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

June 15, 2022

Erik Takayesu

Vice President Asset Strategy and Planning

Southern California Edison (SCE)

2244 Walnut Grove

Rosemead, CA 91770

NOD_SCE_GCA_ 20220412-01

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 Ventura County on April 12, 2022, and discovered the following defect(s):

1. Defect 1: Vegetation (vine) was breaking the minimum clearance distance from conductors at pole 1603964E. Energy Safety considers vegetation to be at a minimum clearance distance of 4ft in HFTD areas. Energy Safety considers vegetation breaking minimum clearance requirements as a Moderate defect.
2. Defect 2: Pole numbered 1603964E had vegetation (vine) contacting guy wire above the insulator. Guy wires can become energized and pose an increased risk if in contact with vegetation. Energy Safety considers this risk to be in the Minor category.
3. Defect 3: An oak tree's vegetation was breaking the minimum clearance distance from conductors. Energy Safety considers vegetation to be at a minimum clearance distance of 4ft in HFTD areas. Energy Safety considers vegetation breaking minimum clearance requirements as a Moderate defect.

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), July 18, 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 2022-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 – July 18, 2022. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOD become final.

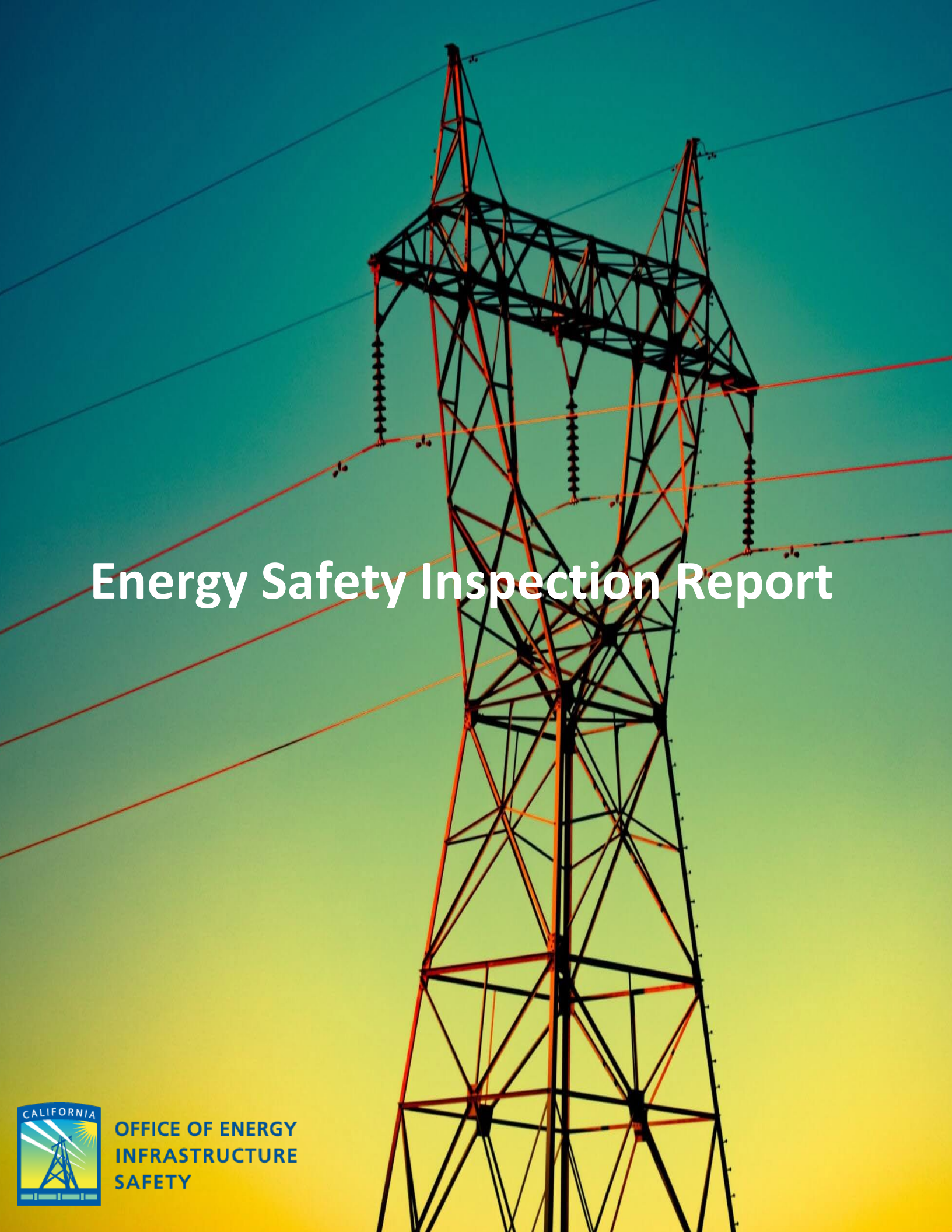
Pursuant to Public Utilities Code § 8389(g), following receipt of SCE's response to this NOD and resolution of any disputes, this matter may be referred to the California Public Utilities Commission (CPUC) for its consideration of potential enforcement action, as the CPUC deems appropriate.

Sincerely,

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

[1] https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-NOD

Cc:
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: GCA_SCE_20220412
Date(s): April 12, 2022
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 April 12, 2022, at approximately 0740 hours, I, Gary Candelas Environmental Scientist, performed a walking inspection of the vegetation near the power poles in the city of Oak View in Ventura County. I also examined the overall condition of SCE's infrastructure. The focus of this inspection was the following initiatives: 7.3.5.5.1 (expanded pole brushing), 7.3.5.16.1 (hazard tree mitigation program) and 7.3.5.20 (vegetation management to achieve clearance around electric lines and equipment). The weather was 49 degrees Fahrenheit with wind present. 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. General Wildfire Safety Inspections

	Structure ID	HFTD	Defect Type	Severity	Defect Description
1	4495329E	Tier 3	Vegetation near supply conductor w/radial clearance requirements	Moderate	Lateral tree branch within 4 feet of conductors.
2	1603964E	Tier 3	Vegetation contacting guy wire above insulator	Minor	Vegetation (vine) contacting guy wire above insulator.
3	1603964E	Tier 3	Vegetation near supply conductor w/radial clearance requirements	Moderate	Vegetation (vine) at crossarm and signs of wrapping around pole.

III. DISCUSSION

Energy Safety observed vegetation within the minimum clearance requirements from conductors. Existing regulation requires vegetation to be at a minimum clearance distance of four (4) feet from conductors in HFTD areas. Energy Safety observed multiple locations where vegetation was within the minimum clearance from conductors. Energy Safety considers vegetation breaking the minimum clearance distance requirement as a moderate defect.

Additionally, Energy Safety discovered vegetation contacting a guy wire above the insulator. The vegetation, a vine, has grown up the guy wire and grown past the crossarm of SCE pole numbered 1603964E. 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 de-energized 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.

Structures where vegetation within the minimum clearance distance and vegetation in contact with the guy wire above the insulator is noted in Table 2.

IV. CONCLUSION

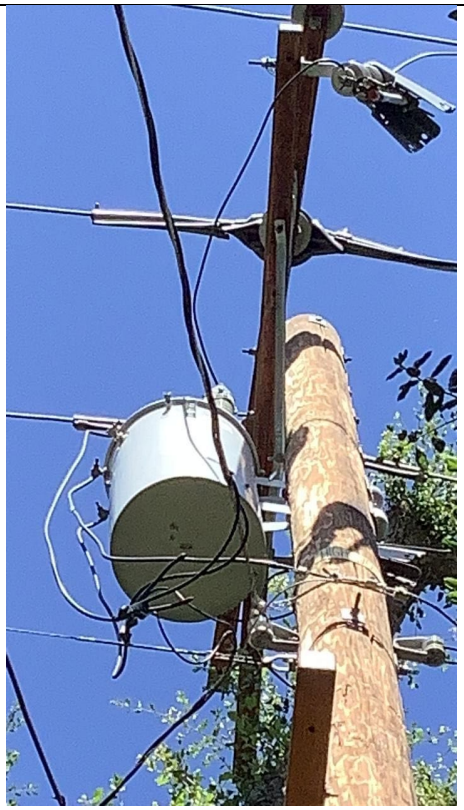
Pursuant to its objectives and statutory obligations, Energy Safety has completed the above-referenced inspection and discovered violations and/or defects by Southern California Edison. Southern California Edison's required response to these non-compliances and options for hearing are detailed in the associated notice of violation and/or defect, respectively.

V. APPENDICES

APPENDIX A: Photo Log

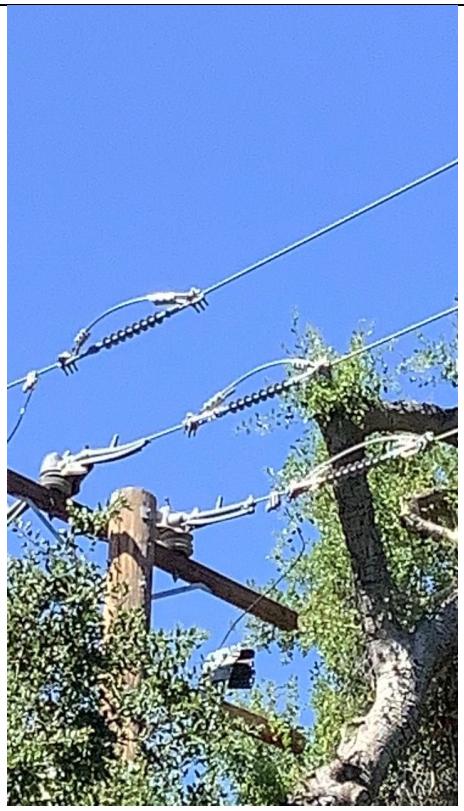
Structure ID: 4495329E

General Photo

	
Item7GImg1: Pole ID	**Item7GImg2**: Pole assets

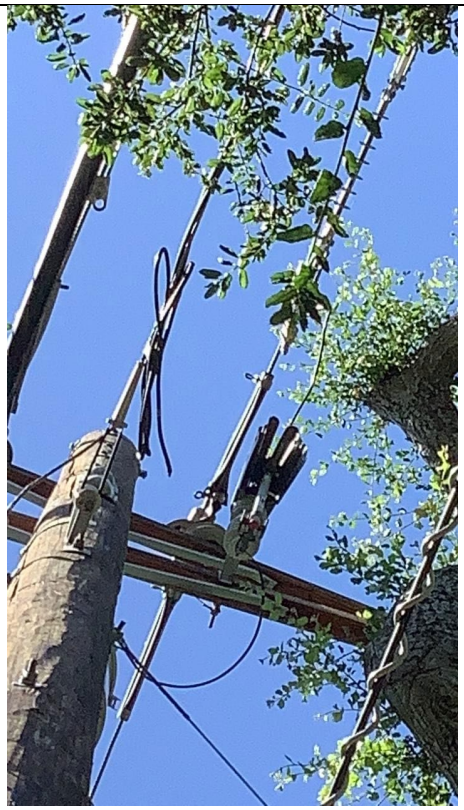
	
Item7GImg3: Pole base	

Vegetation Question #4 Photo



Item7VG4Img1: Vegetation within 4ft

Item7VG4Img2: Vegetation within 4ft

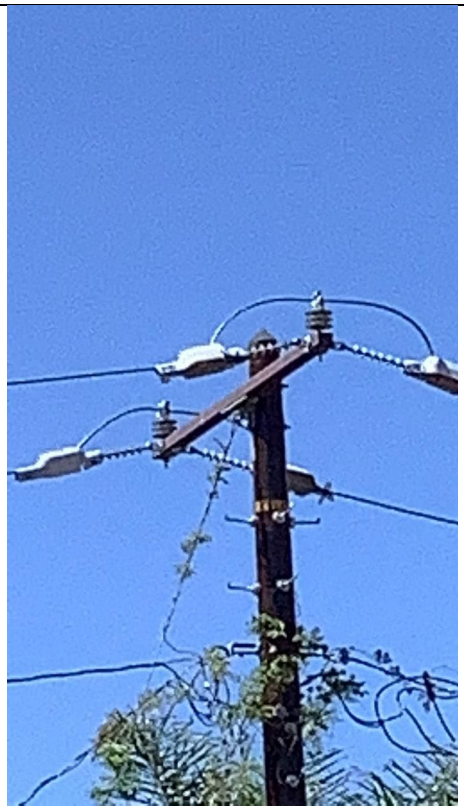
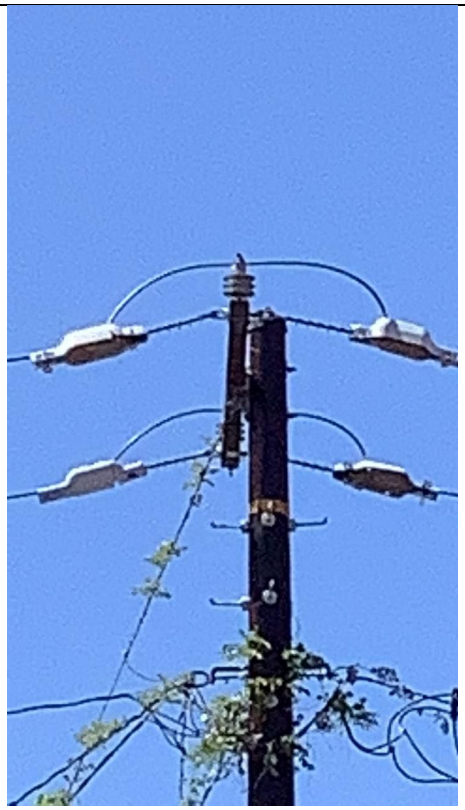


Item7VG4Img3: Vegetation within 4ft

Item7VG4Img4: Vegetation within 4ft

Structure ID: 1603964E

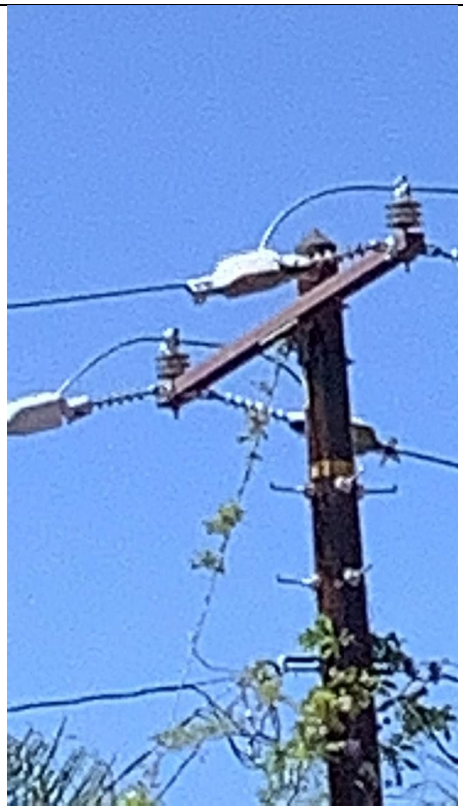
General Photo

	
Item8GImg1: Vegetation growing up guy wire	**Item8GImg2**: Vegetation growing around pole

Guy Wire Question #2 Photo

	
Item8GW2Img1: Vegetation above guy insulator	**Item8GW2Img2**: Vegetation above guy insulator

Vegetation Question #4 Photo

	
Item8VG4Img1: Vegetation growing on guy wire reaching cross arm	**Item8VG4Img2**: Vegetation growing on guy wire reaching cross arm

	
Item8VG4Img3: Vegetation growing along guy wire (close up)	**Item8VG4Img4**: Vegetation growing around the pole (close up)