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

May 11, 2022

Erik Takayesu

Vice President Asset Strategy and Planning

Southern California Edison (SCE)

2244 Walnut Grove

Rosemead, CA 91770

NOD_SCE_GCA_ 20211116-01

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 Southern California Edison (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 in Simi Valley on November 16, 2021, and discovered the following defect(s):

1. Defect 1: Conductor showing evidence of bird-caging near pole X11580E. Energy Safety considers bird-caging wires to weaken the strength of the supply conductors leading to an increased risk of a wire down event and ignition. Energy Safety considers this defect 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 defects relative to their risk category. Within 30 days from

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the issuance date of this notice of defect (NOD), June 10, 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[1] docket, and the associated file name(s) must begin with the NOD identification number provided above.

Table 1 Energy Safety Defect 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 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 – June 10, 2022. If a petition for a 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,

Koko Tomassian
Compliance Program Manager
Compliance Assurance Division
Office of Energy Infrastructure Safety

Cc:

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

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Gary Chen, SCE
Elizabeth Leano, SCE
Diana Gallegos, SCE
Johnny Parker, SCE
Jonathan Chacon, SCE
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: SCE_GCA_2021116-01
Date(s): November 16, 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 causes 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 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 16, 2021, I performed a walking inspection of the vegetation near Southern California Edison (SCE) poles in the City of Simi Valley. I also examined the overall condition of the SCE's poles. 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	Risk Category	Violation Description
1	1473452E	Tier 3	7.3.5.20	Adherence to Protocol	Severe	Palm fronds in contact with conductors.

Table 3. General Wildfire Safety Inspections

Item	Structure ID	HFTD	Defect Type	Risk Category	Defect Description
1	X11580E	Tier 3	Conductor evidence of bird caging	Minor	Bird caging near phase splice. Bird caging is on the eastmost conductor and the middle conductor.

III. DISCUSSION

In accordance with SCE's protocols, as stated in its Distribution Vegetation Management Plan (DVMP), "Compliance Clearance Distance[1] (CCD) [is] to be maintained at all times based on line voltage."[2] The referenced DVMP excerpt may be found in Appendix B. In addition, SCE's 2021 WMP update states, "The line clearance scope in HFRA is driven by the CPUC requirements and GO95 Rule 35 Appendix E."[3] During the inspection, Energy Safety found a Queen Palm frond in contact with the primary conductors. The palm was found in a residential backyard near pole 1473452E. Energy Safety notified SCE Regulatory Affairs and Compliance Advisor Erick Sanchez, via phone on November 16, 2021, of vegetation in direct contact with the primary conductors. Mr. Sanchez acknowledged receipt of the information and indicated that SCE would remediate ignition risk as soon as possible. On November 19, 2021, Mr. Sanchez indicated to Energy Safety staff, via text message, that SCE mitigated the vegetation contact discovered by Energy Safety on November 16, 2021. The structure where compliance clearance distance was not maintained is noted in Table 2.

During the inspections, Energy Safety also discovered a phase conductor that showed evidence of bird-caging. Bird-caging on a supply conductor can weaken its strength and lead to a wire down event and ignition, thus increasing the risk of structural failure and potential ignition under adverse weather conditions. Energy Safety considers this a minor defect due to the severity of the bird-caging. The structure where bird-caging was observed is identified in Table 3. See photos labeled Item4CD5Img1, Item4CD5Img2, Item4CD5Img1 for visual representation.

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] **CCD = Regultion Clearance Distance (RCD) x 1.5 (safety Margin) rounded up**
[2] **Version 4 of DVMP, page 8**
[3] **2021 WMP update, page 280**

V. APPENDICES

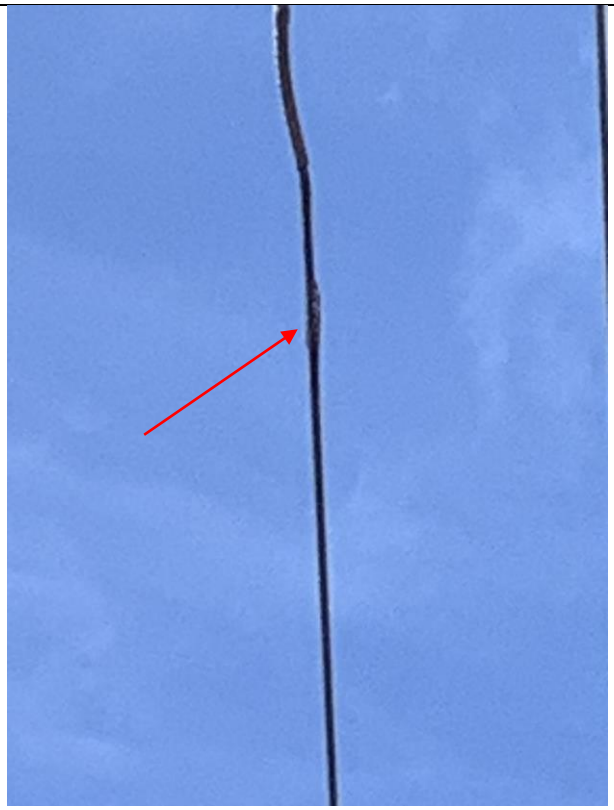
APPENDIX A: Photo Log

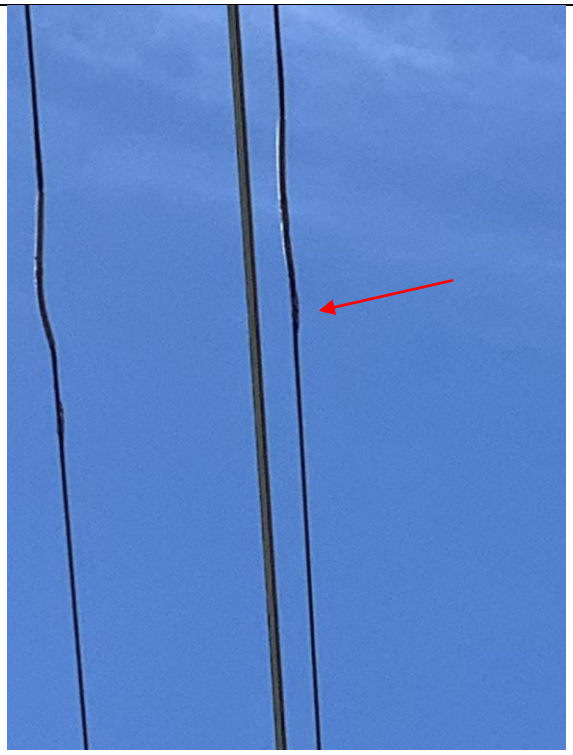
Structure ID: X11580E

General Photo

Item4GImg1: Pole ID

Conductor Question #5 Photo

	
Item4CD5Img1: Bird-Cage middle conductor from pole X11580E at 0.2 span	**Item4CD5Img2**: Close up of bird-caging

	
Item4CD5Img3: Bird-Caging middle conductor near pole X11580E	

Structure ID: 1473452E

General Photo

	
Item9GImg1: Queen palm touching conductor	

Initiative Activity #1 Photo

Item9IA1Img1: Palm fronds contacting the conductor.

Item9IA1Img2: Palm fronds contacting the conductor.

Item9IA1Img3: Palm fronds contacting conductor

Item9IA1Img4: Palm fronds contacting conductors

APPENDIX B: Other Documentation

SCE	Legal, Regulatory, and Compliance	Transmission & Distribution Utility Vegetation Management Program	Methodology	Doc. No.	UVM-03
				Version	5
	Effective Date	3/1/21			
	Supersedes	Version 4			

Distribution Vegetation Management Plan (DVMP)

Vegetation inspections and maintenance should be completed annually or more often as deemed necessary. SCE or its approved contractor will verify the completion of annual vegetation maintenance.

Maintenance Work Validation

Maintenance work will be validated in accordance with UVM-07, "Post Work Verification and UVM Program Oversight," to provide reasonable assurance the work is completed in accordance with the work specification.

5 Clearance Requirements

5.1 Distribution Lines

Based on the conditions described below, the subsequent processes are to be used to establish the clearance requirements in the Encroachment Zones:

5.1.1 Fire Areas (reference Table 1)

Applicable regulations:

1. PRC § 4293
2. GO 95, Rule 35, Case 14

Grid Resiliency Clearance Distances (GRCD) are established to mitigate fire risk and maintain compliance with PRC § 4293 and GO 95, Rule 35 requirements.

- GRCD-A and GRCD-B are to be established at time of maintenance work based on line voltage
- Trigger Clearance Distance[3] (TCD) for UVM work to be initiated based on line voltage
- Compliance Clearance Distances[4] (CCD) to be maintained at all times based on line voltage
- Drop-in Zone is to be cleared of all vegetation as appropriate

5.1.2 Non-Fire Areas (reference Table 2)

Applicable regulation:

1. GO 95, Rule 35, Case 13

GRCDs are established to maintain compliance with GO 95, Rule 35 requirements.

- GRCD-A and GRCD-B are to be established at time of maintenance work based on line voltage
- CCD to be maintained at all times based on voltage

[3] TCD = CCD + 3-feet
[4] CCD = RCD x 1.5 (Safety Margin) rounded up