

ANNUAL COMPLIANCE REPORT OF
SOUTHERN CALIFORNIA EDISON (U338-E)
FOR THE PERIOD OF JULY 1, 2004 - JUNE 30, 2005
(GENERAL ORDER NO. 166)

This report is submitted by Southern California Edison Company ("SCE") in compliance with General Order No. 166 ("G.O.166"), Standards for Operation, Reliability, and Safety During Emergencies and Disasters, and Section 364(b) of the Public Utilities Code. This compliance report comprises the following:

- Compliance Statement: Summarizing SCE's compliance with G.O. 166 for the twelve-month period ending June 30, 2005 (the "compliance period").
- Appendix A: SCE's Corporate Emergency Response & Recovery Plan, submitted in accordance with G.O.166, Standards 1.I. and 11.
- Appendix B: CUEA Mutual Assistance Agreement and the Western Regional Mutual Assistance Agreement executed by, *inter alia*, Southern California Edison, submitted in accordance with G.O.166, Standard 2.
- Appendix C: Report of Lessons Learned from SCE's Annual Emergency Exercise conducted October 6, 2004 in accordance with G.O.166, Standard 3.B.
- Appendix D: Listing of Emergency Personnel by Region and Job Title as of June 30, 2004 and June 30, 2005, submitted in accordance with G.O.166, Standard 11.

Compliance Statement:

G.O. 166, STANDARD 1. Emergency Response Plan

During the compliance period, SCE maintained its Corporate Emergency Response & Recovery Plan ("Corporate Plan") and completed an update of the plan. A redacted copy of Southern California Edison's 2005 Corporate Emergency Response & Recovery Plan is attached hereto as Appendix A.¹ The 2005 Corporate Plan includes the following updates, revisions, and additions:

General Changes: In accordance with G.O.166 Standard 11, the following discussion identifies and describes the modifications to this year Corporate Emergency Response & Recovery Plan.

¹ Several appendices of the 2005 Corporate Plan include numerous direct phone numbers for key departments, organizations, and individuals responsible for emergency response activity. In order to mitigate the potential for interference or disruption of response activities during times of actual emergency, these telephone numbers have been redacted from the appendices to the 2005 Corporate Plan, since Section 364 of the Public Utilities Code requires this document to be "made available to the public." For the Commission's and its staff's reference a complete, unredacted version of the appendices is being concurrently submitted under separate cover pursuant to the Commission's confidentiality provisions.

Summary of Changes
Southern California Edison International
CORPORATE EMERGENCY RESPONSE & RECOVERY PLAN
2004 to 2005 Edition

General Changes

Terminology

Some department and business unit names and acronyms have been updated to reflect current organization and/or nomenclature.

2005 Terminology	Formerly Known As
Customer Service Business Unit Business Customer Division (BCD)	Customer Service Business Unit Major Customer Division (MCD)
Customer Service Business Unit Revenue Services Organization	Customer Service Business Unit Billing Process Organization
Customer Service Business Unit Meter Services Organization-Field Services and Meter Reading (MSO- FSMR)	<i>Merger of two CSBU organizations: Field Services & Meter Reading Organization (FS&MRO) and Meter Services Organization (MSO)</i>
Power Procurement Business Unit	<i>Newly formed business unit</i>
Human Resources Department	<i>Reflects merger of Human Resources and Labor Relations</i>

Structure, Format and Organization of the Document

The *Public Information Section* of *Part E, Response and Recovery Activities*, has been moved forward in the chapter to follow the *Management Section*.

Routine Updates

Website addresses, points of contact in various Emergency Management Teams, duty rosters and other data points are updated throughout the document. Key details are noted below in the order that the reader will encounter them.

Part A: Overview

- Among actions taken to escalate response to an emergent event, a new sub-bullet has been added related to department-level command centers. This puts the department command center of the Transmission & Distribution Business Unit—known throughout this document as the Business Unit Storm Support (BUSS)—in a clearer context relative to other important venues such as the Information Technologies Operations Center (ITOC) and the Telecommunications Control Center (TCC).
- The bullet describing Mutual Assistance has been amplified to reference agreements to supplement customer call center personnel if necessary to meet emergency requirements.

Part B: Policies and Authorities

- Document titles are changed to reflect current versions.

Part C: Concept of Operations

- In the paragraph describing public safety and scene management programs, the second sub-bullet (Part C, top of Page 5) has been revised to clarify the mission of the arriving SCE representative.
- In the bullet describing the Fire Management function, the phrase “impacting SCE facilities” has been modified to include impending as well as actual risk by changing the language to “threatening the SCE grid or facilities.”
- In the discussion of ALTERNATE COMMUNICATIONS (Part C, Page 9), the Mobile Command Center and Emergency Planning & Preparedness (a division of the Corporate Security & Emergency Preparedness Department) have been added to the list of venues or organizations equipped with satellite telephone capability.
- Within the discussion of INTERNAL COMMUNICATIONS (Part C, Pages 12 and 13), the role of Transmission & Distribution Business Unit’s “storm reports” is amplified. The paragraph also cites other internal information accessible through the SCE intranet to support emergency communication and coordination.
- The internal points of contact formerly known as Emergency Information Coordinators (EIC) are now referred to as Emergency Communications Liaisons (ECL) (Part C, Page 12). Beyond renaming the function, the revised language describes a higher level of management, a broader perspective of the impact of the emergency, and new authority to delegate data entry into the Edison Emergency Event Reporting System (EEERS) to others.

- The section formerly entitled GOVERNMENT COMMUNICATION AND COORDINATION has been retitled EXTERNAL COORDINATION (Part C, Page 13) to provide a more direct parallel to the preceding paragraph, and to reflect the addition of a new discussion of *Coordination with Third Party Generators* through the System Emergency Preparedness Committee (Part C, Page 16).
- In the same section, EXTERNAL COORDINATION, (Part C, Page 13, second paragraph) new language clarifies how SCE fulfills requests for information from the Federal Emergency Management Agency Disaster Field Office, reflecting protocols developed during the 2003 San Bernardino and Arrowhead fires and the La Conchita landslide.
- A footnote to the discussion of *Coordination with the California Independent System Operator as a Private Transmission Owner* (Part C, Page 14) underscores the shorter CPUC notification requirement for major events or media attention, as requested by the Energy Division memo (WMB 12-3-04).

Part D: Administrative Practices

- In the *Annual Timeline*, the completion of the Department Emergency Response & Recovery plans was moved to the second quarter, to reflect the April due date.

Part E: Response and Recovery Activities

- Part E was revised subsequent to the June distribution of the Corporate Emergency Response and Recovery Plan, in order to capture additional organizational changes. Part E therefore shows a footer date of August 22, 2005.
- The section describing PUBLIC INFORMATION (Part E, Page 7) has been moved forward in the plan relative to the 2004 document.
- Organizational changes and personnel reassignments are reflected as described in General Comments, above.
- A new section, *Edison Carrier Solutions Business Unit*, has been added at part E, Page 27. Although this was a pre-existing organization, this is its first inclusion as a contributor to the response and recovery of the utility's operations.

Part F: Glossary

No changes

Part G: Appendices

- Appendix 7: SCE 2005 Electric Emergency Action Plan: Updated from 2004

- Appendix 10: Officer-In-Charge Procedures (no change) and 2005 Roster (updated from 2004)

G.O.166, STANDARD 2: Mutual Assistance Agreement(s)²

Southern California Edison is an active participant in the Mutual Assistance Agreement Among Members of the California Utilities Emergency Association. As such we maintain contact with the Authorized Representatives of other utilities and periodically discuss any issues surrounding the utilization of the agreement.

Southern California Edison played Edison is an active participant in the Western Regional Mutual Assistance Agreement. We continue to contribute to the agreement's maintenance.

Appendix B is a copy of the most recent revision of the agreements.²

STANDARD 3: Emergency Training and Exercises

The Southern California Edison Company (SCE) held its annual corporate emergency exercise commencing on October 6, 2004, with a functional exercise. The scenario began Wednesday morning, the day after a 6.8 M (Richter) earthquake erupted along the Newport /Inglewood fault at 4:07 PM. Consequentially, the earthquake triggered a 6.6 M along the San Joaquin Hills Fault in Orange County at 4:28 PM. This exercise tested the Corporate Emergency Plan and SCE's employee response to this territory-wide major emergency requiring immediate response and coordination of personnel, equipment, material, customer needs, and internal and external communication.

Our objectives for this exercise were to demonstrate the Company's ability to meet or exceed the thirteen standards set forth in the California Public Utility Commission's General Order 166, in particular:

- Energy service reliability and continuity through rapid and superior response to a simulated emergency.
- The information contained in each organization's response and recovery plan.
- The process for invoking mutual assistance agreements.
- The ability to communicate with customers, media, and governmental agencies in an accurate and timely manner.
- Emergency communication proficiencies in the use of alternate methods of interaction utilizing the Emergency Information Communication System, cellular, 900MHz and fax.

Notice of this exercise was provided to appropriate state and local authorities.

² The agreement includes a listing of authorized representatives of each of the signatories for use during times of emergency. Among other things, this listing includes the home telephone numbers of the authorized representatives. In light of its sensitive nature, this personal information has been redacted from Appendix B, since Section 364 of the Public Utilities Code requires this document to be "made available to the public." For the Commission's and its staff's reference, a complete, unredacted version of the mutual assistance agreement is being concurrently submitted under separate cover pursuant to the Commission's confidentiality provisions.

G.O.166, STANDARD 4: Communications Strategy

During the compliance period, SCE updated and enhanced its communications strategy in conformity with this standard. A copy of this communications strategy is attached in the Appendix to the 2005 Corporate Emergency Response & Recovery Plan.

G.O.166, STANDARDS 5 – 8

These standards prescribe specific actions to be taken by the utility during major outages. SCE experienced no major outages during the compliance period.

G.O.166, STANDARD 9: Personnel Redeployment Planning

During the compliance period, SCE conducted training for selected employees on the performance safety standby and damage assessment activities during emergencies and major outages. The 2005 Plan includes a plan for redeploying these personnel to perform safety standby and damage assessment activities. SCE's Call Center Emergency Plan provides that all emergency and outage related calls receive priority queuing to all representatives.

G.O.166, STANDARD 10: Annual Pre-Event Coordination

During the compliance period, SCE complied with this standard through participative planning, exchange of contact information, and participation in emergency exercises with external agencies, including CAISO.

G.O.166, STANDARD 11: Annual Report

This compliance statement is submitted in conformity with the first paragraph of this standard. In addition, a report of the number of repair and maintenance personnel as of June 30, 2004 and June 30, 2005 is attached hereto as Appendix D, in conformity with the second paragraph of this standard.

G.O.166, STANDARDS 12 – 13

These standards prescribe specific actions to be taken by the utility during a measured event. SCE did not experience a measured event during the compliance period.