



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_ 20220404-01

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 Yucaipa in San Bernardino County on April 04, 2022, and discovered the following defect(s):

1. Defect 1: Danger Tree present near SCE pole numbered 710167E. Energy Safety considers this defect to be in the minor category due to dying foilage and subject danger tree approximately 15 feet from SCE assets. The tree shows no other signs of defects. Danger Trees have a higher probability of failure 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), 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-NOD¹ 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	<ul style="list-style-type: none"> • Immediate resolution
Moderate	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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 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
Elizabeth Leano, SCE
Diana Gallegos, SCE
Jonny Parker, SCE
Jonathan Chacon, SCE
Melissa Semcer, Energy Safety
Edward Chavez, Energy Safety

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

June 15, 2022

NOD_SCE_GCA_20220404-01

Gary Candelas, Energy Safety

Energy Safety Inspection Report



OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY



Table of Contents

I.	BACKGROUND	1
II.	RESULTS.....	2
	Table 1. Risk Category and Correction Timelines	3
	Table 2. General Wildfire Safety Inspections.....	4
III.	DISCUSSION	5
IV.	CONCLUSION	5
V.	APPENDICES	A-1



Report Name: GCA_SCE_20220404
Date(s): April 4, 2022
Inspector: Gary Candelas
Utility: Southern California Edison
Attention: Erik Takayesu
Principal Manager Compliance Assurance

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 4, 2022, at approximately 1030hrs, I, Gary Candelas Environmental Scientist, performed a walking inspection of SCE’s vegetation management initiatives 7.3.5.5.1 (expanded pole brushing) and 7.3.5.20 (vegetation management to achieve clearance around electric lines and equipment) in the county of San Bernadino in and around the city of Yucaipa. I also examined the overall condition of SCE infrastructure. The weather was 77 degrees Fahrenheit, clear skies with no 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	<ul style="list-style-type: none">• Immediate resolution
Moderate	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 12 months or resolution scheduled in WMP update



Table 2. General Wildfire Safety Inspections

Item	Structure ID	HFTD	Defect Type	Severity	Defect Description
1	710167E	Tier 2	Danger tree present	Minor	Deodar Cedar, Danger tree observed with potential to strike conductor and/or pole nearby. The subject tree is in the front yard of property North East of the conductor, approximately 15ft from the conductors. The tree has no foliage, and neighboring trees show foliage. The tree has no other wounds or cavities. Unable to make contact with the homeowner.



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 towards a utility's 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 deodar cedar approximately 15 feet from supply conductors near pole 710167E. The subject danger tree is an evergreen that has dead foliage on the canopy. The tree trunk showed no sign of damage, disease, or decay. Neighboring deodar cedar trees on the same property show healthy foliage on the canopy. Energy Safety was unable to contact the homeowner to discuss the history of the tree. The subject danger tree did not pose an immediate risk of failure. Therefore, Energy Safety considers this defect to be in the minor risk category. Photos in the appendix show a visual representation of the pole and the subject danger tree.

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: 710167E

General Photo



Item1GImg1: Pole assets



Item1GImg2: Pole ID

Vegetation Question #6 Photo



Item1VG6Img1: danger tree near conductor



Item1VG6Img2: Side view of danger tree and conductor



Item1VG6Img3: Front view of danger tree



Item1VG6Img4: Neighboring trees