



February 12, 2026

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

NOTICE OF NON-PERFORMANCE

Mr. Tolentino:

Pursuant to Government Code section 15472, et seq, 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 2025 Wildfire Mitigation Plan (WMP) and determined the existence of non-performance requiring correction. Energy Safety therefore issues SCE a Notice of Non-Performance (NON), identifying non-performance with its approved WMP.

On January 14, 2026, Energy Safety conducted an inspection of Southern California Edison Company's WMP initiatives in the vicinity of the city of Rancho Palos Verdes, CA. The inspection report is enclosed herewith. Energy Safety found the following deficiencies:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.1.3.1 - Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations (IN-1.1), SCE failed to complete clearance of down guy on Pole ID 1392823E, Grid Hardening ID 414093121-1392823E at coordinates 33.7797146678882, -118.395505159758. Energy Safety considers this non-performance to be in the Minor risk category. SCE must complete a corrective action for this deficiency by 12 months from the date of this notice.¹

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

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket² and the associated file name(s) must begin with the NON identification number.

Prior to its response, the electrical corporation 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

¹ Gov. Code section 15475.2(a)(2)

² <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

deadline.³ Requests for informal conference with Energy Safety must be e-mailed to AssetPerformance@energysafety.ca.gov, with a copy sent to all Energy Safety staff identified in the NON.

Sincerely,

Patrick Doherty

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

Cc:

Gary Chen, SCE

Gary.Chen@sce.com

Elizabeth Leano, SCE

Elizabeth.Leano@sce.com

Cynthia Childs, SCE

Cynthia.Childs@sce.com

Raghu Rayalu, SCE

Raghu.Rayalu@sce.com

Erick Sanchez, SCE

Erick.G.Sanchez@sce.com

Sally Jeun, SCE

Sally.Jeun@sce.com

Yana Loginova, Energy Safety

Yana.Loginova@energysafety.ca.gov

Samuel Isaiah, Energy Safety

Samuel.Isaiah@energysafety.ca.gov

Shannon Greene, Energy Safety

Shannon.Greene@energysafety.ca.gov

Assetperformance@energysafety.ca.gov

³ Energy Safety Performance Guidelines, p. 4



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 affect an electrical corporation’s wildfire risk.

A Notice of Non-Performance (NON) is issued for any deficiencies discovered during an inspection related to an electrical corporation’s performance of its WMP.

Correction Timelines

Deficiencies must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a deficiency.⁴ If Energy Safety assigns a risk category to a deficiency, an electrical corporation must correct the deficiency as required per the timelines provided in Table 1.⁵

Table 1. Risk Category and Correction Timelines

Risk Category	Deficiency 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

⁴ Gov. Code section 15475.2(a)(2)

⁵ Energy Safety Performance Guidelines, p. 4



Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the deficiency or deficiencies found during the inspection. Details regarding the inspection that identified the deficiency or deficiencies are provided in the Inspections Details Section below.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	Southern California Edison Company
Report Number:	PAD_SCE_SIS_20260114_1300
Inspector:	Samuel Isaiah
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 3 (Q3)
Inspection Selection:	Energy Safety viewed the contents of the Q3 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 14, 2026
City and/or County of Inspection:	Rancho Palos Verdes, Los Angeles County
Inspection Purpose:	Assess the accuracy of Southern California Edison Company's QDR data, completeness of its work, and performance of requirements.

Table 3: WMP Inspection Deficiencies

Deficiency #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Severity	Deficiency Description
Deficiency 1	1392823E	414093121-1392823E	33.7797146678882, -118.395505159758	Tier 2	8.1.3.1 - Distribution HFRI Inspections and Remediations	Minor	Failure to complete down guy clearance.

Inspection Details

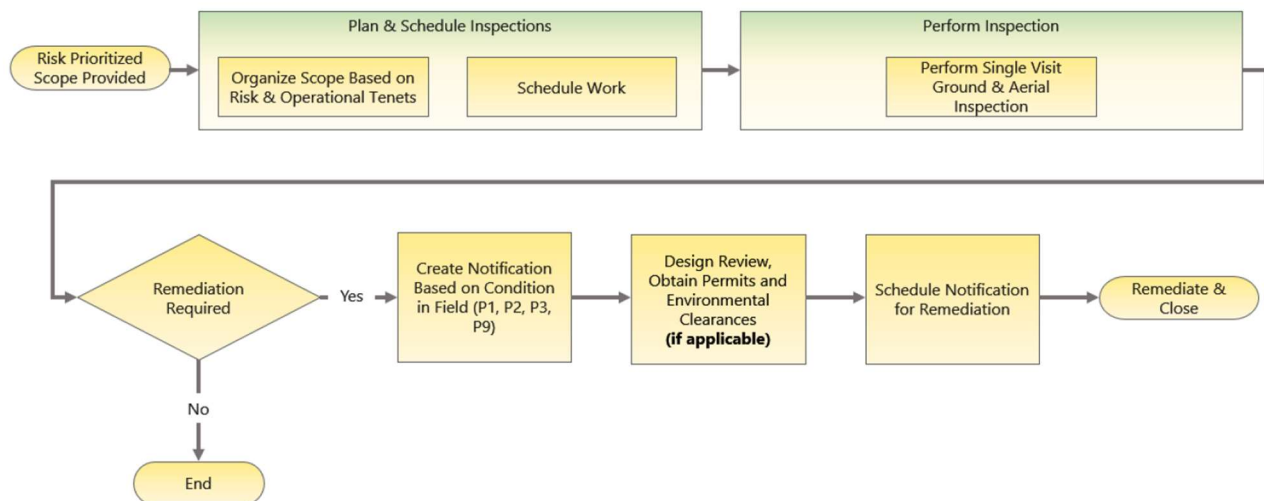
Deficiency 1

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."⁶
2. The following is a workflow diagram from SCE's WMP showing the conditions under which SCE will execute remediations under initiative number 8.1.3.1:⁷

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



California Public Utilities Commission (CPUC) General Order 95, Rule 31.1 states that “[e]lectrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.”⁸ The applicable CPUC General Order 95 requirement is provided in Exhibit B.

⁶ 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>

⁷ 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>

⁸ CPUC General Order 95, Rule 31.1 (Design, Construction and Maintenance), available at https://ia.cpuc.ca.gov/gos/GO95/go_95_rule_31_1.html

Findings:

On Pole ID 1392823E, Grid Hardening ID 414093121-1392823E at 28049 Ella Rd, Rancho Palos Verdes, CA, 90275, 33.7797146678882, -118.395505159758, the inspector observed that three down guy wires were rubbing against the house gutter. The inspector's observation is documented in Deficiency 1 photographs, which are attached to this report. Photo numbers IA1Img2, IA1Img3 and IA1Img4 depict three down guy wires rubbing against a house gutter at the inspection location.

Energy Safety concludes that there is a deficiency because of these facts:

1. According to SCE's Q3 QDR detailed work description, down guy contact with the residence at the inspection location was identified on August 9, 2024, noting "both SCE down guys rubbing on house," and that corrective work identified as "REPAIR CLEARNC SEC GUY POLE" was reported as completed on August 13, 2025.
2. Despite the reported completion, Energy Safety observed that three down guy wires remain in continuous mechanical contact with the house gutter.
3. CPUC General Order 95 requires that supporting structures and associated equipment be constructed and maintained in a condition that is safe.
4. Facilities that remain in continuous mechanical contact with a residential structure result in ongoing abrasion and load transfer to building components, which is unsafe.
5. Based on the continuous mechanical contact between the down guy wires and the house gutter, Energy Safety concludes that the facility is not being maintained in a condition consistent with CPUC General Order 95, Rule 31.1.

Exhibits

Exhibit A: Photo Log

Structure ID: 1392823E

Deficiency 1

 A photograph of a wooden utility pole with multiple cross-arms and power lines. The pole is situated in a residential area with greenery and a house in the background under a blue sky with light clouds.	 A close-up photograph of a wooden utility pole. A yellow identification tag is attached vertically to the pole, displaying the number '1392823E' in black. Several silver metal fasteners are visible on the wood.
<p>G1mg1: Overall Structure</p>	<p>G1mg2: Structure ID</p>



IA1img1: All three down guy wires are rubbing against house gutter



IA1img2: All three down guy wires are rubbing against house gutter



IA1img3: All three down guy wires are rubbing against house gutter



IA1img4: All three down guy wires are rubbing against house gutter

Exhibit B: General Order 95 Rule 31.1

Section III Requirements for All Lines

Rule 31.1

31 Application

The following rules apply to all classes of overhead lines under all conditions.

31.1 Design, Construction and Maintenance

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.

A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard.

For all particulars not specified in General Order 95, a supply or communications company is in compliance with this rule if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions.

All work performed on public streets and highways shall be done in such a manner that the operations of other utilities and the convenience of the public will be interfered with as little as possible and no conditions unusually dangerous to workmen, pedestrians or others shall be established at any time.

Note: The standard of accepted good practice should be applied on a case by case basis. For example, the application of "accepted good practice" may be aided by reference to any of the practices, methods, and acts engaged in or approved by a significant portion of the relevant industry, or which may be expected to accomplish the desired result with regard to safety and reliability at a reasonable cost.

Note: Revised January 13, 2005 by Decision No. 0501030 and January 12, 2012 by Decision No. 1201032.

December 2024