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

April 8, 2022

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

NOV_SCE_ATJ_ 20211130-01_Revised

NOTICE OF VIOLATION

Mr. Takayesu,

With the issuance of this revised notice of violation (NOV), the Office of Energy Infrastructure Safety (Energy Safety) withdraws NOV_SCE_ATJ_20211130-01 issued on February 24, 2022. Accordingly, the deadline to respond and to request a hearing regarding this NOV has been adjusted based on the issuance of this revision, as detailed below.

Pursuant to Government Code § 15475.1, 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 Ventura County on November 30, 2021, and discovered the following violation(s):

1. Violation 1: Per SCE's 2021-Q2 quarterly data report (QDR), covered conductor was installed and terminated at pole numbered 1832050E. This structure was reported under covered conductor initiative (2021 WMP initiative number 7.3.3.3.1) with a status of "complete." However, upon inspection, it was found that covered conductor work terminated and transitioned to bare wire at the next pole (4944416E). Energy Safety considers this violation for data accuracy to be in the Minor risk category.
2. Violation 2: 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" and SCE's Distribution Overhead Construction Standards (DOH), section CC 190, page 1 of 11, indicates

vibration dampers are required when installing covered conductor. Poles numbered 463639E, 929077E, 929076E, 4094275E, 4094276E, 4094277E, 4094278E, 4157910E, 4944416E, 4089206E, 1025312E, and 1025313E 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.

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 NOV, May 9, 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 2021-NOV docket 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 – May 9, 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 Commission (CPUC) for its consideration of potential enforcement action, as the CPUC deems appropriate.

April 8, 2022 NOV_SCE_ATJ_ 20211130-01_Revised

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

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Report Name: ATJ_SCE_20211130-01_Revised
Date(s) of Inspection: November 30, 2021
Inspector: Anthony Trujillo
Utility: Southern California Edison
Attention: Erik Takayesu, Vice President Asset Strategy and Planning

I. BACKGROUND

With the issuance of this revised inspection report, the Office of Energy Infrastructure Safety (Energy Safety) withdraws inspection report ATJ_SCE_20211130-01 issued on February 24, 2022.

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, 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 is 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 November 30, 2021, I performed a walking inspection of Southern California Edison (SCE) covered conductor installations, 2021 WMP initiative number 7.3.3.3.1, in the cities of Fillmore and Santa Paula, California. 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; not in HFTD Tier 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	463639E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
3	929077E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
4	929076E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
5	4094275E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
6	4094276E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
7	4094277E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
8	4094278E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
9	4157910E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers
10	4944416E	Tier 3	7.3.3.3.1	Data Accuracy	Minor	Data submitted by SCE is inaccurate and indicates covered conductor work terminates one span to the East. Covered conductor terminates at this pole.

Item	Structure ID	HFTD	Initiative Number	Violation Type	Severity	Violation Description
11	4944416E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
12	4089206E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
13	1025312E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install vibration dampers on a span
14	1025313E	Tier 3	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	1561562E	Tier 3	Down guy wire loose	Minor	Loose guy wire

III. DISCUSSION

In its 2021-Q2 quarterly data report (QDR) submission on August 1, 2021, SCE provided initiative data indicating that covered conductor installation projects (2021 WMP initiative number 7.3.3.3.1) in Santa Paula and Fillmore were completed. This QDR submission represented the reporting period of April through June (i.e., Q2) 2021. Based on this information received from SCE, Energy Safety planned an inspection of select structures in these areas to assess the accuracy of SCE data, the completeness of SCE's work, and whether SCE followed its protocols for covered conductor installation. Upon arriving to the inspection location in Fillmore, Energy Safety observed that the covered conductor work was reported as terminating at the pole numbered 1832050E but instead terminated one span further at the pole numbered 4944416E. This data accuracy violation is noted in Table 2 above.

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"[2] (hereafter, "Memo"). 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. In accordance with SCE's Q2 QDR submission, the covered conductor installations inspected by Energy Safety were completed prior to the issuance of the Memo. Also, SCE informed Energy Safety of this supply chain issue only after inspections commenced. Consequently, 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 addition to the violations discovered during WMP inspections of SCE's covered conductor installations, Energy Safety discovered one structure that had a loose guy wire. Energy Safety

[1] **DOH CC section 190, DDS section DDS-10, page 10-82**
[2] **Interim Deviation from Standards on Vibration Damper for Covered Conductor (see Appendix B)**

considers loose guy wires as a condition that increases an electrical corporation's ignition risk because the primary purpose of a guy wire is to provide stability to a structure (e.g., a pole) where imbalanced loads are present. If a guy wire is loose and not maintained taut, it cannot serve its intended purpose of balancing load and adding stability, thus increasing the risk of structure failure and potential ignition under adverse weather conditions. The structure where a loose guy wire was observed is identified in Table 3.

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.

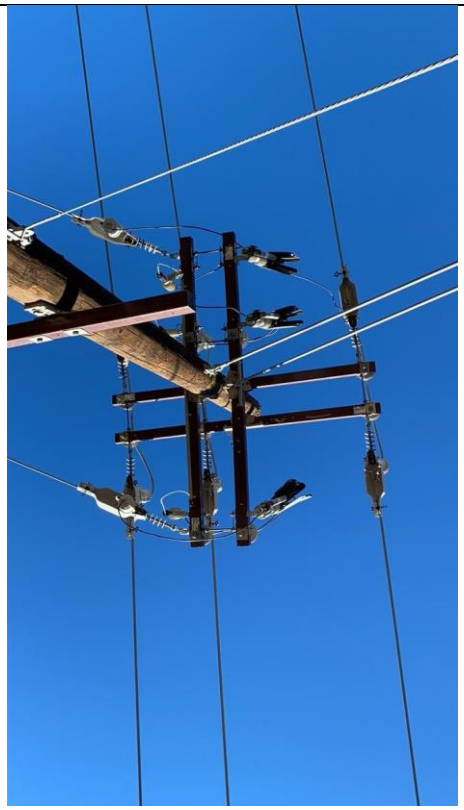
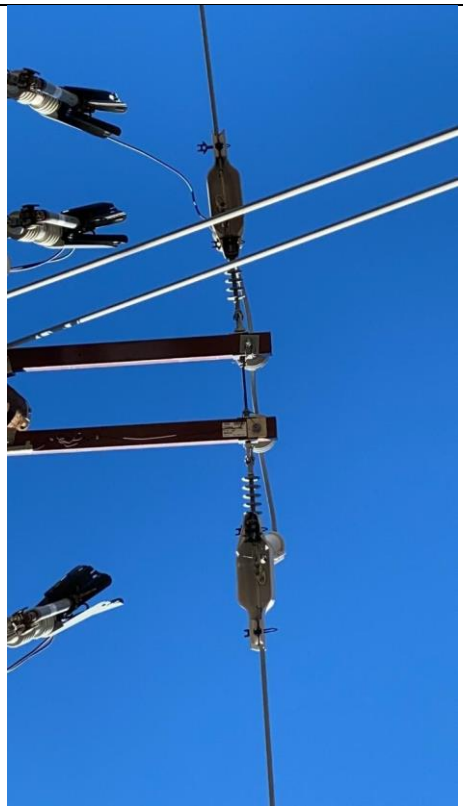
V. APPENDICES

APPENDIX A: Photo Log

Structure ID: 463639E
General Photo

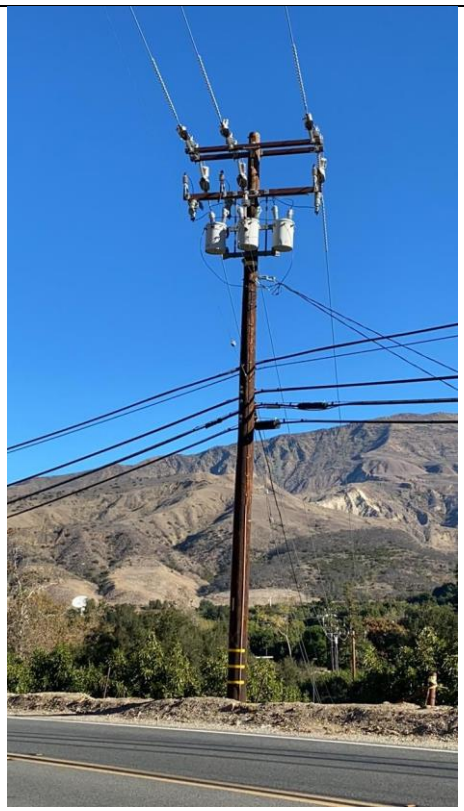
	
Item1GImg1: Overall pole	**Item1GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item1IA1Img1: Vibration dampers not installed	**Item1IA1Img2**: Close up, no vibration dampers installed

Structure ID: 1561562E

General Photo

	
Item2GImg1: Overall pole	**Item2GImg2**: Pole ID

Guy Wire Question #1 Photo

	
Item2GW1Img1: Overview of pole with loose down guy wire	

Structure ID: 247535E

General Photo

	
Item3GImg1: Overall pole	**Item3GImg2**: Pole ID

Structure ID: 247536E

General Photo

	
Item4GImg1: Overall pole	
	
Item4GImg3: Pole ID	

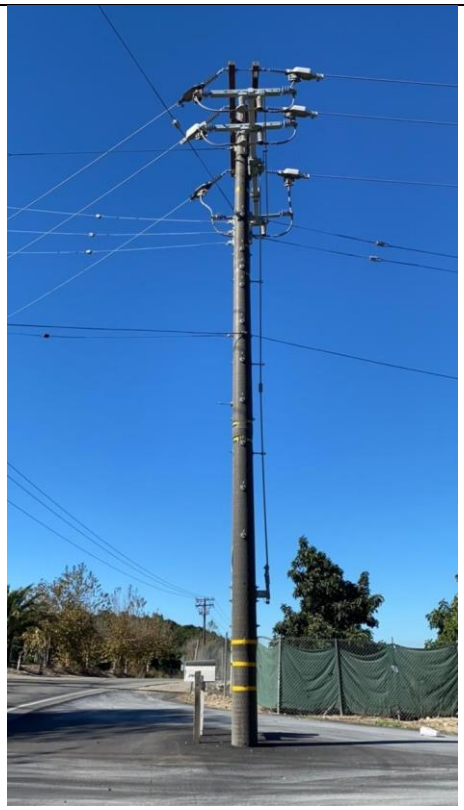
Structure ID: 247537E

General Photo

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

Structure ID: 929077E

General Photo

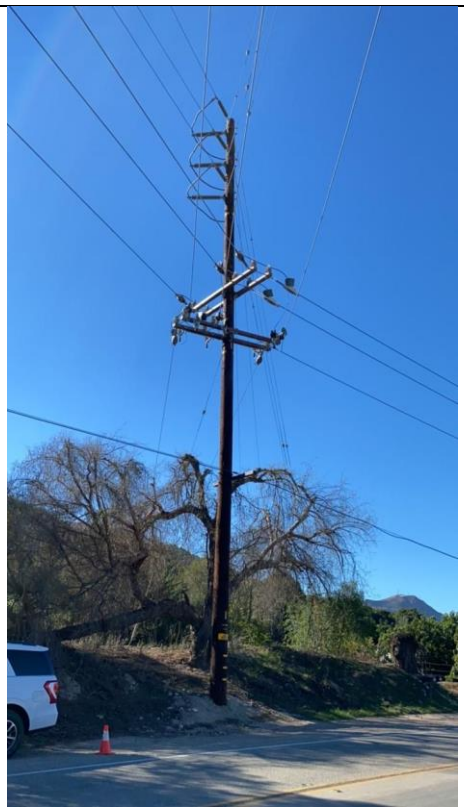
	
Item6GImg1: Overall pole	**Item6GImg2**: Pole ID

Initiative Activity #2 Photo

	
Item6IA2Img1: Vibration dampers not installed	

Structure ID: 929076E

General Photo

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

Initiative Activity #1 Photo

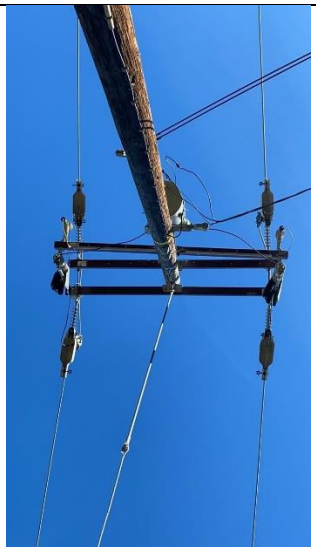
	
Item7IA1Img1: Vibration dampers not installed	

Structure ID: 4094275E

General Photo

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

Initiative Activity #1 Photo

	
Item8IA1Img1: Vibration dampers not installed	

Structure ID: 4094276E

General Photo

	
Item9GImg1: Overall pole	**Item9GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item9IA1Img1: Vibration dampers not installed	

Structure ID: 4094277E

General Photo

	
Item10GImg1: Overall pole	**Item10GImg2**: Pole ID

Initiative Activity #1 Photo

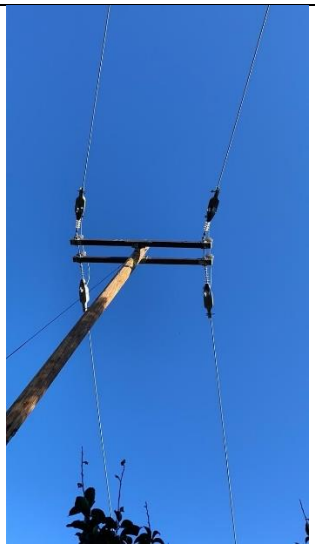
	
Item10IA1Img1: Vibration dampers not installed	

Structure ID: 4094278E

General Photo

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

Initiative Activity #1 Photo

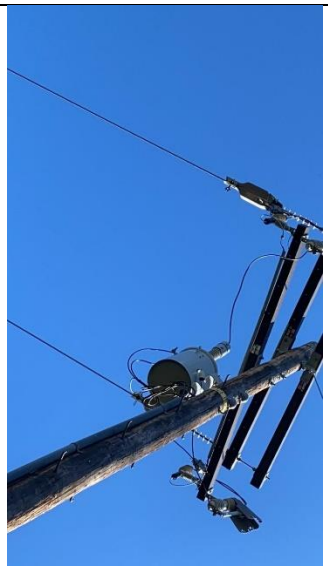
	
Item11IA1Img1: Vibration dampers not installed	

Structure ID: 4157910E

General Photo

	
Item12GImg1: Overall pole	**Item12GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item12IA1Img1: Vibration dampers not installed	

Structure ID: 4944416E

General Photo

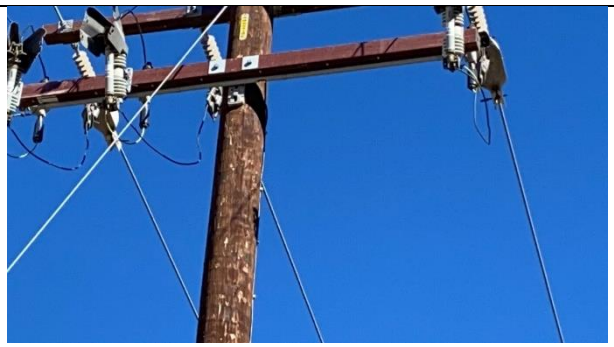
	
Item13GImg1: Overall pole	**Item13GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item13IA1Img1: Bare wire to covered conductor	**Item13IA1Img2**: Bare wire to covered conductor close up

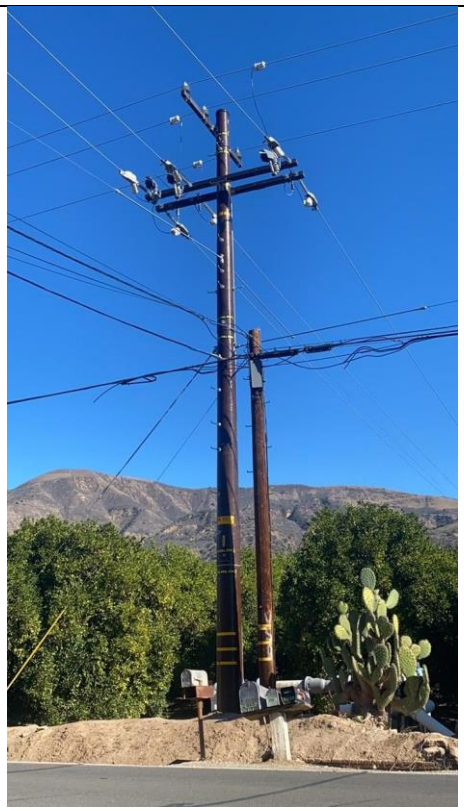
Initiative Activity #2 Photo

Initiative Activity #3 Photo

	
Item13IA3Img1: Vibration dampers not installed	

Structure ID: 4089206E

General Photo

	
Item14GImg1: Overall pole	**Item14GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item14IA1Img1: Vibration dampers not installed	

Structure ID: 1025312E

General Photo

	
Item15GImg1: Overall pole	**Item15GImg2**: Pole ID

Initiative Activity #1 Photo

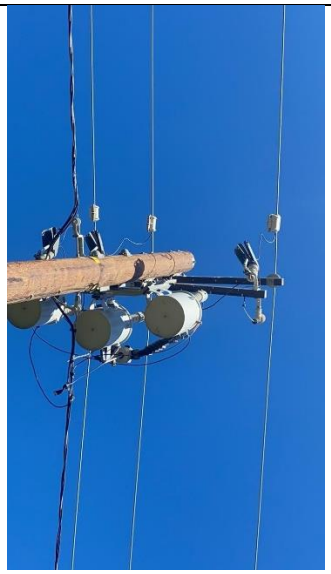
	
Item15IA1Img1: Vibration dampers not installed	

Structure ID: 1025313E

General Photo

	
Item16GImg1: Overall pole	**Item16GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item16IA1Img1: No vibration dampers installed	

APPENDIX B: Other Documentation

Data Request Set, Question 3, ES-SCE-CC Protocols:

Southern California Edison
WSD Compliance – WSD Compliance

DATA REQUEST SET E S - S C E - C C - P r o t o c o l s

To: Energy Safety
Prepared by: Jerald Foster
Job Title: Senior Manager
Received Date: 10/11/2021

Response Date: 10/25/2021

7.3.3.3.1: Covered Conductor installation (SH-1)
Per SCE's 2021 WMP update, "In 2021 SCE continues its Wildfire Covered Conductor Program (WCCP), a multi-year program initiated in 2018 that replaces bare overhead conductor with covered conductor in HFRA. SCE also continues installing covered conductor in HFRAs during post-fire restoration work (outside of the WCCP). Poles that require replacement as part of WCCP are replaced with Fire Resistant Poles (FRP)." 1 Pursuant to this statement and SCE's WCCP, Energy Safety requests the following:

1 2021 WMP Update page 213

Question 03:
When installing covered conductors, do SCE's current protocols and construction standards require the simultaneous installation or upgrade of other equipment (i.e., crossarms, insulators, jumper wires, etc.)?
a. If so, list and describe all such installations or upgrades.

Response to Question 03:

Per the attached document titled "DDS_10 Surge Arresters" it is a requirement to install surge arresters on all equipment connected to covered conductor.

The attached "DOH CC section 190" provides requirements to install vibration dampers on covered conductor systems.

In HFRA installations of covered conductor it is required to upgrade wood crossarms with composite, upgrade all insulators to a polymer insulator, install wildlife protection covers, upgrade fuses where applicable, and upgrade down guy/span guy installation to include Fiberglass Guy Strain Insulators. The standards outlining these requirements are attached in the document titled "DDS Requirements Binder" as well as the attached "DOH Section CC".

Interim Deviation from Standards on Vibration Damper for Covered Conductor

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		