

ANNUAL COMPLIANCE REPORT OF  
SOUTHERN CALIFORNIA EDISON (U338-E)  
FOR THE PERIOD OF JULY 1, 2007 - JUNE 30, 2008  
(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, 2008 (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 September 25, 2007 in accordance with G.O.166, Standard 3.B.
- Appendix D: Listing of Emergency Personnel by Region and Job Title as of June 30, 2007 and June 30, 2008, 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 2008 Corporate Emergency Response & Recovery Plan is attached hereto as Appendix A.<sup>1</sup> The 2008 Corporate Plan includes the following updates, revisions, and additions:

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<sup>1</sup> Several appendices of the 2008 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 2008 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 separately pursuant to the Commission's confidentiality provisions.

## General Changes

### *Terminology*

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

<b>2008 Terminology</b>	<b>Formerly Known As</b>
Corporate Services	Formerly an independent department within Operations Support Business Unit, now a division within Business & Organization Support Department
Corporate Security & Business Continuity Management	Corporate Security & Emergency Preparedness

Other nomenclature relevant to emergency response and recovery, and internal and external coordination has been changed, as noted below.

<b>2008 Terminology</b>	<b>Formerly Known As</b>
SCE Situation Room	Emergency Information Coordination Center (EICC)
Alternate Emergency Operations Center (AEOC)	N/A New in 2008
Edison International Portal	EDNA (Edison Digital Network Agent), the utility's intranet

### *Structure, Format and Organization of the Document*

The structure of the document remains unchanged. A completely updated hard copy was distributed to each authorized recipient in 2008.

### *Routine Updates*

In compliance with the requirements of Standard 1 of General Order No. 166, all details of the 2008 Corporate Emergency Response & Recovery Plan have been validated and updated as necessary.

## Content Changes (Highlights only)

### *Part A: Overview*

- No substantive changes
- Some long paragraphs were broken into bullets for easier reading.

### *Part B: Policies and Authorities*

- Document titles have been changed to reflect prevailing versions.

### *Part C: Concept of Operations*

- The subhead INTRODUCTION was removed.
- In the discussion of CORPORATE RESTORATION PRIORITIES, *Non-System-Related Facilities and Critical Functions*, the responsibilities of individual departments are broadened to include “identifying and prioritizing critical, important, and deferrable business processes, supporting equipment and personnel, and for developing business continuity plans for fulfilling those functions.” This new language reflects the company’s enhanced program in business continuity planning.
- Within the discussion of *Employee Safety and Welfare*, additional information describes the objectives of this program, representing substantial enhancement in this aspect of the company’s emergency response capabilities in the past year.
- Within the discussion of *Public Safety and Scene Management*, the language in the first bullet has been recast to improve clarity.
- The section entitled ROLE OF THE SCE SITUATION ROOM, THE EMERGENCY OPERATIONS CENTER (EOC), ALTERNATE EOC, AND THE MOBILE COMMAND CENTER (MCC), contains a new paragraph to describe the newly developed Alternate Emergency Operations Center in Long Beach, California.
- The list of organizations making use of satellite telephone back up now also includes Grid Operations, reflecting distribution of hand held satellite telephones at key field locations.
- The paragraph which describes *Coordination with Third Party Generators* (Part C, Page 16) has been revised to give a clearer understanding of the System Emergency Preparedness Committee’s purpose and membership.

### *Part D: Administrative Practices*

- The section entitled SCE GEOGRAPHICAL STRUCTURE (Part D, Page 4) has been fully reviewed and updated to clarify new terminology and organization affecting grid operations and outage response activities.
- In the discussion of mutual assistance agreements in which SCE participates (Part D, Page 5) there are two minor changes:
  - Edison Electric Institute (EEI) sponsors a “mutual assistance program.”
  - The California Utilities Emergency Association Mutual Assistance Agreement spans electric and natural gas.
- In the *Annual Timeline* (Part D, Page 7) two activities that have been ongoing but have not been listed here are added:
  - The process of reviewing and updating the Emergency Support Locator (ESL) has been added to the first quarter activities, and
  - The process of updating duty rosters for the following calendar year has been added to the fourth quarter activities

### *Part E: Response and Recovery Activities*

- The list of organizations included in the MANAGEMENT section (Part D, Page 2) no longer includes Corporate Secretary/Community Involvement, as that function has been merged into the Corporate Communications department. The activities formerly associated with this department have therefore been omitted from the PUBLIC INFORMATION section at Part E, Page 6.
- In the *Human Resources Department* discussion (Part E, Page 3), the task bullet “To compile data related to missing, injured, and/or deceased personnel company-wide for SCE” has been deleted from this section. This function is assigned to the Corporate Environmental Health and Safety Department.
- The discussion of the Customer Services Business Unit’s Business Customer Division (Part E, Page 7) has been relocated from the OPERATION section, where other customer service activities are discussed, to the PUBLIC INFORMATION section, in order to reflect their important role in external communication to commercial, industrial and agricultural customers during emergencies.
- In the PLANNING AND INTELLIGENCE section, the complete discussion of Information Technology’s emergency preparedness and response activities has been reviewed and updated (Part E, Page 9).

- In the OPERATIONS section, the title of the document that Transmission & Distribution Business Unit's Power Delivery Organization uses to guide its response to outages has been changed from *Emergency Response & Recovery Plan* to *Emergency Response & Recovery Protocol*.
- Also in the OPERATIONS section, there is a change of name for the CSBU Customer Products & Services Division service provider for notifying customers in the event of load reduction and rotating outages activated by the Independent System Operator. The new company name is Varolii's Enterprise Notification Solutions, as noted in Part E, Page 16.
- In the discussion of activities which Consumer Affairs may offer in support of customers during outages, the third bullet (Part E, Page 17) has been changed to read "*Providing staff to distribute safety flyers, flashlights or other items for customers.*"
- Several updates appear in the discussion of the Energy Supply & Management Department, part of the Power Procurement Business Unit.
  - The responsibilities of the ES&M Department (Part E, Page 21) were modified by deleting reference to "collecting and reporting generation revenue meter data."
  - Under the subhead "Demand Bidding," the sentence was modified to read "ES&M Department's Demand Bidding is responsible for *forecasting* SCE's demand requirements." (Part E, page 22)
  - Also in Part E, Page 22, the paragraph entitled "Computing Services" was moved up above the paragraph entitled "Settlements and Metering." A new subhead introduces the *Power Procurement Business Unit Finance Department*, and the Settlements and Metering groups operations are referred to as part of the Power Procurement Finance Department, instead of Energy Supply & Management's.
  - Finally, on the same page, the group formerly known as Qualifying Facility Resources (QFR) is referenced by its new title, Renewable and Alternative Power (RAP).
- The Renewable and Alternative Power organization has dropped from its nomenclature the phrase "Emergency Response and Business Recovery Team," and replaced it with the simpler term, "the TEAM." (Part E, Page 23)
- Certain activities in support of crews working reconstruction jobs that last for several days have been redistributed between the Business & Organization Support Department and the Corporate Services Department. These changes are noted in various paragraphs in Part E, Pages 24, 25 and 26.

- In the discussion of Corporate Real Estate Facility Operations, the reference to Damage Assessment Teams was clarified by the descriptor *Engineering Damage Assessment Teams*. This change emphasizes the facility focus of these structural engineers, architects and Facility Managers.

The term *Damage Assessment Team* is also used by the Transmission and Distribution Business Unit, Power Delivery, to refer to crews who evaluate the condition of lines and poles in the aftermath of fires, wind storms, or other emergencies which damage electrical equipment and structures.

- Among the bullets which describe the priorities of the Audit Services Department (Part E, Page 31), an item related to reporting of corporate loss information to insurance and governmental agencies was deleted.

#### *Part F: Glossary*

The glossary has undergone a complete review and update.

#### *Part G: Appendices*

- Appendix 1: Emergency Support Locator, January 2007, updated from March 2006
- Appendix 4: Guidelines for Notifying the Energy Division of Electric and Gas Emergencies, November 13, 2006, updated from May 21, 2002
- Appendix 7: SCE 2007 Electric Emergency Action Plan: Updated from 2006
- Appendix 8: Corporate Emergency Communications Management Plan, 2007, updated from 2002
- Appendix 9: Corporate Communication Strategy, May 2007, updated from May 2004
- Appendix 10: Officer-In-Charge Procedures and 2007 Roster (updated from 2006)

#### G.O.166, STANDARD 2: Mutual Assistance Agreement(s)<sup>2</sup>

Southern California Edison is an active participant in, and the custodian for, 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 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.<sup>2</sup>

### STANDARD 3: Emergency Training and Exercises

Southern California Edison conducted its annual Corporate Emergency Exercise (Exercise) on September 25, 2007. The confidential scenario unfolded through a series of events and activities taking place due to an attack on our transmission system.

The Corporate Emergency Exercise demonstrated the Company's ability to meet or exceed the thirteen standards set forth in the CPUC 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

Notice of this Exercise was provided to appropriate state and local authorities as directed by CPUC General Order Number 166, *Standards for Operation, Reliability, and Safety during Emergencies and Disasters*. Agencies attending the Exercise included: the California Energy Commission, Los Angeles County Office of Emergency Management, Orange County Office of Emergency Management, and the California Independent System Operator.

### 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 2008 Corporate Emergency Response & Recovery Plan.

### 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.

### 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 2008 Plan\* includes a plan for redeploying these personnel to perform safety

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<sup>2</sup> 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.

standby and damage assessment activities. SCE's Call Center Plan provides that all emergency and outage related calls receive priority queuing to all representatives.

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.

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, 2007 and June 30, 2008 is attached hereto as Appendix D, in conformity with the second paragraph of this standard.

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.