



April 14, 2025
Shinjini Menon
Vice President, Asset Management and Wildfire Safety
Southern California Edison Company
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 a violation. Energy Safety therefore issues SCE 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 January 16, 2025, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Newhall, California. The inspection report is enclosed. 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 (IN-1.1), SCE failed to complete remediation of a buried down guy anchor on pole ID 4263497E, Grid Hardening ID 413733488-4263497E, at coordinates 34.375031, -118.542017. Energy Safety considers this completeness violation to be in the Moderate risk category.

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

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

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

² Energy Safety Compliance Guidelines, pp. 3

³ Energy Safety Compliance Guidelines, pp. 4-5

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

⁵ Energy Safety Compliance Guidelines, p. 4

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

Raghu Rayalu, SCE

Raghu.rayalu@sce.com

Samuel Isaiah, Energy Safety

samuel.isaiah@energysafety.ca.gov

Yana Loginova, Energy Safety

Yana.Loginova@energysafety.ca.gov

Shannon Downey, Energy Safety

Shannon.Downey@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 Tiers 2 or 3)
Minor	<ul style="list-style-type: none">• 12 months or resolution scheduled in WMP update

⁶ Energy Safety Compliance Guidelines, p. 3



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:	CAD_SCE_ATJ_20250116_0928
Inspector:	Anthony Trujillo
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.3.1 - Distribution Detailed Inspections and Remediations (IN-1.1)
Date of inspection:	January 16, 2025
City and/or County of Inspection:	Newhall, Los Angeles County
Inspection Purpose:	Assess the accuracy of Southern California Edison’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	4263497E	413733488-4263497E	34.375031, -118.542017	Tier 3	8.1.3.1 Distribution Detailed Inspections and Remediations (IN-1.1)	Completeness	Moderate	Failure to complete the remediation of buried guy anchor.

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 (IN-1.1):

1. "Degradation of equipment and structures as part of wear and tear during normal operations and due to external factors, such as weather or third-party caused damage increases the probability of in-service malfunction or failures that can have safety and service reliability impacts."⁷

Finding:

Work pursuant to Southern California Edison Company's 2024 WMP initiative number 8.1.3.1 Distribution Detailed Inspections and Remediations (IN-1.1) to remediate a buried anchor was identified as complete at this location on pole ID 4263497E, Grid Hardening ID 413733488-4263497E at 24660 Apple St, Newhall, CA, 91321, USA, 34.375031, -118.542017. The inspector observed a down guy wire anchor head below grade not meeting the minimum four-inch clearance above grade.⁸ The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1IA1Img1, Item1IA1Img2, Item1IA1Img3, and Item1IA1Img4 depict a corroded down guy anchor rod below grade with a down guy wire preform connected to an automatic. The automatic is connected to a pre-existing severed down guy loop held together by a three-bolt clamp. Per information provided by Southern California Edison Company, the remediation of a buried anchor was completed in the field on May 9, 2024.

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

1. The anchor head was observed below grade.
2. The automatic is not secured to the anchor eye.
3. The existing anchor shows significant signs of corrosion.
4. The supporting guy anchor of the subject pole is located within HFTD 3 and a heavily trafficked residential neighborhood.
5. The anchor remediation was reported as completed on May 9, 2024. Should extreme winds or other environmental conditions occur, the guy anchor rod is more likely to fail.

⁷ Southern California Edison Company, "2023-25 Approved Wildfire Mitigation Plan," October 26, 2023, p. 282. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

⁸ See Exhibit B, Southern California Edison Company, "Distribution Overhead Construction Standards," October 27, 2023, PO 310, Sheet 18 of 23, DOH.

Exhibits

Exhibit A: Photo Log

Structure ID: 4263497E

Violation 1

	
<p>Item1GImg1: Pole ID.</p>	<p>Item1GImg2: Overall pole.</p>



Item1IA1img1: Observed buried guy anchor below grade.



Item1IA1img2: Down guy wire preform is connected to an automatic and not directly to the down guy anchor eye. The automatic is connected to an existing severed down guy loop fastened together by a three-bolt clamp.



Item1IA1img3: Close up of excavated anchor head below grade.




Item1IA1img4: Severed pre-existing down guy loop fastened by a three-bolt clamp.

Exhibit B: Referenced Construction Standards



Table PO 310-9: Expanding Rock Anchor

Expanding Rock	SAP	Photo	Maximum Allowable Guy Anchor Load (lbs)		Guying Options
			New Installations (S.F.=1.5)	In-service (S.F.=1.33)	
3/4" x 30" Triple Eye	10215681		15,000	17,300	3-9/32", or 1-3/8" & 1-9/32", or 1-7/16" & 1-9/32"
1" x 30" Triple Eye	10215682		24,000	27,000	2-3/8" & 1-9/32", or 1-3/8" & 2-9/32", or 1-3/8" & 1-7/16", or 2-7/16", or 3-9/32"

4.0 Anchor Extensions


Anchor rod extensions are designed to extend a properly installed existing 1-inch or 1-1/4"-inch diameter anchor rod, including rock anchors. These anchor extensions are **ONLY** allowed for use when the eye of a properly installed triple eye anchor is below grade to allow for the guy attachments to be made above ground. Anchor extensions shall **NOT** be used in place of anchor rods and must be installed in the eye of the anchor rod. No modifications of anchor rod extensions are allowed. The attachment bolt that comes with the anchor extension shall not be replaced with other hardware to fit double eye or thimble eye anchor rods. Only one anchor extension is permitted per anchor rod, do not daisy chain anchor rod extensions.

4.1 For existing installations, the following applies:

- The appropriate length anchor extension should be selected to allow guy attachments to be made as close to 4 inches minimum through 36 inches maximum above grade.
- Where the entire eye is above grade and no additional guy is to be installed, no action is needed.
- When the work requires additional guy or replacing an existing guy, anchor extension may be used provided existing anchor is properly installed.
- Where entire eye is below ground, anchor extension may be used provided existing anchor is properly installed.

4.2 For new installations, the following applies:

- The bottom of the eye shall be 4 inches minimum to 18 inches maximum above grade.

PO 310 <small>Sheet</small> 18 of 23 DOH	Anchors for Guys	Approved by: 
	What's Changed? Updated Table 310-9.	Effective Date: 02-08-2024