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 22, 2022

Erik Takayesu

Vice President Asset Strategy and Planning

Southern California Edison

2244 Walnut Grove

Rosemead, CA 91770

NOV_SCE_EDC_ 20211208-01

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.

Edward Chavez, 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 Quarterly Data Report (QDR), covered conductor was installed on pole numbered 2348187E. This structure reported a 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 any of these locations. Energy Safety considers this data accuracy violation to be in the Moderate Risk category.

2. Violation 2: Per SCE's 2021-Q1 QDR, covered conductor was installed on pole numbered 2348187E. 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 Distribution Overhead Standards (DOH), section CC 190, page 3 of 11, install the "vibration damper onto the conductor by wrapping the damping section onto the conductor in a clockwise fashion. Maintain a minimum of 6 inches away from the splice side on the opposite side to the structure, or on the other end of the span." Pole number 1008929E had a vibration damper installed but was found to be within six inches of the structure. 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 notice of violation (NOV), March 23, 2022, advise Energy Safety of corrective actions taken or planned by SCE to remedy the above-identified violation(s) and prevent a 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 – March 23, 2022. If a petition for a 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 22, 2022 NOV_SCE_EDC_ 20211208-01

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
Compliance Program Manager
Compliance Assurance Division
Office of Energy Infrastructure Safety

Cc:
Gary Chen, SCE
Elizabeth Leano, SCE
Diana Gallegos, SCE
Jonathon Chacon, SCE
Johny Parker, SCE
Melissa Semcer, Energy Safety
Edward Chavez, Energy Safety

Energy Safety Inspection Report

CALIFORNIA
OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY

Table of Contents

Report Name: SCE_EDC_20211208
Date(s): December 8, 2021
Inspector: Edward Chavez
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 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." 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 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 Utility Engineer Anthony Trujillo. 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

Line Item	Structure ID	HFTD	Initiative Number	Violation Type	Severity	Violation Description
1	1008929E	Tier 3	7.3.3.3.1	Adherence to Protocol	Minor	Vibration damper is within 6 inches from insulator
2	2348187E	Tier 3	7.3.3.3.1	Data Accuracy	Moderate	Covered conductor reported as completed, and has not started
3	2348187E	Tier 3	7.3.3.3.1	Completeness	Moderate	Failure to install covered conductor

III. DISCUSSION

In its 2021-Q1 and 2021-Q2 quarterly data report (QDR) submission on May 1, 2021, and August 1, 2021, SCE provided initiative data indicating that a covered conductor installation project (WMP initiative number 7.3.3.3.1) in Lake Arrowhead was 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 where SCE's QDR indicated covered conductor work had a status of "Complete." These structures are noted in Table 2 above.

Per SCE's Distribution Overhead Standards (DOH), Section CC 190, page 3 of 11, the vibration damper must be installed to maintain a minimum of 6 inches away from the splice on the opposite side to the structure, or on the other end of the span.[1] These structures are noted in table 2 above.

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.

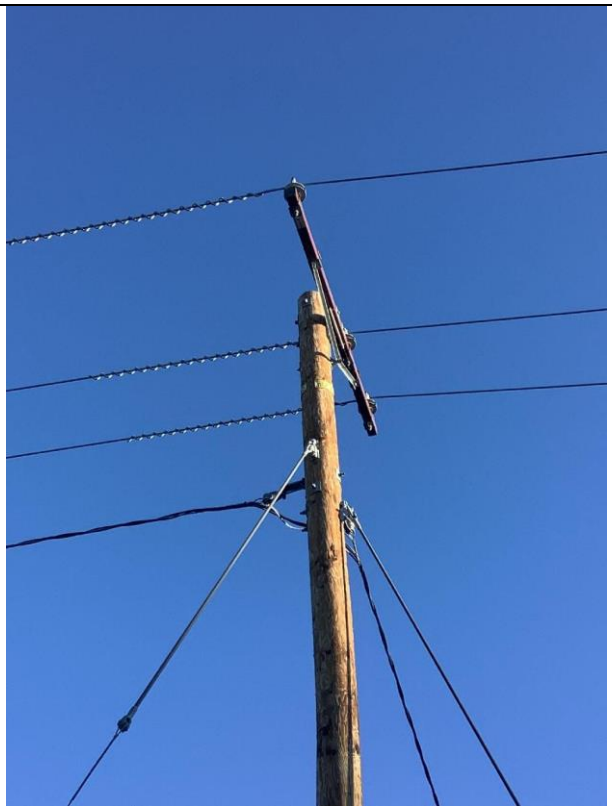
[1] **Distribution Overhead Construction Standards (DOH) CC 190 Pages 3 and 4 of 11, Appendix B**

V. APPENDICES

APPENDIX A: Photo Log

Structure ID: 1008929E

General Photo

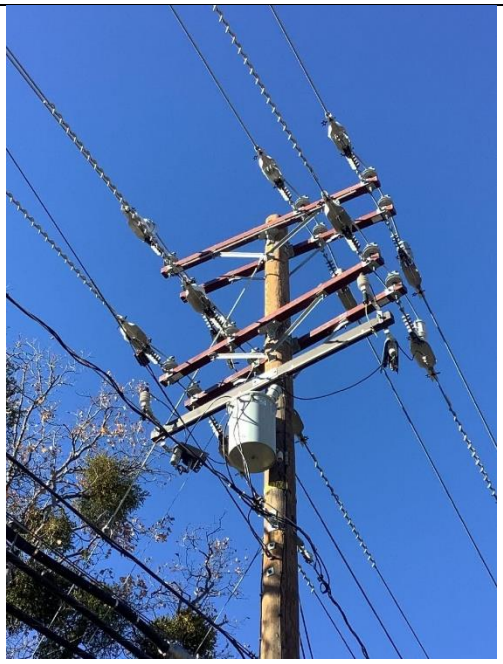
	
Item2GImg1: Pole ID	**Item2GImg2**: Overall photo

Initiative Activity #1 Photo

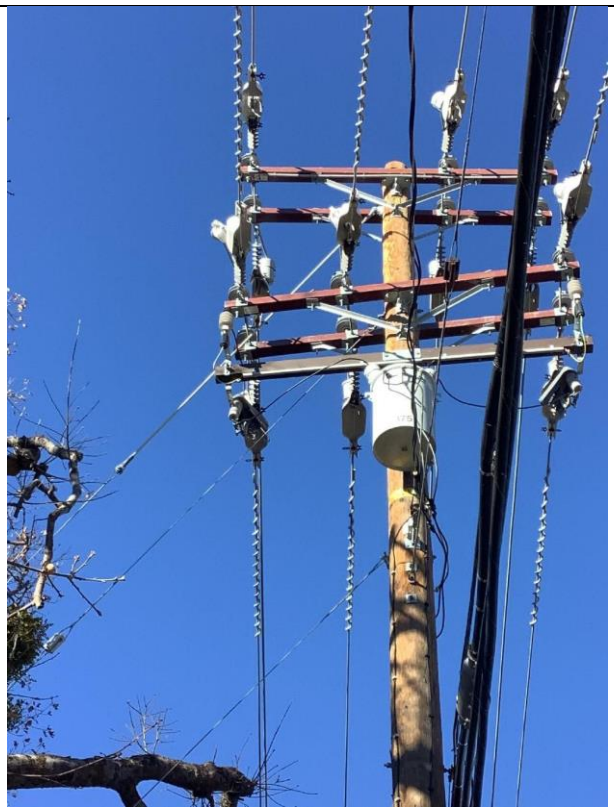
	
Item2IA1Img1: Vibration damper within 6 inches of insulator	

Structure ID: 783316E

General Photo

	
Item3GImg1: Pole ID	**Item3GImg2**: Overall photo

Initiative Activity #1 Photo

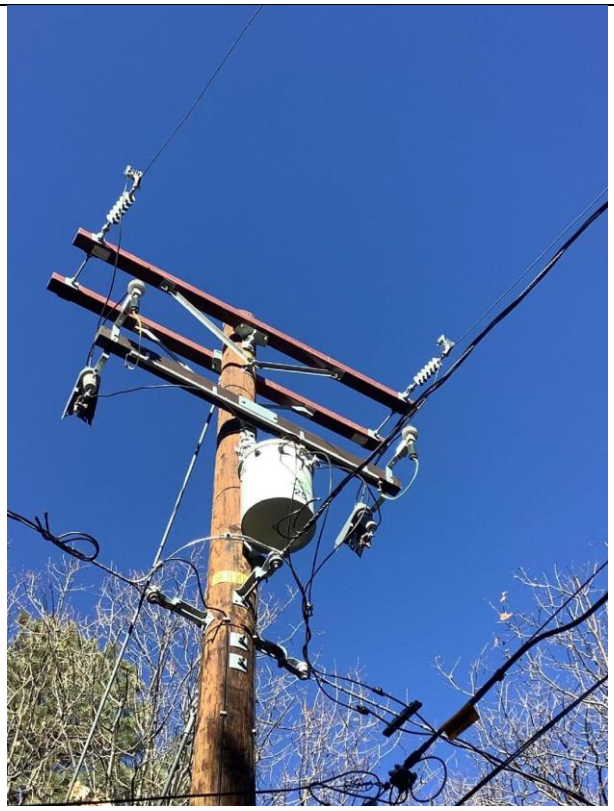
	
Item3IA1Img1: No fiberglass guy insulator installed at the secondary level	

Structure ID: 2348187E

General Photo

	
Item4GImg1: Pole id	**Item4GImg2**: Overall photo

Initiative Activity #1 Photo

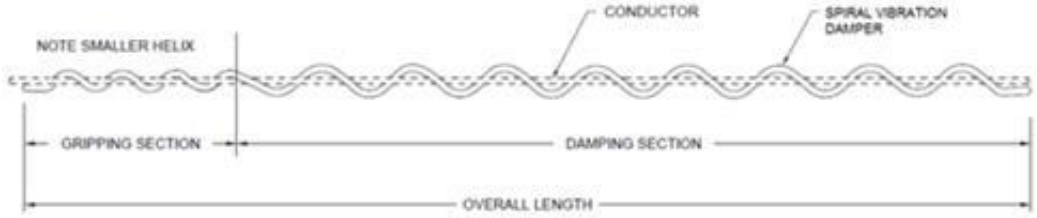
	
Item4IA1Img1: No covered conductor installed as reported	

Distribution Overhead Construction Standards (DOH) CC 190 Pages 3 and 4 of 11

Scope CC 190.2 Installation of Spiral Vibration Dampers in Covered Conductor Systems

1.0 Spiral Vibration Damper Installation

Figure CC 190–3: Spiral Vibration Dampers



The following are installation procedures for the spiral vibration damper on covered conductor systems

STEP 1. See Table CC 190–1 to ensure the appropriate damper is selected.

STEP 2. Position the damper with the gripping section situated toward the closest support point.

STEP 3. Install the spiral vibration damper onto the conductor by wrapping the damping section onto the conductor in a clockwise fashion. Maintain a minimum of 6 inches from dead-end or insulator conductor clamp. If a splice is installed within 9 feet of the insulator or dead-end, place the damper at least 6 inches away from the splice on the side opposite to the structure, or on the other end of the span.

STEP 4. Wrap the gripping section in a counter-clockwise fashion.

STEP 5. Make sure the gripping section is properly seated on the conductor.

Figure CC 190–4: Installed Spiral Vibration Dampers on Covered Conductor

Figure CC 190–5: Installation of Spiral Vibration Dampers on Covered Conductor

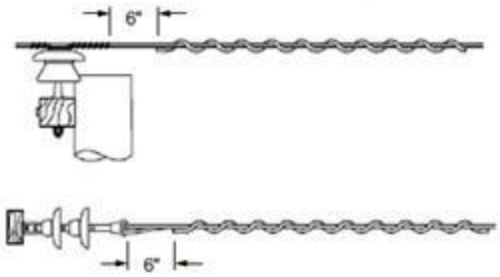


Figure CC 190–6: Spiral Vibration Damper Subset

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".