



## TRANSMITTED VIA ELECTRONIC MAIL

April 22, 2022

Erik Takayesu

NOD\_SCE\_GCA\_ 20211118-01

Vice President Asset Strategy and Planning

Southern California Edison (SCE)

2244 Walnut Grove

Rosemead, CA 91770

# NOTICE OF DEFECT

Mr. Takayesu,

Pursuant to Government Code § 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has completed a compliance assessment of SCE and determined the existence of one or more defects. In accordance with Government Code § 15475.2 and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2), a deficiency, error, or condition increasing the risk of ignition posed by electrical lines and equipment is considered a defect.

Gary Candelas, Energy Safety staff, conducted an inspection on Toro Canyon Rd. in Santa Barbara County on November 18, 2021, and discovered the following defect(s):

1. Defect 1: Pole numbered 4892458E had vegetation contacting guy wire above the insulator. Guy wires may become energized and pose an increased risk if in contact with vegetation. Energy Safety considers this risk to be in the Minor category.

In accordance with the Energy Safety Compliance Process, outlined in Table 1 below are the correction timelines for identified defects relative to their risk category. Within 30 days from the issuance date of this notice of defect (NOD), May 23, 2022, advise Energy Safety of corrective actions taken or planned by SCE to remedy the above-identified defect(s) and prevent a recurrence. This response shall be filed in the Energy Safety e-Filing system under the [2021-NOD<sup>1</sup>](#) docket, and the associated file name(s) must begin with the NOD identification number provided above.

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<sup>1</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2021-NOD>



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*Table 1 Energy Safety Defect Correction Timeline by Risk Category*

<b>Risk Category</b>	<b>Violation and defect correction timeline</b>
Severe	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in HFTD Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tier 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months or resolution scheduled in WMP update</li></ul>

Pursuant to Government Code § 15475.4(b), this NOD 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 NOD – May 23, 2022. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOD become final.

Pursuant to Public Utilities Code § 8389(g), following receipt of SCE’s response to this NOD 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,

A handwritten signature in black ink, appearing to read "Koko Tomassian".

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



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Melissa Semcer, Energy Safety  
Edward Chavez, Energy Safety  
Gary Candelas, Energy Safety

# Energy Safety Inspection Report



OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY



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Report Name: GCA\_SCE\_20211118-01  
Date(s): November 18, 2021  
Inspector: Gary Candelas  
Utility: Southern California Edison  
Attention: Erik Takayesu  
Vice President Asset 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 are referred to as "WMP Initiative Inspections," findings. 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 2 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 18, 2021, at approximately 0840hrs, I, Gary Candelas Environmental Scientist, and Anthony Trujillo Utility Engineer performed a walking inspection of the vegetation and power poles in Toro Canyon in Santa Barbara County. 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	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in HFTD Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tier 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months or resolution scheduled in WMP update</li></ul>





**Table 2. General Wildfire Safety Inspections**

Item	Structure ID	HFTD	Defect Type	Severity	Defect Description
1	4892458E	Tier 3	Vegetation contacting guy wire above insulator	Minor	Vegetation contacting guy wire above insulator



### III. DISCUSSION

Energy Safety discovered vegetation contacting the 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 may 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. A structure where vegetation was in contact with the guy wire above the insulator is noted in Table 2.

### 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: 4892458E

General Photo



Item4Gimg1: Pole ID



Item4Gimg2: Pole



Guy Wire Question #2 Photo



**Item4GW2Img1:** Vegetation contacting guy wire above insulator



**Item4GW2Img2:** Vegetation contacting guy wire above insulator