21

[redacted]

From: John.Pespisa@sce.com
Sent: Wednesday, December 14, 2011 5:31 PM
To: [redacted]
Cc: [redacted] [redacted] Rebecca.Furman@sce.com; Kamyar.Ghaneabassiri@sce.com; Thomas.Botello@sce.com; Akbar.Jazayeri@sce.com
Subject: Re: High Priority SCE Data Requests

[redacted]

At this time, it appears that SCE will be able to provide the requested critical items by January 3, 2012. We will keep you advised of our progress and notify you if we anticipate any delay.

John Pespisa
NERC Compliance Program Director
Southern California Edison
626-302-3308

From: [redacted]
To: <john.pespisa@sce.com>
Cc: [redacted]
Date: 12/13/2011 03:10 PM
Subject: High Priority SCE Data Requests

John,

The following SCE data requests are the highest priority for staff: 8,9,15, 21, 22, 27, and 44. Would it be possible for staff to receive responses to these requests by January 3, 2012, and the remaining requests by January 16, 2012? We understand if some of SCE's responses have to come in after this date, but, to the extent possible, we'd really appreciate all responses by January 16th. This schedule will help staff's inquiry stay on course, and we appreciate all your efforts in this matter. Thanks.

[redacted]

Information withheld pursuant to FOIA Exemption 6.

22

[redacted]

From: [redacted]
Sent: Tuesday, December 13, 2011 6:10 PM
To: 'john.pespisa@sce.com'
Cc: [redacted]
Subject: High Priority SCE Data Requests

John,

The following SCE data requests are the highest priority for staff: 8,9,15, 21, 22, 27, and 44. Would it be possible for staff to receive responses to these requests by January 3, 2012, and the remaining requests by January 16, 2012? We understand if some of SCE's responses have to come in after this date, but, to the extent possible, we'd really appreciate all responses by January 16th. This schedule will help staff's inquiry stay on course, and we appreciate all your efforts in this matter. Thanks.

[redacted]

Information withheld pursuant to FOIA Exemption 6.

23

[redacted]

From: [redacted]
Sent: Wednesday, March 21, 2012 7:42 AM
To: 'John.Pespisa@sce.com'
Cc: [redacted]
Subject: RE: AzSoCal Report: Confirmation of Customers Affected by the Blackout

Good Morning,

For the purpose of our final report, we would like to verify information you provided to the CAISO Joint Task Force Appendix A report. In the report issued on 9/15/11, SCE stated **117 customers** were affected by the September 2011 blackout. Can you confirm this number?

Thanks in advance for your time and cooperation.

Sincerely,

[redacted]
Paralegal Specialist

Federal Energy Regulatory Commission
Office of Enforcement
Division of Investigation
888 First Street, N.E.
Room 51-64
Washington, D.C. 20426
[redacted]

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24

[redacted]

From: John.Pespisa@sce.com
Sent: Thursday, April 19, 2012 3:22 PM
To: [redacted]
Subject: Re: Meeting Tomorrow

You can reach me on my cell, since I am out of my office.

John
626-688-6291

From: [redacted]
Sent: 04/19/2012 08:58 AM AST
To: John Pespisa
Cc: "[redacted]
Subject: RE: Meeting Tomorrow

Okay, John. We'll cancel our conflicting meeting and meet at 11 (your time). Will you provide a call in number again?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Thursday, April 19, 2012 8:50 AM
To: [redacted]
Subject: Re: Meeting Tomorrow

No, I have all the engineers set to meet at 11 and since they are at a different location, I am traveling to them. I have canceled several meetings today along with my engineering and protection staff. I would really appreciate trying to keep the 11am meeting.

From: [redacted]
Sent: 04/19/2012 08:13 AM AST
To: John Pespisa
Cc: "[redacted]
Subject: RE: Meeting Tomorrow

John,

We have a conflict. Anyway we could do 9 AM your time?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Wednesday, April 18, 2012 8:03 PM
To: [redacted]
Subject: Re: Meeting Tomorrow

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I think we can do it starting at 11 our time, will that work?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: [redacted]
Date: 04/18/2012 04:59 PM
Subject: Meeting Tomorrow

John,

Are you free tomorrow morning (California time) to continue our meeting? How about any time between 9:00 AM and 12:00 PM PT? I expect we'll need about 2 hours. Thanks.

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25

[redacted]

From: John.Pespisa@sce.com
Sent: Tuesday, August 21, 2012 11:19 AM
To: [redacted]
Cc: [redacted]
Subject: Re: Time for a quick call?

That will work, we could spend 25 minutes with you before we need to go to our next meeting.

John

From: [redacted]
Sent: 08/21/2012 11:11 AM AST
To: [redacted] John Pespisa
Cc: [redacted]
Subject: RE: Time for a quick call?

Actually I need it to be 2 instead of 1:45. I have an interview at 2:30 so it would probably be best to call [redacted] to come down unless you can't get him.

From: [redacted]
Sent: Tuesday, August 21, 2012 9:57 AM
To: 'John.Pespisa@sce.com'
Cc: [redacted]
Subject: RE: Time for a quick call?

John, we can do 1:45. Call me or [redacted] when you get here and we'll come get you.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Monday, August 20, 2012 2:21 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Time for a quick call?

Sure,
I am here in DC, at the FERC office in meetings from 3 p.m. until 5 p.m. I could meet you there or call after 5 p.m. By the way we are meeting with the Chairman at 3:30 p.m. on this issue, so if this is important, give me a call. My cell is 626-688-6291

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

Information withheld pursuant to FOIA Exemption 6.

From: [redacted]
To: john.pespisa@sce.com
Cc: [redacted]
Date: 08/20/2012 10:49 AM
Subject: Time for a quick call?

John,

I know you may be traveling today, but do you have time for a brief discussion about the handout you shared with [redacted]? It shouldn't take more than a few minutes. I can be reached at below number or cell [redacted] after 5 p.m.

[redacted]

Attorney-Advisor

Federal Energy Regulatory Commission

Office of Enforcement | Division of Investigations
888 First Street, N.E.
Washington, DC 20426
Direct Dial: +[redacted]

Fax: +1.[redacted]

Email: [redacted]

http://www.ferc.gov

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26

[redacted]

From: John.Pespisa@sce.com
Sent: Wednesday, January 15, 2014 4:46 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Call today?

Could one of you please give me a call, or confirm that FERC is issuing an NOV (not NOAV), I wrote NOV in my notes, but someone here is questioning it.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: John.Pespisa@sce.com,
Cc: [redacted]
Date: 01/15/2014 09:19 AM
Subject: Call today?

John, would you be free for a call after 1:45 EST?

[redacted]

Attorney-Advisor

Federal Energy Regulatory Commission

Office of Enforcement | Division of Investigations
888 First Street, N.E.
Washington, DC 20426
Direct Dial: +1[redacted]

Fax: +1[redacted]

Email:[redacted]

http://www.ferc.gov

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by electronic mail at [redacted] and delete this message and all copies and backups thereof. Thank you.

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27

[redacted]

From: [redacted]
Sent: Wednesday, January 15, 2014 5:00 PM
To: John.Pespisa@sce.com
Cc: [redacted]
Subject: Re: Call today?

John,

The correct term is a Notice of Alleged Violations. As [redacted] and I mentioned, we expect it to be issued early next week and no sooner than Monday. Let us know if you have further questions.

On Wednesday, January 15, 2014, <John.Pespisa@sce.com> wrote:
Could one of you please give me a call, or confirm that FERC is issuing an NOV (not NOAV), I wrote NOV in my notes, but someone here is questioning it.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: John.Pespisa@sce.com,
Cc: [redacted]gov>
Date: 01/15/2014 09:19 AM
Subject: Call today?

John, would you be free for a call after 1:45 EST?

[redacted]

Attorney-Advisor

Federal Energy Regulatory Commission

Office of Enforcement | Division of Investigations
888 First Street, N.E.
Washington, DC 20426
Direct Dial: +[redacted]

Fax: +[redacted]

Email: [redacted]

http://www.ferc.gov

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--

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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28

[redacted]

From: [redacted]
Sent: Wednesday, January 22, 2014 12:02 PM
To: John.Pespisa@sce.com
Cc: Erin.Moore@sce.com; [redacted]
Subject: RE: NOAV re: September 8, 2011 Outage

John,

Unfortunately, I cannot give you a more specific timeframe, except to say that we still expect it will be issued soon.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Wednesday, January 22, 2014 11:53 AM
To: [redacted]
Cc: Erin.Moore@sce.com; [redacted]
Subject: RE: NOAV re: September 8, 2011 Outage

[redacted],
Can you give us a hint at when FERC might be issuing the communication. Just trying to plan my day.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: Erin.Moore@sce.com,
Cc: John.Pespisa@sce.com, [redacted]
Date: 01/22/2014 06:03 AM
Subject: RE: NOAV re: September 8, 2011 Outage

Thanks, Erin. Happy New Year to you, as well. The snow seems to be never-ending this winter!

From: Erin.Moore@sce.com [mailto:Erin.Moore@sce.com]
Sent: Friday, January 17, 2014 1:35 PM
To: [redacted]
Cc: John.Pespisa@sce.com
Subject: NOAV re: September 8, 2011 Outage

[redacted]

I understand that we'll be seeing a NOAV some time next week regarding the September 8, 2011 SDG&E Outage. Please include me on any correspondence as SCE's attorney for this matter, instead of John Lilyestrom. I look forward to working with you to resolve this.

Erin

P.S. Belated Happy New Year! I hope you aren't still digging out from the snowstorms.

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~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Erin K. Moore
Senior Attorney
Southern California Edison Law Department
erin.moore@sce.com
Ph: (626)302-6848

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

[redacted]

From: Stephanie.B.Kenny@sce.com on behalf of John.Pespisa@sce.com
Sent: Monday, August 04, 2014 1:40 PM
To: [redacted]
Cc: [redacted] 'John.Pespisa@sce.com'
Subject: Re: Call Tomorrow?

Hello [redacted]

I scheduled a meeting for tomorrow 2:30-3:00pm Eastern time. The conference call in number is 1-877-952-1281 participant code 41357169.

Please let me know if you need anything else.

Thank you!
Stephanie Kenny

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

Call Tomorrow?

[redacted] to: 'John.Pespisa@sce.com' 08/04/2014 05:44 AM

Cc: [redacted]

Hi John,

Do you have time to do a call with [redacted]r and me tomorrow to discuss the Reliability Enhancements issue? We have availability between noon and 2:30 PM eastern time and would likely not need more than 30 minutes for the call.

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30

[redacted]

From: John.Pespisa@sce.com
Sent: Wednesday, January 15, 2014 12:33 PM
To: [redacted]
Subject: Re: Call today?

Hi...Happy Hew Year...

Do I need an Attorney?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: John.Pespisa@sce.com,
Cc: [redacted]
Date: 01/15/2014 09:19 AM
Subject: Call today?

John, would you be free for a call after 1:45 EST?

[redacted]

Attorney-Advisor

Federal Energy Regulatory Commission

Office of Enforcement | Division of Investigations
888 First Street, N.E.
Washington, DC 20426
Direct Dial: +[redacted]

Fax: +1.[redacted]

Email: [redacted]

http://www.ferc.gov

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by electronic mail at [redacted] and delete this message and all copies and backups thereof. Thank you.

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31

[redacted]

From: John.Pespisa@sce.com
Sent: Tuesday, January 28, 2014 4:59 PM
To: [redacted]
Subject: Re: U still in San diego?

Yes.. Back of the room by the coffee

From: [redacted]
Sent: 01/28/2014 04:57 PM EST
To: John Pespisa
Subject: Re: U still in San diego?

I am. Are you at the CUG meeting?

On Tuesday, January 28, 2014, <John.Pespisa@sce.com> wrote:

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32

[redacted]

From: John.Pespisa@sce.com
Sent: Wednesday, January 15, 2014 6:36 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Call today?

Thank you..

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Cc: [redacted]
Date: 01/15/2014 01:59 PM
Subject: Re: Call today?

John,

The correct term is a Notice of Alleged Violations. As [redacted] and I mentioned, we expect it to be issued early next week and no sooner than Monday. Let us know if you have further questions.

On Wednesday, January 15, 2014, <John.Pespisa@sce.com> wrote:
Could one of you please give me a call, or confirm that FERC is issuing an NOV (not NOAV), I wrote NOV in my notes, but someone here is questioning it.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: John.Pespisa@sce.com,
Cc: [redacted]
Date: 01/15/2014 09:19 AM
Subject: Call today?

John, would you be free for a call after 1:45 EST?
[redacted]

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Attorney-Advisor

Federal Energy Regulatory Commission

Office of Enforcement | Division of Investigations
888 First Street, N.E.
Washington, DC 20426
Direct Dial: +1[redacted]

Fax: +1[redacted]

Email: [redacted]

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--

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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33

[redacted]

From: [redacted]
Sent: Tuesday, February 04, 2014 10:56 AM
To: 'John.Pespisa@sce.com'
Cc: [redacted] 'Sean.Bodkin@nerc.net'
Subject: Call with SCE on questions about coordination of protection systems

John,

Following up on our conversations, we could do a call tomorrow or Thursday. I'm free tomorrow between 12:30 and 3 EST. Thursday I am free between 1 and 3 EST.

[redacted]
Attorney-Advisor

Federal Energy Regulatory Commission
Office of Enforcement | Division of Investigations
888 First Street, N.E.
Washington, DC 20426
Direct Dial: +1.[redacted]
Fax: +1.[redacted]7
Email: [redacted]
http://www.ferc.gov

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34

[redacted]

From: [redacted]
Sent: Wednesday, April 09, 2014 10:41 AM
To: 'John.Pespisa@sce.com'
Cc: 'Erin.Moore@sce.com'
Subject: RE: SCE Draft Stipulation Rev.docx

John,

Sorry I did not reply sooner. Thanks for getting this back to us. We are reviewing it now and will be in touch when we are ready to discuss.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Friday, April 04, 2014 7:15 PM
To: [redacted]
Cc: Erin.Moore@sce.com
Subject: SCE Draft Stipulation Rev.docx

[redacted]

Thank you for the opportunity to comment on this document. Erin and I can be available next week to discuss any of the modifications proposed.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

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35

[redacted]

From: John.Pespisa@sce.com
Sent: Wednesday, April 09, 2014 10:47 AM
To: [redacted]
Cc: Erin.Moore@sce.com
Subject: RE: SCE Draft Stipulation Rev.docx

Thanks,
I was going to call you today to see if you received it.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: John.Pespisa@sce.com,
Cc: Erin.Moore@sce.com
Date: 04/09/2014 07:41 AM
Subject: RE: SCE Draft Stipulation Rev.docx

John,

Sorry I did not reply sooner. Thanks for getting this back to us. We are reviewing it now and will be in touch when we are ready to discuss.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Friday, April 04, 2014 7:15 PM
To: [redacted]
Cc: Erin.Moore@sce.com
Subject: SCE Draft Stipulation Rev.docx

[redacted]

Thank you for the opportunity to comment on this document. Erin and I can be available next week to discuss any of the modifications proposed.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

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[redacted]

36

From: [redacted]
Sent: Wednesday, May 14, 2014 2:37 PM
To: john.pespisa@sce.com
Cc: [redacted]
Subject: Reliability Enhancements

John,

Have you had a chance to talk to your contact at WECC about SCE's proposed Reliability Enhancements related to the O&P5 process?

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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[redacted]

37

From: John.Pespisa@sce.com
Sent: Thursday, May 15, 2014 8:53 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Reliability Enhancements

Is there a time tomorrow I can call you to discuss our call with WECC.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: john.pespisa@sce.com,
Cc: [redacted]
Date: 05/14/2014 11:37 AM
Subject: Reliability Enhancements

John,

Have you had a chance to talk to your contact at WECC about SCE's proposed Reliability Enhancements related to the O&P5 process?

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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[redacted]

From: John.Pespisa@sce.com
Sent: Monday, September 15, 2014 2:06 PM
To: [redacted]
Subject: RE: Monday

yes

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/15/2014 11:02 AM
Subject: RE: Monday

Are you available now?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Monday, September 15, 2014 12:23 PM
To: [redacted]
Subject: RE: Monday

I have a conf call at 10, can we do 11?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/15/2014 09:19 AM
Subject: RE: Monday

Okay, can I call you at 1 PM (10 AM your time)?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Monday, September 15, 2014 12:18 PM
To: [redacted]
Subject: RE: Monday

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All of our legal folks are at an offsite. I can go over the material I have, it should only take 10-15 min. Give me a call.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/15/2014 08:33 AM
Subject: RE: Monday

I can be ready in a half hour and am pretty much available until 4. I'd rather do it on the early side. How much time do you think we'll need?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Monday, September 15, 2014 11:27 AM
To: [redacted]
Subject: RE: Monday

What time works for you today?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/14/2014 06:35 PM
Subject: RE: Monday

I have not heard back on the language I proposed for P 26, but I should hear back from our technical folks on it very early tomorrow morning.

I am fine discussing by phone. I'll then need to report to my technical folks and get back to you, but that shouldn't take too long on our end. Let me know what time works for you.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Sunday, September 14, 2014 8:54 PM
To: [redacted]
Subject: Re: Monday

Let just discuss them on the call. Were your folks ok with the language you proposed?

John Pespisa

Information withheld pursuant to FOIA Exemption 6.

Director, NERC Compliance Program
Southern California Edison
626-302-3308

On Sep 14, 2014, at 5:22 PM, "[redacted] <[redacted]> wrote:
That works. Would you send me the edits before our call, or would we just discuss them on the call? Either way, I am generally available before 4 PM Eastern.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Friday, September 12, 2014 6:10 PM
To: [redacted]
Subject: Re: Monday

You want to have a call on Monday to iron out the last few issues?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/12/2014 03:08 PM
Subject: Monday

John,

Just want to let you know that I will be teleworking Monday. You can of course reach me by email, but also feel free to call my cell if you need. [redacted].

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[redacted]

From: [redacted]
Sent: Friday, May 16, 2014 10:15 AM
To: John.Pespisa@sce.com
Cc: [redacted] Stephanie.B.Kenny@sce.com
Subject: RE: Reliability Enhancements

That works. Thanks.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Friday, May 16, 2014 9:55 AM
To: [redacted]
Cc: [redacted] Stephanie.B.Kenny@sce.com
Subject: Re: Reliability Enhancements

How about 2 EST? If that works I will send a call in number.

John

From: [redacted]
Sent: 05/16/2014 07:37 AM AST
To: John Pespisa
Cc: [redacted]
Subject: RE: Reliability Enhancements

I am teleworking today, so I will call you. What times work for you?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Thursday, May 15, 2014 8:53 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Reliability Enhancements

Is there a time tomorrow I can call you to discuss our call with WECC.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: john.pespisa@sce.com,
Cc: [redacted]
Date: 05/14/2014 11:37 AM
Subject: Reliability Enhancements

Information withheld pursuant to FOIA Exemption 6.

John,

Have you had a chance to talk to your contact at WECC about SCE's proposed Reliability Enhancements related to the O&P5 process?

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

[redacted]

From: [redacted]
Sent: Friday, May 16, 2014 10:15 AM
To: John.Pespisa@sce.com
Cc: [redacted] Stephanie.B.Kenny@sce.com
Subject: RE: Reliability Enhancements

That works. Thanks.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Friday, May 16, 2014 9:55 AM
To: [redacted]
Cc: [redacted]; Stephanie.B.Kenny@sce.com
Subject: Re: Reliability Enhancements

How about 2 EST? If that works I will send a call in number.

John

From: [redacted]
Sent: 05/16/2014 07:37 AM AST
To: John Pespisa
Cc: [redacted]
Subject: RE: Reliability Enhancements

I am teleworking today, so I will call you. What times work for you?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Thursday, May 15, 2014 8:53 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Reliability Enhancements

Is there a time tomorrow I can call you to discuss our call with WECC.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: john.pespisa@sce.com,
Cc: [redacted]
Date: 05/14/2014 11:37 AM
Subject: Reliability Enhancements

Information withheld pursuant to FOIA Exemption 6.

John,

Have you had a chance to talk to your contact at WECC about SCE's proposed Reliability Enhancements related to the O&P5 process?

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

41

[redacted]

From: John.Pespisa@sce.com
Sent: Tuesday, May 27, 2014 5:02 PM
To: [redacted] Erin Moore
Cc: [redacted]
Subject: Re: Communications with WECC and CAISO

I am on vacation. Erin is working on this, I expect she will get you an answer soon.

From: [redacted]
Sent: 05/27/2014 03:32 PM AST
To: John Pespisa
Cc: [redacted]
Subject: Communications with WECC and CAISO

John,

I am following up on our phone conversation from Friday, May 16, regarding the possibility of SCE authorizing staff to have discussions with WECC and CAISO regarding the proposed Reliability Enhancements. Does SCE agree to this? Thanks.

--

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

42

[redacted]

From: [redacted]
Sent: Tuesday, May 27, 2014 3:32 PM
To: John.Pespisa@sce.com
Cc: [redacted]
Subject: Communications with WECC and CAISO

John,

I am following up on our phone conversation from Friday, May 16, regarding the possibility of SCE authorizing staff to have discussions with WECC and CAISO regarding the proposed Reliability Enhancements. Does SCE agree to this? Thanks.

--

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

[redacted]

From: [redacted]
Sent: Tuesday, July 08, 2014 9:08 AM
To: 'John.Pespisa@sce.com'
Cc: [redacted]
Subject: Call Today

John,

Are you available for a call with [redacted] and me today? We would like to follow-up on our conversation last week about WECC and the O&P5 process. Thanks.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

44

[redacted]

From: John.Pespisa@sce.com
Sent: Tuesday, July 08, 2014 11:56 AM
To: [redacted]
Cc: [redacted] Erin.Moore@sce.com
Subject: Re: Call Today

How about 2:30 EDT?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "'John.Pespisa@sce.com'" <John.Pespisa@sce.com>,
Cc: [redacted]
Date: 07/08/2014 06:08 AM
Subject: Call Today

John,

Are you available for a call with [redacted] and me today? We would like to follow-up on our conversation last week about WECC and the O&P5 process. Thanks.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

45

[redacted]

From: John.Pespisa@sce.com
Sent: Tuesday, July 08, 2014 1:50 PM
To: [redacted]
Subject: RE: Call Today

Yes...thanks

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Cc: [redacted] "Erin.Moore@sce.com" <Erin.Moore@sce.com>
Date: 07/08/2014 09:47 AM
Subject: RE: Call Today

Yes, that works. Should we call your office?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Tuesday, July 08, 2014 11:56 AM
To: [redacted]
Cc: [redacted] Erin.Moore@sce.com
Subject: Re: Call Today

How about 2:30 EDT?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "'John.Pespisa@sce.com'" <John.Pespisa@sce.com>,
Cc: [redacted]
Date: 07/08/2014 06:08 AM
Subject: Call Today

John,

Are you available for a call with [redacted] and me today? We would like to follow-up on our conversation last week about WECC and the O&P5 process. Thanks.

Information withheld pursuant to FOIA Exemption 6.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

46

[redacted]

From: [redacted]
Sent: Tuesday, August 12, 2014 1:47 PM
To: 'John.Pespisa@sce.com'
Cc: [redacted] Sean.Bodkin@nerc.net
Subject: RE: Draft Stipulation

John,

I also wanted to let you know that [redacted] and I will both be on vacation the week of August 18, returning the week of August 25.

From: [redacted]
Sent: Tuesday, August 12, 2014 1:45 PM
To: 'John.Pespisa@sce.com'
Cc: [redacted] Sean.Bodkin@nerc.net
Subject: Draft Stipulation

NON-PUBLIC AND PRIVILEGED

FOR SETTLEMENT PURPOSES ONLY

John,

Attached please find a revised Stipulation and Consent Agreement for SCE's consideration. This revision responds to SCE's proposed revisions to staff's initial draft. It also includes a few questions (highlighted) for SCE. Please let me know if you would like to discuss any of the questions or any other aspects of the draft. We are hopeful that we will be able to finalize the agreement with you quickly. Thanks.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

[redacted]

From: John.Pespisa@sce.com
Sent: Friday, September 12, 2014 6:10 PM
To: [redacted]
Subject: Re: Monday

You want to have a call on Monday to iron out the last few issues?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/12/2014 03:08 PM
Subject: Monday

John,

Just want to let you know that I will be teleworking Monday. You can of course reach me by email, but also feel free to call my cell if you need. [redacted].

Information withheld pursuant to FOIA Exemption 6.

48

[redacted]

From: John.Pespisa@sce.com
Sent: Monday, September 15, 2014 12:23 PM
To: [redacted]
Subject: RE: Monday

I have a conf call at 10, can we do 11?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/15/2014 09:19 AM
Subject: RE: Monday

Okay, can I call you at 1 PM (10 AM your time)?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Monday, September 15, 2014 12:18 PM
To: [redacted]
Subject: RE: Monday

All of our legal folks are at an offsite. I can go over the material I have, it should only take 10-15 min. Give me a call.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/15/2014 08:33 AM
Subject: RE: Monday

I can be ready in a half hour and am pretty much available until 4. I'd rather do it on the early side. How much time do you think we'll need?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Monday, September 15, 2014 11:27 AM
To: [redacted]
Subject: RE: Monday

Information withheld pursuant to FOIA Exemption 6.

What time works for you today?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/14/2014 06:35 PM
Subject: RE: Monday

I have not heard back on the language I proposed for P 26, but I should hear back from our technical folks on it very early tomorrow morning.

I am fine discussing by phone. I'll then need to report to my technical folks and get back to you, but that shouldn't take too long on our end. Let me know what time works for you.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Sunday, September 14, 2014 8:54 PM
To: [redacted]
Subject: Re: Monday

Let just discuss them on the call. Were your folks ok with the language you proposed?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

On Sep 14, 2014, at 5:22 PM, "[redacted]v> wrote:
That works. Would you send me the edits before our call, or would we just discuss them on the call? Either way, I am generally available before 4 PM Eastern.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Friday, September 12, 2014 6:10 PM
To: [redacted]
Subject: Re: Monday

You want to have a call on Monday to iron out the last few issues?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/12/2014 03:08 PM
Subject: Monday

Information withheld pursuant to FOIA Exemption 6.

John,

Just want to let you know that I will be teleworking Monday. You can of course reach me by email, but also feel free to call my cell if you need. [redacted].

Information withheld pursuant to FOIA Exemption 6.

[redacted]

From: John.Pespisa@sce.com
Sent: Monday, September 15, 2014 2:05 PM
To: [redacted]
Subject: RE: Monday

You going to call?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/15/2014 09:27 AM
Subject: RE: Monday

Sure, I'll call you at 11 (and feel free to call me if your conf call ends early).

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Monday, September 15, 2014 12:23 PM
To: [redacted]
Subject: RE: Monday

I have a conf call at 10, can we do 11?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/15/2014 09:19 AM
Subject: RE: Monday

Okay, can I call you at 1 PM (10 AM your time)?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Monday, September 15, 2014 12:18 PM
To: [redacted]
Subject: RE: Monday

Information withheld pursuant to FOIA Exemption 6.

All of our legal folks are at an offsite. I can go over the material I have, it should only take 10-15 min. Give me a call.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/15/2014 08:33 AM
Subject: RE: Monday

I can be ready in a half hour and am pretty much available until 4. I'd rather do it on the early side. How much time do you think we'll need?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Monday, September 15, 2014 11:27 AM
To: [redacted]
Subject: RE: Monday

What time works for you today?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/14/2014 06:35 PM
Subject: RE: Monday

I have not heard back on the language I proposed for P 26, but I should hear back from our technical folks on it very early tomorrow morning.

I am fine discussing by phone. I'll then need to report to my technical folks and get back to you, but that shouldn't take too long on our end. Let me know what time works for you.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Sunday, September 14, 2014 8:54 PM
To: [redacted]
Subject: Re: Monday

Let just discuss them on the call. Were your folks ok with the language you proposed?

John Pespisa

Information withheld pursuant to FOIA Exemption 6.

Director, NERC Compliance Program
Southern California Edison
626-302-3308

On Sep 14, 2014, at 5:22 PM, "[redacted]> wrote:
That works. Would you send me the edits before our call, or would we just discuss them on the call? Either way, I am generally available before 4 PM Eastern.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Friday, September 12, 2014 6:10 PM
To: [redacted]
Subject: Re: Monday

You want to have a call on Monday to iron out the last few issues?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "John.Pespisa@sce.com" <John.Pespisa@sce.com>,
Date: 09/12/2014 03:08 PM
Subject: Monday

John,

Just want to let you know that I will be teleworking Monday. You can of course reach me by email, but also feel free to call my cell if you need. [redacted].

Information withheld pursuant to FOIA Exemption 6.

50

[redacted]

From: John.Pespisa@sce.com
Sent: Friday, September 19, 2014 4:57 PM
To: [redacted]
Cc: 'John.Pespisa@sce.com'
Subject: Re: Your Message

I plan on taking the team out for a nice dinner next week...

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: '"John.Pespisa@sce.com"' <John.Pespisa@sce.com>,
Date: 09/19/2014 01:04 PM
Subject: Your Message

John,

I got your message. That sounds great, and I told Sean that you would be sending him the 3 signed copies via fed ex. Thanks, John! Have a great weekend – maybe a celebration?

Information withheld pursuant to FOIA Exemption 6.

51

[redacted]

From: John.Pespisa@sce.com
Sent: Friday, September 19, 2014 5:01 PM
To: [redacted] Sean.Bodkin@nerc.net, ,@sce.com
Subject: Tracking number for SCE settlement
Attachments: GO4-GRND-COL-A14-MX4101@SCE.COM_20140919_130032.pdf

Sean,

The tracking number for the three copies is UPS 1z31e5122212491715

Signed PDF copy.

Thanks again.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: John Pespisa/SCE/EIX
To: [redacted]
Cc: '"John.Pespisa@sce.com"' <John.Pespisa@sce.com>
Date: 09/19/2014 01:56 PM
Subject: Re: Your Message

FOR INTERNAL USE ONLY

I plan on taking the team out for a nice dinner next week...

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: '"John.Pespisa@sce.com"' <John.Pespisa@sce.com>,
Date: 09/19/2014 01:04 PM
Subject: Your Message

Information withheld pursuant to FOIA Exemption 6.

John,

I got your message. That sounds great, and I told Sean that you would be sending him the 3 signed copies via fed ex. Thanks, John! Have a great weekend – maybe a celebration?

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Southern California Edison Company) Docket No. IN14-8-000

STIPULATION AND CONSENT AGREEMENT

I. INTRODUCTION

1. Staff of the Office of Enforcement (Enforcement) of the Federal Energy Regulatory Commission (Commission), the North American Electric Reliability Corporation (NERC), and Southern California Edison Company (SCE) enter into this Stipulation and Consent Agreement (Agreement) to resolve a non-public investigation conducted by Enforcement and NERC pursuant to Part 1b of the Commission's regulations, 18 C.F.R. Part 1b (2014). The investigation examined possible violations of NERC Reliability Standards by SCE related to a system event in the Pacific Southwest on September 8, 2011 (September 8 event or event). SCE neither admits nor denies that it violated the Reliability Standard described in the Agreement, but agrees to pay a total civil penalty of $650,000, of which $250,000 will be paid to the United States Treasury and NERC, divided in equal amounts, and $400,000 will be invested, subject to Enforcement and NERC approval, by SCE in reliability enhancement measures identified below that go above and beyond the Agreement's mitigation commitments or what that Reliability Standards require (Reliability Enhancements). SCE also commits to mitigation and compliance measures, subject to compliance monitoring, as detailed in the Agreement.

II. STIPULATED FACTS

2. Enforcement, NERC, and SCE hereby stipulate and agree to the following facts.

A. SCE

3. SCE, a wholly-owned subsidiary of Edison International, is an investor-owned utility providing electricity in central, coastal, and southern California. Among other NERC registrations, SCE operates as a Transmission Owner (TO) and Operator (TOP) within the California Independent System Operator's (CAISO) Balancing Authority area, and has delegated part of its responsibilities as TOP, including seasonal, next-day, and current-day planning, to CAISO under a

Coordinated Functional Registration.[1] SCE owns approximately 5,490 circuit miles of transmission lines, including 500, 230, and 161 kV lines. At the time of the event, SCE owned more than 5,600 MW of generation, including a majority share in the San Onofre Nuclear Generating Station (SONGS) in Southern California.[2] SCE's peak load exceeds 22,000 MW.

B. Event Description

4. During an 11-minute period on the afternoon of September 8, 2011, a system disturbance occurred in the Pacific Southwest, resulting in cascading outages and leaving approximately 2.7 million customers without power, some for multiple hours extending into the next day. The total load loss for the event was in excess of 30,000 MWh. The event started with a three-phase fault which led to the loss of Arizona Public Service's (APS's) Hassayampa-N. Gila 500 kV transmission line (H-NG). This transmission line is a segment of the Southwest Power Link (SWPL), a major transmission corridor transporting power in an east-west direction, from generators in Arizona, through the service territory of Imperial Irrigation District (IID), into Southern California.

5. With the SWPL's major east-west corridor broken by the loss of H-NG, power flows instantaneously redistributed throughout the electric system in the Pacific Southwest and Southern California, increasing flows through lower voltage systems parallel to the SWPL as power continued to flow on a hot day during hours of peak demand.

6. These redistributed flows traveled through IID's and Western Area Power Administration – Desert Southwest's (Western-DSW's) territories onto Western Electricity Coordinating Council (WECC)[3] Path 44, an aggregation of five 230 kV

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[1] JRO00009 was originally entered into on September 11, 2008 and most recently updated on May 24, 2012. JRO00009 delineates compliance responsibility for the Standards and Requirements associated with the TOP function between CAISO and SCE.

[2] In June 2013, SONGS permanently ceased power operations.

[3] At the time of the event, WECC was registered with NERC as the Reliability Coordinator (RC) for all of the entities affected by the event, as well as serving as the Regional Entity (RE) under a delegation agreement with NERC. Since the event, the Regional Entity and Reliability Coordinator functions have been bifurcated, with WECC remaining the Regional Entity, and Peak Reliability becoming the independent Reliability Coordinator. *See Order on Compliance,* 146 FERC ¶ 61,092 (2014) (accepting compliance filings submitted by NERC and WECC and eliminating all final obstacles to bifurcation). The Agreement will

transmission lines that deliver power in a north-south direction from SCE's territory in Los Angeles to San Diego Gas & Electric (SDG&E). The increased power flows parallel to the SWPL, together with lower than peak generation levels in California and Mexico, led to significant voltage deviations and transmission equipment overloads. The flow redistributions, voltage deviations, and resulting overloads had a cascading effect, as transmission and generation equipment tripped offline in a relatively short time period. Just seconds before the blackout, Path 44 carried all flows into San Diego as well as parts of Arizona and Mexico. This excessive loading on Path 44 initiated an intertie separation scheme, owned and operated by SCE, located at the San Onofre switchyard.[4] CAISO is responsible for many of the TOP functions for SCE under a Coordinated Functional Registration. Initiation of the intertie separation scheme at the San Onofre switchyard separated SDG&E from Path 44, contributed to tripping the SONGS nuclear units offline, and eventually resulted in the complete blackout of San Diego and Comisión Federal de Electricidad's Baja California Control Area.

7. SCE's role in the September 8 event centers on its ownership and operation of the intertie separation scheme at the San Onofre switchyard that initiated approximately 10 minutes and 40 seconds into the 11-minute event. Operation of the scheme simultaneously opened all five 230 kV transmission lines—Path 44—connecting SCE and SDG&E, as it was designed to do, and the resulting cut in power to SDG&E's system caused a rapid frequency decline indicative of a severe imbalance between generation and load in SDG&E's system. This rapid frequency decline affected SDG&E's Underfrequency Load Shedding (UFLS) program. Prior to this point in the event, SDG&E had already lost its intertie to the east, and with the opening of Path 44, SDG&E was effectively separated from the rest of the Western Interconnection. Before the September 8 event, system conditions had never exceeded the threshold for triggering the intertie separation scheme at the San Onofre switchyard, and SCE had never conducted any studies to assess the scheme's impact on reliability or the scheme's impact on an already severely compromised system.

8. The operation of the separation scheme under the extreme power flow conditions resulted in a sudden change in the angle of the generator rotors at SONGS. This resulted in the activation of turbine control logic to prevent over speed of the equipment which tripped both SONGS units.

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refer to WECC when relevant to the event, and will otherwise refer to the relevant function (RE or RC) rather than using the entity names WECC or Peak Reliability.

[4] Since the September 8 event, Enforcement and NERC have referred to this intertie separation scheme as the SONGS Separation Scheme.

III. INQUIRY AND INVESTIGATION

9. On September 9, 2011, the Commission and NERC announced a joint inquiry to determine how the blackout occurred and to make recommendations to avoid similar situations in the future. The inquiry team, comprised of Commission and NERC staff, used on-site visits and interviews, detailed computer modeling, event simulations, and system analyses to make its findings and recommendations for preventing similar events in the future. The inquiry determined that entities responsible for planning and operating the Bulk-Power System (BPS) were not prepared to ensure reliable operation or prevent cascading outages in the event of a single contingency. On May 1, 2012, the inquiry team published a report entitled *Arizona-Southern California Outages on September 8, 2011, Causes and Recommendations* (the Report), which is hereby incorporated by reference.[5] The Report discusses a detailed sequence of events, simulations, and findings related to the causes of the cascading outages. The Report also makes twenty-seven recommendations related to next-day planning, seasonal planning, near- and long-term planning, situational awareness, consideration of Bulk Electric System (BES) equipment, system operating limits (SOLs) and Interconnection Reliability Operating Limits (IROLs), and protection systems.

10. Following publication of the Report, Enforcement and NERC reviewed the data gathered during the inquiry for compliance implications. As a result of that review, Enforcement and NERC initiated non-public investigations of several entities, including SCE, under Part 1b of the Commission's regulations, 18 C.F.R. Part 1b (2014). Enforcement and NERC determined that SCE violated Reliability Standard PRC-001-1 R4 and found that this violation undermined the reliability of the BPS and contributed to the September 8 event. Enforcement and NERC recognized, however, that after the event, and during the inquiry and investigation, SCE voluntarily began making improvements in its planning and operations, and implementing recommendations from the Report, that addressed many of the findings arising from the Report. In addition, SCE fully cooperated with Enforcement and NERC during the investigation.

11. As part of the investigation, Enforcement and NERC reviewed SCE's compliance program and discovered that SCE satisfies the criteria for an effective compliance program under the Commission's Penalty Guidelines.[6] Enforcement

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[5] *Arizona-Southern California Outages on September 8, 2011, Causes and Recommendations* (April 2012), *available at* http://www.ferc.gov/legal/staff-reports/04-27-2012-ferc-nerc-report.pdf.

[6] *Enforcement of Statutes, Orders, Rules and Regulations,* 132 FERC ¶ 61,216, § 1B2.1 (2010).

and NERC considered the following elements of SCE's compliance program: (1) SCE's NERC Compliance Program office is staffed by seventeen full time employees devoted to ensuring compliance with each Reliability Standard; (2) SCE conducts an annual self-assessment of its overall NERC compliance as well as monthly assessments of compliance with specific Reliability Standards; (3) Five of SCE's senior Officers are a part of SCE's NERC Executive Steering Team (EST). The EST team members are fully engaged in the compliance program and attend monthly status meetings with the director of the compliance program; and (4) SCE employees attend annual training sessions on NERC compliance and have opportunities to report and raise compliance issues, including through an anonymous Hotline maintained by a third party.

IV. VIOLATION

12. Enforcement and NERC determined that SCE violated Reliability Standard PRC-001-1 R4 because prior to the September 8 event it did not adequately coordinate the intertie separation scheme at the San Onofre switchyard with protection systems, including (1) the acceleration limits within the turbine control systems on the two SONGS generators; and (2) the UFLS program of its neighbor, SDG&E. Prior to the event, SCE had not conducted studies to assess the scheme's impact on reliability. Prior to the event, SCE also had not conducted studies to assess the scheme's impact on the acceleration of the SONGS units, or the impact to an already severely compromised system. As a result, SCE did not know how the initiation of the scheme would impact reliability, including whether the scheme would result in the tripping of the SONGS generators or how it might affect the ability of SDG&E's UFLS program to arrest extreme frequency decline, as described in paragraphs 6, 7, and 8 above.

V. REMEDIES AND SANCTIONS

13. SCE stipulates to the facts as described in Section II of the Agreement, but neither admits nor denies Enforcement's and NERC's findings that its conduct violated the Reliability Standard specified in Section IV. For purposes of settling any and all civil and administrative disputes within the jurisdiction of the Commission arising from reliability issues related to the September 8 event and Enforcement and NERC's investigation, SCE agrees to the remedies set forth in the following paragraphs.

A. Civil Penalty

14. SCE shall pay a total civil penalty of $650,000, of which $250,000 shall be paid, divided in equal amounts, to the United States Treasury and NERC within ten days of the Effective Date of the Agreement. Enforcement and NERC agree to give SCE a partial civil penalty offset for the remaining $400,000 in exchange for

SCE agreeing to implement the Reliability Enhancements set forth in Section V.B. The value of the Reliability Enhancements is expected to substantially exceed the amount of the offset.

B. Reliability Enhancements

15. In exchange for the $400,000 offset, as Reliability Enhancements, SCE shall provide the RE and/or RC with three Full-Time Equivalent (FTE) technical employees for a total of 6,240 hours to assist the RE and/or RC with their efforts in response to the September 8 event.

16. As part of the Reliability Enhancements, SCE employees will participate in regional study groups and various RE, RC, and/or NERC reliability initiatives, created in response to and for the purpose of improving reliability after the September 8 event. SCE, the RE, and/or RC will agree on the skill set of the employees to be shared and the employees' projects and tasks.

17. The scope and nature of the projects and tasks to be performed by the aforementioned SCE employees shall be approved by Enforcement and NERC, such approval not to be unreasonably withheld. SCE shall complete the Reliability Enhancements by December 31, 2016.

18. If SCE has not performed the Reliability Enhancements by December 31, 2016, or determines, prior to December 31, 2016, that it cannot reach an agreement with the RE and/or RC on the projects or tasks to be performed, SCE shall subtract from $400,000 the cash value of the services, if any, already performed, and pay the remaining sum in equal shares to the United States Treasury and NERC. The calculation of the sum due to Treasury and NERC, including the cash value of the services, and the identification of the services to be credited, are subject to review and approval by Enforcement and NERC.

C. Completed and Required Mitigation

19. SCE commits to the following actions, designed to mitigate the Reliability Standard violations and to improve overall reliability of the BES. As indicated below, SCE affirms that it has already completed most of the mitigation measures and shall complete all remaining mitigation measures no later than December 31, 2015, unless otherwise stated in this Section. In those instances where SCE has already implemented mitigation measures prior to entering into the Agreement, it shall continue operating under the practices and procedures implemented as part of the mitigation, until such time as it implements improved practices and procedures, as determined by Enforcement and NERC. SCE will report on the status of all mitigation measures described in this Section and submit evidence of

status and progress in its compliance monitoring reports to be submitted to Enforcement and NERC pursuant to Section V.C of the Agreement.

i. Mitigation Related to Protection Systems

Protection System Coordination[7]

20. SCE has completed multiple mitigation measures and has also agreed to implement multiple additional mitigating measures aimed at improving its coordination of Covered Protection Systems, including intertie overload separation schemes.[8]

21. Following the September 8 event, SCE undertook an expedited technical and physical evaluation of all its intertie overload separation schemes, to ensure that such schemes and the schemes' settings were properly coordinated across its transmission system. Based on this evaluation and to the extent necessary to ensure proper coordination, SCE changed the settings on some schemes, and disabled and removed others.

22. In addition to any requirements under the Reliability Standards related to protection systems, starting in 2014, SCE agrees to conduct a detailed study of twenty percent of its existing and planned Covered Protection Systems each year with 100 percent of the studies to be completed by December 31, 2018. SCE will prioritize its assessment of intertie overload separation schemes and will complete its assessment of such schemes by December 31, 2015. This assessment shall consider (1) the purpose and limitations of Covered Protection Systems; (2) the necessity of Covered Protection Systems; (3) the classification of Covered Protection Systems; (4) coordination of Covered Protection Systems with other devices and systems; (5) impact of Covered Protection Systems on internal and external elements; (6) whether Covered Protection Systems have unintended reliability consequences; (7) whether SCE's Underfrequency Load Shedding program is effective and consistent with the RE's Off-Nominal Frequency Load

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[7] This section on Protection System coordination applies to the following Protection Systems: (1) internal to SCE's system, Special Protection Systems (including intertie overload separation schemes), overload Protection Systems on transmission equipment, and overload Protection Systems that studies show affect the BPS; and (2) external to SCE's system, Protection Systems that are known to affect SCE's operations (referred to as "Covered Protection Systems").

[8] SCE has identified its intertie overload separation schemes that remain in service, and Enforcement, NERC, and SCE maintain a list of such schemes confidentially.

Shedding plan; and (8) affected generators' response to activation of Covered Protection Systems.

23. SCE further agrees to share relevant information, including Covered Protection System settings, from the foregoing assessments with impacted entities and the Reliability Coordinator. To the extent SCE learns from the assessments that any Covered Protection Systems have degraded or have the potential to not operate as designed, SCE will immediately share this information with impacted entities and the Reliability Coordinator.

Effect of Protection Systems on Transmission Facility Loadability

24. SCE agrees to implement mitigation measures aimed at ensuring that its protection system relay settings do not limit the loadability of its transmission facilities. Specifically, in its 2016 Annual Transmission Reliability Assessment, and each year thereafter, SCE will review its transmission facility SOLs to ensure that they account for protection system relay settings and that they are equal to the most limiting operating criteria during all timeframes, including restoration. SCE will also identify instances where its relay trip points are set too close to transmission facility emergency ratings and to develop plans to mitigate such instances.

Protection System Training

25. SCE agrees to broaden its protection system training program. SCE has provided its transmission operators training on internal protection systems since before the September 8 event. Within six months of the Effective Date of the Agreement, SCE agrees to review this training to ensure it covers the purpose and limitations of Covered Protection Systems, the settings of Covered Protection Systems, and the impact of Covered Protection Systems on internal and external elements. SCE also agrees to expand this training within one year of the completion of the assessment described in Paragraph 22 to cover external protection systems, as identified by SCE, the CAISO, or any adjacent entity, that are likely to impact SCE's system reliability.

ii. Mitigation Related to Long-Term Planning

Consideration of Critical System Conditions in Long-Term Planning Assessments

26. Within one year of the Effective Date of the Agreement, SCE agrees to implement several steps (described below in paragraphs 27-30) to ensure that its long-term planning assessments consider critical system conditions, including expected system transfers above firm, expected internal and external generation dispatch, the impact of internal and external facilities, transmission facilities

operated below 100 kV, local distribution facilities operated below 100 kV that are known to impact the BPS, and the impact of active protection and control devices.

27. Regarding expected system transfers above firm, SCE agrees to include in its long-term studies additional sensitivities by varying generation and load to stress system transfers.

28. To ensure it considers expected internal and external generation dispatch levels in its long-term planning studies, SCE agrees to simulate combinations of various generator outages in its transmission area as well as neighboring areas that could impact its system.

29. SCE also agrees to improve its long-term planning process by ensuring that it considers internal and external facilities operated below 100 kV, where those facilities operate in parallel with facilities above 100 kV or have the potential to affect BPS reliability.[9] For example, SCE agrees to begin utilizing the RE's new base case coordination system to develop cases that include 69 kV facilities and to monitor contingencies involving facilities operated at 69 kV and above in SDG&E's, IID's, and APS's territories that have an impact on SCE's system.

30. SCE agrees to update its contingency files of its various Special Protection Systems (SPS)/Remedial Action Schemes (RAS) for its annual long-term planning studies. Also, it will continue to support the work and respond to data requests of the RE's Modeling SPS and Relays Ad-hoc Task Force to incorporate selected relays into base cases.

Analyses and Benchmarking of Past Planning Studies

31. On a going forward basis, SCE agrees to benchmark annually the prior year's planning studies against actual system operating conditions and look and account for higher stress conditions not captured in its annual assessments, such as unusual generation and import patterns, higher than expected load patterns, and contingencies that may have occurred and were not evaluated. SCE agrees to share information from its benchmarking analyses with impacted entities, CAISO, and the Reliability Coordinator.

iii. Mitigation Related to Situational Awareness

Greater Coordination to Improve Situational Awareness

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[9] Inclusion of transmission facilities operated below 100 kV in the mitigation measures pursuant to the Agreement shall have no effect on any current or future analysis regarding whether these facilities comprise part of the BPS.

32. SCE agrees to implement various mitigating measures to improve its coordination efforts with neighboring entities as a way of strengthening its situational awareness. When provided with additional system information for coordination, SCE will have greater capability to assess information, including in the next-day and real-time timeframes, that could impact its system.

33. When released by Peak Reliability for usage, SCE agrees to ensure that its operators and operating engineers utilize, on a daily basis, relevant elements of Peak Reliability's new data sharing portal, which contains next-day studies, historical archives, and data from the Western Interconnection Synchrophasor Project. When released for entity use by Peak Reliability the phasor measurement data will provide operators visibility of system conditions in near real-time and may enable early detection of problems that could lead to cascading outages.

Expanded Situational Awareness

34. To the extent SCE has not already done so, within six months of the Effective Date of the Agreement, SCE also agrees to undertake efforts to identify internal and external elements that impact its portion of the BPS, including facilities operated below 100 kV. In addition, to the extent it has not already done so, SCE agrees to identify all internal elements, including elements operated below 100 kV, that impact external BPS elements, and to notify impacted entities and the Reliability Coordinator of such elements. All such elements shall be included in its models for monitoring in its seasonal, next-day, current-day, and real-time studies. SCE has also received and continues to receive Inter-Control Center Communications Protocol (ICCP) data from neighbors to further improve its transmission models with real-time, verified data on facilities that impact its system.

Response to Impaired Situational Awareness

35. Within six months of the Effective Date of the Agreement, SCE agrees to improve its procedures for responding to the impairment of its monitoring capabilities. These procedures maintain plans for the loss of SCADA/EMS, RTCA, and the loss of communication. They also cover plans for communicating with the Reliability Coordinator and neighboring entities in case SCE loses situational awareness. SCE also agrees to revise its procedures governing the exchange of information regarding the loss or change in service status of critical facilities with the Reliability Coordinator and other impacted entities. SCE will complete operator training on all of these new processes within one year of the Effective Date of the Agreement.

D. Compliance Monitoring

36. SCE shall make semi-annual reports to Enforcement and NERC until all of the mitigation measures and Reliability Enhancements, identified in the Agreement, have been fully implemented and verified by Enforcement and NERC. The first semi-annual report shall cover the first six month period after the Effective Date of the Agreement and shall be submitted to Enforcement and NERC staff within thirty days of the expiration of that period. The subsequent report(s) shall be due in six month increments thereafter. Each report shall detail the following: (1) actions taken as of the date of the report to satisfy the terms of the Agreement, including all mitigation items and Reliability Enhancements; (2) actions taken to improve reliability compliance, including investments in new measures and training activities during the reporting period; and (3) any additional violations of Reliability Standards that have occurred and whether and how SCE has addressed those new violations. The reports must include an affidavit executed by an officer of SCE that the compliance reports are true and accurate and also include corroborative documentation or other satisfactory evidence demonstrating or otherwise supporting the content of these reports. Enforcement and NERC staff may require additional semi-annual reporting if circumstances indicate the need for further monitoring or if SCE has not yet completed all the mitigation measures described in this Section.

VI. TERMS

37. The "Effective Date" of the Agreement shall be the date on which the Commission issues an order approving the Agreement without material modification. When effective, the Agreement shall resolve all reliability matters relating to the September 8 event within the jurisdiction of the Commission, and that arose on or before the Effective Date, as to SCE or any affiliated entity.

38. Commission approval of the Agreement without material modification shall release SCE and forever bar the Commission and NERC from holding SCE, any affiliated entity, and any successor in interest to SCE liable for any and all administrative or civil claims arising out of the reliability issues related to the September 8 event or conduct addressed and stipulated to in the Agreement that occurred on or before the Agreement's Effective Date.

39. Failure to make timely civil penalty payments or to comply with the mitigation, Reliability Enhancements, and monitoring agreed to herein, or any other provision of the Agreement, shall be deemed a violation of a final order of the Commission issued pursuant to the Federal Power Act (FPA), 16 U.S.C. §792, *et seq.*, and may subject SCE to additional action under the enforcement provisions of the FPA.

40. If SCE does not make the civil penalty payment described above at the time

agreed by the parties, interest payable to the United States Treasury and NERC shall begin to accrue pursuant to the Commission's regulations at 18 C.F.R. § 35.19(a)(2)(iii) (2014) from the date that payment is due, in addition to the penalty specified above and any other enforcement action and penalty that the Commission or NERC may take or impose.

41. The Agreement binds SCE and its agents, successors, and assignees. The Agreement does not create any additional or independent obligations on SCE, or any affiliated entity, its agents, officers, directors, or employees, other than the obligations identified in the Agreement.

42. The signatories to the Agreement agree that they enter into the Agreement voluntarily and that, other than the recitations set forth herein, no tender, offer or promise of any kind by any member, employee, officer, director, agent or representative of Enforcement, NERC, or SCE has been made to induce the signatories or any other party to enter into the Agreement.

43. Unless the Commission issues an order approving the Agreement in its entirety and without material modification, the Agreement shall be null and void and of no effect whatsoever, and Enforcement, NERC, and SCE shall not be bound by any provision or term of the Agreement, unless otherwise agreed to in writing by Enforcement, NERC, and SCE.

44. SCE agrees that the Commission's order approving the Agreement without material modification shall be a final and unappealable order assessing a civil penalty under the Federal Power Act. SCE waives findings of fact and conclusions of law, rehearing of any Commission order approving the Agreement without material modification, and judicial review by any court of any Commission order approving the Agreement without material modification.

45. The Agreement can be modified only if in writing and signed by Enforcement, NERC, and SCE, and any modifications will not be effective unless approved by the Commission.

46. Each of the undersigned warrants that he or she is an authorized representative of the entity designated, is authorized to bind such entity and accepts the Agreement on the entity's behalf.

47. The undersigned representative of SCE affirms that he or she has read the Agreement, that all of the matters set forth in the Agreement are true and correct to the best of his or her knowledge, information and belief, and that he or she understands that the Agreement is entered into by Enforcement and NERC in express reliance on those representations.

48. The Agreement may be signed in counterparts.

49. The Agreement is executed in triplicate, each of which so executed shall be deemed to be an original.

Agreed to and accepted:

_____
Larry D. Gasteiger
Acting Director, Office of Enforcement
Federal Energy Regulatory Commission

Date: _____

_____
Charles A. Berardesco
Senior Vice President, General Counsel and Corporate Secretary
North American Reliability Corporation

Date: _____

John Pespisa
John Pespisa
Director, NERC Compliance Program
Southern California Edison Company

Date: 09/19/2014

52

[redacted]

From: Neya.Williams@sce.com
Sent: Monday, September 22, 2014 4:49 PM
To: sean.bodkin@nerc.net; [redacted]
Cc: John.Pespisa@sce.com; Pete.Dietrich@sce.com
Subject: Tracking Number for Settlement
Attachments: PIV1-3RD-EXEC-SUPPORT-MX4101@sce.com_20140922_124522.pdf

Tracking number for three copies of the signed settlement via UPS is 1Z 31E 512 22 1252 9596.

Thank you.

Neya Williams
Executive Assistant to
Pete Dietrich
Senior Vice President, Transmission & Distribution
Southern California Edison
PIV Phone: (909) 274-1115
GO4 Phone: (626) 302-6728
Cell: (714) 334-7294
Be Safe. Always.

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UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Southern California Edison Company) Docket No. IN14-8-000

STIPULATION AND CONSENT AGREEMENT

I. INTRODUCTION

1. Staff of the Office of Enforcement (Enforcement) of the Federal Energy Regulatory Commission (Commission), the North American Electric Reliability Corporation (NERC), and Southern California Edison Company (SCE) enter into this Stipulation and Consent Agreement (Agreement) to resolve a non-public investigation conducted by Enforcement and NERC pursuant to Part 1b of the Commission's regulations, 18 C.F.R. Part 1b (2014). The investigation examined possible violations of NERC Reliability Standards by SCE related to a system event in the Pacific Southwest on September 8, 2011 (September 8 event or event). SCE neither admits nor denies that it violated the Reliability Standard described in the Agreement, but agrees to pay a total civil penalty of $650,000, of which $250,000 will be paid to the United States Treasury and NERC, divided in equal amounts, and $400,000 will be invested, subject to Enforcement and NERC approval, by SCE in reliability enhancement measures identified below that go above and beyond the Agreement's mitigation commitments or what that Reliability Standards require (Reliability Enhancements). SCE also commits to mitigation and compliance measures, subject to compliance monitoring, as detailed in the Agreement.

II. STIPULATED FACTS

2. Enforcement, NERC, and SCE hereby stipulate and agree to the following facts.

A. SCE

3. SCE, a wholly-owned subsidiary of Edison International, is an investor-owned utility providing electricity in central, coastal, and southern California. Among other NERC registrations, SCE operates as a Transmission Owner (TO) and Operator (TOP) within the California Independent System Operator's (CAISO) Balancing Authority area, and has delegated part of its responsibilities as TOP, including seasonal, next-day, and current-day planning, to CAISO under a

Coordinated Functional Registration.[1] SCE owns approximately 5,490 circuit miles of transmission lines, including 500, 230, and 161 kV lines. At the time of the event, SCE owned more than 5,600 MW of generation, including a majority share in the San Onofre Nuclear Generating Station (SONGS) in Southern California.[2] SCE's peak load exceeds 22,000 MW.

B. Event Description

4. During an 11-minute period on the afternoon of September 8, 2011, a system disturbance occurred in the Pacific Southwest, resulting in cascading outages and leaving approximately 2.7 million customers without power, some for multiple hours extending into the next day. The total load loss for the event was in excess of 30,000 MWh. The event started with a three-phase fault which led to the loss of Arizona Public Service's (APS's) Hassayampa-N. Gila 500 kV transmission line (H-NG). This transmission line is a segment of the Southwest Power Link (SWPL), a major transmission corridor transporting power in an east-west direction, from generators in Arizona, through the service territory of Imperial Irrigation District (IID), into Southern California.

5. With the SWPL's major east-west corridor broken by the loss of H-NG, power flows instantaneously redistributed throughout the electric system in the Pacific Southwest and Southern California, increasing flows through lower voltage systems parallel to the SWPL as power continued to flow on a hot day during hours of peak demand.

6. These redistributed flows traveled through IID's and Western Area Power Administration – Desert Southwest's (Western-DSW's) territories onto Western Electricity Coordinating Council (WECC)[3] Path 44, an aggregation of five 230 kV

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[1] JRO00009 was originally entered into on September 11, 2008 and most recently updated on May 24, 2012. JRO00009 delineates compliance responsibility for the Standards and Requirements associated with the TOP function between CAISO and SCE.

[2] In June 2013, SONGS permanently ceased power operations.

[3] At the time of the event, WECC was registered with NERC as the Reliability Coordinator (RC) for all of the entities affected by the event, as well as serving as the Regional Entity (RE) under a delegation agreement with NERC. Since the event, the Regional Entity and Reliability Coordinator functions have been bifurcated, with WECC remaining the Regional Entity, and Peak Reliability becoming the independent Reliability Coordinator. *See Order on Compliance,* 146 FERC ¶ 61,092 (2014) (accepting compliance filings submitted by NERC and WECC and eliminating all final obstacles to bifurcation). The Agreement will

transmission lines that deliver power in a north-south direction from SCE's territory in Los Angeles to San Diego Gas & Electric (SDG&E). The increased power flows parallel to the SWPL, together with lower than peak generation levels in California and Mexico, led to significant voltage deviations and transmission equipment overloads. The flow redistributions, voltage deviations, and resulting overloads had a cascading effect, as transmission and generation equipment tripped offline in a relatively short time period. Just seconds before the blackout, Path 44 carried all flows into San Diego as well as parts of Arizona and Mexico. This excessive loading on Path 44 initiated an intertie separation scheme, owned and operated by SCE, located at the San Onofre switchyard.[4] CAISO is responsible for many of the TOP functions for SCE under a Coordinated Functional Registration. Initiation of the intertie separation scheme at the San Onofre switchyard separated SDG&E from Path 44, contributed to tripping the SONGS nuclear units offline, and eventually resulted in the complete blackout of San Diego and Comisión Federal de Electricidad's Baja California Control Area.

7. SCE's role in the September 8 event centers on its ownership and operation of the intertie separation scheme at the San Onofre switchyard that initiated approximately 10 minutes and 40 seconds into the 11-minute event. Operation of the scheme simultaneously opened all five 230 kV transmission lines—Path 44—connecting SCE and SDG&E, as it was designed to do, and the resulting cut in power to SDG&E's system caused a rapid frequency decline indicative of a severe imbalance between generation and load in SDG&E's system. This rapid frequency decline affected SDG&E's Underfrequency Load Shedding (UFLS) program. Prior to this point in the event, SDG&E had already lost its intertie to the east, and with the opening of Path 44, SDG&E was effectively separated from the rest of the Western Interconnection. Before the September 8 event, system conditions had never exceeded the threshold for triggering the intertie separation scheme at the San Onofre switchyard, and SCE had never conducted any studies to assess the scheme's impact on reliability or the scheme's impact on an already severely compromised system.

8. The operation of the separation scheme under the extreme power flow conditions resulted in a sudden change in the angle of the generator rotors at SONGS. This resulted in the activation of turbine control logic to prevent over speed of the equipment which tripped both SONGS units.

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refer to WECC when relevant to the event, and will otherwise refer to the relevant function (RE or RC) rather than using the entity names WECC or Peak Reliability.

[4] Since the September 8 event, Enforcement and NERC have referred to this intertie separation scheme as the SONGS Separation Scheme.

III. INQUIRY AND INVESTIGATION

9. On September 9, 2011, the Commission and NERC announced a joint inquiry to determine how the blackout occurred and to make recommendations to avoid similar situations in the future. The inquiry team, comprised of Commission and NERC staff, used on-site visits and interviews, detailed computer modeling, event simulations, and system analyses to make its findings and recommendations for preventing similar events in the future. The inquiry determined that entities responsible for planning and operating the Bulk-Power System (BPS) were not prepared to ensure reliable operation or prevent cascading outages in the event of a single contingency. On May 1, 2012, the inquiry team published a report entitled *Arizona-Southern California Outages on September 8, 2011, Causes and Recommendations* (the Report), which is hereby incorporated by reference.[5] The Report discusses a detailed sequence of events, simulations, and findings related to the causes of the cascading outages. The Report also makes twenty-seven recommendations related to next-day planning, seasonal planning, near- and long-term planning, situational awareness, consideration of Bulk Electric System (BES) equipment, system operating limits (SOLs) and Interconnection Reliability Operating Limits (IROLs), and protection systems.

10. Following publication of the Report, Enforcement and NERC reviewed the data gathered during the inquiry for compliance implications. As a result of that review, Enforcement and NERC initiated non-public investigations of several entities, including SCE, under Part 1b of the Commission's regulations, 18 C.F.R. Part 1b (2014). Enforcement and NERC determined that SCE violated Reliability Standard PRC-001-1 R4 and found that this violation undermined the reliability of the BPS and contributed to the September 8 event. Enforcement and NERC recognized, however, that after the event, and during the inquiry and investigation, SCE voluntarily began making improvements in its planning and operations, and implementing recommendations from the Report, that addressed many of the findings arising from the Report. In addition, SCE fully cooperated with Enforcement and NERC during the investigation.

11. As part of the investigation, Enforcement and NERC reviewed SCE's compliance program and discovered that SCE satisfies the criteria for an effective compliance program under the Commission's Penalty Guidelines.[6] Enforcement

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[5] *Arizona-Southern California Outages on September 8, 2011, Causes and Recommendations* (April 2012), *available at* http://www.ferc.gov/legal/staff-reports/04-27-2012-ferc-nerc-report.pdf.

[6] *Enforcement of Statutes, Orders, Rules and Regulations,* 132 FERC ¶ 61,216, § 1B2.1 (2010).

and NERC considered the following elements of SCE's compliance program: (1) SCE's NERC Compliance Program office is staffed by seventeen full time employees devoted to ensuring compliance with each Reliability Standard; (2) SCE conducts an annual self-assessment of its overall NERC compliance as well as monthly assessments of compliance with specific Reliability Standards; (3) Five of SCE's senior Officers are a part of SCE's NERC Executive Steering Team (EST). The EST team members are fully engaged in the compliance program and attend monthly status meetings with the director of the compliance program; and (4) SCE employees attend annual training sessions on NERC compliance and have opportunities to report and raise compliance issues, including through an anonymous Hotline maintained by a third party.

IV. VIOLATION

12. Enforcement and NERC determined that SCE violated Reliability Standard PRC-001-1 R4 because prior to the September 8 event it did not adequately coordinate the intertie separation scheme at the San Onofre switchyard with protection systems, including (1) the acceleration limits within the turbine control systems on the two SONGS generators; and (2) the UFLS program of its neighbor, SDG&E. Prior to the event, SCE had not conducted studies to assess the scheme's impact on reliability. Prior to the event, SCE also had not conducted studies to assess the scheme's impact on the acceleration of the SONGS units, or the impact to an already severely compromised system. As a result, SCE did not know how the initiation of the scheme would impact reliability, including whether the scheme would result in the tripping of the SONGS generators or how it might affect the ability of SDG&E's UFLS program to arrest extreme frequency decline, as described in paragraphs 6, 7, and 8 above.

V. REMEDIES AND SANCTIONS

13. SCE stipulates to the facts as described in Section II of the Agreement, but neither admits nor denies Enforcement's and NERC's findings that its conduct violated the Reliability Standard specified in Section IV. For purposes of settling any and all civil and administrative disputes within the jurisdiction of the Commission arising from reliability issues related to the September 8 event and Enforcement and NERC's investigation, SCE agrees to the remedies set forth in the following paragraphs.

A. Civil Penalty

14. SCE shall pay a total civil penalty of $650,000, of which $250,000 shall be paid, divided in equal amounts, to the United States Treasury and NERC within ten days of the Effective Date of the Agreement. Enforcement and NERC agree to give SCE a partial civil penalty offset for the remaining $400,000 in exchange for

SCE agreeing to implement the Reliability Enhancements set forth in Section V.B. The value of the Reliability Enhancements is expected to substantially exceed the amount of the offset.

B. Reliability Enhancements

15. In exchange for the $400,000 offset, as Reliability Enhancements, SCE shall provide the RE and/or RC with three Full-Time Equivalent (FTE) technical employees for a total of 6,240 hours to assist the RE and/or RC with their efforts in response to the September 8 event.

16. As part of the Reliability Enhancements, SCE employees will participate in regional study groups and various RE, RC, and/or NERC reliability initiatives, created in response to and for the purpose of improving reliability after the September 8 event. SCE, the RE, and/or RC will agree on the skill set of the employees to be shared and the employees' projects and tasks.

17. The scope and nature of the projects and tasks to be performed by the aforementioned SCE employees shall be approved by Enforcement and NERC, such approval not to be unreasonably withheld. SCE shall complete the Reliability Enhancements by December 31, 2016.

18. If SCE has not performed the Reliability Enhancements by December 31, 2016, or determines, prior to December 31, 2016, that it cannot reach an agreement with the RE and/or RC on the projects or tasks to be performed, SCE shall subtract from $400,000 the cash value of the services, if any, already performed, and pay the remaining sum in equal shares to the United States Treasury and NERC. The calculation of the sum due to Treasury and NERC, including the cash value of the services, and the identification of the services to be credited, are subject to review and approval by Enforcement and NERC.

C. Completed and Required Mitigation

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20. SCE has completed multiple mitigation measures and has also agreed to implement multiple additional mitigating measures aimed at improving its coordination of Covered Protection Systems, including intertie overload separation schemes.[8]

21. Following the September 8 event, SCE undertook an expedited technical and physical evaluation of all its intertie overload separation schemes, to ensure that such schemes and the schemes' settings were properly coordinated across its transmission system. Based on this evaluation and to the extent necessary to ensure proper coordination, SCE changed the settings on some schemes, and disabled and removed others.

22. In addition to any requirements under the Reliability Standards related to protection systems, starting in 2014, SCE agrees to conduct a detailed study of twenty percent of its existing and planned Covered Protection Systems each year with 100 percent of the studies to be completed by December 31, 2018. SCE will prioritize its assessment of intertie overload separation schemes and will complete its assessment of such schemes by December 31, 2015. This assessment shall consider (1) the purpose and limitations of Covered Protection Systems; (2) the necessity of Covered Protection Systems; (3) the classification of Covered Protection Systems; (4) coordination of Covered Protection Systems with other devices and systems; (5) impact of Covered Protection Systems on internal and external elements; (6) whether Covered Protection Systems have unintended reliability consequences; (7) whether SCE's Underfrequency Load Shedding program is effective and consistent with the RE's Off-Nominal Frequency Load

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[7] This section on Protection System coordination applies to the following Protection Systems: (1) internal to SCE's system, Special Protection Systems (including intertie overload separation schemes), overload Protection Systems on transmission equipment, and overload Protection Systems that studies show affect the BPS; and (2) external to SCE's system, Protection Systems that are known to affect SCE's operations (referred to as "Covered Protection Systems").

[8] SCE has identified its intertie overload separation schemes that remain in service, and Enforcement, NERC, and SCE maintain a list of such schemes confidentially.

Shedding plan; and (8) affected generators' response to activation of Covered Protection Systems.

23. SCE further agrees to share relevant information, including Covered Protection System settings, from the foregoing assessments with impacted entities and the Reliability Coordinator. To the extent SCE learns from the assessments that any Covered Protection Systems have degraded or have the potential to not operate as designed, SCE will immediately share this information with impacted entities and the Reliability Coordinator.

Effect of Protection Systems on Transmission Facility Loadability

24. SCE agrees to implement mitigation measures aimed at ensuring that its protection system relay settings do not limit the loadability of its transmission facilities. Specifically, in its 2016 Annual Transmission Reliability Assessment, and each year thereafter, SCE will review its transmission facility SOLs to ensure that they account for protection system relay settings and that they are equal to the most limiting operating criteria during all timeframes, including restoration. SCE will also identify instances where its relay trip points are set too close to transmission facility emergency ratings and to develop plans to mitigate such instances.

Protection System Training

25. SCE agrees to broaden its protection system training program. SCE has provided its transmission operators training on internal protection systems since before the September 8 event. Within six months of the Effective Date of the Agreement, SCE agrees to review this training to ensure it covers the purpose and limitations of Covered Protection Systems, the settings of Covered Protection Systems, and the impact of Covered Protection Systems on internal and external elements. SCE also agrees to expand this training within one year of the completion of the assessment described in Paragraph 22 to cover external protection systems, as identified by SCE, the CAISO, or any adjacent entity, that are likely to impact SCE's system reliability.

ii. Mitigation Related to Long-Term Planning

Consideration of Critical System Conditions in Long-Term Planning Assessments

26. Within one year of the Effective Date of the Agreement, SCE agrees to implement several steps (described below in paragraphs 27-30) to ensure that its long-term planning assessments consider critical system conditions, including expected system transfers above firm, expected internal and external generation dispatch, the impact of internal and external facilities, transmission facilities

operated below 100 kV, local distribution facilities operated below 100 kV that are known to impact the BPS, and the impact of active protection and control devices.

27. Regarding expected system transfers above firm, SCE agrees to include in its long-term studies additional sensitivities by varying generation and load to stress system transfers.

28. To ensure it considers expected internal and external generation dispatch levels in its long-term planning studies, SCE agrees to simulate combinations of various generator outages in its transmission area as well as neighboring areas that could impact its system.

29. SCE also agrees to improve its long-term planning process by ensuring that it considers internal and external facilities operated below 100 kV, where those facilities operate in parallel with facilities above 100 kV or have the potential to affect BPS reliability.[9] For example, SCE agrees to begin utilizing the RE's new base case coordination system to develop cases that include 69 kV facilities and to monitor contingencies involving facilities operated at 69 kV and above in SDG&E's, IID's, and APS's territories that have an impact on SCE's system.

30. SCE agrees to update its contingency files of its various Special Protection Systems (SPS)/Remedial Action Schemes (RAS) for its annual long-term planning studies. Also, it will continue to support the work and respond to data requests of the RE's Modeling SPS and Relays Ad-hoc Task Force to incorporate selected relays into base cases.

Analyses and Benchmarking of Past Planning Studies

31. On a going forward basis, SCE agrees to benchmark annually the prior year's planning studies against actual system operating conditions and look and account for higher stress conditions not captured in its annual assessments, such as unusual generation and import patterns, higher than expected load patterns, and contingencies that may have occurred and were not evaluated. SCE agrees to share information from its benchmarking analyses with impacted entities, CAISO, and the Reliability Coordinator.

iii. Mitigation Related to Situational Awareness

Greater Coordination to Improve Situational Awareness

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[9] Inclusion of transmission facilities operated below 100 kV in the mitigation measures pursuant to the Agreement shall have no effect on any current or future analysis regarding whether these facilities comprise part of the BPS.

32. SCE agrees to implement various mitigating measures to improve its coordination efforts with neighboring entities as a way of strengthening its situational awareness. When provided with additional system information for coordination, SCE will have greater capability to assess information, including in the next-day and real-time timeframes, that could impact its system.

33. When released by Peak Reliability for usage, SCE agrees to ensure that its operators and operating engineers utilize, on a daily basis, relevant elements of Peak Reliability's new data sharing portal, which contains next-day studies, historical archives, and data from the Western Interconnection Synchrophasor Project. When released for entity use by Peak Reliability the phasor measurement data will provide operators visibility of system conditions in near real-time and may enable early detection of problems that could lead to cascading outages.

Expanded Situational Awareness

34. To the extent SCE has not already done so, within six months of the Effective Date of the Agreement, SCE also agrees to undertake efforts to identify internal and external elements that impact its portion of the BPS, including facilities operated below 100 kV. In addition, to the extent it has not already done so, SCE agrees to identify all internal elements, including elements operated below 100 kV, that impact external BPS elements, and to notify impacted entities and the Reliability Coordinator of such elements. All such elements shall be included in its models for monitoring in its seasonal, next-day, current-day, and real-time studies. SCE has also received and continues to receive Inter-Control Center Communications Protocol (ICCP) data from neighbors to further improve its transmission models with real-time, verified data on facilities that impact its system.

Response to Impaired Situational Awareness

35. Within six months of the Effective Date of the Agreement, SCE agrees to improve its procedures for responding to the impairment of its monitoring capabilities. These procedures maintain plans for the loss of SCADA/EMS, RTCA, and the loss of communication. They also cover plans for communicating with the Reliability Coordinator and neighboring entities in case SCE loses situational awareness. SCE also agrees to revise its procedures governing the exchange of information regarding the loss or change in service status of critical facilities with the Reliability Coordinator and other impacted entities. SCE will complete operator training on all of these new processes within one year of the Effective Date of the Agreement.

D. Compliance Monitoring

36. SCE shall make semi-annual reports to Enforcement and NERC until all of the mitigation measures and Reliability Enhancements, identified in the Agreement, have been fully implemented and verified by Enforcement and NERC. The first semi-annual report shall cover the first six month period after the Effective Date of the Agreement and shall be submitted to Enforcement and NERC staff within thirty days of the expiration of that period. The subsequent report(s) shall be due in six month increments thereafter. Each report shall detail the following: (1) actions taken as of the date of the report to satisfy the terms of the Agreement, including all mitigation items and Reliability Enhancements; (2) actions taken to improve reliability compliance, including investments in new measures and training activities during the reporting period; and (3) any additional violations of Reliability Standards that have occurred and whether and how SCE has addressed those new violations. The reports must include an affidavit executed by an officer of SCE that the compliance reports are true and accurate and also include corroborative documentation or other satisfactory evidence demonstrating or otherwise supporting the content of these reports. Enforcement and NERC staff may require additional semi-annual reporting if circumstances indicate the need for further monitoring or if SCE has not yet completed all the mitigation measures described in this Section.

VI. TERMS

37. The "Effective Date" of the Agreement shall be the date on which the Commission issues an order approving the Agreement without material modification. When effective, the Agreement shall resolve all reliability matters relating to the September 8 event within the jurisdiction of the Commission, and that arose on or before the Effective Date, as to SCE or any affiliated entity.

38. Commission approval of the Agreement without material modification shall release SCE and forever bar the Commission and NERC from holding SCE, any affiliated entity, and any successor in interest to SCE liable for any and all administrative or civil claims arising out of the reliability issues related to the September 8 event or conduct addressed and stipulated to in the Agreement that occurred on or before the Agreement's Effective Date.

39. Failure to make timely civil penalty payments or to comply with the mitigation, Reliability Enhancements, and monitoring agreed to herein, or any other provision of the Agreement, shall be deemed a violation of a final order of the Commission issued pursuant to the Federal Power Act (FPA), 16 U.S.C. §792, *et seq.*, and may subject SCE to additional action under the enforcement provisions of the FPA.

40. If SCE does not make the civil penalty payment described above at the time

agreed by the parties, interest payable to the United States Treasury and NERC shall begin to accrue pursuant to the Commission's regulations at 18 C.F.R. § 35.19(a)(2)(iii) (2014) from the date that payment is due, in addition to the penalty specified above and any other enforcement action and penalty that the Commission or NERC may take or impose.

41. The Agreement binds SCE and its agents, successors, and assignees. The Agreement does not create any additional or independent obligations on SCE, or any affiliated entity, its agents, officers, directors, or employees, other than the obligations identified in the Agreement.

42. The signatories to the Agreement agree that they enter into the Agreement voluntarily and that, other than the recitations set forth herein, no tender, offer or promise of any kind by any member, employee, officer, director, agent or representative of Enforcement, NERC, or SCE has been made to induce the signatories or any other party to enter into the Agreement.

43. Unless the Commission issues an order approving the Agreement in its entirety and without material modification, the Agreement shall be null and void and of no effect whatsoever, and Enforcement, NERC, and SCE shall not be bound by any provision or term of the Agreement, unless otherwise agreed to in writing by Enforcement, NERC, and SCE.

44. SCE agrees that the Commission's order approving the Agreement without material modification shall be a final and unappealable order assessing a civil penalty under the Federal Power Act. SCE waives findings of fact and conclusions of law, rehearing of any Commission order approving the Agreement without material modification, and judicial review by any court of any Commission order approving the Agreement without material modification.

45. The Agreement can be modified only if in writing and signed by Enforcement, NERC, and SCE, and any modifications will not be effective unless approved by the Commission.

46. Each of the undersigned warrants that he or she is an authorized representative of the entity designated, is authorized to bind such entity and accepts the Agreement on the entity's behalf.

47. The undersigned representative of SCE affirms that he or she has read the Agreement, that all of the matters set forth in the Agreement are true and correct to the best of his or her knowledge, information and belief, and that he or she understands that the Agreement is entered into by Enforcement and NERC in express reliance on those representations.

48. The Agreement may be signed in counterparts.

49. The Agreement is executed in triplicate, each of which so executed shall be deemed to be an original.

Agreed to and accepted:

_____
Larry D. Gasteiger
Acting Director, Office of Enforcement
Federal Energy Regulatory Commission

Date: _____

_____
Charles A. Berardesco
Senior Vice President, General Counsel and Corporate Secretary
North American Reliability Corporation

Date: _____

_____
Pete Dietrich
Senior Vice President , Transmission & Distribuition
Southern California Edison Company

Date: 09/22/2014

[redacted]

From: [redacted]
Sent: Thursday, October 02, 2014 3:20 PM
To: 'John.Pespisa@sce.com'
Cc: [redacted]
Subject: Civil Penalty Payment Instructions
Attachments: Civil Penalty Payment Instructions.doc

John,

While we still do not anticipate that the order will be approved until next week at the earliest (and we'll keep you posted as much as possible), I wanted to go ahead and send you the civil penalty payment instructions – I thought it might be helpful for you to have these now rather than wait until the order goes through and the ten days starts running. Please let me know if you have any questions. Thanks.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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FEDERAL ENERGY REGULATORY COMMISSION
CIVIL PENALTY PAYMENT INSTRUCTIONS

Make your check or money order payable to U.S. Treasury-FERC. On your check or money order, please write the Docket Number identified on the Commission's order. FERC's Federal ID Number is 52-1383541. Payment must be received by the due date to avoid penalty. Correspondence sent to the addresses noted below will NOT be received by FERC staff. You may confirm receipt of payment by contacting Norman Richardson at 202-502-6219.

Payment methods include the following:

ACH Credit: Federal Reserve Bank of Richmond
ABA Number 051036706
FERC's Account Number 540032
Docket No.

Courier: US Bank
Attn: Government Lockbox
1005 Convention Plaza
SL-MOC1GL
St. Louis, MO 63101
Docket No.

Wire: Federal Reserve Bank of NYC
ABA Number 021030004
Beneficiary FERC: 89000004
Docket No.

Mail: Federal Energy Regulatory Commission
Docket No.
P. O. Box 979010
St. Louis, MO 63197-9000

54

[redacted]

From: John.Pespisa@sce.com
Sent: Tuesday, October 14, 2014 10:55 AM
To: [redacted]
Cc: [redacted]
Subject: Re: Out of the Office

Thank you for letting me know...

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "'John.Pespisa@sce.com'" <John.Pespisa@sce.com>,
Cc: [redacted]
Date: 10/14/2014 06:24 AM
Subject: Out of the Office

John,

I am going to be out of the office starting this afternoon through next Monday, October 20. While I am out, [redacted] will keep you posted regarding the timing of the order. Feel free to contact her with any questions in the meantime. Thanks. [redacted] direct office number is [redacted]

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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55

[redacted]

From: John.Pespisa@sce.com
Sent: Monday, March 18, 2013 12:50 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Your call

Thanks for the note, needed to make reservations for the other meeting and did not want to miss an opportunity.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: John.Pespisa@sce.com
Cc: [redacted]
Date: 03/18/2013 09:43 AM
Subject: Your call

John,

I got your message. I'm not available on the specific days you mentioned due to a prior commitment, but we do hope to be able to begin discussions with you soon. We anticipate that we can begin them by phone, but of course if SCE representatives would like to meet with us in person, we would be happy to do so.

[redacted]

Attorney-Advisor

Federal Energy Regulatory Commission

Office of Enforcement | Division of Investigations
888 First Street, N.E.
Washington, DC 20426
Direct Dial: +1[redacted]

Fax: +1.[redacted]

Email: [redacted]

http://www.ferc.gov

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[redacted]

56

From: Demetra Anas
Sent: Thursday, May 30, 2013 4:12 PM
To: Lipson, Kevin J.
Cc: [redacted]
Subject: RE: SCE Meeting

My apologies that [redacted] won't be back on the 10th. I am out Friday (tomorrow), but if you need to reach me -- call me on my cell at [redacted].

Deme Anas
Division of Investigations
Office of Enforcement
202-502-8178
-----Original Message-----
From: Lipson, Kevin J. [mailto:kevin.lipson@hoganlovells.com]
Sent: Wednesday, May 29, 2013 8:13 PM
To: demetra.anas@ferc.gov
Subject: SCE Meeting

Deme: does June 10 work? That date was a part of your originally-proposed dates. Please advise. Best, Kevin.

Sent from my iPhone

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57

[redacted]

From: Lipson, Kevin J.
Sent: Thursday, June 27, 2013 4:33 PM
To: [redacted]
Cc: Lilyestrom, John R.; [redacted]
Subject: Re: SCE

Please call him directly.

Sent from my iPhone

On Jun 27, 2013, at 4:23 PM, "[redacted] wrote:

Kevin,

I just received a voicemail message from John Pespisa at SCE, asking to talk about our meeting next week. Are you okay with me calling him directly, or would you like to be included in any such discussions. Please just let me know what you prefer. I am happy to talk with John, but, of course, understand if you want to be included.

Thanks.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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58

[redacted]

From: [redacted]
Sent: Thursday, June 27, 2013 10:55 AM
To: john.lilyestrom@hoganlovells.com
Cc: [redacted]
Subject: Meeting with SCE -- July 2 at 10 AM

John,

We are going to be in Room 3M-2A next week for our meeting with SCE. Can you provide me with a list of attendees on your end so I can provide the list to our security folks? Thanks.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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[redacted]

From: [redacted]
Sent: Tuesday, July 16, 2013 12:50 PM
To: john.pespisa@sce.com
Cc: [redacted]
Subject: Your Voicemail Message

John,

I received your voicemail message. Here is the list of FERC and NERC staff in attendance at our July 2nd meeting in DC:

- [redacted], Office of Enforcement (OE)
- [redacted] OE
- Demetra Anas, OE
- [redacted], OE
- [redacted], OE
- [redacted], Office of Electric Reliability (OER)
- [redacted] (OER)
- Sean Bodkin, NERC
- Jim Stuart, NERC (participated by phone)

As for your request for a "due date" for a settlement proposal from SCE, let me just reiterate that there is no due date, as we do not know exactly when we will be seeking authority from the Commission. As we said last week, however, I think you will be safe if you get us something this week, including by close of business Friday.

Thanks, John.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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60

[redacted]

From: John.Pespisa@sce.com
Sent: Tuesday, July 16, 2013 12:54 PM
To: [redacted]
Cc: [redacted]; Erin.Moore@sce.com
Subject: Re: Your Voicemail Message

[redacted],

Thanks for the quick reply. Understood on the due date. SCE's intention is to have a settlement response to FERC by COB Friday.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]>
To: john.pespisa@sce.com
Cc: [redacted]
Date: 07/16/2013 09:50 AM
Subject: Your Voicemail Message

John,

I received your voicemail message. Here is the list of FERC and NERC staff in attendance at our July 2nd meeting in DC:

- [redacted], Office of Enforcement (OE)
- [redacted], OE
- Demetra Anas, OE
- [redacted], OE
- [redacted] OE
- [redacted], Office of Electric Reliability (OER)
- [redacted] (OER)
- Sean Bodkin, NERC
- Jim Stuart, NERC (participated by phone)

As for your request for a "due date" for a settlement proposal from SCE, let me just reiterate that there is no due date, as we do not know exactly when we will be seeking authority from the Commission. As we said last week, however, I think you will be safe if you get us something this week, including by close of business Friday.

Thanks, John.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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61

[redacted]

From: [redacted]
Sent: Monday, July 22, 2013 6:57 AM
To: [redacted]; Demetra Anas; [redacted]; [redacted]
Subject: Fwd: Southern California Edison Settlement
Attachments: SCE Settlement 7.19.13.pdf

All,

Here is SCE's settlement proposal. I'm out on AWS today, but back in the office the rest of the week.

---------- Forwarded message ----------
From:
Date: Friday, July 19, 2013
Subject: Southern California Edison Settlement
To: [redacted]>
Cc: Erin.Moore@sce.com, John Pespisa <john.pespisa@sce.com>

[redacted]

Please find SCE's settlement attached below.

I will be in DC Monday evening through Tuesday evening.

Please give me a call if you would like to discuss.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

--

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

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62

[redacted]

From: John.Pespisa@sce.com
Sent: Tuesday, July 23, 2013 2:32 PM
To: [redacted]
Cc: [redacted]; sean.bodkin@nerc.net
Subject: RE: Southern California Edison Settlement

I am checking with the team. I will get back by the end of the day.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: John.Pespisa@sce.com
Cc: [redacted] sean.bodkin@nerc.net
Date: 07/23/2013 11:23 AM
Subject: RE: Southern California Edison Settlement

John,

Are you available this Thursday, July 25, at 1 PM Eastern Time (10 AM your time) for a call with Sean, [redacted], and me? While we do not have an official response yet on your submission, we would like to provide some initial feedback and thoughts. Thanks.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Friday, July 19, 2013 11:11 PM
To: [redacted]
Cc: Erin.Moore@sce.com; John Pespisa
Subject: Southern California Edison Settlement

[redacted]

Please find SCE's settlement attached below.

I will be in DC Monday evening through Tuesday evening.

Please give me a call if you would like to discuss.

John

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John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

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[redacted]

From: [redacted]
Sent: Wednesday, July 24, 2013 10:35 AM
To: John.Pespisa@sce.com
Cc: [redacted]; sean.bodkin@nerc.net
Subject: RE: Call-In Information

Yes, we have it and might want to discuss it on the call tomorrow.◆ Thanks.
◆

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Wednesday, July 24, 2013 10:34 AM
To: [redacted]
Subject: Re: Call-In Information
◆

[redacted] do you still have the RTDS presentation SCE sent you in Feb?

◆ **From:** [redacted]
◆ **Sent:** 07/24/2013 09:44 AM AST
◆ **To:** John Pespisa
◆ **Cc:** [redacted]>; sean.bodkin@nerc.net
◆ **Subject:** Call-In Information

◆
John,
◆
Here is the call-in information for your call with staff tomorrow at 1 PM Eastern Time:
◆
From outside Local Wash, DC area 1-877-857-1347
◆
Meeting ID: 5921
◆

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[redacted]

From: [redacted]
Sent: Thursday, August 01, 2013 2:29 PM
To: John.Pespisa@sce.com
Cc: [redacted]
Subject: RE: September 8, 2011 Outage: Revised Proposed Settlement Letter

John,

Thanks for the call today. I just wanted to give you a head's up that I will be out of the office on Monday, so, to the extent you get back to us then, please include [redacted] in your communication. Thanks.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Thursday, August 01, 2013 12:38 PM
To: [redacted]
Subject: RE: September 8, 2011 Outage: Revised Proposed Settlement Letter

use 626-302-2467

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]>
To: John.Pespisa@sce.com
Date: 08/01/2013 09:36 AM
Subject: RE: September 8, 2011 Outage: Revised Proposed Settlement Letter

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No, just [redacted] and me from one phone.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Thursday, August 01, 2013 12:24 PM
To: [redacted]
Subject: RE: September 8, 2011 Outage: Revised Proposed Settlement Letter

Will you have people from multiple phones calling in?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]>
To: John.Pespisa@sce.com
Cc: Erin.Moore@sce.com
Date: 08/01/2013 05:01 AM
Subject: RE: September 8, 2011 Outage: Revised Proposed Settlement Letter

Information withheld pursuant to FOIA Exemption 6.

Thanks.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Wednesday, July 31, 2013 7:04 PM
To: [redacted]
Cc: Erin.Moore@sce.com
Subject: September 8, 2011 Outage: Revised Proposed Settlement Letter

[redacted],

Attached is SCE's revised settlement offer. Feel free to call me with any questions.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

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[redacted]

From: [redacted]
Sent: Monday, August 26, 2013 2:19 PM
To: Lilyestrom, John R.
Cc: [redacted]; Demetra Anas
Subject: RE: SCE

Great. Can we call you at 10:00 AM tomorrow?

From: Lilyestrom, John R. [mailto:john.lilyestrom@hoganlovells.com]
Sent: Monday, August 26, 2013 2:17 PM
To: [redacted]
Cc: [redacted]; Demetra Anas
Subject: RE: SCE

[redacted],

Yes, any time tomorrow morning works best for me.

John Lilyestrom
Partner

Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004

Tel: +1 202 637 5600
Direct: +1 202 637 5633
Fax: +1 202 637 5910
Email: john.lilyestrom@hoganlovells.com
www.hoganlovells.com

Please consider the environment before printing this e-mail.

From: [redacted]
Sent: Monday, August 26, 2013 2:15 PM
To: Lilyestrom, John R.
Cc: [redacted]; Demetra Anas
Subject: SCE

John,

Do you have time for a call this afternoon or tomorrow morning to discuss SCE?

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement

Information withheld pursuant to FOIA Exemption 6.

Federal Energy Regulatory Commission
[redacted]

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Information withheld pursuant to FOIA Exemption 6.

[redacted]

From: John.Pespisa@sce.com
Sent: Thursday, September 05, 2013 2:02 PM
To: [redacted]
Subject: Re: Your Message

Can you call me at 6266886291, I am at one of our substations today and don't have your number with me.

John

From: [redacted]
Sent: 09/05/2013 12:35 PM AST
To: John Pespisa; [redacted]>
Subject: RE: Your Message

[redacted] is out for the holiday today but I would be available.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Thursday, September 05, 2013 12:30 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Your Message

[redacted],
Left you a VM this morning, you available for a quick call at 2pm your time?

John

From: [redacted]
Sent: 09/04/2013 02:45 PM AST
To: John Pespisa
Cc: [redacted]>
Subject: RE: Your Message

Okay, thanks. Call my office.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Wednesday, September 04, 2013 2:45 PM
To: [redacted]
Subject: Re: Your Message

Information withheld pursuant to FOIA Exemption 6.

Let's say 4 your time.

From: [redacted]
Sent: 09/04/2013 02:42 PM AST
To: John Pespisa
Cc: [redacted]>
Subject: RE: Your Message

Okay. Are you available for a call with [redacted] and me this afternoon? I am here until 5 PM ET.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Wednesday, September 04, 2013 2:40 PM
To: [redacted]
Subject: Re: Your Message

Yes he knows I am calling.

From: [redacted]]
Sent: 09/04/2013 02:38 PM AST
To: John Pespisa
Cc: [redacted]>
Subject: Your Message

John,

I received your voicemail message. I apologize for the delay – I was actually on a mini-vacation in California.

We have been dealing with your outside counsel, John Lilyestrom, lately and before returning your call, I want to be sure that he is okay with us communicating directly. Does he know that you reached out to us?

Thanks, John.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
202-502-6768

Information withheld pursuant to FOIA Exemption 6.

[redacted]

From: [redacted]
Sent: Wednesday, March 21, 2012 4:00 PM
To: Arizona-Southern California Outage Inquiry
Subject: FW: Document

FYI – regarding the status of the SCE document I emailed about on Monday.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Wednesday, March 21, 2012 3:35 PM
To: [redacted]
Subject: RE: Document

Should have it out Monday, but might be able to get it out Friday if we can get the execs to approve quicker. I guess it was something your folks felt they could use?

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: "[redacted]
To: <John.Pespisa@sce.com>
Date: 03/21/2012 06:00 AM
Subject: RE: Document

Thanks, John.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Wednesday, March 21, 2012 8:55 AM
To: [redacted]
Subject: Re: Document

It is going through our exec review, let me see where it is at and I will get you a date.

From: "[redacted]
Sent: 03/21/2012 08:08 AM AST
To: John Pespisa
Subject: Document

John,

Just checking in to see when you think we might receive the document that you mentioned on Monday about the separation scheme. Thanks.

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68

[redacted]

From: Cherise Ojo
Sent: Wednesday, March 28, 2012 7:16 AM
To: 'Dworzak, David'; 'connor.flanigan@sce.com'; 'john.pespica@sce.com'; 'Neil.Shockey@sce.com'
Cc: 'Fama, Jim'; 'akbar.jazayeri@sce.com'; [redacted]
Subject: RE: March 28 meeting at FERC

All:

The conference has been confirmed for Wednesday, March 28th from 2pm to 4pm. On the day of the meeting, you must notify security that you are here for the conference in Hearing Room 2. The address and an optional call in number are provided below. Feel free to notify me of any questions you may have before the meeting.

Address:
Federal Energy Regulatory Commission
Hearing Room 2
888 First Street, N.E.
Washington, DC 20426

Conference Call In Number:
From an Internal phone 6888
From within local Wash, DC area 202-502-6888
From outside Local Wash, DC area 1-877-857-1347
Meeting ID: 5567
Password: Not required

Thanks,
Cherise

From: Dworzak, David [mailto:DDworzak@eei.org]
Sent: Tuesday, March 27, 2012 4:43 PM
To: Cherise Ojo; [redacted]
Cc: Fama, Jim; connor.flanigan@sce.com; john.pespica@sce.com; Neil.Shockey@sce.com; akbar.jazayeri@sce.com
Subject: March 28 meeting at FERC

Cherise;

Many apologies for the late request, Southern California Edison Co. is interested in participating in the March 28 meeting on the AZ/CA outage with the following personnel:

Connor Flanigan
Manager, Federal Regulatory Affairs
Southern California Edison Co.
connor.flanigan@sce.com

John Pespisa
Director, NERC Compliance
Southern California Edison Co.

Information withheld pursuant to FOIA Exemption 6.

john.pespisa@sce.com

Neil Shockey
Manager, Reliability Standards Compliance
Southern California Edison Co.
neil.shockey@sce.com

We understand that Mr. Flanigan and Mr. Pespica plan to attend the meeting in person. Mr. Shockey plans to use the conference call facility.

Again, we apologize for the lateness of our request, and appreciate your ability to accommodate.

[redacted]

From: John.Pespisa@sce.com
Sent: Monday, April 30, 2012 4:16 PM
To: [redacted]
Cc: Sean Bodkin
Subject: Re: Call-In Information

Thank You

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: <John.Pespisa@sce.com>
Date: 04/30/2012 01:15 PM
Subject: Call-In Information

John,

Here is the call-in information:

Call in number: 1-800-369-1885
Pass Code: 96533
Leader: [redacted]

Information withheld pursuant to FOIA Exemption 6.

70

[redacted]

From: John.Pespisa@sce.com
Sent: Wednesday, May 09, 2012 12:46 PM
To: [redacted]
Subject: Re: Call Tomorrow

[redacted], can we shoot for tomorrow? My folks got called into a business line meeting.

John

From: "[redacted]
Sent: 05/08/2012 03:31 PM AST
To: John Pespisa
Subject: Call Tomorrow

John,

Can we have a brief call (I'm thinking no more than 15 minutes) tomorrow at either 10:30 AM or 11 AM your time?

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21

[redacted]

From: [redacted]
Sent: Tuesday, August 21, 2012 9:57 AM
To: John.Pespisa@sce.com
Cc: [redacted]
Subject: RE: Time for a quick call?

John, we can do 1:45. Call me or [redacted] when you get here and we'll come get you.

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Monday, August 20, 2012 2:21 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Time for a quick call?

Sure,
I am here in DC, at the FERC office in meetings from 3 p.m. until 5 p.m. I could meet you there or call after 5 p.m. By the way we are meeting with the Chairman at 3:30 p.m. on this issue, so if this is important, give me a call. My cell is 626-688-6291

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: john.pespisa@sce.com
Cc: [redacted]
Date: 08/20/2012 10:49 AM
Subject: Time for a quick call?

John,

I know you may be traveling today, but do you have time for a brief discussion about the handout you shared with [redacted]? It shouldn't take more than a few minutes. I can be reached at below number or cell [redacted] after 5 p.m.

[redacted]

Attorney-Advisor

Federal Energy Regulatory Commission

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Office of Enforcement | Division of Investigations
888 First Street, N.E.
Washington, DC 20426
Direct Dial: +1[redacted]

Fax: +1.[redacted]

Email: [redacted]

http://www.ferc.gov

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72

[redacted]

From: Akbar.Jazayeri@sce.com
Sent: Friday, September 16, 2011 2:35 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Data Retention to Southern California Edison
Attachments: Document_Retention_SCE.pdf

Attached is Southern California Edison Company's confirmation that it will comply with the data preservation directive in your letter of September 12, 2011 to me. Please let me know if you have any questions or need a hard copy of this response mailed to you.

(See attached file: Document_Retention_SCE.pdf)

From: "[redacted]
To: <Akbar.Jazayeri@sce.com>
Cc: [redacted], [redacted]

Date: 09/12/2011 03:04 PM
Subject: Data Retention to Southern California Edison

Attached please find a data retention letter issued by the Office of Enforcement of the Federal Energy Regulatory Commission to Southern California Edison. Please let me know if you have any questions.

Thank you.

<<Data Retention SCE.pdf>>

[redacted]

Attorney

Division of Investigations

Office of Enforcement

Federal Energy Regulatory Commission

(202) [redacted][attachment "Data Retention SCE.pdf" deleted by Akbar Jazayeri/SCE/EIX]

Information withheld pursuant to FOIA Exemption 6.

SOUTHERN CALIFORNIA
EDISON
An EDISON INTERNATIONAL Company

Akbar Jazayeri
Vice President of
Regulatory Operations
Akbar.Jazayeri@SCE.com

September 16, 2011

[redacted]
Office of Enforcement
Federal Energy Regulatory Commission
888 First St., N.E.
Washington, D.C. 20426

Re: Direction to Southern California Edison to Preserve Documents

Dear [redacted]

Southern California Edison Company has received your letter of September 12, 2011, in which the Division of Investigations of the Office of Enforcement of the Federal Energy Regulatory Commission directed SCE to preserve and maintain all documents and information related to the September 8, 2011 power outages affecting parts of California, Arizona, and Mexico. SCE hereby confirms that it will comply with this directive. SCE has taken initial steps to identify the scope of documents that may be relevant and identify the personnel who may have this data in their possession, and SCE has started implementing its standard procedures for retaining this data. It should be noted, however, that certain electronic documents related to the outages, particularly electronic mail, may have been deleted in the ordinary course of business prior to the receipt of your September 12 letter or prior to our reasonable ability to implement the preservation measures requested in it. Further, while SCE has retained the Digital Fault Recorder (DFR) data for the DFRs that were triggered during the event, all other DFR data automatically deletes from that system every 30 days. SCE cannot suspend the automatic deletion feature of the DFRs. Therefore, if there is a need to review DFR data for SCE's system for the DFRs that did not trigger at the time of the event, that specific data must be requested before the 30 day automatic deletion period.

Please contact me if you have any questions about these efforts or need additional information.

Very truly yours,

Akbar Jazayeri

Akbar Jazayeri

P.O. Box 800 8631 Rush Street Rosemead, California 91770 (626) 302-3630 FAX (626) 302-2076

Information withheld pursuant to FOIA Exemption 6.

[redacted]

From: Ian.Adan@sce.com
Sent: Friday, October 14, 2011 6:46 PM
To: [redacted]
Cc: Aeri.Daniels@SCE.com
Subject: Fw: FedEx tracking number for DR

Hi [redacted], please see the email below sent on behalf of of Aeri Daniels. Thank you.

Ian Adan
Regulatory Policy & Affairs
NERC Compliance Program
Office: (626) 302-6702
Cell: (626) 260-3129
PAX: 26702
ian.adan@sce.com
----- Forwarded by Ian Adan/SCE/EIX on 10/14/2011 03:44 PM -----

From: Aeri Daniels/SCE/EIX
To: "Ian Adan" <ian.adan@sce.com>
Date: 10/14/2011 03:40 PM
Subject: Fw: FedEx tracking number for DR

Fyi

----- Original Message -----
From: Aeri Daniels
Sent: 10/14/2011 03:37 PM PDT
To: [redacted]
Subject: Fw: FedEx tracking number for DR

----- Original Message -----
From: Aeri Daniels
Sent: 10/14/2011 03:34 PM PDT
To: : [redacted]
Subject: FedEx tracking number for DR

[redacted]
Per our conversation, here is FedEx tracking number for the FERC Data Request. Please let me know if you have any questions. Thank you.

8704 1063 0890

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44

[redacted]

From: Akbar.Jazayeri@sce.com
Sent: Friday, December 09, 2011 12:51 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Data Request to SCE

I acknowledge receipt of the data request.

From: "[redacted]
Sent: 12/09/2011 12:18 PM EST
To: Akbar Jazayeri
Cc: "[redacted]
Subject: Data Request to SCE

Dear Mr. Jazayeri,

Attached please find a data request to SCE related to staff and NERC's inquiry into the September 8, 2011 power outages in Southern California, parts of Arizona, and Northern Baja Mexico. Please confirm receipt of this request and don't hesitate to contact me with any questions. Thanks.

<<12.9.2011 Data Request to SCE.pdf>>

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

75

[redacted]

From: [redacted]
Sent: Tuesday, December 13, 2011 3:38 PM
To: 'john.pespisa@sce.com'
Cc: [redacted]
Subject: Data Requests to SCE

John,

When you get a chance can you call me in the office or on my cell ([redacted])? I'd like to talk to you some more about SCE's proposed production schedule and about questions 43 and 44, which you asked about today. I'm in the office for another 25 minutes today, but can be reached on my cell later today. Thanks.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

[redacted]

76

From: [redacted]
Sent: Friday, May 16, 2014 7:38 AM
To: John.Pespisa@sce.com
Cc: [redacted]
Subject: RE: Reliability Enhancements

Follow Up Flag: Follow up
Flag Status: Completed

I am teleworking today, so I will call you. What times work for you?

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Thursday, May 15, 2014 8:53 PM
To: [redacted]
Cc: [redacted]
Subject: Re: Reliability Enhancements

Is there a time tomorrow I can call you to discuss our call with WECC.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: john.pespisa@sce.com,
Cc: [redacted]
Date: 05/14/2014 11:37 AM
Subject: Reliability Enhancements

John,

Have you had a chance to talk to your contact at WECC about SCE's proposed Reliability Enhancements related to the O&P5 process?

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

77

[redacted]

From: John.Pespisa@sce.com
Sent: Tuesday, October 14, 2014 10:55 AM
To: [redacted]
Cc: [redacted]
Subject: Re: Out of the Office

Thank you for letting me know...

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: "'John.Pespisa@sce.com'" <John.Pespisa@sce.com>,
Cc: [redacted]
Date: 10/14/2014 06:24 AM
Subject: Out of the Office

John,

I am going to be out of the office starting this afternoon through next Monday, October 20. While I am out, [redacted] will keep you posted regarding the timing of the order. Feel free to contact her with any questions in the meantime. Thanks. [redacted] direct office number is [redacted]

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

78

[redacted]

From: [redacted]
Sent: Tuesday, August 12, 2014 1:46 PM
To: 'John.Pespisa@sce.com'
Cc: [redacted] Sean.Bodkin@nerc.net
Subject: Draft Stipulation
Attachments: 8.12.2014 Draft Stipulation SCE - Copy.docx

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FOR SETTLEMENT PURPOSES ONLY

John,

Attached please find a revised Stipulation and Consent Agreement for SCE's consideration. This revision responds to SCE's proposed revisions to staff's initial draft. It also includes a few questions (highlighted) for SCE. Please let me know if you would like to discuss any of the questions or any other aspects of the draft. We are hopeful that we will be able to finalize the agreement with you quickly. Thanks.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

Sixteen (16) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

79

[redacted]

From: John.Pespisa@sce.com
Sent: Wednesday, September 03, 2014 1:24 PM
To: [redacted]
Cc: [redacted] Anna.Valdberg@sce.com; Erin.Moore@sce.com
Subject: SCE Draft Stipulation
Attachments: Draft Stipulation SCE 9.3.2014.docx

[redacted]

Attached is SCE's Draft Stipulation. Please feel free to give me a call with any questions.

Also, Erin Moore is out of the office this week, I have copied Anna Valdberg who is covering in her absence. Please include Anna in any correspondence.

Thank you.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

Information withheld pursuant to FOIA Exemption 6.

Seventeen (17) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

80

[redacted]

From: [redacted]
Sent: Friday, June 28, 2013 4:06 PM
To: [redacted];
[redacted]
Cc: Demetra Anas
Subject: FW: Meeting with SCE on Tuesday, July 2
Attachments: 2011 Outage Settlement Discussions.pptx

FYI. SCE will also provide us with its response to the CFE study issue, but that likely will come on Monday.

From: Erin.Moore@sce.com [mailto:Erin.Moore@sce.com]
Sent: Friday, June 28, 2013 4:01 PM
To: [redacted]
Cc: John.Pespisa@sce.com; Connor.Flanigan@sce.com
Subject: Meeting with SCE on Tuesday, July 2

[redacted]

Attached is the presentation that SCE plans to use in our meeting on Tuesday to walk through the discussion on the September 8, 2011 event. Please let me know if you have any questions or trouble opening the document. We will be traveling on Monday, but Connor Flanigan (copied on this note) will be available on Monday if you have any difficulties.

Thanks.

Erin

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Erin K. Moore
Senior Attorney
Southern California Edison Law Department
erin.moore@sce.com
Ph: (626)302-6848
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Information withheld pursuant to FOIA Exemption 6.

Eighteen (18) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

81

[redacted]

From: [redacted]
Sent: Monday, July 22, 2013 6:57 AM
To: [redacted]; Demetra Anas; [redacted];
[redacted]

Subject: Fwd: Southern California Edison Settlement
Attachments: SCE Settlement 7.19.13.pdf

All,

Here is SCE's settlement proposal. I'm out on AWS today, but back in the office the rest of the week.

---------- Forwarded message ----------
From:
Date: Friday, July 19, 2013
Subject: Southern California Edison Settlement
To: [redacted]
Cc: Erin.Moore@sce.com, John Pespisa <john.pespisa@sce.com>

[redacted]

Please find SCE's settlement attached below.

I will be in DC Monday evening through Tuesday evening.

Please give me a call if you would like to discuss.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

--

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

Four (4) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

82

[redacted]

From: John.Pespisa@sce.com
Sent: Tuesday, September 10, 2013 3:43 PM
To: [redacted]
Cc: [redacted] Erin.Moore@sce.com
Subject: SCE Settlement Letter
Attachments: FERC Settlement Letter.pdf

[redacted]

Attached is SCE's revised settlement offer. Feel free to call me with any questions.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

Information withheld pursuant to FOIA Exemption 6.

Four (4) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

83

[redacted]

From: John.Pespisa@sce.com
Sent: Friday, April 04, 2014 7:15 PM
To: [redacted]
Cc: Erin.Moore@sce.com
Subject: SCE Draft Stipulation Rev.docx
Attachments: SCE Draft Stipulation Rev.docx

[redacted]

Thank you for the opportunity to comment on this document. Erin and I can be available next week to discuss any of the modifications proposed.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

Information withheld pursuant to FOIA Exemption 6.

Fifteen (15) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

84

[redacted]

From: John.Pespisa@sce.com
Sent: Wednesday, September 03, 2014 1:24 PM
To: [redacted]
Cc: [redacted] Anna.Valdberg@sce.com; Erin.Moore@sce.com
Subject: SCE Draft Stipulation
Attachments: Draft Stipulation SCE 9.3.2014.docx

[redacted]

Attached is SCE's Draft Stipulation. Please feel free to give me a call with any questions.

Also, Erin Moore is out of the office this week, I have copied Anna Valdberg who is covering in her absence. Please include Anna in any correspondence.

Thank you.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

Information withheld pursuant to FOIA Exemption 6.

Seventeen (17) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

85

[redacted]

From: John.Pespisa@sce.com
Sent: Monday, January 07, 2013 4:42 PM
To: [redacted]
Cc: Demetra Anas; [redacted]; Ken Lotterhos; Sean Bodkin; Jennifer.Hasbrouck@sce.com; Akbar.Jazayeri@sce.com
Subject: SCE Preliminary Findings Letter response
Attachments: September 8 Incident Response Letter Final.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

[redacted]

Attached you will find SCE's response to FERC's Office of Enforcement Preliminary Findings Letter. Per our discussion, SCE will be sending a DVD via Fedex with the attachments referenced in the letter.

Thank you again for allowing SCE to participate in the settlement process. As the letter states, SCE welcomes further discussion regarding this issue and is willing to meet face to face if needed.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

From: [redacted]
To: John.Pespisa@sce.com
Cc: Ken Lotterhos <Ken.Lotterhos@nerc.net>, Sean Bodkin <Sean.Bodkin@nerc.net>, Demetra Anas <demetra.anas@ferc.gov>, [redacted]
Date: 12/06/2012 12:08 PM
Subject: Preliminary Findings Letter

John,

Please see the attached preliminary findings letter. A hard copy will also be mailed. Please feel free to contact [redacted] or me with any questions.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

[attachment "20121203 SCE Potentially Violated Standards and Violations.pdf" deleted by John Pespisa/SCE/EIX]

Information withheld pursuant to FOIA Exemption 6.

Fourteen (14) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

86

[redacted]

From: [redacted]
Sent: Monday, July 01, 2013 12:44 PM
To: sean.bodkin@nerc.net
Cc: [redacted]
Subject: FW: Meeting with SCE on Tuesday, July 2
Attachments: 2011 Outage Settlement Discussions.pptx

Sean,

Here is the first set from SCE.

From: Erin.Moore@sce.com [mailto:Erin.Moore@sce.com]
Sent: Friday, June 28, 2013 4:01 PM
To: [redacted]
Cc: John.Pespisa@sce.com; Connor.Flanigan@sce.com
Subject: Meeting with SCE on Tuesday, July 2

[redacted]

Attached is the presentation that SCE plans to use in our meeting on Tuesday to walk through the discussion on the September 8, 2011 event. Please let me know if you have any questions or trouble opening the document. We will be traveling on Monday, but Connor Flanigan (copied on this note) will be available on Monday if you have any difficulties.

Thanks.

Erin

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Erin K. Moore
Senior Attorney
Southern California Edison Law Department
erin.moore@sce.com
Ph: (626)302-6848
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Information withheld pursuant to FOIA Exemption 6.

Eighteen (18) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

87

[redacted]

From: [redacted]
Sent: Thursday, August 01, 2013 7:58 AM
To: [redacted]
Subject: FW: September 8, 2011 Outage: Revised Proposed Settlement Letter
Attachments: Revised Proposed Settlement.pdf

FYI

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Wednesday, July 31, 2013 7:04 PM
To: [redacted]
Cc: Erin.Moore@sce.com
Subject: September 8, 2011 Outage: Revised Proposed Settlement Letter

[redacted]

Attached is SCE's revised settlement offer. Feel free to call me with any questions.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

Information withheld pursuant to FOIA Exemption 6.

Five (5) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

88

[redacted]

From: [redacted]
Sent: Thursday, August 01, 2013 3:47 PM
To: [redacted]
Cc: [redacted]
Subject: FW: September 8, 2011 Outage: Revised Proposed Settlement Letter
Attachments: Revised Proposed Settlement.pdf

FYI

From: John.Pespisa@sce.com [mailto:John.Pespisa@sce.com]
Sent: Wednesday, July 31, 2013 7:04 PM
To: [redacted]
Cc: Erin.Moore@sce.com
Subject: September 8, 2011 Outage: Revised Proposed Settlement Letter

[redacted]

Attached is SCE's revised settlement offer. Feel free to call me with any questions.

John

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

Information withheld pursuant to FOIA Exemption 6.

Five (5) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

89

[redacted]

From: John.Pespisa@sce.com
Sent: Friday, August 17, 2012 11:51 AM
To: [redacted]
Subject: SCE presentation
Attachments: RTDSNEWS_2012.pdf; FERC Presentation re SCE Actions in Response to September 8 Southwest Outage.pptx

[redacted]

Attached is the presentation I discussed with you on Wednesday. Let me know if you have any concerns. Feel free to share with any of the FERC staff that worked on the report. I have also attached additional information on SCE's RTDS efforts. We would love to show the team that worked on the report our RTDS lab.

John Pespisa
Director, NERC Compliance Program
Southern California Edison
626-302-3308

Information withheld pursuant to FOIA Exemption 6.

Fourteen (14) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

[redacted]

From: [redacted]
Sent: Thursday, December 06, 2012 3:09 PM
To: John.Pespisa@sce.com
Cc: Ken Lotterhos; Sean Bodkin; Demetra Anas; [redacted]
Subject: Preliminary Findings Letter
Attachments: 20121203 SCE Potentially Violated Standards and Violations.pdf

John,

Please see the attached preliminary findings letter. A hard copy will also be mailed. Please feel free to contact [redacted] or me with any questions.

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

Five (5) pages are being withheld pursuant to FOIA Exemptions 4 and 7(A).

91

[redacted]

From: [redacted]
Sent: Tuesday, October 04, 2011 6:06 PM
To: 'Akbar.Jazayeri@sce.com'
Cc: [redacted]; Donna Lovitt
Subject: Data Request to SCE

Attached please find a data request issued to Southern California Edison by the Federal Energy Regulatory Commission.

Please let myself or my colleague [redacted] ([redacted] [redacted] or [redacted] know if you have any questions. I will be out of the office the week of October 10, 2010, if you have any questions during that time please contact [redacted] directly.

Thank you,
[redacted]

October 4 Data Request SCE.pdf...

[redacted]
Attorney
Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

Ten (10) pages are being withheld pursuant to FOIA Exemptions 7(A) and 7(E).

92

[redacted]

From: [redacted]
Sent: Friday, December 09, 2011 12:19 PM
To: 'Akbar.Jazayeri@sce.com'
Cc: [redacted]
Subject: Data Request to SCE

Dear Mr. Jazayeri,

Attached please find a data request to SCE related to staff and NERC's inquiry into the September 8, 2011 power outages in Southern California, parts of Arizona, and Northern Baja Mexico. Please confirm receipt of this request and don't hesitate to contact me with any questions. Thanks.

12.9.2011 Data Request to SCE....

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

Thirteen (13) pages are being withheld pursuant to FOIA Exemptions 7(A) and 7(E).

93

[redacted]

From: [redacted]
Sent: Thursday, December 22, 2011 3:50 PM
To: 'Akbar.Jazayeri@sce.com'
Cc: [redacted]
Subject: Data Request to SCE

Akbar,

Attached please find an additional data request to SCE related to our inquiry into the September 8, 2011 power outages in Southern California, parts of Arizona, and Northern Baja Mexico. Please let me know if you have any questions. Please confirm receipt of this email. Thanks.

12.22.2011 Data Request to SCE...

[redacted]
Attorney-Advisor, Division of Investigations
Office of Enforcement
Federal Energy Regulatory Commission
[redacted]

Information withheld pursuant to FOIA Exemption 6.

Eight (8) pages are being withheld pursuant to FOIA Exemptions 7(A) and 7(E).