



June 19, 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 May 20, 2025, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Canyon Country, 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 (IN-1.1), SCE failed to complete the remediation of rotated dead-end wildlife covers on pole ID 4864658E, Grid Hardening ID 413854385-4864658E at coordinates 34.422765, -118.419019. Energy Safety considers this completeness violation to be in the Minor 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

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

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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_20250520_1304
Inspector:	Anthony Trujillo
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4)
Inspection Selection:	Energy Safety viewed the contents of the Q4 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:	May 20, 2025
City and/or County of Inspection:	Canyon Country, 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	4864658E	413854385-4864658E	34.422765, -118.419019	Tier 3	8.1.3.1 - Distribution Detailed Inspections and Remediations (IN-1.1)	Completeness	Minor	Failure to remediate rotated wildlife dead-end covers.

Inspection Details

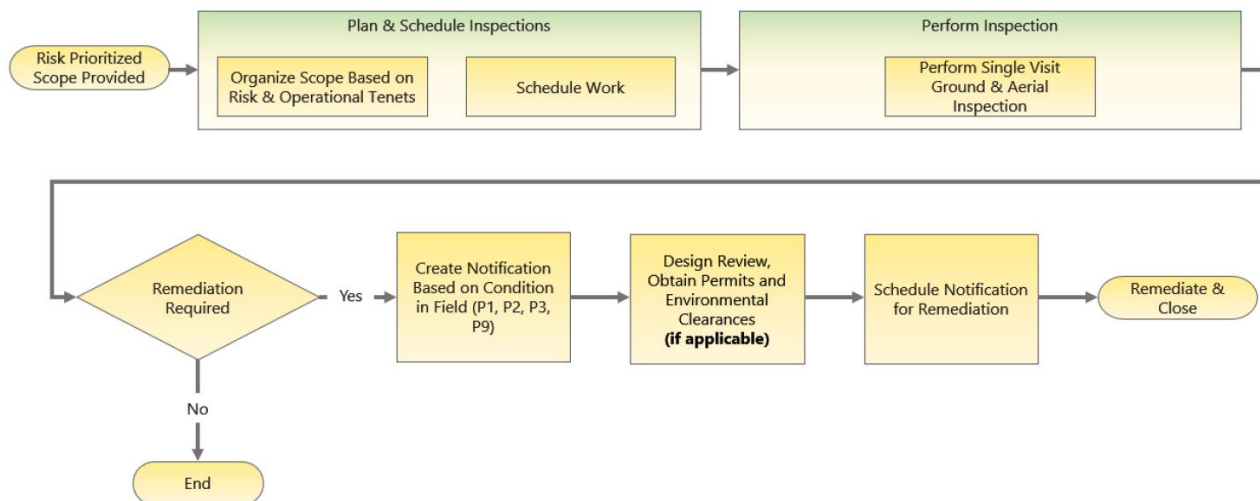
Violation 1:

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. "The frequency of [High Fire Risk-Informed inspections] varies by the location-specific risk... within SCE's [High Fire Risk Area] and emergent conditions. Issues identified by inspectors during the detailed inspections are prioritized for remediation to be completed within [General Order 95] 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. The following is a workflow diagram from SCE's WMP showing the conditions under which SCE will execute remediations under initiative number 8.1.3.1:⁸

Figure 8-1a - Distribution Detailed Inspections and Remediations Workflow



⁷ Southern California Edison Company, "2023-25 Wildfire Mitigation Plan," October 26, 2023, p. 284. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

⁸ Southern California Edison Company, "2023-25 Wildfire Mitigation Plan," October 26, 2023, p. 285. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

Southern California Edison Company's Distribution Overhead Construction Standards provides the following images indicating the proper orientation of dead-end wildlife covers when seated on dead-end insulators.

1. The body of the dead-end cover is commonly referred to as the Canoe. Proper installation of the canoe is when the opening at the bottom faces the ground indicated by the following photos: ⁹

Figure CC 150-2: 4-Wire Covered Conductor Double Dead-end Construction

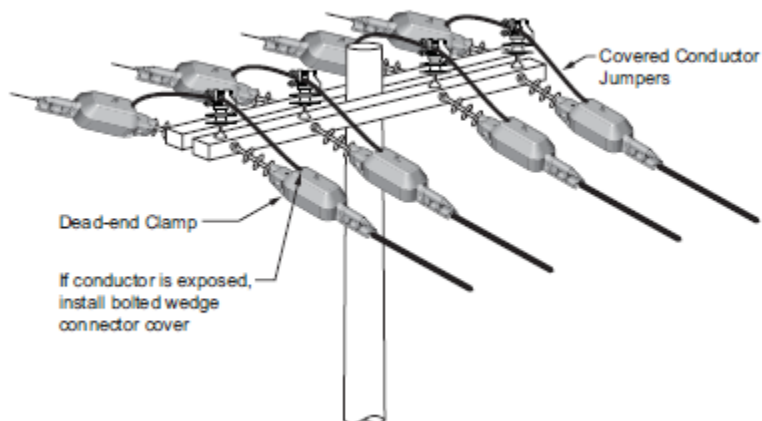


Figure CC 150-3: Connector Cover Installed at Dead-End Tap



⁹ Southern California Edison Company's "Distribution Overhead Construction Standards (DOH)", 2025-First Quarter Issue January 31, 2025. Effective Date: 01-31-2025, DOH, CC 150 "Covered Conductor Installation Materials and Equipment," Sheet 3 of 5 and 4 of 5.

Finding:

On pole ID 4864658E, Grid Hardening ID 413854385-4864658E at 16218-16234 Lost Canyon Rd, Canyon Country, CA, 91387, USA, 34.422765, -118.419019, the inspector observed two of three dead-end wildlife covers on primary conductor rotated with the canoe opening facing other conductors. Dead-end wildlife cover canoe openings should face the ground when installed properly. Per information provided by SCE to the Compliance Inbox on April 3, 2025, at approximately 12:15 pm, SCE identified that dead end covers were over rotated, and that remediation was required and completed.

The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1G1mg1, Item1G1mg2, Item1IA11mg1, Item1IA11mg2, Item1IA11mg3, and Item1IA11mg4 depict two of three dead-end wildlife covers seated improperly on the dead-end insulators.

Energy Safety concludes there is a violation because of these facts:



1. Pursuant to Southern California Edison Company's 2023 WMP 8.1.3.1 Distribution Detailed Inspections and Remediations work, corrected dead-end wildlife cover rotation was identified as complete at this location.
2. Two of three dead-end wildlife covers are not properly seated on the dead-end insulators. Exhibit B shows the proper installation of the dead-end wildlife covers.

Exhibits

Exhibit A: Photo Log

Structure ID: 4864658E

Violation 1

 A photograph showing a tall wooden utility pole on the side of a residential street. The pole is supported by cross-arms and has several power lines attached. The background shows a clear blue sky, trees, and a fence.	 A close-up photograph of a blue identification tag attached to a wooden utility pole. The tag is oriented vertically and contains the alphanumeric string '104 69 01 01 10 00 10' printed on it.
<p>Item1Gimg1: Overall pole.</p>	<p>Item1Gimg2: Pole ID.</p>



Item1IA1Img1: View showing dead-end wildlife covers seated at approximately ninety degrees.



Item1IA1Img2: View showing dead-end wildlife covers seated at approximately ninety degrees.



Item1IA1Img3: View showing dead-end wildlife covers seated at approximately ninety degrees.



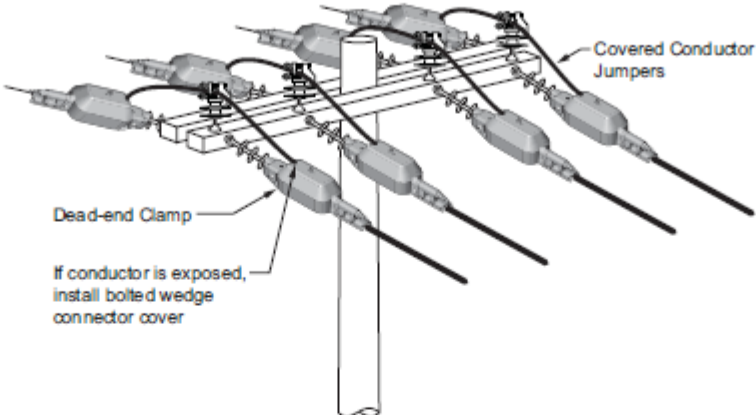
Item1IA1Img4: View showing dead-end wildlife covers seated at approximately ninety degrees.

Exhibits

Exhibit B: SCE Construction Standards



Figure CC 150-2: 4-Wire Covered Conductor Double Dead-end Construction



Approved by: <i>BSC</i>	Covered Conductor Installation Materials and Equipment	CC 150
Effective Date: 01-31-2025	What's Changed?	Sheet 3 of 5 DOH

Scope CC 150.3 Covered Conductor Tap Connections

Bolted wedge connectors are the preferred mainline-to-mainline or tapline connectors in covered conductor systems. This includes connections to mainline devices such as reclosers, voltage regulators, and overhead switches. See [CO 100](#) for alternate connector options if installation of the bolted wedge connector is not practical.

Connectors shall be covered with an appropriately sized connector cover (see [DC 535](#)).

Figure CC 150-3: Connector Cover Installed at Dead-End Tap



CC 150	Covered Conductor Installation Materials and Equipment	Approved by: <i>BSC</i>
Sheet 4 of 5	What's Changed?	Effective Date:
DOH		01-31-2025