

SOUTHERN CALIFORNIA EDISON (U338-E)

ANNUAL REPORT OF COMPLIANCE WITH GENERAL ORDER 166

Compliance Period: July 1, 2005 through June 30, 2006

This report is submitted by Southern California Edison Company ("SCE") in compliance with Standard 11 of General Order 166 ("GO166"), Standards for Operation, Reliability, and Safety during Emergencies and Disasters, and Section 364(b) of the Public Utilities Code. This compliance report is structured as follows:

Compliance Statement

Summarizes SCE's compliance with each of the thirteen standards of the General Order for the twelve-month period ending June 30, 2006 (the "compliance period")

Appendix A: Emergency Response Plan

SCE's Corporate Emergency Response & Recovery Plan, submitted in accordance with GO 166, Standards 1.I. and 11.

Appendix B: Mutual Assistance Agreements

CUEA Mutual Assistance Agreement and the Western Regional Mutual Assistance Agreement, executed by, *inter alia*, Southern California Edison, submitted in accordance with GO 166, Standard 2.

Appendix C: Emergency Training and Exercises

Report of Lessons Learned from SCE's Annual Emergency Exercise conducted December 6, 2005 submitted in accordance with GO 166, Standard 3.B.

Appendix D: Repair and Maintenance Personnel

Listing of Emergency Personnel by Region and Job Title as of June 30, 2005 and June 30, 2006, submitted in accordance with GO 166, Standard 11.

Compliance Statement

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 2006 Corporate Emergency Response & Recovery Plan is attached hereto as Appendix A.¹

Summary of Changes Southern California Edison International CORPORATE EMERGENCY RESPONSE & RECOVERY PLAN 2005 to 2006 Edition

General Changes

Terminology

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

2006 Terminology	Formerly Known As
Customer Service Business Unit Meter Services Organization	Customer Service Business Unit Meter Services Organization, merged with Field Services and Meter Reading Organization
Customer Service Business Unit Local Public Affairs	Public Affairs, city and county liaisons, merged with Customer Service Business Unit, Business Customer Division
Shared Services Business Unit Business & Operations Support	Shared Services Business Unit Business Resources

Structure, Format and Organization of the Document

No change.

¹ Several appendices of the 2006 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 2006 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 confidential reference, a complete, unredacted version of the appendices is being submitted concurrently—but under separate cover—pursuant to the Commission’s confidentiality provisions.

Routine Updates

In compliance with the requirements of Standard 1 of General Order No. 166, all details of the 2006 Corporate Emergency Response & Recovery Plan have been validated and updated as necessary.

Content Changes

Part A: Overview

- No changes.

Part B: Policies and Authorities

- Document titles are changed to reflect prevailing versions.

Part C: Concept of Operations

- In the paragraph describing employee safety and welfare, the last bullet, “Provide care for the injured or deceased following an emergency” has been deleted.
- In the discussion of **EVENT NOTIFICATIONS, ACTIVATION AND DEACTIVATION** (Part C, Page 5), Figure 1 has been deleted.
- Within the discussion of **EMERGENCY MANAGEMENT TEAMS**, (Part C, Page 6, Paragraph 4), the reference to the Emergency Support Locator has been deleted.
- Within the paragraphs describing **THE ROLE OF THE EMERGENCY INFORMATION COORDINATION CENTER (EICC), EMERGENCY OPERATIONS CENTER (EOC), AND THE MOBILE COMMAND CENTER (MCC)** (Part C, Page 7), reference to the garage location of the Mobile Command Center has been deleted.
- In the paragraph entitled *Cellular and Satellite Phones*, (Part C, Page 8), the reference to Mohave Generating Station has been deleted.
- In the paragraph entitled *900 MHz Radio*, (Part C, Page 8), the third bullet “the Governor’s Office of Emergency Services declares a state of emergency in a county served by SCE” has been deleted as an automatic trigger of activation of the 900 MHz radio emergency talk groups.
- The discussion of *Coordination with the California Independent System Operator as a Private Transmission Owner* (Part C, Page 13) has been slightly recast to emphasize the reference to **notification** standards.

Part D: Administrative Practices

- In the discussion of **SCE ORGANIZATIONAL STRUCTURE** (Part D, Page 2) the names of some organizations are changed.
- Maps have been deleted.

- In the *Annual Timeline*, the corporate emergency tabletop exercise has been moved to the second quarter.

Part E: Response and Recovery Activities

- Within the *Abstract*, (Part E, Page 1), the first bullet describing the SEMS sections has been modified to emphasize the inclusion of public information.
- Throughout Part E, the names of individuals participating in each organization's Emergency Management Team and reporting to the Corporate Emergency Operations Center have been deleted.
- In the **MANAGEMENT** section, the discussion of the *Officer in Charge Program* has been updated to omit reference to the OIC's option to delegate responsibilities to an Executive in Charge of Recovery (Part E, Page 3).
- The terminology *Human Resources Department* now encompasses the labor relations function as well as general human resources functions (Part E, Page 3 and following).
- The full discussion of the **PUBLIC INFORMATION** function has been moved forward to Part E, Pages 6 and 7, in the **MANAGEMENT** section.
 - The discussion of the synergistic roles of *Corporate Communications* and Public Affairs has been modified to reflect the new title of *Local Public Affairs*, those corporate representatives who provide liaison to cities and counties and local media. This organization has been merged into Customer Service Business Unit's Business Customer Division.
 - The company's liaison to state, regional and federal governmental agencies continues to reside in a separate organization known as *Public Affairs*.
- In the **OPERATIONS SECTION**, organizational name changes for the Customer Service Business Unit are changed as indicated earlier (Part E, Pages 17-20). Some subheads are omitted for easier reading.
- A new subhead at Part E, Page 23, emphasizes the formation of a new business unit, *Power Procurement Business Unit (PPBU)* which includes Energy Supply & Management and Qualifying Facility Resources.

Part F: Glossary

No changes

Part G: Appendices

- Appendix 7: SCE 2006 Electric Emergency Action Plan
- Appendix 10: Officer-In-Charge Procedures and 2006 Roster

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*. We maintain contact with the authorized representatives of other utilities and periodically discuss any issues surrounding the utilization of the agreement.

Southern California 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

Southern California Edison conducted its annual functional emergency exercise on December 6, 2005. The scenario challenged all business units and was played out from the Corporate Emergency Operations Center in the General Office as well as from Department Command Centers at locations throughout the service territory. Lessons learned are described in Appendix C of this document. Notice of this exercise was provided to appropriate state and local authorities.

STANDARD 4: Communications Strategy

During the compliance period, SCE made no new changes to its communications strategy. A copy of the prevailing communications strategy is attached as an Appendix to the 2006 Corporate Emergency Response & Recovery Plan.

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.

STANDARDS 5 through 8

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

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 2006 Plan includes a plan for redeploying these personnel to perform safety standby and damage assessment activities.

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.

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, 2005 and June 30, 2006 is attached as Appendix D, in conformity with the second paragraph of this standard.

STANDARDS 12 and 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.