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

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
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Caroline Thomas Jacobs, Director

TRANSMITTED VIA ELECTRONIC MAIL

July 22, 2022

Erik Takayesu
Vice President Asset Strategy and Planning
Southern California Edison
2244 Walnut Grove
Rosemead, CA 91770

NOV_ SCE ATJ_20220406-01

NOTICE OF VIOLATION

Mr. Takayesu,

Pursuant to Government Code § 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has completed a compliance assessment of Southern California Edison (SCE) and determined the existence of one or more violations. In accordance with Government Code § 15475.2 and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2), noncompliance with an approved wildfire mitigation plan (WMP) or any law, regulation, or guideline within Energy Safety's authority is considered a violation.

Anthony Trujillo, Energy Safety staff, conducted a walking inspection in the Tule River Reservation in Springwater, California, on April 5, 2022, and discovered the following violation(s):

1. Violation 1: Per SCE's Distribution Design Standards (DDS), Section DDS-10, page 10-82, "for the 336 (30/7) ACSR covered conductor, vibration dampers shall be installed on every span in both light loading and heavy loading areas." Also, SCE's Distribution Overhead Construction Standards (DOH), Section CC 190, page 1 of 11, indicates that vibration dampers are required when installing covered conductor. Poles numbered 4237077E, 4237080E, 4477345E, 4465129E, and 4369478E had covered conductor installed but failed to install vibration dampers. Energy Safety considers this violation for failure of adhering to protocol to be in the Minor risk category.
2. Violation 2: Per SCE's DDS, Section 10, 5.7.C.1.f. states, "Covered conductor systems shall be an all-covered system." Per SCE's DOH, Section CC 150.4, page 5 of 5, "All overhead equipment shall utilize appropriate wildlife covers. This means that wildlife covers shall be installed on dead-ends, terminations, connectors, equipment bushings, and any

partially covered exposed conductor." Energy Safety observed structure numbered 4362869E that showed a pothead cover on the ground next to the structure with an uncovered splice on one phase of covered conductor. Energy Safety considers this violation for failure of adhering to protocol to be in the Minor risk category.

3. Violation 3: Per SCE's DOH, Table DC 535-1: Wildlife Protection Material, SCE requires that anti-rotation clips be used with Dead-End Clamp Covers.[1] Pole numbered 4477345E and 4465129E did not have anti-rotational clips installed in dead-end covers. Energy Safety considers this violation for failure of adhering to protocol to be in the Minor risk category.

In accordance with the Energy Safety Compliance Process, outlined in Table 1 below are the correction timelines for identified violations relative to their risk category. Within 30 days from the issuance date of this notice of violation (NOV), August 22, 2022, advise Energy Safety of corrective actions taken or planned by SCE to remedy the above identified violation(s) and prevent recurrence. This response shall be filed in the Energy Safety e-Filing system under the 2022-NOV docket[2] and the associated file name(s) must begin with the NOV identification number provided above.

Table 1 Energy Safety Violation Correction Timeline by Risk Category

Risk Category	Violation and defect correction timeline
Severe	• Immediate resolution
Moderate	• 2 months (in HFTD Tier 3) • 6 months (in HFTD Tier 2) • 6 months (if relevant to worker safety; not in HFTD Tier 3)
Minor	• 12 months or resolution scheduled in WMP update

Pursuant to Government Code § 15475.4(b), this NOV is served electronically, and SCE may request a hearing to take public comment or present additional information. Per statute, the deadline to request a hearing is within 30 days from the issuance date of this NOV – August 22, 2022. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Pursuant to Public Utilities Code § 8389(g), following receipt of SCE's response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities

[1] **SCE DOH, Table DC 535-01, SAP 10214048**
[2] **https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2021-NOV**

July 22, 2022 NOV_ SCE ATJ_20220406-01

Commission (CPUC) for its consideration of potential enforcement action, as the CPUC deems appropriate.

Sincerely,

Koko Tomassian
Compliance Program Manager
Compliance Assurance Division
Office of Energy Infrastructure Safety

Cc:
Gary Chen, SCE
Elizabeth Leano, SCE
Diana Gallegos, SCE
Johnny Parker, SCE
Jonathan Chacon, SCE
Melissa Semcer, Energy Safety
Edward Chavez, Energy Safety
Anthony Trujillo, Energy Safety

Energy Safety Inspection Report

CALIFORNIA
OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY

Table of Contents

Report Name: SCE_ATJ_20220406-01
Date(s): April 6, 2022
Inspector: Anthony Trujillo
Utility: Southern California Edison
Attention: Erik Takayesu, Vice President Asset Strategy and Planning

I. BACKGROUND

While wildfires are a natural part of California's ecosystem, the "fire season" in California and throughout the West is beginning and finishing earlier and later each year. Climate change and drought are believed to be a major contributor to this unsettling pattern. Utility-ignited wildfires are also a significant contributor to the wildfire risk in the Golden State, as this ignition cause category represents a disproportionate amount of the largest and most destructive fires in state history. Consequently, the Office of Energy Infrastructure Safety (Energy Safety) was established per the California Energy Infrastructure Safety Act (Government Code Sections 15470 – 15476) with the primary purpose of ensuring electrical corporations are reducing wildfire risk and complying with energy infrastructure safety measures. One such method for Energy Safety meeting its objective is to conduct detailed visual inspections of electrical infrastructure.

Inspections are carried out by Energy Safety's Compliance Division on a regular basis to verify the work performed by utilities, as reported in approved wildfire mitigation plans (WMPs) or subsequent filings, and assess general conditions of electrical infrastructure that may adversely impact an electrical corporation's wildfire risk. Accordingly, Energy Safety inspections are distinguished into two lines of effort. Inspections related to an electrical corporation's execution of its WMP initiatives are referred to as "WMP Initiative Inspections," findings of which are detailed in Table 2. Issues discovered during these inspections are categorized as violations and are accompanied by a notice of violation (NOV). In addition to assessing compliance with WMP initiatives, Energy Safety inspectors also visually assess the electrical infrastructure and surrounding vegetation to determine whether conditions are present which increase an electrical corporation's ignition and wildfire risk. These inspections are referred to as "General Wildfire Safety Inspections" and findings are detailed in Table

3 below. Issues discovered during these inspections are categorized as defects and are accompanied by a notice of defect (NOD).

This report details the findings of a recent Energy Safety inspection.

Section 15475.1. of the Government Code states that:

(a) The office may determine that a regulated entity is not in compliance with any matter under the authority of the office. If necessary, the office may undertake an investigation into whether the regulated entity is noncompliant with its duties and responsibilities or has otherwise committed violations of any laws, regulations, or guidelines within the authority of the office.
(b) The office's primary objective is to ensure that regulated entities are reducing wildfire risk and complying with energy infrastructure safety measures as required by law.

On April 6, 2022, I performed a walking inspection of Southern California Edison (SCE) covered conductor installations, 2021 WMP initiative number 7.3.3.3.1, in the Tule River Reservation in Springwater, California. I also observed the overall vegetation management within the area. Detailed findings from this field inspection are laid out in Section II below.

II. RESULTS

In accordance with Energy Safety's Wildfire Mitigation Plan Compliance Process, violations and defects discovered by Energy Safety must be corrected in a timely manner. The timeline for corrective action is dependent on the risk category, location, and potential impact to worker safety of the violation or defect discovered. Risk categories range from severe to minor, and locational risks are determined with tier levels in the California Public Utility Commission's High Fire Threat District (HFTD) map. Table 1 below outlines violation and defect risk categories and their associated correction timelines. The correction timelines identified below apply to the results of both WMP initiative inspections as well as general wildfire safety inspections.

Table 1. Risk Category and Correction Timelines

Risk Category	Violation and defect correction timeline
Severe	• Immediate resolution
Moderate	• 2 months (in HFTD Tier 3) • 6 months (in HFTD Tier 2) • 6 months (if relevant to worker safety and not in HFTD Tiers 2 or 3)
Minor	• 12 months or resolution scheduled in WMP update

Table 2. WMP Initiative Inspections

Item	Structure ID	HFTD	Initiative Number	Violation Type	Severity	Violation Description
1	4237077E	Non-HFTD	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
2	4362869E	Tier 2	7.3.3.3.1	Adherence to Protocol	Minor	Wildlife terminator/pothead covers found on ground
3	4237080E	Tier 2	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
4	4477345E	Tier 2	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
5	4477345E	Tier 2	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install anti-rotational clip on dead end cover
6	4465129E	Tier 2	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
7	4465129E	Tier 2	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install anti-rotational clip on dead end cover
8	4369478E	Tier 2	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span

Table 3. General Wildfire Safety Inspections

Item	Structure ID	HFTD	Defect Type	Severity	Defect Description
1	4719578E	Tier 2	Cold End Hardware	Minor	Triangular wildlife Guard loose/detaching from crossarm

III. DISCUSSION

In its 2021, Q1-Q4 quarterly data reports (QDR) submissions, SCE provided initiative data indicating that a covered conductor installation project (WMP initiative number 7.3.3.3.1) in the Tule River Reservation in Springwater, California was completed. This QDR submission represented the reporting periods of January through December (i.e., Q1-Q4) of 2021. Based on this information received from SCE, Energy Safety planned an inspection of select structures in this area to assess the accuracy of SCE data, the completeness of SCE's work, and whether SCE followed its protocols for covered conductor installation.

Per SCE's DDS and DOH, when installing covered conductor, vibration dampers must also be installed.[1] Energy Safety staff found that vibration dampers were not installed at multiple structures where covered conductor was completed. The structures missing vibration dampers where covered conductor was installed are identified in Table 2 above. On November 19, 2021, SCE submitted a memo to Energy Safety titled, "Interim Deviation from Standards on Vibration Damper for Covered Conductor" (hereafter, "Memo").[2] This Memo was dated August 18, 2021, and indicates that due to supply chain issues, SCE will suspend the installation of vibration dampers until December 31, 2021. On March 25, 2022, SCE sent an earlier version of that Memo that was dated May 18, 2021.[3] However, Energy Safety finds that SCE is still in violation of its protocols requiring the installation of vibration dampers as part of covered conductor installations.

In accordance with SCE's protocols for covered conductor installation, DOH CC 180, "If conductor is exposed, install bolted wedge connector cover" and "If overhead equipment is located at a pole transition from bare wire to covered conductor, the equipment is considered part of the covered conductor system." During the inspection, Energy Safety found one instance where a pothead cover fell off the conductor and lying next to the pole. The structure where this protocol was not followed is

[1] **DOH CC section 190, DDS section DDS-10, page 10-82**
[2] **Interim Deviation from Standards on Vibration Damper for Covered Conductor dated 8/18/2021, See Appendix B**
[3] **Interim Deviation from Standards on Vibration Damper for Covered Conductor dated 5/18/2021, See Appendix B**

noted in Table 2 above.

Energy Safety discovered two dead-end covers that were missing anti-rotational devices. Per SCE's DOH, Table DC 535-1: Wildlife Protection Material, SCE requires that anti-rotation clips be used with Dead-End Clamp Covers.[4] Structures where this protocol was not followed are noted in Table 2 above.

In addition to the violations discovered during WMP inspections of SCE's covered conductor installations, Energy Safety discovered a triangular wildlife guard that was dislodged and falling off a crossarm. The structure where this was found is identified in Table 3 above.

IV. CONCLUSION

Pursuant to its objectives and statutory obligations, Energy Safety has completed the above referenced inspection and discovered violations and/or defects by Southern California Edison. Southern California Edison's required response to these non-compliances and options for hearing are detailed in the associated notice of violation and/or defect, respectively.

[4] **SCE DOH, Table DC 535-01, SAP 10214048**

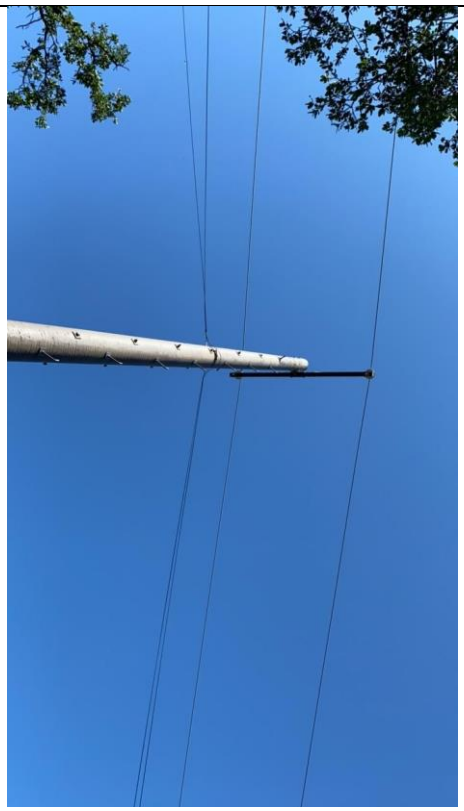
V. APPENDICES

APPENDIX A: Photo Log

Structure ID: 4237077E
General Photo

	
Item1GImg1: Overall pole	**Item1GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item1IA1Img1: No vibration dampers	

Structure ID: 4362869E

General Photo

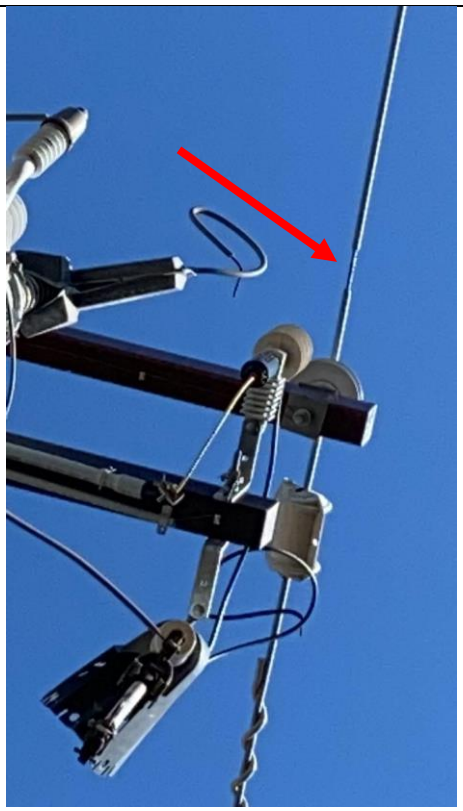
Item3GImg1: Overall pole

Item3GImg2: Pole ID

Item3GImg3: Pole tag

Initiative Activity #1 Photo

Item3IA1Img1: Wildlife terminator/pothead on ground next to pole

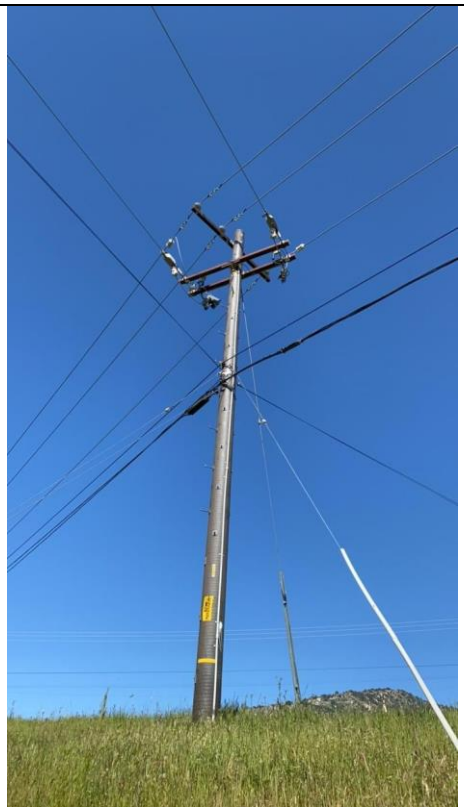


Item3IA1Img2: No Wildlife terminator/pothead on conductor, exposing conductor

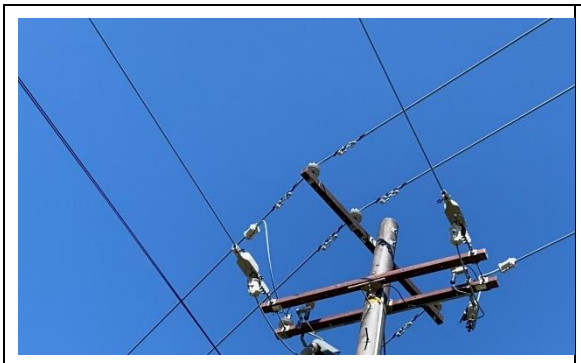
Item3IA1Img3: Observation, 3 Fuses are popped with jumpers hanging in air

Structure ID: 4237080E

General Photo

	
Item4GImg1: Overall pole	**Item4GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item4IA1Img1: No Vibration dampers on secondary phase level	**Item4IA1Img2**: Observation: Close up showing vibration dampers on upper pole phase level between jumper and crossarms

Structure ID: 4465119E

General Photo

	
Item5GImg1: Overall pole	**Item5GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item5IA1Img1: Observation: Vibration dampeners installed between bolted wedge connector cover and crossarm	

Structure ID: 4477345E

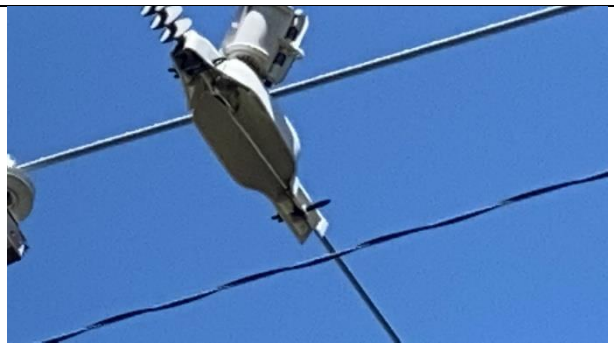
General Photo

	
Item6GImg1: Overall pole	**Item6GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item6IA1Img1: No vibration dampers	

Initiative Activity #2 Photo

	
Item6IA2Img1: No anti-rotation clip installed on dead end cover	

Structure ID: 4465129E

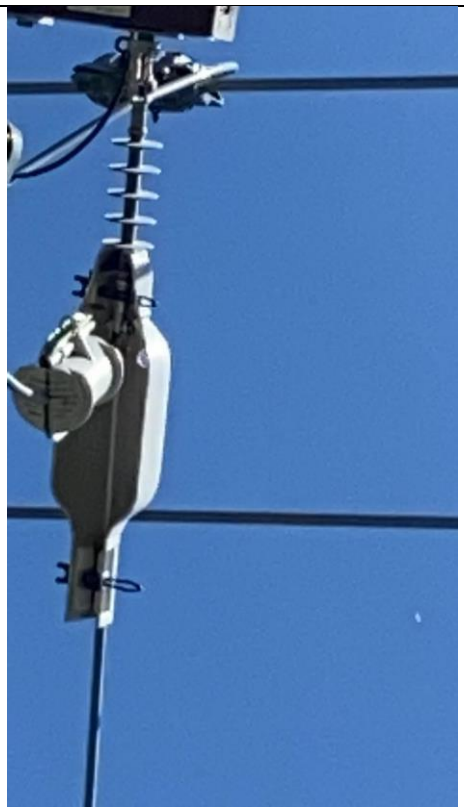
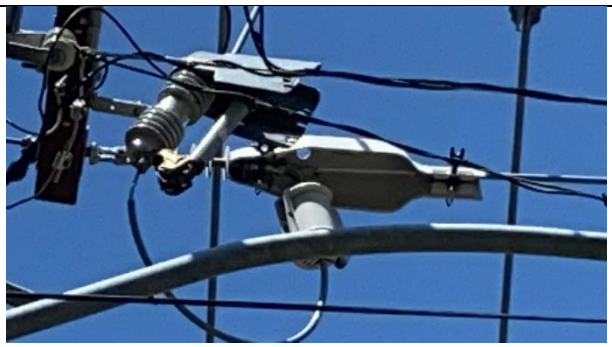
General Photo

	
Item7GImg1: Overall pole	**Item7GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item7IA1Img1: No vibration dampers	

Initiative Activity #2 Photo

	
Item7IA2Img1: No anti-rotational clip installed on dead end cover	**Item7IA2Img2**: No anti-rotational clip installed on dead end cover

Structure ID: 4369478E

General Photo

	
Item8GImg1: Overall pole	**Item8GImg2**: Pole ID

Initiative Activity #1 Photo

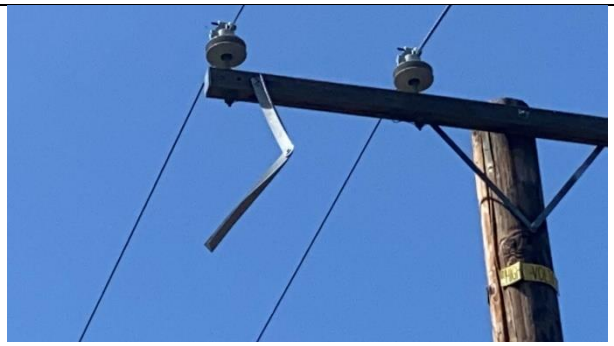
	
Item8IA1Img1: No vibration dampers	

Structure ID: 4719578E

General Photo

	
Item11GImg1: Overall pole	**Item11GImg2**: Pole ID

Crossarm Question #2 Photo

	
Item11CA2Img1: Wildlife Mitigation device falling off crossarm	

APPENDIX B: Survey123 Inspection Form

TRANSMISSION & DISTRIBUTION HOTLINE

PUBLISHED BY T&D CONSTRUCTION METHODS, CHINO

8/18/2021 Ref. No. HL-1921

Interim Deviation from Standards on Vibration Damper for Covered Conductor

This Bulletin Supersedes HL-0821

Purpose

This Hotline Bulletin provides SCE, Contract Construction, and Quality Control Personnel guidance on the requirement for installation of vibration dampers due to the temporary shortage of vibration dampers. This deviation allows installation of covered conductor without dampers.

This deviation only applies if the work location does not have the required dampers to complete the installation and will be in effect until December 31, 2021; dampers are still required to be installed for the work locations that have inventory on hand.

Background

Installing vibration dampers on the covered conductor mitigates Aeolian vibration by protecting the covered conductor from abrasion and fatigue damage. The vibration damper standard was put into effect in October 2020 and is required for all covered conductors in light loading areas (elevation below 3,000 feet). Recently, SCE has been experiencing an acute shortage of Stockbridge Dampers (refer to Figure 1) for 336 ACSR Covered Conductor due to the high demand and supplier constraints. Additionally, the spiral vibration dampers (refer to Figure 2) for 1/0 ACSR, #2 Copper, and 2/0 Copper may be running low on stock.

Figure 1: Stockbridge Damper

Figure 2: Spiral Damper

Discussion

Apart from supply shortages, a review of the orders placed for vibration dampers indicates inconsistent ordering practices at various store locations. For example, the analysis shows that some locations are ordering up to ten times more vibration dampers than needed based on the circuit miles of covered conductors to be installed. On the other hand, the analysis shows that some locations with high covered conductor orders are not ordering enough dampers. To ensure consistent delivery of vibration dampers, the following guidance is developed by Supply Chain and Asset & Engineering Strategy team, and it will be applied towards the field requests.[1]
As more inventories become available, Supply Chain will distribute vibration dampers based on the guidance developed and the covered conductor assigned on-site at the designated location.

- 10214215 Spiral Dampers: 1 damper required per phase per span
  - 30 dampers should be allocated per 5,280 feet of covered conductor [2]

- 10214216 (Spiral), 10214493, 10214494, 10214495, 10214496, 10214497, 10214498, 10214499 Stockbridge Dampers: 2 dampers required per phase per span
  - 60 dampers allocated per 5,280 feet of covered conductor [2]

Action

Deviation from Distribution Overhead Construction Standards CC 190 when dampers are not available is acceptable for the duration of the damper shortage[3], which is projected to last until December 31, 2021. SCE field crews and contractor personnel shall record any spans/locations on the Job Information Sheet (JIS) and Damper Shortage Report, which can be filled out online or in the form attached at the end of this bulletin (refer to Appendix A). The Damper Shortage Report is intended to capture pertinent information where vibration dampers were not installed due to the shortage. The Shortage Reports shall be sent to Niousha Tavakoli biweekly for damper retrofit determination[4]. Then, they will be compiled and sent to the Quality Organization to ensure that no QC corrective actions are given on these work orders. Once the material shortage has been resolved, another bulletin will be published to revoke the deviation process.

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[1] This is distinguished from the standard installation requirement, and it is only for inventory purposes.
[2] Damper allocation assumptions are based on a system average of 180 feet span and should be utilized as guidance, not a one size fits all.
[3] The interim deviation from the standard only applies to construction, and planners need to plan the projects in accordance with the standard as required.
[4] The go back will only target the high vibration susceptibility areas.

Standards Affected

DOH CC 190

Contact Information

If you have any questions related to this bulletin, please contact:

- Niousha Tavakoli: 949-910-8819
  - Niousha.Tavakoli@sce.com

Appendix A- Damper Shortage Report

Date	TD Number	Company Name	District	System Voltage	Structure Number		Circuit Name	Covered Conductor Size
					From	To		

TRANSMISSION & DISTRIBUTION HOTLINE
PUBLISHED BY T&D CONSTRUCTION METHODS, CHINO

05/18/2021 Ref. No. HL-0821

Interim Deviation from Standards on Vibration Damper for Covered Conductor

Purpose

This Hotline Bulletin provides SCE, Contract Construction, and Quality Control Personnel guidance on the requirement for installation of vibration dampers due to the temporary shortage of vibration dampers. This deviation allows installation of covered conductor without dampers.

This deviation only applies if the work location does not have the required dampers to complete the installation and will be in effect until December 31, 2021; dampers are still required to be installed for the work locations that have inventory on hand.

Background

Installing vibration dampers on the covered conductor mitigates Aeolian vibration by protecting the covered conductor from abrasion and fatigue damage. The vibration damper standard was put into effect in October 2020 and is required for all covered conductors in light loading areas (elevation below 3,000 feet). Recently, SCE has been experiencing an acute shortage of Stockbridge Dampers (refer to Figure 1) for 336 ACSR Covered Conductor due to the high demand and supplier constraints. Additionally, the spiral vibration dampers (refer to Figure 2) for 1/0 ACSR, #2 Copper, and 2/0 Copper may be running low on stock.

Figure 1: Stockbridge Damper

Figure 2: Spiral Damper

Discussion

Apart from supply shortages, a review of the orders placed for vibration dampers indicates inconsistent ordering practices at various store locations. For example, the analysis shows that some locations are ordering up to ten times more vibration dampers than needed based on the circuit miles of covered conductors to be installed. On the other hand, the analysis shows that some locations with high covered conductor orders are not ordering enough dampers. To ensure consistent delivery of vibration dampers, the following guidance is developed by Supply Chain and Asset & Engineering Strategy team, and it will be applied towards the field requests.[1]
As more inventories become available, Supply Chain will distribute vibration dampers based on the guidance developed and the covered conductor assigned on-site at the designated location.

- 10212415 Spiral Dampers: 1 damper required per phase per span
  - 30 dampers should be allocated per 5,280 feet of covered conductor [2]

- 10212416 (Spiral), 10214493, 10214494, 10214495, 10214496, 10214497, 10214498, 10214499 Stockbridge Dampers: 2 dampers required per phase per span
  - 60 dampers allocated per 5,280 feet of covered conductor [2]

Action

Deviation from Distribution Overhead Construction Standards CC 190 when dampers are not available is acceptable for the duration of the damper shortage, which is projected to last until December 31, 2021. SCE field crews and contractor personnel shall record any spans/locations on the Job Information Sheet (JIS) and Damper Shortage Report, which can be filled out online or in the form attached at the end of this bulletin (refer to Appendix A). The Damper Shortage Report is intended to capture pertinent information where vibration dampers were not installed due to the shortage. The Shortage Reports shall be sent to Niousha Tavakoli biweekly for damper retrofit determination. Then, they will be compiled and sent to the following individuals to ensure that no QC corrective actions are given on these work orders:

Quality Control – Timothy Garcia
- Timothy.Garcia@sce.com

Governance & Reporting – Jose Angel Loya
- Jose.A.Loya@sce.com

[1] This is distinguished from the standard installation requirement, and it is only for inventory purposes.

[2] Damper allocation assumptions are based on a system average of 180 feet span and should be utilized as guidance, not a one size fits all.

This information needs to be provided to the individuals identified above as soon as work is complete. Once the material shortage has been resolved, another bulletin will be published to revoke the deviation process.

Standards Affected

DOH CC 190

Contact Information

If you have any questions related to this bulletin, please contact:

- Hunly Chy: 626-483-8864
  - Hunly.Chy@sce.com
- Niousha Tavakoli: 949-910-8819
  - Niousha.Tavakoli@sce.com

Appendix A- Damper Shortage Report

Date	TD Number	Company Name	District	System Voltage	Structure Number		Circuit Name	Covered Conductor Size
					From	To		