



August 28, 2024

Ms. Shinjini Menon
Southern California Edison Company
Vice President, Asset Management and Wildfire Safety
2244 Walnut Grove
Rosemead, CA 91770

NOTICE OF VIOLATION

Ms. Menon:

Pursuant to Public Utilities Code section 326 and Government Code section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by Southern California Edison Company (SCE) in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of one or more violations. Energy Safety therefore issues Southern California Edison Company a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the Office.¹

On June 19, 2024, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Lakeshore, California. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.3.1 – Distribution Detailed Inspections and Remediations, SCE failed to completely remediate a damaged secondary neutral on pole ID 1601717E, Grid Hardening ID 413647057-1601717E, at coordinates 37.1972558377877 -119.201249924051. Energy Safety considers this completeness violation to be in the Moderate risk category.

Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.² Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction and all supporting documentation.³ SCE should note that, in the case of this NOV, the violation is expected to be corrected within two months of receipt of this NOV.

¹ Cal. Code Regs., tit. 14, section 29302(b)(2)

² Energy Safety Compliance Guidelines, pp. 5-6

³ Energy Safety Compliance Guidelines, pp. 6-7

This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket⁴ and the associated file name(s) must begin with the NOV identification number provided above.

Pursuant to Government Code section 15475.4, if the electrical corporation intends to request a hearing “to take public comment or present additional information,” it must also do so within the 30-day timeframe. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.⁵ Requests for informal conference with Energy Safety must be e-mailed to compliance@energysafety.ca.gov, with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation’s response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,



Patrick Doherty
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
Patrick.doherty@energysafety.ca.gov

Cc:

Raymond Fugere, SCE
Raymond.Fugere@sce.com
Gary Chen, SCE
Gary.chen@sce.com
Sunny Chu, SCE
Sunny.Chu@sce.com
Elizabeth Leano, SCE
Elizabeth.leano@sce.com
Johnny Parker, SCE
Johnny.parker@sce.com
Cynthia Childs, SCE
Cynthia.childs@sce.com

⁴ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NOV>

⁵ Energy Safety Compliance Guidelines, p. 6

Denise Harris, SCE

Denise.Harris@sce.com

Edward Chavez, Energy Safety

Edward.Chavez@energysafety.ca.gov

Yana Loginova, Energy Safety

Yana.Loginova@energysafety.ca.gov

Compliance@energysafety.ca.gov



INSPECTION REPORT

Overview

Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk.

A Notice of Violation (NOV) is issued for any instances of noncompliance discovered during an inspection related to an electrical corporation’s execution of its WMP initiatives.

Correction Timelines

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.⁶

Table 1. Risk Category and Correction Timelines

Risk Category	Violation and defect correction timeline
Severe	<ul style="list-style-type: none">• Immediate resolution
Moderate	<ul style="list-style-type: none">• 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 Tier 3)
Minor	<ul style="list-style-type: none">• 12 months or resolution scheduled in WMP update

⁶ Energy Safety Compliance Guidelines, p. 5



Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	Southern California Edison Company
Report Number:	SCE_CAC20_20240619_1341
Inspector:	CAC20
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 1 (Q1)
Inspection Selection:	Energy Safety viewed the contents of the Q1 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	Distribution Detailed Inspections and Remediations (2024 WMP initiative number 8.1.3.1)
Date of inspection:	June 19, 2024
City and/or County of Inspection:	Lakeshore, Fresno County
Inspection Purpose:	Assess the accuracy of Southern California Edison Company’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

Table 3: WMP Inspection Violation(s)

Violation #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	1601717E	413647057- 1601717E	37.1972558377877, -119.201249924051	Tier 3	8.1.3.1 - Distribution Detailed Inspections and Remediations	Completeness	Moderate	Failure to complete work on "REPAIR DAMAGE SEC CBL/CND POLE"

Inspection Details

Violation 1:

Relevant Requirement:

Southern California Edison Company's WMP states the following regarding initiative number 8.1.3.1 Distribution Detailed Inspections and Remediations:

1. "Issues identified by inspectors during the detailed inspections are prioritized for remediation to be completed within [General Order 95 (GO95)] compliance timelines. Remediations can be repairs to or replacements of existing assets depending on asset condition. For example, SCE repairs ground molding with that is found to be broken/damaged with an exposed ground wire at the public level. Also, SCE replaces wood guy guards if found to be missing, damaged or outdated."⁷
2. Per Figure 8-1a – Distribution Detailed Inspections and Remediation Workflow, once the inspection is performed, if remediation is required a notification is created, and the asset is scheduled for remediation, the asset is remediated and closed.⁸

Finding:

On pole ID 1601717E, Grid Hardening ID 413647057-1601717E, at 55451 Flintridge Ave, Lakeshore, CA 93634, 37.1972558377877, -119.201249924051, SCE reported the completed work as: repaired a damaged/broken distribution secondary cable/conductor on pole (REPAIR DAMAGE SEC CBL/CND POLE). Upon arrival Energy Safety observed a frayed and damaged distribution secondary neutral wire. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1GIimg1, Item1GIimg2, Item1IA1img1, and Item1IA1img2 depict a frayed and damaged distribution secondary neutral wire connected by one unbroken strand.

Energy Safety concludes that Violation 1 is Moderate because of these facts:

1. Southern California Edison's 2024 WMP initiative 8.1.3.1 - Distribution Detailed Inspections and Remediations reported REPAIR DAMAGE SEC CBL/CND POLE work as completed at pole ID 1601717E.
2. The pole is within High Fire Threat District (HFTD) Tier 3, and a heavily forested area.
3. The secondary neutral wire is frayed and broken connected by one unbroken strand.
4. This one unbroken neutral strand is supporting the weight of the energized secondary conductors.
5. This one neutral strand is in danger of failing.

⁷ Southern California Edison, "2023-2025 Wildfire Mitigation Plan," Oct. 26, 2023. p. 284. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

⁸ Southern California Edison, "2023-2025 Wildfire Mitigation Plan," Oct. 26, 2023. p. 285. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: 1601717E

Violation 1



Item1GImg1: Pole ID.

Item1GImg2: Overall area showing secondary wire connected to a support pole in a heavily forested area.



Item1IA1Img1: Overall view of frayed and broken secondary neutral wire.

Item1IA1Img2: Close-up view of neutral wire showing frayed and broken wire.