State of California – A Natural Resources Agency
Gavin Newsom, Governor

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 20th Floor | Sacramento, CA 95814
916.902.6000 | *www.energysafety.ca.gov*

Caroline Thomas Jacobs, Director

TRANSMITTED VIA ELECTRONIC MAIL

April 20, 2022

Erik Takayesu

Vice President Asset Strategy and Planning

Southern California Edison

2244 Walnut Grove

Rosemead, CA 91770

NOV_SCE_ATJ_ 20211208-01_Revised

NOTICE OF VIOLATION

Mr. Takayesu,

Pursuant to Government Code § 15475.1, the Office of Energy Infrastructure Safety (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 San Bernardino County on December 8, 2021, and discovered the following violation(s):

1. Violation 1: Per SCE's 2021-Q1 and Q2 quarterly data report (QDR), covered conductor was installed on poles numbered 453043E, and 4920022E. These structures reported covered conductor initiative (2021 WMP initiative number 7.3.3.3.1) with a status of "complete." However, upon inspection, SCE has not even begun covered conductor installation at these locations. Energy Safety considers this data accuracy violation to be in the Moderate risk category.
2. Violation 2: Per SCE's 2021-Q1 and Q2 QDR, covered conductor was installed on poles numbered 453043E, and 4920022E. Upon inspection, Energy Safety staff found no covered conductor installed at the above-mentioned structures. Given SCE's focus on covered conductor as one of its flagship wildfire mitigation programs and the scope of this mitigation program, Energy Safety is greatly concerned about how much covered conductor work is completed and how prevalent this issue may be. Energy Safety

considers this violation related to incomplete WMP work to be in the Moderate risk category.

3. Violation 3: Per SCE's DOH, when transitioning from covered conductor to bare wire, "if conductor is exposed, install bolted wedge connector cover." Per SCE's DDS, Section 10, 5.7.C.1.f, "Covered conductor systems shall be an all-covered system. This means that wildlife covers shall be installed on dead-ends, terminations, connectors, equipment bushings, and any partially covered exposed conductor." Pole 1008927E did not have bolted wedge connector covers when transitioning from bare to covered conductor. Energy Safety considers this failure to follow protocol violation to be in the Minor risk category.
4. Violation 4: At pole numbered 4621322E, the pole identification number on the structure did not match the identification number provided by SCE in its QDR. Energy Safety considers this data accuracy violation 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 notice of violation (NOV), May 20, 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[1] 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 20, 2022. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

[1] https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2021-NOV

April 20, 2022 NOV_SCE_ATJ_ 20211208-01_Revised

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.

Sincerely,

Koko Tomassian
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_20211208-01
Inspection Date(s): December 8, 2021
Inspector: Anthony Trujillo
Utility: Southern California Edison
Attention: Erik Takayesu, Vice President Assets Strategy and Planning

I. BACKGROUND

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, the Office of Energy Infrastructure Safety (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 Wednesday, December 8, 2021, I performed a walking inspection of Southern California Edison (SCE) covered conductor installations, 2021 WMP initiative number 7.3.3.3.1, in various locations in the city of Lake Arrowhead, California. I was accompanied by Energy Safety Supervisor Edward Chavez. 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	1008927E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install bolted wedge connector cover
2	4621322E	Tier 3	7.3.3.3.1	Data Accuracy	Minor	Wrong pole ID reported. Actual pole ID: 4611322E. Reported: 4621322E
3	453043E	Tier 3	7.3.3.3.1	Data Accuracy	Moderate	Covered Conductor reported as completed, and has not started
4	453043E	Tier 3	7.3.3.3.1	Completeness	Moderate	Failure to install covered conductor
5	4920022E	Tier 3	7.3.3.3.1	Data Accuracy	Moderate	Covered Conductor reported as completed, and has not started
6	4920022E	Tier 3	7.3.3.3.1	Completeness	Moderate	Failure to install covered conductor

Table 3. General Wildfire Safety Inspections

Item	Structure ID	HFTD	Defect Type	Severity	Defect Description
1	1008927E	Tier 3	Potential for wire slap	Moderate	Down guy wire is within six inches of 12kV primary conductor
2	453043E	Tier 3	Vegetation contacting guy wire above insulator	Minor	Vegetation touching guy wire above insulator
3	4920022E	Tier 3	Excessive splicing in single span	Minor	Three splices found on one phase

III. DISCUSSION

In its 2021-Q1 and 2021-Q2 quarterly data report (QDR) submission on May 1, 2021, and August 1, 2021, respectively, SCE provided initiative data indicating that covered conductor installation projects (WMP initiative number 7.3.3.3.1) in Lake Arrowhead were completed. This QDR submission represented the reporting periods of January through March (Q1) and April through June (i.e., Q2) of 2021. Based on this information received from SCE, Energy Safety planned an inspection of select structures in this area 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, Energy Safety observed that covered conductor was not installed in several instances where SCE's QDR indicated covered conductor work had a status of "Complete." These structures are noted in Table 2 above.

Per SCE's DOH, Section CC 150, page 3 of 5, in circumstances of 4-wire covered conductor double dead-end construction, if conductor is exposed, bolted wedge connector covers must be installed. Also, DDS, Section 10, 5.7.C.1.f. states, "Covered conductor systems shall be an all-covered system." Per SCE's DOH, Section CC 150.4, page 5 of 5, "All overhead equipment shall utilize appropriate wildlife covers. This means that wildlife covers shall be installed on dead-ends, terminations, connectors, equipment bushings, and any partially covered exposed conductor." Energy Safety observed structure numbered 4487750E that did not have bolted wedge connector cover installed when transitioning from bare to covered conductor. This structure is noted in Table 2 above.

During the inspections, Energy Safety also found one structure where the structure identification number provided by SCE did not match the structure identification number observed in the field. The structure where Energy Safety observed this data accuracy issue is noted in Table 2 above.

In addition to the violations discovered during WMP inspections of SCE's covered conductor installations, Energy Safety discovered vegetation contacting a guy wire above the insulator. Guy wires are metallic and can become energized in some circumstances. Insulators break the current path and prevent electricity from reaching the ground where a down guy wire is anchored. However, the portion above the insulator can remain energized until the circuit is deenergized and may cause

an ignition if energized while in contact with vegetation. Accordingly, Energy Safety considers vegetation in contact with down guy wires above the insulator a condition that increases an electrical corporation's ignition risk. The structure where Energy Safety observed vegetation in contact with the guy wire above the insulator is noted in Table 3.

Energy Safety also discovered a conductor that had an excessive number of splices along a single phase. Energy Safety considers the presence of three or more splices along a single-phase conductor to be an indicator of potential issues with electrical loading or physical weakening of the line. The weakening of conductors can result in heightened risk of conductor failure or of arcing that could result in an ignition. The structure where Energy Safety observed excessive splices observed along a single phase is identified in Table 3.

Finally, Energy Safety discovered a guy wire that was within six inches of a 12kV primary conductor. Energy Safety considers energized conductors that are in close proximity of a guy wire a potential ignition driver. Guy wires that may slap energized conductors may cause arcing, increasing an electrical corporation's ignition risk. The structure where Energy Safety observed a down guy wire in close proximity of bare conductor 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.

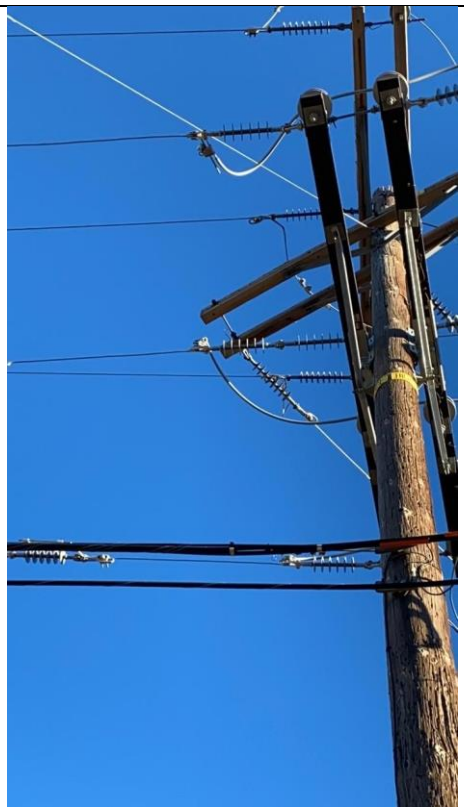
V. APPENDICES

APPENDIX A: Photo Log

Structure ID: 1008927E
General Photo

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

Initiative Activity #2 Photo



Item1IA2Img1: Guy wire is within 6 inches of bare conductor (top of photo, guy wire coming out of the picture)

Conductor Question #2 Photo

Item1CD2Img1: No wildlife covers at transition from bare to covered conductor

Structure ID: 4560199E

General Photo

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

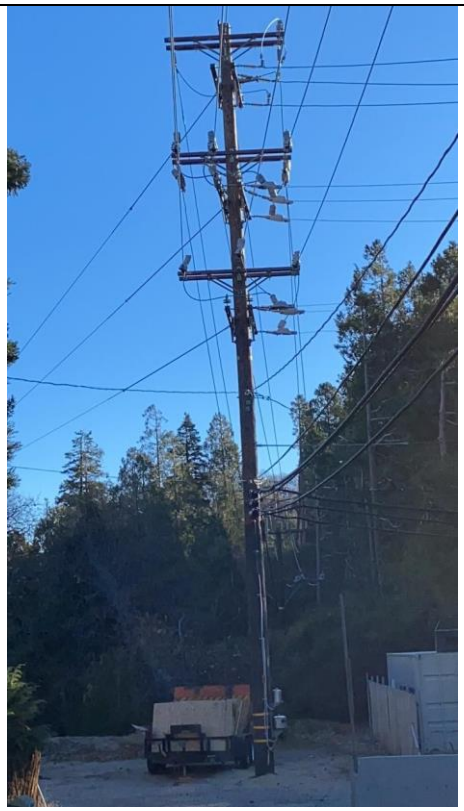
Structure ID: 4092838E

General Photo

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

Structure ID: 4621322E

General Photo

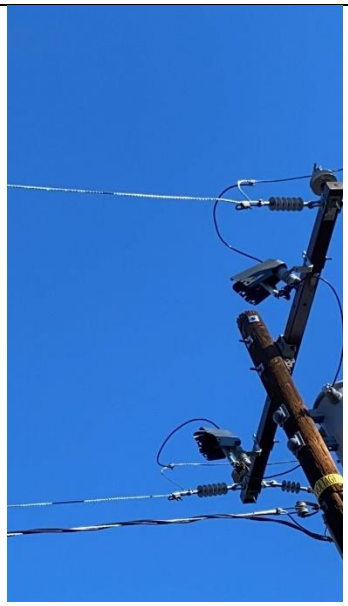
	
Item4GImg1: Overall pole	**Item4GImg2**: Pole ID

Structure ID: 453043E

General Photo

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

Initiative Activity #1 Photo


Item5IA1Img1: Bare wire

Guy Wire Question #2 Photo

Item5GW2Img1: Vegetation touching guy wire above insulator

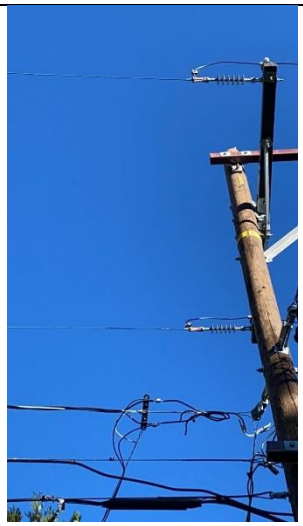
Structure ID: 4920022E

General Photo

Item6GImg1: Overall pole

Item6GImg2: Pole ID

Initiative Activity #1 Photo



Item6IA1Img1: Bare wire

Conductor Question #9 Photo

Item6CD9Img1: 3 splices on one phase

Structure ID: 710038E

General Photo

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

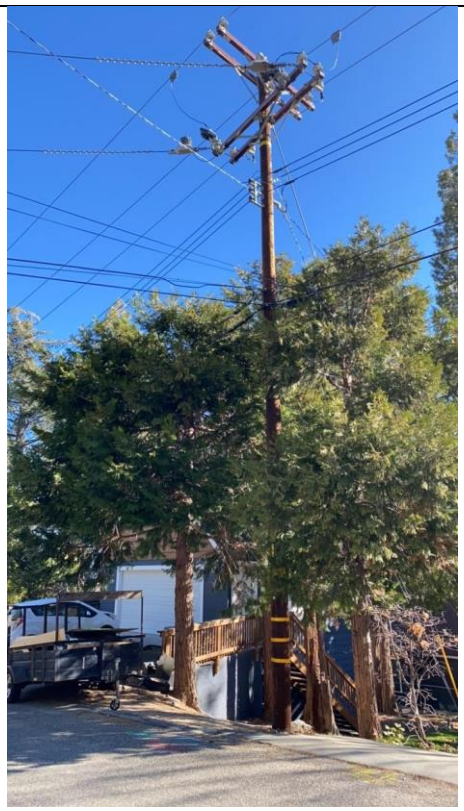
Structure ID: 710036E

General Photo

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

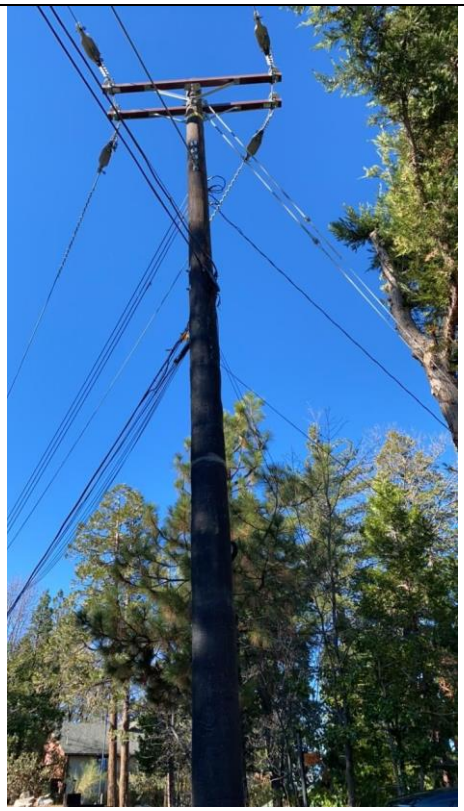
Structure ID: 1649668E

General Photo

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

Structure ID: 1669456E

General Photo

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

Structure ID: 1669454E

General Photo

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

Structure ID: 4574898E

General Photo

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

Structure ID: 1513774E

General Photo

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

Structure ID: 1513772E

General Photo

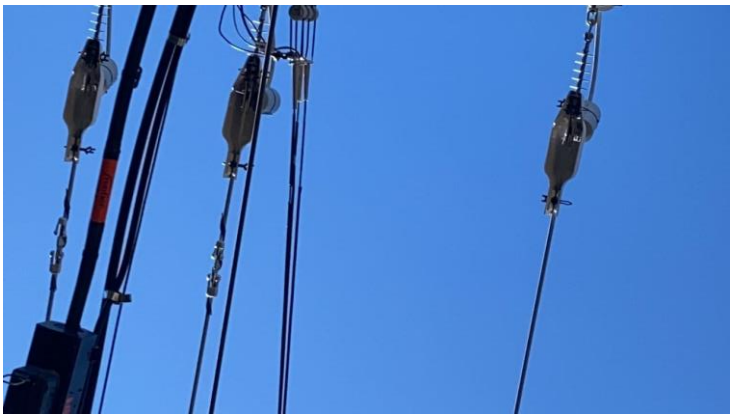
	
Item15GImg1: Overall Pole	**Item15GImg2**: Pole ID

Structure ID: 1513770E

General Photo

Item16GImg2: Pole ID

Initiative Activity #1 Photo



Item16IA1Img1: Note to Utility: In photo, right phase missing vibration damper

Structure ID: 1513768E

General Photo

	
Item17GImg1: Overall pole	**Item17GImg2**: Pole ID

Structure ID: 1513760E

General Photo

	
Item19GImg1: Overall pole	**Item19GImg2**: Pole ID