.

Category 1 – Satisfactory	Minor or no weaknesses.
Category 2 – Satisfactory with Exceptions	Weaknesses exist and require attention by management and an action plan. Audited business objectives are still achievable.
Category 3 – Unsatisfactory	Significant weaknesses exist. Immediate attention by management and an action plan are required. Audited business objectives are at risk of not being met.
Not Applicable	Not applicable. Applies to engagements such as investigations, limited engagements, consulting, risk assessments, and organizational unit support.

d. Please refer to Q 02.c above.

e. "Access issues" refers to when an Electrical Service Inspector (ESI) is not able to inspect a pole because it is inaccessible (e.g. located in a customer's backyard).

Southern California Edison
A.24-10-002 – Woolsey Fire Cost Recovery

DATA REQUEST SET E P U C - S C E - 0 0 4

To: EPUC
Prepared by: Michelle Olavides
Job Title: Audit, Sr Mgr
Received Date: 7/2/2025

Response Date: 7/11/2025

Question 03.a-b:
Exhibit No. SCE-03, page 43, lines 15 states "SCE implemented corrective measures to address any findings." Further, Exhibit No. SCE-03, page 43, lines 18-21 states "SCE diligently implemented the audit's recommendations, such as developing options for ESIs to follow for inaccessible poles when the customer does not contact SCE as requested and enhancing its annual GO 165 Report to identify how many poles it was unable to inspect within grids due to access issues."

a. In response to the 2015 and 2018 audits, did SCE implement other audit recommendations beyond those referenced in Exhibit No. SCE-03, page 43, lines 18-21, as quoted above? Please describe any other audit recommendations SCE implemented in response to the 2015 and 2018 audits.

i. Please describe and provide supporting documentation for other audit recommendations SCE implemented for the ODI program for years 2013, 2014, 2016, and 2017.

b. Describe the timeframe in which SCE implemented the 2015 and 2018 audit recommendations, from the date the audit was completed or released to the a. date or dates SCE "diligently implemented the audit's recommendations" referenced in Exhibit No. SCE-03, page 43, lines 18-19, e.g., the 2015 audit was completed on X date, and implementation of the audit recommendations began on Y date and were concluded on Z date.

i. What was the timeframe from the date the audit was completed or released, to the date or dates for other audit recommendations SCE implemented for the ODI program for years 2013, 2014, 2016, and 2017?

Response to Question 03.a-b:

a. SCE did not implement any other audit recommendations in response to the 2015 audit beyond those referenced in Exhibit No. SCE-03, page 43, lines 18-21. The 2018 audit is protected by the attorney-client privilege and the attorney work product doctrine.
   i. There were no other audit findings that recommended improvements to the ODI program for the years 2013, 2014, 2016, and 2017.

b. The Distribution Inspection and Maintenance Programs – Overhead Detailed Inspections (Y15-53003) audit was completed on September 11, 2015. Implementation of management action items were completed as follows: Observation #1 related to follow-up procedures for inspections with access issues was completed by November 6, 2015, Observation #2 related to pending record correction notifications was completed by November 9, 2015, and Observation #3 related to reporting was completed by July 1, 2015 (prior to the audit report being issued). The 2018 audit is protected by the attorney-client privilege and the attorney

work product doctrine.

i. Not applicable as there were no other audit findings that recommended improvements to the ODI program for the years 2013, 2014, 2016, and 2017.

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE

STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) for Authority to Recover Costs Related to the 2018 Woolsey Fire Recorded in the Wildfire Expense Memorandum Account and Catastrophic Event Memorandum Account.	**Application 24-10-002** **(Filed October 08, 2024)**

DECLARATION OF MICHAEL P. GORMAN
REGARDING CONFIDENTIALITY OF
CERTAIN DATA/DOCUMENTS

I, Michael P. Gorman, do declare as follows:

1. I am a consultant in the field of public utility regulation and a Managing Principal of the firm of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants. I am personally familiar with the facts in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with General Order ("GO") 66-D to demonstrate that the confidential/proprietary information ("Protected Materials") provided is within the scope of data protected as confidential under applicable law.

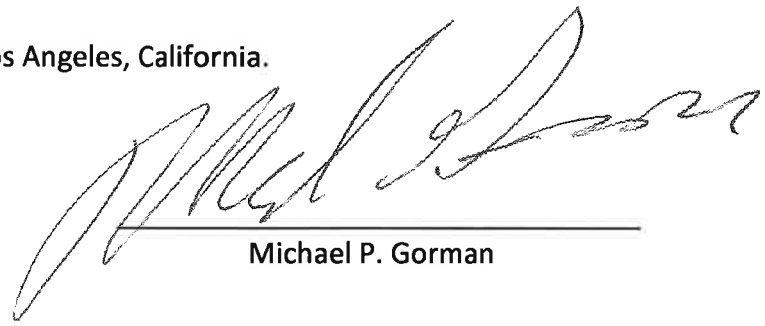
3. Exhibit MPG-3 submitted on behalf of the Energy Producers & Users Coalition ("EPUC") contains confidential information that, based on my information and belief, has not been publicly disclosed.

4. This data was provided in confidential data responses pursuant to individual non-disclosure agreements between myself on behalf of EPUC and Southern California Edison Company ("SCE").

5. In accordance with the narrative justification described in **Attachment A**, the Protected Information should be protected from public disclosure.

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 July 15, 2025 in Los Angeles, California.



Michael P. Gorman

ATTACHMENT A

Request for Confidentiality
on the following information in the Direct Testimony of
Michael P. Gorman on Behalf of Energy Producers and Users Coalition

Location of Protected Information	Authority	Narrative Justification
• The entirety of Exhibit MPG-3	Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law.")	This information was produced in SCE's confidential data responses subject to non-disclosure or confidentiality agreements or obligations. Confidential treatment is requested to avoid any unauthorized public disclosure of this information.