

November 30, 2020

VIA ELECTRONIC FILING

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: **NERC Full Notice of Penalty regarding Southern California Edison Company,
FERC Docket No. NP21-_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty¹ regarding Southern California Edison Company (SCEC), NERC Registry ID# NCR05398,² in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations, and orders, as well as NERC's Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).³

NERC is filing this Notice of Penalty, with information and details regarding the nature and resolution of the violations,⁴ with the Commission because Western Electricity Coordinating Council (WECC) and SCEC have entered into a Settlement Agreement to resolve all outstanding issues arising from WECC's determination and findings of the violations of the Reliability Standards listed below.

According to the Settlement Agreement, SCEC neither admits nor denies the violations, but has agreed to the assessed penalty of two hundred ninety-six thousand dollars (\$296,000), in addition to other

¹ *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards, Order No. 672, 114 FERC ¶ 61,104, order on reh'g, Order No. 672-A, 114 FERC ¶ 61,328 (2006); Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the N. Am. Elec. Reliability Corp., Docket No. RM05-30-000 (February 7, 2008); Mandatory Reliability Standards for the Bulk-Power System, Order No. 693, 118 FERC ¶ 61,218, order on reh'g, Order No. 693-A, 120 FERC ¶ 61,053 (2007).*

² SCEC was included on the NERC Compliance Registry as a Distribution Provider (DP), Generator Owner (GO), Generator Operator (GOP), Resource Planner (RP), Transmission Owner (TO), Transmission Operator (TOP), and Transmission Planner (TP) on June 17, 2007.

³ See 18 C.F.R § 39.7(c)(2) and 18 C.F.R § 39.7(d).

⁴ For purposes of this document, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged, or confirmed violation.

1325 G Street NW Suite 600
Washington, DC 20005
202-400-3000 | www.nerc.com

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remedies and actions to mitigate the instant violations and facilitate future compliance under the terms and conditions of the Settlement Agreement.

Statement of Findings Underlying the Violations

This Notice of Penalty incorporates the findings and justifications set forth in the Settlement Agreement, by and between WECC and SCEC. The details of the findings and basis for the penalty are set forth in the Settlement Agreement and herein. This Notice of Penalty filing contains the basis for approval of the Settlement Agreement by the NERC Board of Trustees Compliance Committee (NERC BOTCC).

In accordance with Section 39.7 of the Commission’s regulations, 18 C.F.R. § 39.7 (2020), NERC provides the following summary table identifying each violation of a Reliability Standard resolved by the Settlement Agreement. Further information on the subject violations is set forth in the Settlement Agreement and herein.

Violation(s) Determined and Discovery Method								
*SR = Self-Report / SC = Self-Certification / CA = Compliance Audit / SPC = Spot Check / CI = Compliance Investigation								
NERC Violation ID	Standard	Req.	VRF/VSL	Applicable Function(s)	Discovery Method* & Date	Violation Start-End Date	Risk	Penalty Amount
WECC2017018527	FAC-003-3	R2	High/High	TO, GO	SR 10/27/2017	5/16/2016- 8/18/2017	Moderate	\$296k
WECC2018020303	FAC-003-3	R6	Medium/Severe	TO, GO	CA 8/17/2018	7/1/2014- 10/16/2017	Moderate	

Information About the Entity

SCEC delivers power to 15 million people across central, coastal, and Southern California, excluding Los Angeles and some other cities. SCEC monitors and maintains an electricity system consisting of 12,635 miles of transmission lines and 2,959 substation transformers.

FAC-003-3 R2

During an annual routine pre-inspection for vegetation management, a third-party contractor for SCEC identified a tree that could have been encroaching on the Minimum Vegetation Clearance Distance (MVCD) to one 220 kV transmission line, interconnected at a 175 MW generation station. However, due

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to the significant slope angle and heavy vegetation growth from wet, seasonal weather within the forested area of the Right-of-Way, SCEC was initially unable to identify from the ground and from a helicopter whether there had been a MVCD encroachment. Once the ground crews gained access, they could see that an oak tree had encroached into the MVCD. On August 18, 2017, SCEC removed the subject tree under a safety guard emergency outage.

The cause of this violation was SCEC's misinterpretation of the expectation for a Vegetation Inspection, resulting in an inadequate implementation of its systematic examination of vegetation conditions for the applicable transmission line in one area, which allowed fast growing vegetation to visually obscure the tree in the MVCD, leading to an MVCD encroachment.

WECC determined that this violation posed a moderate and not serious or substantial risk to the reliability of the bulk power system (BPS). Attachment A includes the facts regarding the violation that WECC considered in its risk assessment.

SCEC submitted a Mitigation Plan to address the referenced violation. Attachment A includes a description of the mitigation activities SCEC took to address this violation. A copy of the Mitigation Plan is included as Attachment C.

SCEC certified that it had completed all mitigation activities. WECC verified that SCEC had completed all mitigation activities as of September 26, 2019. Attachments A and E provide specific information on WECC's verification of SCEC's completion of the activities.

FAC-003-3 R6

During a Compliance Audit, WECC determined that, although SCEC had provided records of Vegetation Inspections and had a Transmission Vegetation Management Plan (TVMP), the records did not demonstrate that SCEC performed a systematic Vegetation Inspection for the area associated with the vegetation encroachment in the MVCD described above, as required by FAC-003-3 R6. In 2015 and 2016, SCEC completed Vegetation Inspections via aerial inspection for the area associated with the vegetation encroachment in the MVCD of the 220 kV transmission line at issue, but SCEC did not have records demonstrating that the inspector considered certain factors, including sag and sway of the transmission line, thus did not adequately complete the Vegetation Inspection. Though SCEC provided evidence that it completed ground inspections for certain areas, this evidence did not demonstrate that the sag and sway of the transmission line was considered.

WECC determined that the ground inspection was not effective in detecting the slow-growing oak tree that should have been trimmed or removed due to its proximity to the MVCD. WECC determined that

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SCEC was unable to demonstrate that it had completed sufficient Vegetation Inspections for the 220 kV transmission line area associated with the R2 violation.

The cause of this violation was SCEC's misinterpretation of the expectation for a Vegetation Inspection, resulting in an inadequate implementation of its systematic examination of vegetation conditions for the applicable transmission line in one area, which allowed fast growing vegetation to visually obscure the tree in the MVCD, leading to an MVCD encroachment.

WECC determined that this violation posed a moderate and not serious or substantial risk to the reliability of the BPS. Attachment A includes the facts regarding the violation that WECC considered in its risk assessment.

SCEC submitted a Mitigation Plan to address the referenced violation. Attachment A includes a description of the mitigation activities SCEC took to address this violation. A copy of the Mitigation Plan is included as Attachment G.

SCEC certified that it had completed all mitigation activities. WECC verified that SCEC had completed all mitigation activities as of April 28, 2020. Attachments A and I provide specific information on WECC's verification of SCEC's completion of the activities.

Regional Entity's Basis for Penalty

According to the Settlement Agreement, WECC has assessed a penalty of two hundred ninety six thousand dollars (\$296,000) for the referenced violations. In reaching this determination, WECC considered the following factors:

1. The instant violations constitute SCEC's first occurrence of violations of the subject NERC Reliability Standards.
2. The violations of FAC-003-3 R2 and FAC-003-3 R6 posed a moderate and did not pose a serious or substantial risk to the reliability of the BPS, as discussed in Attachment A;
3. SCEC self-reported the FAC-003-3 R2 violation in a timely manner from the date of discovery;
4. WECC did not apply mitigating credit for SCEC's internal compliance program (ICP) because WECC determined that the ICP was not effective in detecting these violations;
5. SCEC was cooperative throughout the compliance enforcement process;
6. SCEC agreed to settle these violations and penalty;

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7. SCEC had “above and beyond” activities, consisting of building out its Vegetation Management team and completing additional vegetation clearing actions in 2017 and 2018, removing approximately 60,000 trees beyond those required for mitigation and what would be considered typical for a similarly situated entity, at a cost of over \$10 million; and
8. There were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

After consideration of the above factors, WECC determined that, in this instance, the penalty amount of two hundred ninety six thousand dollars (\$296,000) is appropriate and bears a reasonable relation to the seriousness and duration of the violations.

Statement Describing the Assessed Penalty, Sanction, or Enforcement Action Imposed⁵

Basis for Determination

Taking into consideration the Commission’s direction in Order No. 693, the NERC Sanction Guidelines and the Commission’s July 3, 2008, October 26, 2009 and August 27, 2010 Guidance Orders,⁶ the NERC BOTCC reviewed the violations on October 26, 2020 and approved the resolution between WECC and SCEC. In approving the resolution, the NERC BOTCC reviewed the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

In reaching this determination, the NERC BOTCC considered the factors listed above.

For the foregoing reasons, the NERC BOTCC approved the resolution and believes that the assessed penalty of two hundred ninety six thousand dollars (\$296,000) is appropriate for the violations and circumstances at issue, and is consistent with NERC’s goal to promote and ensure reliability of the BPS.

Pursuant to 18 C.F.R. § 39.7(e), the penalty will be effective upon expiration of the 30-day period following the filing of this Notice of Penalty with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

⁵ See 18 C.F.R. § 39.7(d)(4).

⁶ N. Am. Elec. Reliability Corp., “Guidance Order on Reliability Notices of Penalty,” 124 FERC ¶ 61,015 (2008); N. Am. Elec. Reliability Corp., “Further Guidance Order on Reliability Notices of Penalty,” 129 FERC ¶ 61,069 (2009); N. Am. Elec. Reliability Corp., “Notice of No Further Review and Guidance Order,” 132 FERC ¶ 61,182 (2010).

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Attachments to be Included as Part of this Notice of Penalty

The attachments to be included as part of this Notice of Penalty are the following documents:

1. Settlement Agreement by and between WECC and SCEC executed August 7, 2020, included as Attachment A;
2. SCEC's Self-Report for FAC-003-3 R2 dated October 27, 2017, included as Attachment B;
3. SCEC's Mitigation Plan designated as WECCMIT013552 for FAC-003-3 R2 submitted January 29, 2018, included as Attachment C;
4. SCEC's Certification of Mitigation Plan Completion for FAC-003-3 R2 submitted August 9, 2019, included as Attachment D;
5. WECC's Verification of Mitigation Plan Completion for FAC-003-3 R2 dated September 26, 2019, included as Attachment E;
6. SCEC's Compliance Audit for FAC-003-3 R6 dated August 17, 2018, included as Attachment F;
7. SCEC's Mitigation Plan designated as WECCMIT014799 for FAC-003-3 R6 submitted October 4, 2019, included as Attachment G;
8. SCEC's Certification of Mitigation Plan Completion for FAC-003-3 R6 submitted March 31, 2020, included as Attachment H; and
9. WECC's Verification of Mitigation Plan Completion for FAC-003-3 R6 dated April 28, 2020, included as Attachment I.

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Notices and Communications: Notices and communications with respect to this filing may be addressed to the following:

<p>*Persons to be included on the Commission’s service list are indicated with an asterisk. NERC requests waiver of the Commission’s rules and regulations to permit the inclusion of more than two people on the service list.</p>	<p>Teresina Stasko* Assistant General Counsel and Director of Enforcement North American Electric Reliability Corporation 1325 G Street NW, Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile teresina.stasko@nerc.net</p>
<p>Melanie Frye* President and Chief Executive Officer Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6882 (801) 883-6894 – facsimile mfrye@wecc.org</p>	<p>James McGrane* Senior Counsel North American Electric Reliability Corporation 1325 G Street NW, Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile james.mcgrane@nerc.net</p>
<p>Ruben Arredondo* Senior Legal Counsel Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 819-7674 (801) 883-6894 – facsimile rarredondo@wecc.org</p>	<p>Joshua Yang* Associate Counsel North American Electric Reliability Corporation 1325 G Street NW Suite 600 Washington, DC 20005 (202) 400-3000 (202) 644-8099 – facsimile joshua.yang@nerc.net</p>
<p>Heather Laws* Director of Enforcement Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 819-7642 (801) 883-6894 – facsimile hlaws@wecc.org</p>	

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Conclusion

NERC respectfully requests that the Commission accept this Notice of Penalty as compliant with its rules, regulations, and orders.

Respectfully submitted,

/s/ Joshua Yang

Teresina Stasko
Assistant General Counsel and Director of
Enforcement
James McGrane
Senior Counsel
Joshua Yang
Associate Counsel
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cc: Southern California Edison Company
Western Electricity Coordinating Council

Attachments

Attachment A
Settlement Agreement by and between WECC and SCEC
executed August 7, 2020



Heather M. Laws
Director, Enforcement and Mitigation
801-819-7642
hlaws@wecc.org

July 28, 2020

Michael Montoya
VP / Chief Ethics & Compliance Officer Southern California Edison Company

Subject: Notice of Expedited Settlement Agreement – Revision 2

Michael Montoya,

I. Introduction

The Western Electricity Coordinating Council (WECC) hereby notifies Southern California Edison Company (SCEC) NCR05398 that WECC identified Possible Violations of North American Electric Reliability Corporation (NERC) Reliability Standards (Reliability Standards) in the Preliminary Screen process and that based on an assessment of the facts and circumstances of the Possible Violations addressed herein, evidence exists that SCEC has Alleged Violation of the Reliability Standards.

WECC reviewed the Alleged Violation referenced below and determined that these violations are appropriate violations for disposition through the Expedited Settlement process. In determining whether to exercise its discretion to use the Expedited Settlement process, WECC considered all facts and circumstances related to the violations.

This Notice of Expedited Settlement Agreement (Notice) notifies SCEC of the proposed penalty and/or sanction for such violations. By this Notice, WECC reminds SCEC to retain and preserve all data and records relating to the Alleged Violations.

II. Alleged Violations

Standard Requirement	NERC Violation ID	WECC Violation ID
FAC-003-3 R2	WECC2017018527	WECC2017-614680
FAC-003-3 R6	WECC2018020303	WECC2018-615100

The attached Expedited Settlement Agreement includes a summary of the facts and evidence supporting each Alleged Violation, as well as the basis on which the penalty and/or sanction were determined.

Expedited Settlement Agreement –Revision 2

Southern California Edison Company

CF1504

July 28, 2020

III. Proposed Penalty or Sanction

Pursuant to the Federal Energy Regulatory Commission’s (FERC or Commission) regulations and orders, NERC Rules of Procedure, and the NERC Sanction Guidelines, WECC proposes to assess a penalty for the violations of the Reliability Standards referenced in the Attachment in the amount of \$296,000.

In determining a penalty and/or sanction, WECC considers various factors that may include, but are not limited to: (1) Violation Risk Factor; (2) Violation Severity Level; (3) risk to the reliability of the Bulk Electric System (BES)¹, including the seriousness of the violation; (4) Violation Time Horizon and timeliness of remediation; (5) the violation’s duration; (6) the Registered Entity’s compliance history; (7) the timeliness of the Registered Entity’s self-report; (8) the degree and quality of cooperation by the Registered Entity in the audit or investigation process, and in any remedial action; (9) the quality of the Registered Entity’s Internal Compliance Program; (10) any attempt by the Registered Entity to conceal the violation or any related information; (11) whether the violation was intentional; (12) any other relevant information or extenuating circumstances; (13) whether the Registered Entity admits to and takes responsibility for the violation; (14) “above and beyond” actions and investments made by the Registered Entity in an effort to prevent recurrence of this issue and/or proactively address and reduce reliability risk due to similar issues; and (15) the Registered Entity’s ability to pay a penalty, as applicable.

WECC’s determination of penalties is guided by the statutory requirement codified at 16 U.S.C. § 824o(e)(6) that any penalty imposed “shall bear a reasonable relation to the seriousness of the violation and shall take into consideration the efforts of [the Registered Entity] to remedy the violation in a timely manner.” In addition, WECC considers all other applicable guidance from NERC and FERC.

IV. Procedures for Registered Entity’s Response

If SCEC accepts WECC’s proposal that the violations listed in the Settlement Agreement be processed through the Expedited Settlement process, SCEC must sign the attached Settlement Agreement and submit it through the WECC Enhanced File Transfer (EFT) Server Enforcement folder **within 15 calendar days from the date of this Notice.**

¹ “The Commission, the ERO, and the Regional Entities will continue to enforce Reliability Standards for facilities that are included in the Bulk Electric System.” (*Revision to Electric Reliability Organization Definition of Bulk Electric System*, 113 FERC ¶ 61,150 at P 100 (Nov. 18, 2010))



Expedited Settlement Agreement –Revision 2

Southern California Edison Company

CF1504

July 28, 2020

If SCEC does not accept WECC's proposal, SCEC must submit a written rejection, through the EFT Server, **within 15 calendar days from the date of this Notice**, informing WECC of the decision not to accept WECC's proposal.

If SCEC rejects this proposal or does not respond **within 15 calendar days**, WECC will issue a Notice of Alleged Violation and Proposed Penalty or Sanction.

V. Conclusion

In all correspondence, please provide the name and contact information of a representative from SCEC who is authorized to address the above-listed Alleged Violations and who is responsible for providing the required Mitigation Plans. Please also list the relevant NERC Violation Identification Numbers in any correspondence.

Responses or questions regarding the Settlement Agreement to Katherine Bennett, Senior Enforcement Analyst, at 801-883-6850 or kbennett@wecc.org.

Sincerely,



Heather M. Laws

Director, Enforcement and Mitigation

cc: NERC Enforcement



Attachment
EXPEDITED SETTLEMENT AGREEMENT
OF
WESTERN ELECTRICITY COORDINATING COUNCIL
AND
SOUTHERN CALIFORNIA EDISON COMPANY

Western Electricity Coordinating Council (WECC) and Southern California Edison Company (SCEC) (individually a "Party" or collectively the "Parties") agree to the following:

1. SCEC neither admits or denies for the violations of the NERC Reliability Standards listed below.
2. The violations addressed herein will be considered Confirmed Violations as set forth in the NERC Rules of Procedure.
3. The terms of this Settlement Agreement, including the agreed upon payment, are subject to review and possible revision by NERC and FERC. Upon NERC approval of the Settlement Agreement, NERC will file a Notice of Penalty with FERC and will post the Settlement Agreement publicly. If either NERC or FERC rejects the Settlement Agreement, then WECC will attempt to negotiate a revised Settlement Agreement with SCEC that includes any changes to the Settlement Agreement specified by NERC or FERC. If the Parties cannot reach a Settlement Agreement, the CMEP governs the enforcement process.
4. In addition to the agreed penalty amount, WECC considered "above and beyond" actions and investments made by SCEC in an effort to prevent recurrence of this issue and/or proactively address and reduce reliability risk due to similar issues. SCEC has built out its Vegetation Management team and completed additional vegetation clearing actions in 2017 and 2018 totaling over \$10 million. The Vegetation Management team hired new personnel and a new executive responsible for SCEC's Vegetation Management program. In addition, SCEC performed LiDAR inspections over the entirety of the circuit followed by ground inspections to validate specific trees within the MVCD, associated with the violations herein and as required by the mitigation. However, as an above and beyond measure, based on the Lidar and ground inspections, approximately 25,000 trees were removed in 2017. Additionally, SCEC expanded its LiDAR inspections to encompass greater geographic areas and performed extensive vegetation clearing. Approximately 35,000 trees were removed in this area in 2018. These above and beyond measures are a complete overhaul of SCEC's management of its Vegetation Management program and the extensive vegetation clearing is well beyond what would be considered typical of a similarly



Expedited Settlement Agreement

situation entity. These measures were not taken as result of a mitigation plan, but rather a commitment to the continued present and future reliability of the BES.

5. The Parties have agreed to enter into this Settlement Agreement to avoid extended litigation with respect to the matters described or referred to herein, to avoid uncertainty, and to effectuate a complete and final resolution of the issues set forth herein. The Parties agree that this Settlement Agreement is in the best interest of each Party and in the best interest of Bulk Power System (BPS) reliability.
6. This Settlement Agreement represents a full and final disposition of the violations listed below, subject to approval or modification by NERC and FERC. SCEC waives its right to further hearings and appeal; unless and only to the extent that SCEC contends that any NERC or FERC action on this Settlement Agreement contains one or more material modifications to this Settlement Agreement.
7. In the event SCEC fails to comply with any of the terms set forth in this Settlement Agreement, WECC will initiate enforcement, penalty, and/or sanction actions against SCEC to the maximum extent allowed by the NERC Rules of Procedure, up to the maximum statutorily allowed penalty. Except as otherwise specified in this Settlement Agreement, SCEC shall retain all rights to defend against such enforcement actions, in accordance with the NERC Rules of Procedure.
8. This Settlement Agreement shall be governed by and construed under federal law. This Settlement Agreement and all terms and stipulations set forth herein shall become effective upon FERC's approval of the Agreement by order or operation of law.
9. This Settlement Agreement contains the full and complete understanding of the Parties regarding all matters set forth herein. The Parties agree that this Settlement Agreement reflects all terms and conditions regarding all matters described herein and no other promises, oral or written, have been made that are not reflected in this Settlement Agreement.
10. Each of the undersigned warrants that he or she is an authorized representative of the Party identified, is authorized to bind such Party and accepts the Settlement Agreement on that Party's behalf.
11. The undersigned representative of each Party affirms that he or she has read the Settlement Agreement, that all representations set forth in the Settlement Agreement are true and correct to the best of his or her knowledge, information, and belief, and that he or she understands that the Settlement Agreement is entered into by each Party in express reliance on those representations.



Expedited Settlement Agreement

12. To settle these matters, SCEC hereby agrees to pay \$296,000 to WECC via wire transfer or cashier's check. SCEC shall make the funds payable to a WECC account identified in a Notice of Payment Due that WECC will send to SCEC upon approval of this Settlement Agreement by NERC and FERC. SCEC shall issue the payment to WECC no later than thirty days after receipt of the Notice of Payment Due. If this payment is not timely received, WECC shall assess, and SCEC agrees to pay, an interest charge calculated according to the method set forth at 18 CFR §35.19(a)(2)(iii) beginning on the 31st day following issuance of the Notice of Payment Due.
13. In addition, SCEC must submit Mitigation Plans within 30 calendar days from the date of this Settlement Agreement, if it has not already done so previously.
14. NOW, THEREFORE, in consideration of the terms set forth herein the Parties stipulate to the following:

A. NERC RELIABILITY STANDARD FAC-003-3 REQUIREMENT 2

NERC VIOLATION ID: WECC2017018527

WECC VIOLATION ID: WECC2017-614680

STANDARD

1. NERC Reliability Standard FAC-003-3 Requirement 2 states:

R2. Each applicable Transmission Owner and applicable Generator Owner shall manage vegetation to prevent encroachments into the MVCD of its applicable line(s) which are not either an element of an IROL, or an element of a Major WECC Transfer Path; operating within its Rating and all Rated Electrical Operating Conditions of the types shown below.

[...]

1. *An encroachment into the MVCD, observed in Real-time, absent a Sustained Outage.²*

B. NERC RELIABILITY STANDARD FAC-003-3 REQUIREMENT 6

NERC VIOLATION ID: WECC2018020303

WECC VIOLATION ID: WECC2018-615100

² If a later confirmation of a Fault by the applicable Transmission Owner or applicable Generator Owner shows that a vegetation encroachment within the MVCD has occurred from vegetation within the ROW, this shall be considered the equivalent of a Real-time observation.



STANDARD

2. NERC Reliability Standard FAC-003-3 Requirement 6 states:

R6. Each applicable Transmission Owner and applicable Generator Owner shall perform a Vegetation Inspection of 100% of its applicable transmission lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.) at least once per calendar year and with no more than 18 calendar months between inspections on the same ROW³

VIOLATION FACTS

3. On October 27, 2017, SCEC submitted a Self-Report stating, as a Generator Owner and Transmission Owner, it had a potential noncompliance with FAC-003-4 R2. WECC determined that the start date predated FAC-003-4 R2, therefore the potential noncompliance was with FAC-003-3 R2. During a Compliance Audit conducted August 6, 2018 through August 17, 2018, while validating the R2 issue, WECC determined SCEC, as a Generator Owner and Transmission Owner, also had a potential noncompliance with FAC-003-3 R6.
4. On August 17, 2017, during an annual routine pre-inspection for vegetation management, a third-party contractor for SCEC identified a tree that could have been encroaching on the Minimum Vegetation Clearance Distance (MVCD) to one 220 kV transmission line, interconnected at a 175 MW generation station. However, due to the significant slope angle and heavy vegetation growth from wet, seasonal weather within the forested area of the Right-of-Way, SCEC was initially unable to identify from the ground and from a helicopter whether there had been a MVCD encroachment. Once the ground crews cleared access, they could see the evidence oak tree had encroached into the MVCD. On August 18, 2017 SCEC removed the subject tree under a safety guard emergency outage.
5. Additionally, during a Compliance Audit, WECC determined that although SCEC had provided records of Vegetation Inspections and had a Transmission Vegetation Management Plan (TVMP), the records did not demonstrate that SCEC performed a systematic Vegetation Inspection for the area associated with the vegetation encroachment in the MVCD of the 220 kV transmission line at issue in the FAC-003-3 R2 violation, as required by FAC-003-3 R6. In 2015 and 2016, SCEC Vegetation Inspections were completed by aerial inspection for the area associated with the vegetation encroachment in the MVCD of the 220 kV transmission line at issue, but SCEC did not have records demonstrating that the inspector considered certain factors, including sag and sway

³ When the applicable Transmission Owner or applicable Generator Owner is prevented from performing a Vegetation Inspection within the timeframe in R6 due to a natural disaster, the TO or GO is granted a time extension that is equivalent to the duration of the time the TO or GO was prevented from performing the Vegetation Inspection.



Expedited Settlement Agreement

of the transmission line, thus did not adequately complete the Vegetation Inspection. Though SCEC provided evidence that ground inspections were completed for certain areas, this evidence did not demonstrate that the sag and sway of the transmission line was considered. WECC determined that the ground inspection was not effective in detecting that the slow-growing oak tree that should have been trimmed or removed due to its proximity to the MVCD. WECC determined that SCEC was unable to demonstrate that it had completed sufficient Vegetation Inspections for the 220 kV transmission line area associated with the R2 violation.

6. WECC determined the root cause of these violations was attributed to SCEC's misinterpretation of the expectation for a Vegetation Inspection, resulting in an inadequate implementation of its systematic examination of vegetation conditions for the applicable transmission line in one area, which allowed fast growing vegetation to visually obscure the tree in the MVCD, leading to an MVCD encroachment. WECC determined that SCEC's dependence on aerial inspections over several years and lack of proper follow up with ground inspections allowed fast growing vegetation to visually obscure a slow growing oak in the MVCD of the 220 kV transmission line under certain loading conditions. These issues reduced access and accurate measurements by SCEC for visual inspections of the transmission line in one specific area.
7. The FAC-003-3 R2 violation began on May 16, 2016, when SCEC completed its last Vegetation Inspection that did not effectively manage the encroachment of vegetation into the MVCD for the 220 kV transmission line area and the violation ended on August 18, 2017, when SCEC removed the subject tree under a safety guard emergency outage, for a total of 460 days of noncompliance.
8. The FAC-003-3 R6 violation began on July 1, 2014, when the Standard became mandatory and enforceable and the violation ended on October 16, 2017 when SCEC received the LiDAR survey data, for a total of 1,204 days of noncompliance. SCEC contracted out a LiDAR survey of nine of the eleven 220 kV lines originating from the area associated with R2 to ensure all vegetation issues had been identified, the remaining two transmission lines were inspected on foot. Then SCEC received the as-surveyed and modeled LiDAR data (maximum sag and sway) and determined that there were no additional encroachments within the MVCD.

RELIABILITY RISK ASSESSMENT

9. For the FAC-003-3 R2 violation, WECC determined it posed a moderate risk and did not pose a serious and substantial risk to the reliability of the Bulk Power System (BPS). In this instance, SCEC failed to manage vegetation to prevent an encroachment into the MVCD of one 220 kV



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transmission line, which is not either an element of an Interconnection Reliability Operating Limit (IROL), or an element of a Major WECC Transfer Path; operating within its Rating and all Rated Electrical Operating Conditions; specifically, an encroachment into the MVCD, observed in Real-time, absent a Sustained Outage, as required by FAC-003-3 R2.

10. For the FAC-003-3 R6 violation, WECC determined it posed a moderate risk and did not pose a serious and substantial risk to the reliability of the BPS. In this instance, SCEC failed to perform an effective systematic Vegetation Inspection of the affected area of its 220 kV transmission line applicable to the FAC-003-3 R2 violation, as required by FAC-003-3 R6.
11. Failure of R2 could have resulted in the vegetation contacting the line and causing to a Sustained Outage, which could have then led to loss of generation and/or load. However, as compensation, the 220 kV transmission line was one of four transmission lines that interconnected a 175 MW generation station. Generation tripping due to potential loss of one transmission lines in this instance is reduced due the number of transmission lines interconnected. In the event of a Sustained Outage, the redundant lines would have reduced the likelihood of negative impacts to load from the 175 MW generation station.
12. Failure of R6 resulted in an encroachment into the MVCD of the 220 kV line that could have caused a vegetation-related Sustained Outage on the SCEC system. SCEC did not implement effective preventative or detective controls. However, as compensation, SCEC performed annual inspections and ground inspections for the remaining transmission areas, reducing the risk that the inadequate Vegetation Inspections from the area associated with the instant issue would have caused additional encroachments to the MVCD across SCEC's system. The significant duration of the violation of R6 contributed to the overall risk determination.

REMEDICATION AND MITIGATION

13. For the FAC-003-3 R2 violation, on January 29, 2018, SCEC submitted a Mitigation Plan to address its violation and on September 19, 2018, WECC accepted SCEC's Mitigation Plan.
14. To remediate and mitigate the FAC-003-3 R2 violation, SCEC has:
 - a. removed tree encroaching into the MVCD of the 220 kV transmission line;
 - b. performed a patrol via helicopter for the transmission circuits originating from the area associated with the R2 violation;
 - c. field inspectors were mobilized to conduct emergency inspections on SCEC transmissions circuits originating from the area associated with the R2 violation, no additional MVCD encroachments were found;



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- d. conducted gap analysis, resulting in the following suggested corrective actions:
 - i. increased program controls by developing a process for reporting inaccessible areas and areas where work cannot be completed as assigned by SCEC. This process was communicated for pre-inspection, line clearing, and brushing contractors. The process was also established as a contract requirement and triggered activity necessary to complete all assigned work;
 - ii. improved execution of pre-inspection and line clearing work to ensure the required work is completed by either the third-party contractors or SCEC;
 - iii. improved training for pre-inspection and line clearing contractors by mandating training for both pre-inspection and line clearing contractors. Although training has been provided related to the imminent threat procedure, that training should be mandatory and reinforced on a regular basis;
 - iv. employed various inspection methods, as appropriate, to ensure timely and accurate results;
 - e. developed project plan to manage the mitigation efforts and ensure timely completion of mitigation activities;
 - f. created matrix for the implementation of the control design solution and review of GAP analysis;
 - g. updated ROW maintenance and vegetation plan to address gaps; and
 - h. implemented a work plan based on the gap analysis including communication strategies, training, and education.
15. On August 9, 2019, SCEC submitted a Mitigation Plan Completion Certification and on September 26, 2019, WECC verified SCEC's completion of its Mitigation Plan.
16. For the FAC-003-3 R6 violation, on October 4, 2019, SCEC submitted a Mitigation Plan to address its violation and on November 11, 2019, WECC accepted SCEC's Mitigation Plan.
17. To remediate and mitigate this violation, SCEC has:
- a. contracted a Light Detection and Ranging (LiDAR) data survey of nine of the eleven 220 kV lines originating from same area associated with the R2 violation to ensure all vegetation issues had been identified. SCEC received the as-surveyed and modeled LiDAR data- maximum sag and sway. Based on the LiDAR data, there are no additional trees within the MVCD under as-surveyed conditions;
 - b. revised sag and sway tables in its TVMP;
 - c. acquired vegetation LiDAR Data and expanded its use of vegetation LiDAR data for BPS Transmission lines that have adjacent vegetation; and
 - d. revised and implemented its TVMP in phases across its service territory;



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- e. trained vegetation pre-inspection contractors and SCEC employees regarding the revisions in its TVMP, LiDAR data usage and the revised sag and sway tables.
18. On March 31, 2020, SCEC submitted a Mitigation Plan Completion Certification and on April 28, 2020, WECC verified SCEC's completion of its Mitigation Plan

PENALTY AND/OR SANCTION

19. WECC determined the proposed penalty of \$296,000 is appropriate based on the following:
- a. Base penalty factors:
 - i. For the FAC-003-3 R2 violation, the Violation Risk Factor is High and the Violation Severity Level is High.
 - ii. For the FAC-003-3 R6 violation, the Violation Risk Factor is Medium and the Violation Severity Level is Severe.
 - iii. These violations posed a moderate risk to the reliability of the BPS.
 - iv. The FAC-003-3 R2 violation duration was 460 days as described herein. This Requirement has a Real-time violation time horizon expectation for remediation of the Requirement to within one hour or less to preserve the reliability of the BPS.
 - v. The FAC-003-3 R6 violation duration was 1,204 days as described herein. This Requirement has an Operations Planning violation time horizon expectation for remediation of the Requirement from day-ahead up to and including seasonal to preserve the reliability of the BPS.
 - b. WECC applied a mitigating credit for the following reasons:
 - i. SCEC was cooperative throughout the process.
 - ii. SCEC self-reported the FAC-003-3 R2 violation in a timely manner from the date of discovery.
 - iii. SCEC had "above and beyond" activities consisting of building out its Vegetation Management team and completed additional vegetation clearing actions in 2017 and 2018 totaling over \$10 million. The Vegetation Management team hired new personnel and a new executive responsible for SCEC's Vegetation Management program. In addition, SCEC performed LiDAR inspections over the entirety of the circuit followed by ground inspections to validate specific trees within the MVCD, associated with the violations herein and as required by the mitigation. However, as an above and beyond measure, based on the Lidar and ground inspections, approximately 25,000 trees were removed in 2017. Additionally, SCEC expanded its LiDAR inspections to



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encompass greater geographic areas and performed extensive vegetation clearing. Approximately 35,000 trees were removed in this area in 2018. These above and beyond measures are a complete overhaul of SCEC's management of its Vegetation Management program and the extensive vegetation clearing is well beyond what would be considered typical of a similarly situated entity. These measures were not taken as result of a mitigation plan, but rather a commitment to the continued present and future reliability of the BES.

iv. SCEC agreed to settle these violations and penalty.

c. Other Considerations:

- i. WECC did not apply mitigating credit for the entity's Internal Compliance Program (ICP). Although SCEC does have a documented ICP, WECC determined that it was not effective in detecting these violations.
- ii. WECC considered SCEC's compliance history with FAC-003 and determined there were no relevant instances of noncompliance.
- iii. SCEC did not fail to complete any applicable compliance directives. There was no evidence of any attempt by the entity to conceal the violation. There was no evidence that violation was intentional. SCEC submitted all requested documentation and/or mitigation plans timely. There was no evidence SCEC's management was involved in or condoned the actions that caused the noncompliance.
- iv. WECC determined there were no other aggravating factors warranting a penalty higher than the proposed penalty.

[Remainder of page intentionally left blank - signatures affixed to following page]



Expedited Settlement Agreement

Agreed to and Accepted by:

WESTERN ELECTRICITY COORDINATING COUNCIL

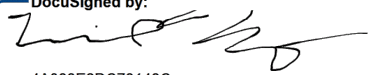

Heather M. Laws (Aug 7, 2020 13:40 MDT)

Heather M. Laws
Director, Enforcement and Mitigation

Aug 7, 2020

Date

SOUTHERN CALIFORNIA EDISON COMPANY

DocuSigned by:

4A083E2DC78148C...

Michael Montoya
VP / Chief Ethics & Compliance Officer

8/6/2020

Date









scec_20200807-130256_CF1504_-_SCEC_Notice_of_Expedited_Settlement_Agreement_-_Final_(signed)

Final Audit Report

2020-08-07

Created:	2020-08-07
By:	Mailee Cook (mcook@wecc.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAA-EvAaosfnLg-yWiuFXP_Vv3t3offORFD

"scec_20200807-130256_CF1504_-_SCEC_Notice_of_Expedited_Settlement_Agreement_-_Final_(signed)" History

-  Document digitally presigned by DocuSign, Inc. (techops@docusign.com)
2020-08-07 - 2:59:44 PM GMT- IP address: 67.2.90.58
-  Document created by Mailee Cook (mcook@wecc.org)
2020-08-07 - 7:17:14 PM GMT- IP address: 67.2.90.58
-  Document emailed to Heather Laws (hlaws@wecc.org) for signature
2020-08-07 - 7:17:54 PM GMT
-  Email viewed by Heather Laws (hlaws@wecc.org)
2020-08-07 - 7:40:07 PM GMT- IP address: 166.70.27.162
-  Document e-signed by Heather Laws (hlaws@wecc.org)
Signature Date: 2020-08-07 - 7:40:57 PM GMT - Time Source: server- IP address: 166.70.27.162
-  Signed document emailed to Mailee Cook (mcook@wecc.org) and Heather Laws (hlaws@wecc.org)
2020-08-07 - 7:40:57 PM GMT

Attachment B
SCEC's Self-Report for FAC-003-3 R2
dated October 27, 2017

Self Report

Entity Name: Southern California Edison Company (SCEC)

NERC ID: NCR05398

Standard: FAC-003-4

Requirement: FAC-003-4 R2.

Date Submitted: October 27, 2017

Has this violation previously No
been reported or discovered?:

Entity Information:

Joint Registration
Organization (JRO) ID:

Coordinated Functional
Registration (CFR) ID:

Contact Name: Paul Rea

Contact Phone: 6263021707

Contact Email: paul.rea@sce.com

Violation:

Violation Start Date: August 17, 2017

End/Expected End Date:

Reliability Functions: Generator Owner (GO)
Transmission Owner (TO)

Is Possible Violation still No
occurring?:

Number of Instances: 1

Has this Possible Violation No
been reported to other
Regions?:

Which Regions:

Date Reported to Regions:

Detailed Description and Cause of Possible Violation: Southern California Edison Company (SCEC) is reporting potential noncompliance with NERC Standard FAC-003-4, Requirement 2, Part 2.1, which requires an entity to "manage vegetation to prevent encroachments into the Minimum Vegetation Clearance Distance (MVCD) of its applicable line".

On August 17, 2017, an SCE contract inspector performed an annual routine pre-inspection for vegetation maintenance of the Big Creek 3 - Rector No. 2 - 220 kV line out of Rector Substation.

The inspector identified a tree that appeared to be encroaching the MVCD but, due to the heavy growth resulting from very wet seasonal weather, was unable to get close enough for an accurate measurement. An Edison technical specialist was also unable to accurately measure the distance from a helicopter but did observe browning of leaves at the tip of several tree branches. After ground crews cleared access, the tree/line was able to be viewed with accuracy and the tree was confirmed to be encroaching the MVCD.

A short time thereafter, due to cooling weather and the line unloading, the line retreated to well outside the MVCD. The tree was reached and removed the morning of August 18, 2017.

A contributing factor to this incident was inadequate access and visibility of this section of the Big Creek 3 - Rector No. 2 - 220 kV line. The lack of visibility to inspect this line allowed a tree to grow within the MVCD.

Self Report

Mitigating Activities:

Description of Mitigating Activities and Preventative Measure: On August 18, 2017, the subject oak tree was removed under a safety guard emergency outage. In addition, all surrounding over growth (brush) limiting access was removed or cut back. Full mitigation and preventative measures will be outlined in the mitigation plan, including revised controls designed to significantly reduce the likelihood of a similar event in the future.

Have Mitigating Activities been Completed? No

Date Mitigating Activities Completed:

Impact and Risk Assessment:

Potential Impact to BPS: Moderate

Actual Impact to BPS: Minimal

Description of Potential and Actual Impact to BPS: The impact to the Bulk Electric System (BES) was minimal to moderate since the incident did not cause disruption nor resulted in any service reliability impacts to the BES.

Risk Assessment of Impact to BPS: A risk assessment was conducted to determine impact to the BES by applying the NERC/ERO Event Analysis Process criteria to the incident and other internal Event Risk Assessment procedures. When assessed, the incident did not meet any of the five event categories or thresholds identified by NERC and therefore is not a qualifying event.

The FAC-003-4 R2.1 standard rates the Violation Risk Factor of this potential violation as HIGH. SCEC believes that this incident resulted in minimal risk to the BES because, by executing our procedures, the incident was treated with the correct level of urgency, caught and remediated quickly and didn't impact the operation (service reliability) of the BES.

Additional Entity Comments:

Additional Comments		
From	Comment	User Name
Entity	If you have any questions about this Self Report, please contact Paul Rea at paul.rea@sce.com. Please reference the following SCE Internal Case Number: SCEC329	Paul Rea

Additional Documents			
From	Document Name	Description	Size in Bytes
No Documents			

Attachment C
SCEC's Mitigation Plan designated as WECCMIT013552 for FAC-003-3 R2
submitted January 29, 2018

Mitigation Plan

Mitigation Plan Summary

Registered Entity: Southern California Edison Company

Mitigation Plan Code: WECCMIT013552

Mitigation Plan Version: 1

<u>NERC Violation ID</u>	<u>Requirement</u>	<u>Violation Validated On</u>
WECC2017018527	FAC-003-4 R2.	09/14/2018

Mitigation Plan Submitted On: January 29, 2018

Mitigation Plan Accepted On: September 19, 2018

Mitigation Plan Proposed Completion Date: February 28, 2019

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by SCEC On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Compliance Notices

Section 6.2 of the NERC CMEP sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:

- (1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Entity Information

Identify your organization:

Entity Name: Southern California Edison Company

NERC Compliance Registry ID: NCR05398

Address: 2244 Walnut Grove Ave.
Rosemead CA 91770

Identify the individual in your organization who will serve as the Contact to the Regional Entity regarding this Mitigation Plan. This person shall be technically knowledgeable regarding this Mitigation Plan and authorized to respond to Regional Entity regarding this Mitigation Plan:

Name: Paul Rea
Title: Investigator
Email: paul.rea@sce.com
Phone: 626-703-6663

Violation(s)

This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2017018527	08/17/2017	FAC-003-4 R2.
Each applicable Transmission Owner and applicable Generator Owner shall manage vegetation to prevent encroachments into the MVCD of its applicable line(s) which are not either an element of an IROL, or an element of a Major WECC Transfer Path; operating within its Rating and all Rated Electrical Operating Conditions of the types shown below:		

Brief summary including the cause of the violation(s) and mechanism in which it was identified:

Southern California Edison Company (SCEC) is reporting noncompliance with NERC Standard FAC-003-4, Requirement 2, (Part 2.1), which requires an entity to "manage vegetation to prevent encroachments into the Minimum Vegetation Clearance Distance (MVCD) of its applicable line".

On August 17, 2017, an SCE contract inspector performed an annual routine pre-inspection for vegetation maintenance of the Big Creek 3 - Rector No. 2 - 220 kV line out of Rector Substation.

The inspector identified a tree that appeared to be encroaching the MVCD but, due to the dense brush located on the SCEC Right-Of-Way within the Sierra National Forest, was unable to get an unobstructed view for an accurate measurement. An Edison Technical Specialist was also unable to accurately measure the distance from a helicopter or from the ground with a laser range finder, but did observe browning of leaves at the tip of several tree branches.

Due to cooling weather the line sag moved to outside the MVCD. On the morning of August 18, 2017, after ground crews cleared access, the tree/line was able to be viewed. Based on observations and evidence the tree was confirmed to encroach the MVCD under specific weather conditions. The subject tree was removed under a safety guard emergency outage between 10:14am and 10:42am on August 18, 2017.

Relevant information regarding the identification of the violation(s):

The issue was identified during an annual routine pre-inspection for vegetation maintenance.

Plan Details

Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the violation(s) identified above in Section C.1 of this form:

SCEC commenced remediation of this event immediately after discovery to restore a state of compliance. In addition to remediating the risk presented by the tree and surrounding brush SCEC also completed the following actions to further mitigate the issue, prevent any future occurrences, and demonstrate the scope of this report is confined to this single occurrence:

- Starting on August 18, 2017, SCEC patrolled via helicopter transmission circuits originating from Big Creek to see if additional MVCD violations existed. This activity has been completed and no other MVCD violations were found.
- On August 21, 2017, field inspectors were mobilized to conduct emergency inspections on SCEC transmissions circuits originating from Big Creek. All inspection activities were completed on September 18, 2017. No MVCD violations were found.
- On October 16, 2017, SCE contracted out a LiDAR survey of nine of the eleven 220 kV lines originating from Big Creek to ensure all vegetation issues had been identified (the remaining 2 lines were inspected by foot). On January 10, 2018, SCE received the as-surveyed and modeled LiDAR data (maximum sag and sway). Based on the LiDAR data, there are no additional trees within the MVCD under as-surveyed conditions. SCEC continues to analyze the data from the LiDAR scans.
- The uniqueness of the reported incident was due to the Big Creek environment presenting specific issues for internal controls that did not manifest itself in other areas of the system.

Provide the timetable for completion of the Mitigation Plan, including the completion date by which the Mitigation Plan will be fully implemented and the violations associated with this Mitigation Plan are corrected:

Proposed Completion date of Mitigation Plan: February 28, 2019

Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
Define Problem/Risk Statement	The matter which needed to be mitigated described in the form of a problem statement. Supporting risk statements are then developed based on the problem statement.	01/31/2018	01/31/2018	Problem and risk statement	No
Conduct Gap Analysis	Identify Gaps in Control Design and Operations in the Big	04/30/2018	04/27/2018	Big Creek ROW Gap Report	No

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
	Creek area				
Develop Project Plan	Develop project plan to manage the mitigation efforts and ensure timely completion of activities	05/31/2018	05/31/2018	High level deliverables from Project Plan.	No
Control Design Solution and Review	Control design addressing GAP findings	08/31/2018	08/31/2018	QA Control Review Report - UVM Risk and Control Matrix	No
Design Solution	Updated ROW maintenance and vegetation plan in Big Creek area to address gaps.	11/30/2018		Updated Maintenance Plan	No
Implement Solution	Work plan based on updated maintenance plan	02/28/2019		Work Plan	No

Additional Relevant Information

N/A

Reliability Risk

Reliability Risk

While the Mitigation Plan is being implemented, the reliability of the bulk Power System may remain at higher Risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are known or anticipated : (i) Identify any such risks or impacts, and; (ii) discuss any actions planned or proposed to address these risks or impacts.

A risk assessment was conducted to determine impact to the Bulk Electric System (BES) by applying the NERC/ERO Event Analysis Process criteria to the incident and other internal Event Risk Assessment procedures. When assessed, the incident did not meet any of the five event categories or thresholds identified by NERC and therefore is not a qualifying event.

A further assessment was conducted against the NERC Violation Severity Level (VSL) published for FAC-003-4 R2.1. The results of the assessment determined that the risk to the BES is rated as HIGH based on the VSL description "The responsible entity failed to manage vegetation to prevent encroachment into the MVCD of a line identified as an element of an IROL or Major

WECC transfer path and encroachment into the MVCD as identified in FAC-003-4-Table 2 was observed in real time absent a Sustained Outage."

SCEC believes the risk presented by this incident was low, supported by the following factors:

- The incident was treated with the extreme level of urgency, caught and remediated quickly,
- The incident did not cause a disruption or any Service Reliability impact to the BES,
- This is the first potential occurrence of an MVCD.

Prevention

Describe how successful completion of this plan will prevent or minimize the probability further violations of the same or similar reliability standards requirements will occur

The completion of the GAP Analysis (milestone 2) will identify the gaps and control deficiencies surrounding the event. The Design Solution (milestone 5) will consider the preventative measures needed to avert or minimize this type of incident from occurring in the future.

The GAP Analysis will also consider improving controls to validate the responsibilities assigned to third party vegetation management vendors are completed as expected. The controls/control changes established as a result of the GAP Analysis will be both preventive and detective in nature to minimize future violations.

The mitigation plan includes both a controls review and training review to determine gaps in either area. The plan also includes an implementation phase to address identified gaps. These actions will be specifically designed to minimize the probability of future violations of the same or similar reliability standards.

Describe any action that may be taken or planned beyond that listed in the mitigation plan, to prevent or minimize the probability of incurring further violations of the same or similar standards requirements

Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

- * Submits the Mitigation Plan, as presented, to the regional entity for acceptance and approval by NERC, and
- * if applicable, certifies that the Mitigation Plan, as presented, was completed as specified.

Acknowledges:

1. I am qualified to sign this mitigation plan on behalf of my organization.
2. I have read and understand the obligations to comply with the mitigation plan requirements and ERO remedial action directives as well as ERO documents, including but not limited to, the NERC rules of procedure and the application NERC CMEP.
3. I have read and am familiar with the contents of the foregoing Mitigation Plan.

Southern California Edison Company Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authority.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Michael Montoya

Title: Vice President, Chief Ethics & Compliance Officer

Authorized On: January 29, 2018

Attachment D
SCEC's Certification of Mitigation Plan Completion for FAC-003-3 R2
submitted August 9, 2019

Certification of Mitigation Plan Completion

Submittal of a Certification of Mitigation Plan Completion shall include data or information sufficient for the Regional Entity to verify completion of the Mitigation Plan. The Regional Entity may request additional data or information and conduct follow-up assessments, on-site or other Spot Checking, or Compliance Audits as it deems necessary to verify that all required actions in the Mitigation Plan have been completed and the Registered Entity is in compliance with the subject Reliability Standard. (CMEP Section 6.6)

Registered Entity Name: Southern California Edison Company

NERC Registry ID: NCR05398

NERC Violation ID(s): WECC2017018527

Mitigated Standard Requirement(s): FAC-003-4 R2.

Scheduled Completion as per Accepted Mitigation Plan: February 28, 2019

Date Mitigation Plan completed: February 28, 2019

WECC Notified of Completion on Date: April 25, 2019

Entity Comment:

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	Issue 329- WECC Mitigation Plan Completion Final.pdf	Mitigation Plan Completion document	123,417

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Michael Montoya

Title: Vice President, Chief Ethics & Compliance Officer

Email: mike.montoya@edisonintl.com

Phone: 1 (626) 302-6057

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Attachment E
WECC's Verification of Mitigation Plan Completion for FAC-003-3 R2
dated September 26, 2019

From: noreply@oati.net

Sent: 09/26/2019 16:21:48

To: John.Pespisa@sce.com;RegulatoryCompliance@sce.com;hecareth.wosu@sce.com;neil.shockey@sce.com;randy.lisbin@sce.com;scott.nickloff@sce.com

Subject: WECC Notice - Completed Mitigation Plan Acceptance - FAC-003-4 R2. - Southern California Edison Company

Please do not REPLY to this message. It was sent from an unattended mailbox and replies are not monitored. If you have a question, send a new message to the OATI Help Desk at support@oati.net.

NERC Registration ID: NCR05398

NERC Violation ID: WECC2017018527

Standard/Requirement: FAC-003-4 R2.

Subject: Completed Mitigation Plan Acceptance

WECC received the Certification of Mitigation Plan Completion submitted by Southern California Edison Company on 04/25/2019 for the violation of FAC-003-4 R2.. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

webCDMS Login: <https://www.cdms.oati.com/CDMS/sys-login.wml>

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[OATI Information - Email Template: MitPlan_Completed]

Attachment F
SCEC's Compliance audit for FAC-003-3 R6
dated August 17, 2018

Violation - Discovery Record

Registered Entity: Southern California Edison Company

NERC Registry ID: NCR05398

NERC Violation ID: WECC2018020303

Discovery Method: Audit

Date Submitted: August 30, 2018

Region Contact: Mailee Cook

Phone: 801-883-6866 Email: mcook@wecc.biz

Standard: FAC-003-3 - Transmission Vegetation Management

Purpose: To maintain a reliable electric transmission system by using a defense-in-depth strategy to manage vegetation located on transmission rights of way (ROW) and minimize encroachments from vegetation located adjacent to the ROW, thus preventing the risk of those vegetation-related outages that could lead to Cascading.

Requirement: FAC-003-3 R6.

Each applicable Transmission Owner and applicable Generator Owner shall perform a Vegetation Inspection of 100% of its applicable transmission lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.) at least once per calendar year and with no more than 18 calendar months between inspections on the same ROW.

Violated Sub-Requirement(s):

Violated Function(s): Generator Owner (GO), Transmission Owner (TO)

Init Determ a Vltn:

Begin Date of Vltn: October 06, 2015

End Date:

Notified of Vltn on: August 17, 2018

Potential Impact to Preventative Controls: SCEC TVMP "2.3 Inspection Methods under 2.3.2 Aerial Inspections states, BES: "Where lines cannot be readily accessed by ground aerial inspections are performed." However, the TVMP does not stipulate that when aerial patrols cannot access portions of the ROW, inspections must be completed using ground patrols for a 100% completion of the ROW.

Detective Controls: When aerial patrols were no longer an effective method for transmission line inspections, ground patrols are used an alternative inspection method. However, SCEC does not have a documented procedure to use ground patrols when aerial patrols are not effective; therefore, there were not detective controls in place at the time of the PNC was determined.

Brief Vltn Descr. & Cause: The entity failed to perform a Vegetation Inspection of 100% of its applicable transmission lines at least once per calendar year and with no more than 18 calendar months between inspections on the same ROW. The ROW in question is Big Creek 3-Rector #2 which the entity has self-reported in encroachment of the MVCD.

Alleged Violation:

Registered Entity
Report/Response:

Risk Factor: Medium

Severity Level: VSL - Lower

Factual Basis: R6. states, "Each applicable Transmission Owner and applicable Generator Owner shall perform a Vegetation Inspection of 100% of its applicable transmission lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.) at least once per calendar year and with no more than 18 calendar months between inspections on the same ROW."

SCEC failed to perform a Vegetation Inspection of 100% of its applicable transmission lines at least once per calendar year and with no more than 18 calendar months between inspections on the same ROW. The ROW in question is Big Creek 3-Rector #2 which SCEC has self-reported in encroachment of the MVCD.

NERC Violation ID: WECC2017018527

Violation Start Date: August 17, 2017

Date Submitted: October 27, 2017

Attachment G
SCEC's Mitigation Plan designated as WECCMIT014799 for FAC-003-3 R6
submitted October 4, 2019

Mitigation Plan

Mitigation Plan Summary

Registered Entity: Southern California Edison Company

Mitigation Plan Code: WECCMIT014799

Mitigation Plan Version: 1

<u>NERC Violation ID</u>	<u>Requirement</u>	<u>Violation Validated On</u>
WECC2018020303	FAC-003-3 R6.	02/28/2019

Mitigation Plan Submitted On: October 06, 2019

Mitigation Plan Accepted On: November 01, 2019

Mitigation Plan Proposed Completion Date: March 31, 2020

Actual Completion Date of Mitigation Plan:

Mitigation Plan Certified Complete by SCEC On:

Mitigation Plan Completion Verified by WECC On:

Mitigation Plan Completed? (Yes/No): No

Compliance Notices

Section 6.2 of the NERC CMEP sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:

- (1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section B.
 - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
 - (3) The cause of the Alleged or Confirmed Violation(s).
 - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
 - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
 - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
 - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
 - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined or recommended to the applicable governmental authorities for not completing work associated with accepted milestones.
 - (9) Any other information deemed necessary or appropriate.
 - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self Certification or Self Reporting submittals.
 - (11) This submittal form may be used to provide a required Mitigation Plan for review and approval by regional entity(ies) and NERC.
- The Mitigation Plan shall be submitted to the regional entity(ies) and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
 - This Mitigation Plan form may be used to address one or more related alleged or confirmed violations of one Reliability Standard. A separate mitigation plan is required to address alleged or confirmed violations with respect to each additional Reliability Standard, as applicable.
 - If the Mitigation Plan is accepted by regional entity(ies) and approved by NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission or filed with the applicable governmental authorities for approval in Canada.
 - Regional Entity(ies) or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
 - Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.
 - The user has read and accepts the conditions set forth in these Compliance Notices.

Entity Information

Identify your organization:

Entity Name: Southern California Edison Company

NERC Compliance Registry ID: NCR05398

Address: 2244 Walnut Grove Ave.
Rosemead CA 91770

Identify the individual in your organization who will serve as the Contact to the Regional Entity regarding this Mitigation Plan. This person shall be technically knowledgeable regarding this Mitigation Plan and authorized to respond to Regional Entity regarding this Mitigation Plan:

Name: Paul Rea
Title: Investgator
Email: paul.rea@sce.com
Phone: 626-703-1707

Violation(s)

This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

Violation ID	Date of Violation	Requirement
Requirement Description		
WECC2018020303	07/01/2014	FAC-003-3 R6.
Each applicable Transmission Owner and applicable Generator Owner shall perform a Vegetation Inspection of 100% of its applicable transmission lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.) at least once per calendar year and with no more than 18 calendar months between inspections on the same ROW.		

Brief summary including the cause of the violation(s) and mechanism in which it was identified:

On February 28, 2019, WECC validated a potential noncompliance with FAC-003-4 R6 regarding 100% inspections of applicable transmission lines. WECC has identified the following cause for this PNC:

The entity's previous vegetation management practices were not consistent with the definition of "Vegetation Inspection" or take into consideration Requirement R3 for FAC-003-4. Per the NERC Glossary of Terms, a Vegetation Inspection is "The systematic examination of vegetation conditions on a Right-of-Way and those vegetation conditions under the applicable Transmission Owner's or applicable Generator Owner's control that are likely to pose a hazard to the line(s) prior to the next planned maintenance or inspection. This may be combined with a general line inspection." The entity is misinterpreting requirements for a systematic examination and thus did not perform a systematic examination on their lines, resulting in a slow-growing tree encroach the MVCD.

WECC is requesting evidence that demonstrates that SCEC took into account, in accordance with Requirement Part 3.1 and 3.2 of R3 of FAC-003-4 as follows:

- 3.1. Movement of applicable line conductors under their Rating and all Rated Electrical Operating Conditions;
- 3.2. Inter-relationships between vegetation growth rates, vegetation control methods, and inspection frequency.

Relevant information regarding the identification of the violation(s):

This instance of potential noncompliance was identified by WECC auditors during SCEC's 2018 WECC regularly scheduled audit. As set forth above, WECC validated the potential noncompliance on February 28, 2019.

Plan Details

Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the violation(s) identified above in Section C.1 of this form:

SCEC refers to its Transmission Vegetation Management Plan (TVMP) version 4 submitted as part of the DR01 SCEC FAC-003-4 R2 data request response for WECC2017018527. Specifically, the TVMP Risk and Control Matrix addresses the R6 potential noncompliance.

As set forth in the FAC-003-4 R2 Mitigation Plan, SCEC is implementing its revised TVMP in phases across its service territory throughout 2019. As a result of this phased implementation, SCEC has identified some enhancements to its pre-inspection process as set forth in the mitigating steps below.

As described below, SCEC uses a combination of LiDAR1 and non-LiDAR facilitated inspections and estimates that it will continue this practice until vegetation LiDAR data is available for all of its Transmission Bulk Power lines, at which point SCEC will transition to LiDAR facilitated inspections whenever possible. SCEC estimates that this data will be available by 12/31/2019.

NON-LiDAR Facilitated Inspections:

SCEC's TVMP provides the clearance requirements to be achieved at the time of maintenance for Transmission Bulk Power lines. When implementing these clearance requirements, conductor dynamics (line sag and line sway) are taken into consideration for the required clearance to prevent encroachments. In May 2019, SCEC started using span specific Sag and Sway tables for its non-LiDAR based inspections. These span specific Sag and Sway tables were developed using LiDAR data related to SCEC's transmission assets. SCEC has LiDAR modeled data for all its bulk power transmission assets. This modeled data incorporates the maximum sag and sway of the lines under their maximum rated and loaded conditions. As explained more fully in the following section, SCEC does not currently have LiDAR data for vegetation conditions for all its Transmission Bulk Power lines. SCEC estimates that this data will be available by 12/31/2019.

For non-LiDAR facilitated inspections, the pre-inspectors inspect the SCEC transmission lines (as scheduled) by ground inspection and verify that SCEC is meeting all clearance requirements established in the TVMP. When vegetation maintenance work is required, prescriptions are made in SCEC's work management system (Collector / Survey 123) and provided to SCEC pruning crews to perform the necessary pruning, typically within 30-60 days. SCEC is currently revising its inspection processes to further simplify and streamline the use of the Sag and Sway tables (see Milestone Activity 1). To ensure consistent application of this revised process, SCEC will provide additional training for using the Sag & Sway tables by 3/31/2020 (see Milestone Activity 3).

LiDAR Facilitated Inspections:

To significantly lower the risk in the Big Creek area, effective 1Q 2019, SCEC started using vegetation LiDAR data for the transmission lines in the Big Creek area, to confirm that SCEC is meeting all vegetation clearance requirements established in the TVMP. When vegetation maintenance work is required, prescriptions are made in SCEC's work management system, which are provided to SCEC pruning crews to perform the necessary pruning, typically within 30-60 days.

When vegetation LiDAR data is available, as it currently is for the Big Creek area, the vegetation LiDAR data and modeled transmission line data are overlaid in a GIS software application ("Fulcrum") and used to identify any vegetation that requires pruning or removal to maintain required clearances under maximum rated conditions. When vegetation LiDAR data is available, as it is for the Big Creek area, it is the preferred method of inspection over ground-based inspections. However, even when LiDAR data is available, ground patrols are required to validate other items, such as tree species, to determine rate of growth.

Based on SCEC's experience in using vegetation LiDAR data in the Big Creek area, SCEC plans to expand its use of vegetation LiDAR data to all of its Bulk-Power System (BPS) Transmission lines that have adjacent vegetation. SCEC currently plans to complete its first round of vegetation LiDAR baseline data acquisition for all of its BPS Transmission lines that have adjacent vegetation by 12/31/2019 (see

Milestone Activity 2). Once vegetation LiDAR data acquisition and analysis are complete, SCEC will train its Transmission vegetation pre-inspector contractors and SCEC employees on how to use the LiDAR data to evaluate the actions needed to ensure that the appropriate clearances have been attained (see Milestone Activity 3).

TVMP Version 1 was issued in 2018 as part of the WECC2017018527 FAC-003-4 R2 mitigation plan, and training was provided to the SCEC vegetation employees and contractors at that time. Since then, the TVMP has undergone several revisions. The most recent revision was completed in August 2019 (see evidence - "UVM-02 TVMP v5.pdf"). Many of these revisions were made to improve the clarity of the document. Improvements to the UVM Program will continue to be made as needed. SCEC conducts UVM Program training annually, or after significant program changes are made. SCEC firmly believes that the entire UVM Program redesign, in addition to the enhancements made to the UVM-02 TVMP, will provide the reasonable assurance that SCEC is managing vegetation inspections to prevent future vegetation encroachments.

1 Light Detection and Ranging (LiDAR), is a remote sensing method that uses light in the form of a pulsed laser to measure ranges (variable distances) to the Earth.

Provide the timetable for completion of the Mitigation Plan, including the completion date by which the Mitigation Plan will be fully implemented and the violations associated with this Mitigation Plan are corrected:

Proposed Completion date of Mitigation Plan: March 31, 2020

Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

Milestone Activity	Description	*Proposed Completion Date (Shall not be greater than 3 months apart)	Actual Completion Date	Entity Comment on Milestone Completion	Extension Request Pending
Revise Sag and Sway tables	Revise Sag and Sway tables to include minimum distance location from preceding tower	10/31/2019		Revise Sag and Sway tables to include minimum distance location from preceding tower	Yes
Acquire vegetation LiDAR Data	Acquire vegetation LiDAR data on all WECC/ISO bulk transmission lines that have adjacent vegetation	12/31/2019		LiDAR data files screen grab. LiDAR data can be provided upon request.	No
Train vegetation pre-inspection contractors and SCEC employees	Train vegetation pre-inspection contractors and SCEC employees on LiDAR data usage and revised Sag and Sway tables	03/31/2020		Training materials and rosters	No

Additional Relevant Information

N/A

Reliability Risk

Reliability Risk

While the Mitigation Plan is being implemented, the reliability of the bulk Power System may remain at higher Risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are known or anticipated : (i) Identify any such risks or impacts, and; (ii) discuss any actions planned or proposed to address these risks or impacts.

SCEC conducted an Internal Risk Assessment that considers Violation History, Service Reliability, Compliance, and Violation Severity. The results of the Internal Risk Assessment determined the risk to the BES was LOW.

Prevention

Describe how successful completion of this plan will prevent or minimize the probability further violations of the same or similar reliability standards requirements will occur

Since the 2018 WECC Audit, SCEC has performed a comprehensive redesign of its Vegetation Management Program. SCEC believes that this redesign has, and will continue to, significantly lower the risk of any future FAC-003-4 R6 instances of potential noncompliance. Prior to this redesign, SCEC's vegetation operations were governed by two specific program manuals: (1) Transmission Vegetation Management Plan (TVMP v3 - September 18, 2017); and (2) Vegetation Management Operations Manual (VMOM 2017 Issue - March 31, 2017). The program redesign commenced in 2Q18, and as of August 2019, the program consists of sixteen (16) program documents used to implement vegetation management across SCEC's entire service territory (all are Utility Vegetation Management (UVM) documents). It is expected that these program documents will continue to be refined as part of SCEC's continuous improvement efforts. This redesign of the Vegetation Management Program is expected to be completed in late 2019, with full implementation in 2020.

UVM-01 Program Manual provides the roadmap for the UVM Program (UVM-01 V2). The UVM Program consists of four operating plans and eleven (11) implementing procedures. The four plans are referenced below, of which only the TVMP pertains to FAC-003-4:

- UVM-02 Transmission Vegetation Management Plan (TVMP) (see evidence - "UVM-02 V5.pdf")
- UVM-03 Distribution Vegetation Management Plan (DVMP)
- UVM-04 Hazard Tree Management Plan (HTMP)
- UVM-05 Integrated Vegetation Management Plan (IVMP)

Additionally, in order to ensure that the UVM Program is functioning at a high and sustainable level of performance, SCEC implemented UVM-07, "Post Work Verification and UVM Program Oversight," which uses a three-tiered "defense-in-depth" oversight strategy consisting of: (1) Post Work Verification; (2) Quality Control Inspections; and (3) Quality Assurance Reviews;

- Post Work Verifications are performed by SCEC UVM Senior Specialists and are the initial reviews performed to validate documentation and field work accuracy
- Quality Control Inspections are performed by appropriately trained and qualified internal or external inspectors whose function and organizational reporting is independent to the UVM organization
- Quality Assurance Reviews are performed to provide reasonable assurance the UVM program and processes are designed and implemented effectively

Describe any action that may be taken or planned beyond that listed in the mitigation plan, to prevent or minimize the probability of incurring further violations of the same or similar standards requirements

N/A.

Authorization

An authorized individual must sign and date the signature page. By doing so, this individual, on behalf of your organization:

- * Submits the Mitigation Plan, as presented, to the regional entity for acceptance and approval by NERC, and
- * if applicable, certifies that the Mitigation Plan, as presented, was completed as specified.

Acknowledges:

1. I am qualified to sign this mitigation plan on behalf of my organization.
2. I have read and understand the obligations to comply with the mitigation plan requirements and ERO remedial action directives as well as ERO documents, including but not limited to, the NERC rules of procedure and the application NERC CMEP.
3. I have read and am familiar with the contents of the foregoing Mitigation Plan.

Southern California Edison Company Agrees to be bound by, and comply with, this Mitigation Plan, including the timetable completion date, as accepted by the Regional Entity, NERC, and if required, the applicable governmental authority.

Authorized Individual Signature: _____
(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Authorized Individual

Name: Christine Fanous

Title: Managing Director

Authorized On: October 04, 2019

Attachment H
SCEC's Certification of Mitigation Plan Completion for FAC-003-3 R6
submitted March 31, 2020

Certification of Mitigation Plan Completion

Submittal of a Certification of Mitigation Plan Completion shall include data or information sufficient for the Regional Entity to verify completion of the Mitigation Plan. The Regional Entity may request additional data or information and conduct follow-up assessments, on-site or other Spot Checking, or Compliance Audits as it deems necessary to verify that all required actions in the Mitigation Plan have been completed and the Registered Entity is in compliance with the subject Reliability Standard. (CMEP Section 6.6)

Registered Entity Name: Southern California Edison Company

NERC Registry ID: NCR05398

NERC Violation ID(s): WECC2018020303

Mitigated Standard Requirement(s): FAC-003-3 R6.

Scheduled Completion as per Accepted Mitigation Plan: March 31, 2020

Date Mitigation Plan completed: March 31, 2020

WECC Notified of Completion on Date: March 31, 2020

Entity Comment: Mitigation is complete. All milestones completed as of 3/31/2020.

Additional Documents			
From	Document Name	Description	Size in Bytes
Entity	UVM-02 - V5.pdf	Evidence - • UVM-02 Transmission Vegetation Management Plan (TVMP)	1,414,728
Entity	WECC2018020303 (380)- Certificaiton of Mitigation Plan Competition.pdf	Certificate of Mitigation Plan Complete summary document	184,712

I certify that the Mitigation Plan for the above named violation(s) has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

Name: Christine J Fanous

Title: Managing Dir, Compliance & Op Support

Email: christine.Fanous@sce.com

Phone: 01 (626) 422-1496

Authorized Signature _____ Date _____

(Electronic signature was received by the Regional Office via CDMS. For Electronic Signature Policy see CMEP.)

Attachment I
WECC's Verification of Mitigation Plan Completion for FAC-003-3 R6
dated April 28, 2020

From: noreply@oati.net

Sent:

To: John.Pespisa@sce.com;RegulatoryCompliance@sce.com;hecaeth.wosu@sce.com;neil.shockey@sce.com;randy.lisbin@sce.com;scott.nickloff@sce.com

Subject: WECC Notice - Completed Mitigation Plan Acceptance - FAC-003-3 R6. - Southern California Edison Company

Please do not REPLY to this message. It was sent from an unattended mailbox and replies are not monitored. If you have a question, send a new message to the OATI Help Desk at support@oati.net.

NERC Registration ID: NCR05398

NERC Violation ID: WECC2018020303

Standard/Requirement: FAC-003-3 R6.

Subject: Completed Mitigation Plan Acceptance

WECC received the Certification of Mitigation Plan Completion submitted by Southern California Edison Company on 03/31/2020 for the violation of FAC-003-3 R6.. After a thorough review, WECC has accepted the Certification of Mitigation Plan Completion.

webCDMS Login: <https://www.cdms.oati.com/CDMS/sys-login.wml>

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[OATI Information - Email Template: MitPlan_Completed]