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_ 20211209-01

# 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 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 Lake Arrowhead in San Bernardino County on December 09, 2021, and discovered the following defect(s):

1. Defect 1: Danger Tree present near SCE pole numbered 4748029E. Energy Safety considers this defect to be in the minor risk category due to dying tree foliage, exposed roots, and location on an uphill slope above SCE assets. The tree shows no other visible signs of defect. Danger Trees have a higher probability of failing due to tree conditions, which can increase the risk of ignition should the tree strike a utility asset.

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), 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

May 11, 2022 NOD_SCE_GCA_20211209-01

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)<br>• 6 months (in HFTD Tier 2)<br>• 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:
Gary Chen, SCE
Diana Gallegos, SCE

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

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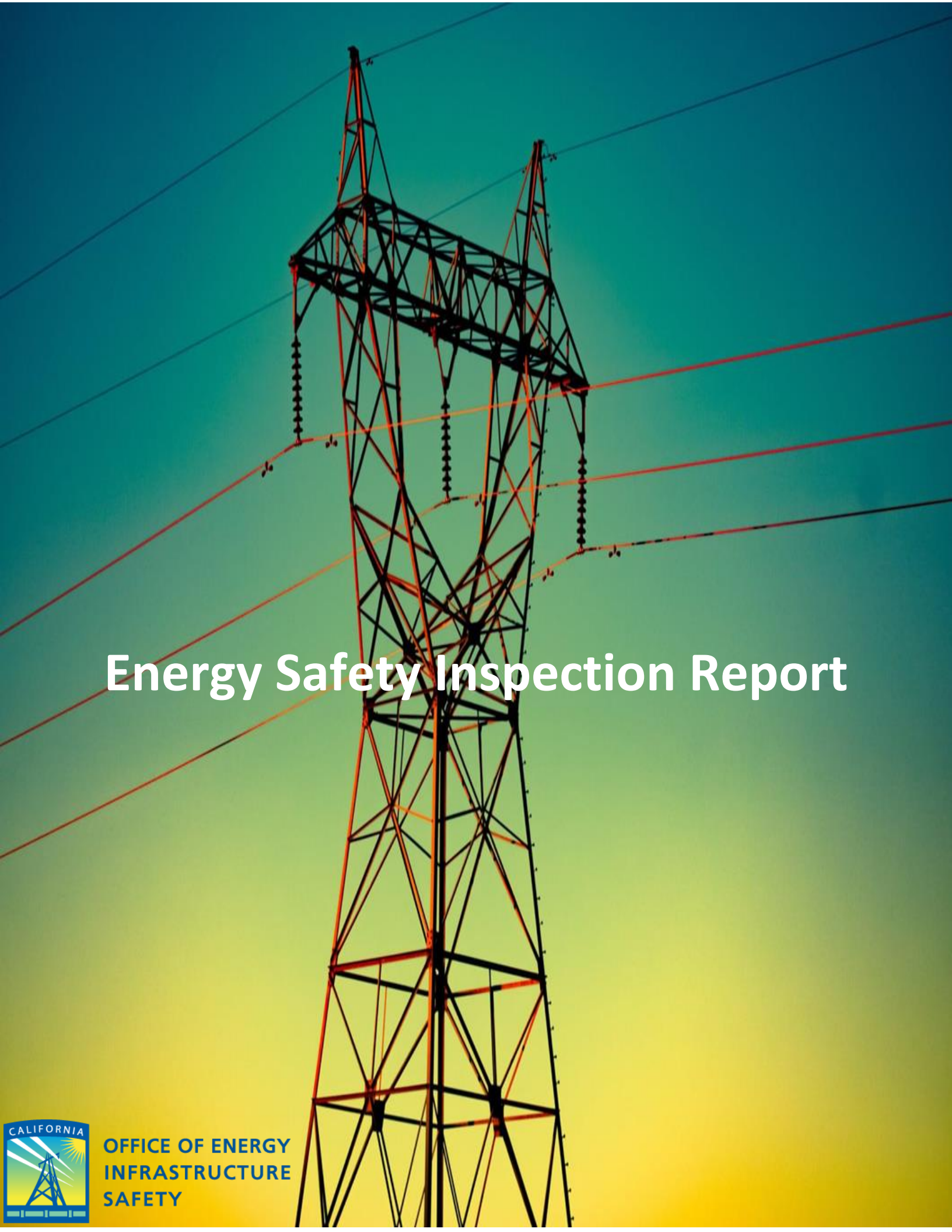
Elizabeth Leano, SCE
Jonny Parker, SCE
Jonathan Chacon, SCE
Melissa Semcer, Energy Safety
Edward Chavez, Energy Safety
Gary Candelas, Energy Safety



# Energy Safety Inspection Report

OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY

# Table of Contents

Report Name: GCA_SCE_20211209-01
Date(s): December 9, 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 is referred to as "WMP Initiative Inspections." 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 December 9, 2021, I performed a walking inspection of Southern California Edison's WMP initiatives pertaining to vegetation management activities in the City of Lake Arrowhead, 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)<br>• 6 months (in HFTD Tier 2)<br>• 6 months (if relevant to worker safety; not in HFTD Tier 3) |
| Minor | • 12 months or resolution scheduled in WMP update |

## **Table 2.** General Wildfire Safety Inspections

| Item | Structure ID | HFTD | Defect Type | Severity | Defect Description |
|---|---|---|---|---|---|
| 1 | 4748029E | Tier 3 | Danger tree present | Minor | Pine tree approximately 55 feet in height on steep slope elevating above SCE assets. Tree has lean towards SCE assets. Distance from conductors to tree approximately 35 feet. Tree has exposed roots and severe dying foliage. |

# III. DISCUSSION

During this inspection, Energy Safety discovered the presence of a "Danger Tree." A "Danger Tree" means any tree that is dead, diseased, dying or has a lean toward utility facilities. A danger tree would be located on or adjacent to a utility right-of-way or facility that could damage utility facilities should it fall. The subject danger tree is a pine tree approximately 55 feet in height, located on a steep slope above an SCE pole numbered 4748029E. The subject danger tree is located approximately 35 feet from the conductors. The subject danger tree has exposed roots and dying foliage. Similar pine trees in the surrounding areas showed no signs of dying foliage. The tree trunk showed no sign of damage, disease, or decay. The subject danger tree did not pose an immediate risk failure. Therefore, Energy Safety considers this defect to be in the minor risk category.

The subject danger tree is approximately located at 26642-26898 Modoc Ln., Lake Arrowhead, CA, 92352. The subject danger tree was accessed from Brentwood Dr, Lake Arrowhead, CA, 92352. Photos in the appendix below show a visual representation of the pole and the subject danger tree. During the inspection, Energy Safety noted that the subject danger tree had a yellow marking on its trunk. Energy Safety followed up with SCE regarding this marking and was notified that the subject danger tree was previously inspected under SCE's Dead and Dying Tree Removal Program and was scheduled for removal in January 2022. Energy Safety agrees with SCE's assessment that the removal of this subject danger tree is necessary to mitigate ignition risk due to potential tree failure and contact with SCE assets.

# 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:** 4748029E

General Photo

| | |
|---|---|
|  |  |
| **Item3GImg1**: Pole ID | **Item3GImg2**: Equipment |

| | |
|---|---|
|  | |
| **Item3GImg3**: Base of Pole | |

Vegetation Question #6 Photo

| | |
|---|---|
|  |  |
| **Item3VG6Img1**: Base of tree with exposed roots | **Item3VG6Img2**: Tree with yellow marking around trunk |

| | |
|---|---|
|  |  |
| **Item3VG6Img3**: Dying foliage in tree canopy | **Item3VG6Img4**: Proximity of tree to SCE assets |