State of California – A Natural Resources Agency
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Gavin Newsom, Governor
Forest Kaser, Director

September 30, 2026

Mr. Brandon Tolentino
Vice President, Wildfire and Business Resiliency
Southern California Edison Company
2244 Walnut Grove Ave
Rosemead, CA 91770

NOTICE OF NON-PERFORMANCE

Mr. Brandon Tolentino:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) conducted inspections of work completed by Southern California Edison Company (SCE) in accordance with its 2026 Wildfire Mitigation Plan (WMP). During the inspections, Energy Safety determined the existence of non-performance requiring correction. Energy Safety therefore issues SCE a Notice of Non-Performance (NON).

On September 17, 2026, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of Wilkerson, California in High Fire Threat District (HFTD) Tier 2 and State Responsibility Area (SRA). The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that SCE failed to implement its 2026 WMP Clearance 9.2.1.3 initiative, which requires compliance with Public Resource Code 4293, by not maintaining a four-foot clearance distance around the primary covered conductors near coordinates 37.27417661367399, -118.38703594289174. Energy Safety considers this non-performance to be in the Moderate risk category. SCE must complete a corrective action for this non-performance by six months from the date of this notice.[1]

Within 30 days from the issuance date of this NON, SCE must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency.

This response shall be filed in the Energy Safety e-Filing system under the 2026 NON Docket[2] and the associated file name(s) must begin with the NON identification number.

Prior to its response, SCE may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than 10 business days before the response deadline.[3] Requests for

[1] Gov. Code section 15475.2(a)(2)
[2] https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026%20NON
[3] Energy Safety Performance Guidelines, p. 4

informal conference with Energy Safety must be e-mailed to environmentalscience@energysafety.ca.gov, with a copy sent to me and Ricardo Garcia, Ricardo.Garcia@energysafety.ca.gov.

Sincerely,

Elizabeth McAlpine

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INSPECTION REPORT

Overview

The Office of Energy Infrastructure Safety (Energy Safety) conducts field inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP), and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation's wildfire risk. A Notice of Non-Performance (NON) is issued for any instances of non-performance identified during an inspection of its WMP initiatives.

Energy Safety has designated this finding of a deficiency as a "Moderate" risk. SCE must correct the deficiency pursuant to the timeline provided in Table 1.[4]

Table 1. Risk Category and Correction Timelines

Risk Category	Deficiency correction timeline
Severe	• Immediate resolution
Moderate	• 2 months (in High Fire Threat District (HFTD) Tier 3) • 6 months (in HFTD Tier 2) • 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)
Minor	• 12 months

[4] Energy Safety Performance Guidelines, p. 4

Inspection Summary

Energy Safety found a "Moderate" deficiency near pole ID 5008480E in HFTD Tier 2 and the SRA. SCE failed to maintain vegetation at least four feet away from the primary conductors as required by PRC 4293 and SCE's WMP commitments.[5]

The inspection location and WMP initiative summary are included in Table 2.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	SCE
Report Number:	NON_ESD_SCE_RGA_20260917_0950
Inspector:	Ricardo Garcia
WMP Year Inspected:	2026
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2) 2026
Inspection Selection:	Energy Safety inspected the locations based on SCE's Q2 QDR.
Relevant WMP Initiative(s):	Clearance 9.2.1.3
Date of inspection:	September 17, 2026
City and/or County of Inspection:	Wilkerson, California

[5] Southern California Edison Company, 2026-2028 Base Wildfire Mitigation Plan, Published January 22, 2026, p. 338 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60095&shareable=true, accessed September 24, 2026).

Inspection Findings

Deficiency 1

Relevant Requirement:

SCE's WMP initiative Clearance 9.2.1.3 states "SCE uses the [Grid Resiliency Clearance Distance] GRCD to determine clearances from distribution lines which are based on standards set forth in [General Order] GO 95 Rule 35 (Case 13 and Case 14), GO 95 Rule 37, PRC 429..."[6] Public Resource Code 4292 requires that SCE maintain a four-foot minimum clearance distance in all directions between all vegetation and all conductors for power lines between 2,400 volts and 72,000 volts.[7]

Additionally, SCE states that "At a minimum, SCE's Inspections for Vegetation Clearances from Distribution Lines maintains at least the required four feet clearance for distribution lines within [High Fire Risk Area] HFRA."[8]

Findings:

Energy Safety considers this deficiency as "Moderate" because SCE failed to maintain the required minimum clearance distance between vegetation and its covered conductors, consistent with the requirements of Public Resources Code section 4293 and SCE's WMP commitments. An elm tree was growing within the four-foot minimum clearance distance, and the continued encroachment presents a wildfire risk.

On September 17, 2026, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of Wilkerson, California. During the inspection, Energy Safety observed an elm tree growing within the four-foot minimum clearance distance near pole ID 5008480E and near coordinates 37.27417661367399, -118.38703594289174 along Gerkin Road. The elm tree is located within the SRA and HFTD Tier 2 which encompasses the HFRA. The inspector measured the distance between the primary conductors and the closest branches of the elm tree using a Nikon Forestry Pro II laser range finder. The measured distance was no more than two feet, which is less than the required four-foot clearance. The relevant PRC 4293 requirements and SCE's WMP do not make a distinction between covered and bare conductors. The covered conductor may still pose an ignition risk if vegetation comes in contact. According to the asset ArcGIS layer provided by SCE, the operating voltage of the primary conductors is 12,000 volts. In the 2026 Q2 QDR submission SCE reported that the elm tree was trimmed on April 12, 2026, under VMP ID R124158121444-2026_1. The elm tree has an approximate diameter at breast height of 30 inches, is 35 feet tall, and is located approximately 30 feet south of the pole ID 5008480E. The inspector's observations are documented in Exhibit A photographs which are

[6] Southern California Edison Company, 2026-2028 Base Wildfire Mitigation Plan, Published January 22, 2026, p. 338 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60095&shareable=true, accessed September 24, 2026).
[7] https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4293.&lawCode=PRC, accessed Sept. 24, 2026.
[8] Southern California Edison Company, 2026-2028 Base Wildfire Mitigation Plan, Published January 22, 2026, p. 338 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60095&shareable=true, accessed September 24, 2026).

attached to this report. Photo 1 depicts pole ID 5008480E. Photos 2, 3, and 4 depict the elm tree encroaching within the four-foot minimum clearance distance from the primary conductor.

Exhibits

Exhibit A: Photo Log

Structure ID: 5008480E

Deficiency 1

	
Photo 1: Photo of pole ID 5008480E.	Photo 2: Photo of the elm tree within the four-foot minimum clearance distance from the primary conductor.



Photo 3: Close-up photo of the same elm tree within the four-foot minimum clearance distance from the primary conductor.



Photo 4: Additional close-up photo of the same elm tree within the four-foot minimum clearance distance from the primary conductor taken from a different angle.