

May 11, 2022

Fadi Daye, P.E.
Program and Project Supervisor
California Public Utilities Commission
Electric Safety and Reliability Branch
Safety and Enforcement Division
320 West 4th St., Ste. 500
Los Angeles, California 90013

CPUCID: E20180118-01
Regarding: Notice of Violation
Location: Kramer Junction in San Bernardino, CA

Dear Mr. Daye:

On behalf of Southern California Edison Company (SCE), please accept this letter as acknowledgement of, and response to, your letter dated April 11, 2022, regarding the above-referenced notice of violation.

Your letter concerns an incident that occurred on January 18, 2018, involving a facilities relocation project performed by SCE's contractor Herman Weissker, Inc. (HWI), near the intersection of Highways 58 and 395, at Kramer Junction in San Bernardino County. While working on the project, HWI lineman [REDACTED] was tasked with transferring three 115 kV overhead conductors from a lattice transmission tower to a new steel pole. Though Mr. [REDACTED] successfully transferred the first two 115kV conductors without incident, while performing the transfer of the third conductor, he was electrocuted when he removed his personal grounding bond and made contact with the conductor.¹ Your letter alleges that SCE is in violation of General Order 95, Rule 31.1 because SCE allowed the project to proceed without HWI completing certain documentation required by SCE's 2017 Contractor Safety Management Standard (CSMS).

SCE disputes that it violated General Order 95, Rule 31.1 in connection with this incident. Nonetheless, SCE takes incidents like this one very seriously and routinely examines whether there are opportunities for process improvements. SCE has revised its CSMS with an aim to improve contractor safety oversight, increase collaboration with contractors, and more effectively manage risks. As part of these revisions, effective February 5, 2019, SCE streamlined its processes and eliminated redundancy by combining the Hazard Assessment and the Site Specific EHS Plan (SSSP) into a single document, the Hazard Assessment and Safety Plan (HASP). The HASP was designed to promote a mutual understanding of safety, hazard awareness, and mitigation. SCE also created the Contractor Handbook and Orientation Checklist (CHOC).

SCE also recently implemented improved procedures to track compliance with the completion of the HASP and CHOC by its contractors on Safety Tier 1 projects. Specifically, for

¹ Your letter correctly states that the overhead conductor Mr. [REDACTED] was transferring had been de-energized from its source; however, it had become charged by induced voltage due to the proximity of other nearby circuits—a hazard Mr. [REDACTED]'s personal grounding bond was designed to protect against.

bid-based work, the CHOC and HASP are included in the Request for Proposal (RFP) for completion by all bidders, and for all direct awards and bid-based awards, the CHOC and HASP are required to be signed when the purchase order is executed. SCE has created a centralized database where CHOCs and HASPs are uploaded and stored, and has dedicated resources who perform audits of the database every week to confirm the required documents have been uploaded (following up as necessary for any missing documentation). Additionally, SCE's contractors are required to upload the CHOC and HASP in the database managed by SCE's Third-Party Administrator.

SCE also has implemented additional requirements for Safety Tier 1 transmission contractors that allow SCE more oversight of specific grounding plans. The Transmission Contractor Site-Specific Grounding Plan(s) Process/Procedure requires transmission source contractors and contractors bidding on transmission bid-based projects to submit detailed grounding sketches (and structure-specific photos in some instances) for review and comment by SCE. The procedure also provides that the SCE representative or the transmission contractor may call an "all stop" if a deviation from the approved grounding plan is identified, so that amended plans can be submitted and reviewed.

Finally, as of January 2021, SCE's revised Health and Safety Handbook for Contractors includes additional, enhanced safety requirements for contractors performing high-voltage transmission work. These requirements include, among other things:

- a higher frequency of safety observations (contractor must conduct 2 observations per crew per month);
- a minimum of one dedicated Safety Professional for every 30 employees;
- the contractor must train their workforce regarding the applicable Critical Observable Actions;²
- for contractors working near energized high-voltage lines, each crew must have an automated external defibrillator (AED) onsite.

Thank you for the opportunity to provide you with this information about the measures SCE has taken to remedy and prevent the recurrence of this type of incident.

Sincerely,



Mel Stark
Principal Manager, T&D Compliance & Quality
1 Innovation Way
Pomona, CA 91768

² Critical Observable Actions are written guides/checklists provided by SCE that outline observable mitigation measures specific to certain work, which protect against the primary hazards that can lead to injuries and fatalities. The COA for Bulk Transmission work includes mitigation actions related to induction hazards.