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

July 22, 2022

Erik Takayesu
Vice President Asset Strategy and Planning
Southern California Edison
2244 Walnut Grove
Rosemead, CA 91770

NOD_SCE_ATJ_20220622-01

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.

On June 22, 2022, Anthony Trujillo, Energy Safety staff, conducted a walking inspection in Los Angeles, Orange, Riverside, and San Bernardino Counties, California and discovered the following defect(s):

1. Defect 1: Pole number 2344930E had loose down and span guy wires. The primary purpose of a guy wire is to provide stability to a structure (e.g., a pole) where imbalanced loads are present. To provide this stability a guy wire must be maintained taut. A loose guy wire increases the risk of structure failure and potential ignition under adverse weather conditions, as the guy wire can no longer serve its intended purpose of balancing an imbalanced load. Energy Safety considers this defect to be in the Minor risk category.
2. Defect 2: Pole number 4003373E had loose down and span guy wires. The primary purpose of a guy wire is to provide stability to a structure (e.g., a pole) where imbalanced loads are present. To provide this stability a guy wire must be maintained

taut. A loose guy wire increases the risk of structure failure and potential ignition under adverse weather conditions, as the guy wire can no longer serve its intended purpose of balancing an imbalanced load. Per SCE's DOH, PO 300, pages 6 and 7 of 9, **"**the bottom of the eye of the anchor rod shall extend a minimum of 4 inches and a maximum of 18 inches above finish grade**."** Energy Safety considers this defect to be in the Minor risk category.

3. Defect 3: Pole numbered 1564552E and 4003373E had buried guy anchors. Per SCE's DOH, PO 300, pages 6 and 7 of 9, **"**the bottom of the eye of the anchor rod shall extend a minimum of 4 inches and a maximum of 18 inches above finish grade**."** 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 the issuance date of this notice of defect (NOD), August 22, 2022, advise Energy Safety of corrective actions taken or planned by SCE to remedy the above identified defect(s) and prevent recurrence. This response shall be filed in the Energy Safety e-Filing system under the 2022-NOD docket[1] 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 – August 22, 2022. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOD become final.

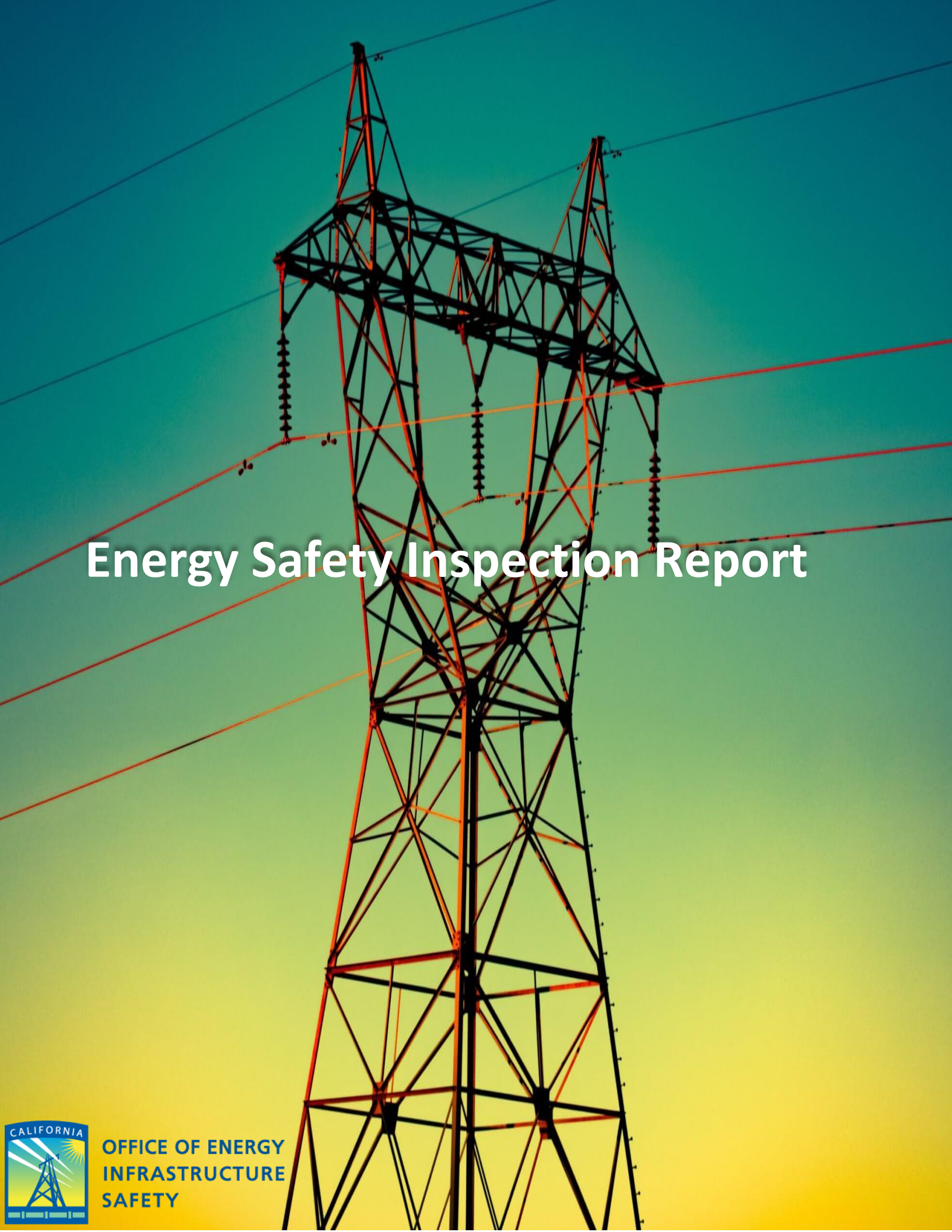
Pursuant to Public Utilities Code § 8389(g), following receipt of SCE's response to this NOD and resolution of any disputes, this matter will be referred to the California Public Utilities Commission (CPUC) for its consideration of potential enforcement action, as the CPUC deems appropriate.

Sincerely,

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

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
Johnny Parker, SCE
Melissa Semcer, Energy Safety
Edward Chavez, Energy Safety
Anthony Trujillo, Energy Safety



Energy Safety Inspection Report

CALIFORNIA
OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY

Table of Contents

Report Name: ATJ_SCE_20220622-01
Date(s): June 22, 2022
Inspector: Anthony Trujillo
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 June 22, 2022, I performed an opportunistic General Wildfire Safety Inspection (GWSI) of Southern California Edison (SCE) assets in Los Angeles, Orange, Riverside, and San Bernardino Counties. 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 and not in HFTD Tiers 2 or 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	2344930E	Non-HFTD	Down guy wire loose	Minor	Span guy wire loose
2	4003373E	Non-HFTD	Down guy wire loose	Minor	Two loose down guys, one loose guy span
3	4003373E	Non-HFTD	Down guy wire loose	Minor	Two burried guy anchors
4	1564552E	Tier 2	Down guy wire loose	Minor	Buried guy anchor

III. DISCUSSION

Energy Safety discovered two structures that had loose span and down guy wires. Energy Safety considers loose guy wires as a condition that increases an electrical corporation's ignition risk because the primary purpose of a guy wire is to provide stability to a structure (e.g. a pole) where imbalanced loads are present. If a guy wire is loose and not maintained taut, it cannot serve its intended purpose of balancing load and adding stability, thus increasing the risk of structure failure and potential ignition under adverse weather conditions. Structures where loose guy wires were observed are identified in Table 2.

Energy Safety discovered two structures that had either a Plate Anchor or Heavy-Duty Power-Installed Screw Anchors buried under the soil. Per SCE's DOH, PO 300, pages 6 and 7 OF 9, "the bottom of the eye of the anchor rod shall extend a minimum of 4 inches and a maximum of 18 inches above finish grade." Structures where buried guy anchors were observed are identified in Table 2.

IV. CONCLUSION

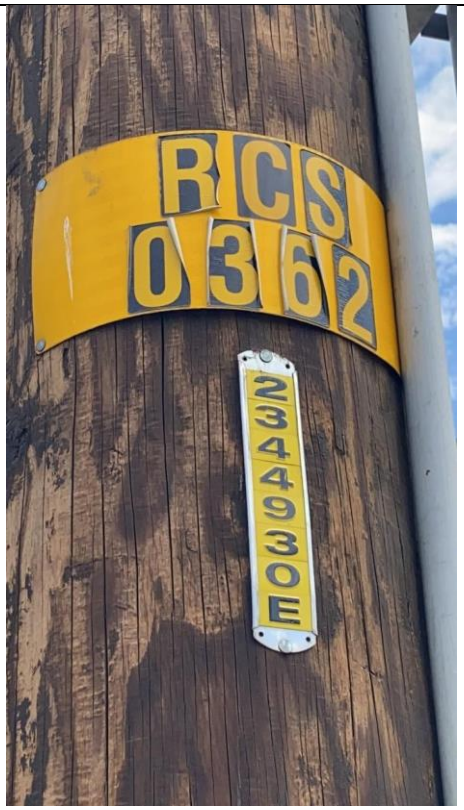
Pursuant to its objectives and statutory obligations, Energy Safety has completed the above referenced inspection and discovered violations and/or defects by Southern California Edison. Southern California Edison's required response to these non-compliances and options for hearing are detailed in the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

V. APPENDICES

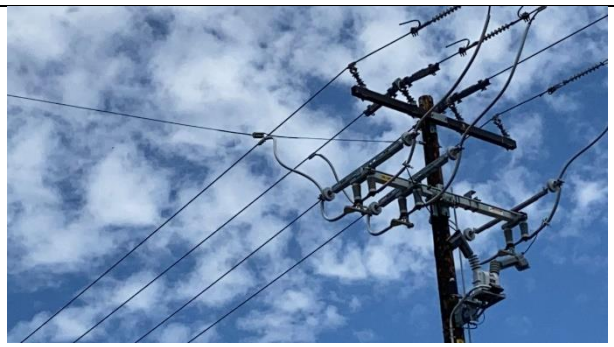
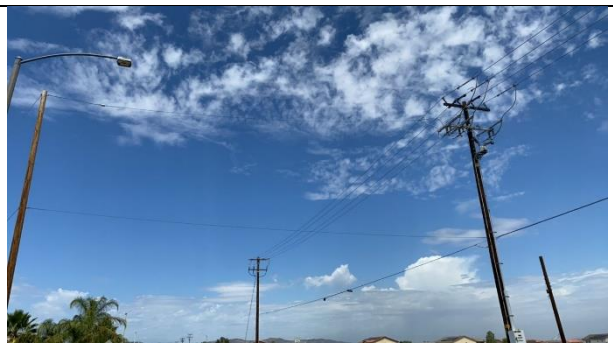
APPENDIX A: Photo Log

Structure ID: 2344930E

General Photo

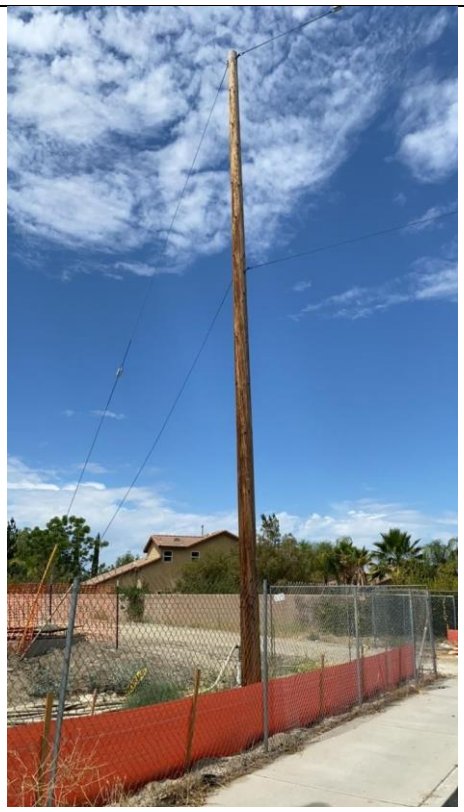
	
	Item6GImg2: Pole ID

Guy Wire Question #1 Photo

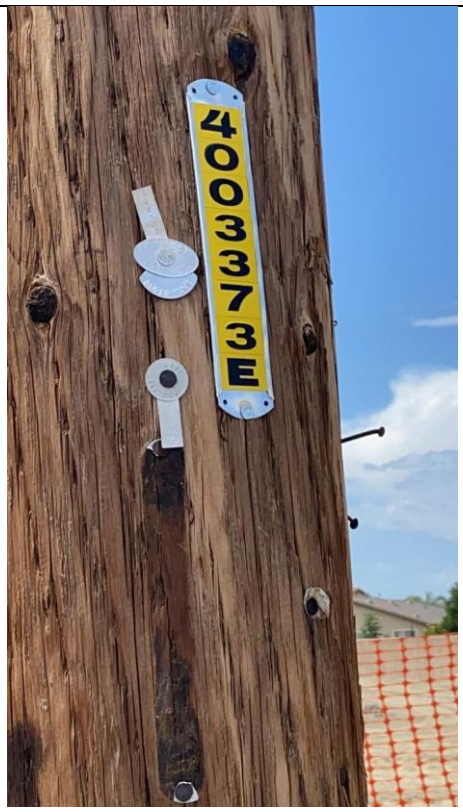
	
Item6GW1Img1: Close up Loose span guy	**Item6GW1Img2**: Overall view of guy span connecting to support pole

Structure ID: 4003373E

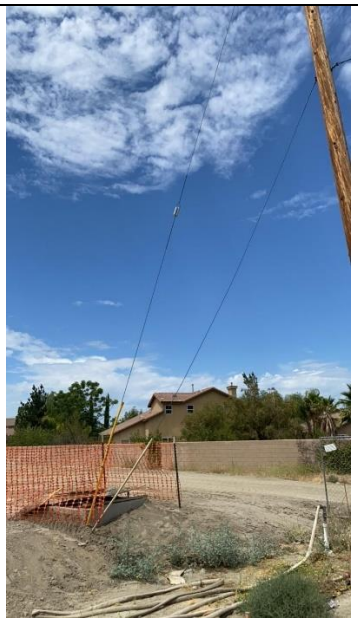
General Photo



Item7GImg1: Overall pole

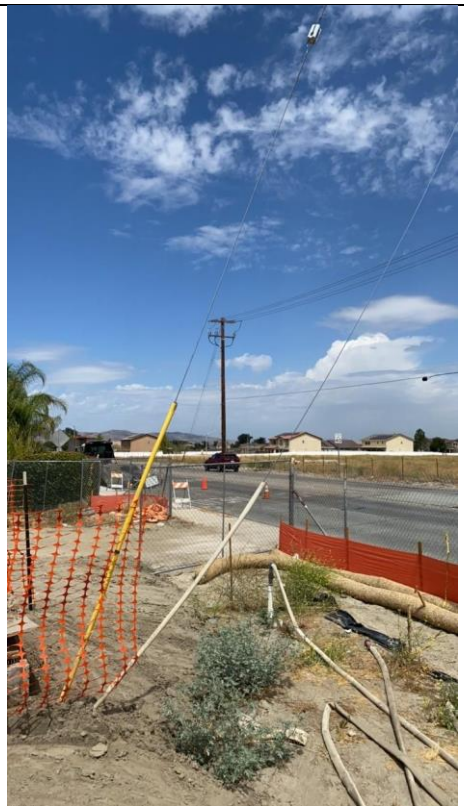


Item7GImg2: Pole ID

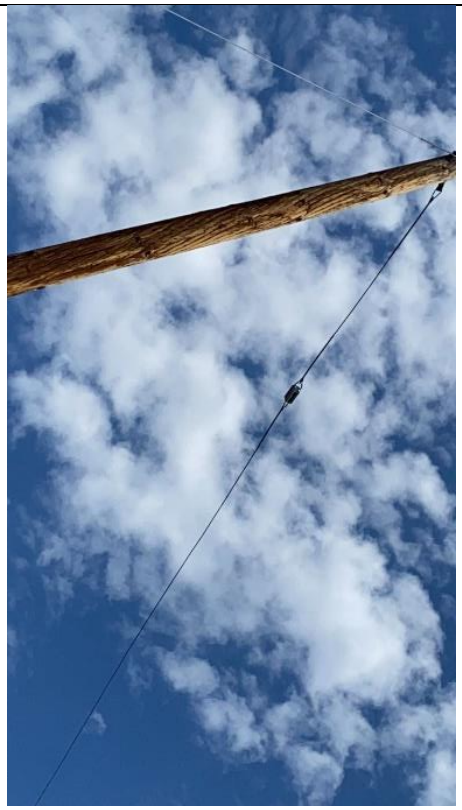


Item7GImg3: Two loose down guys

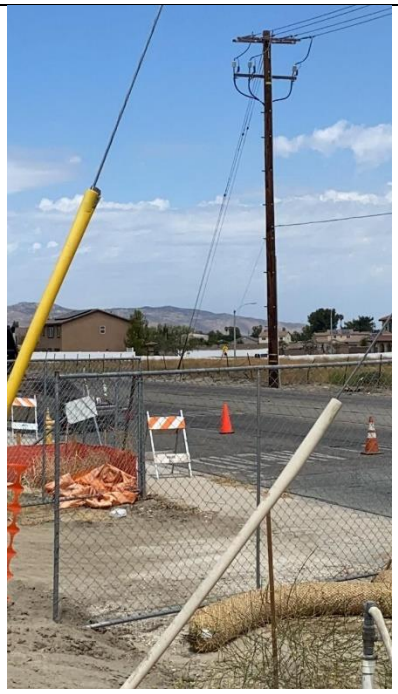
Guy Wire Question #1 Photo



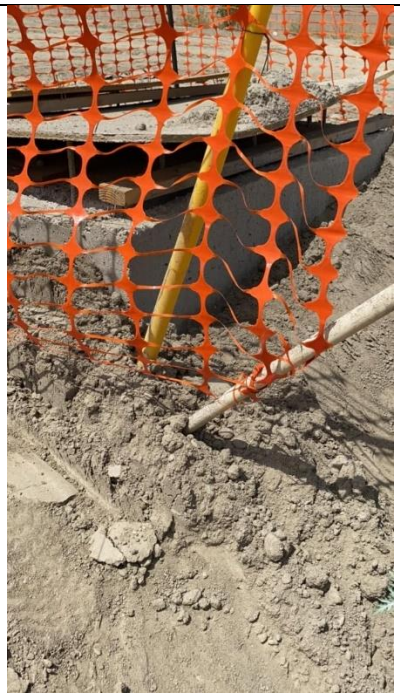
Item7GW1Img1: Two loose down guys



Item7GW1Img2: Loose guy span



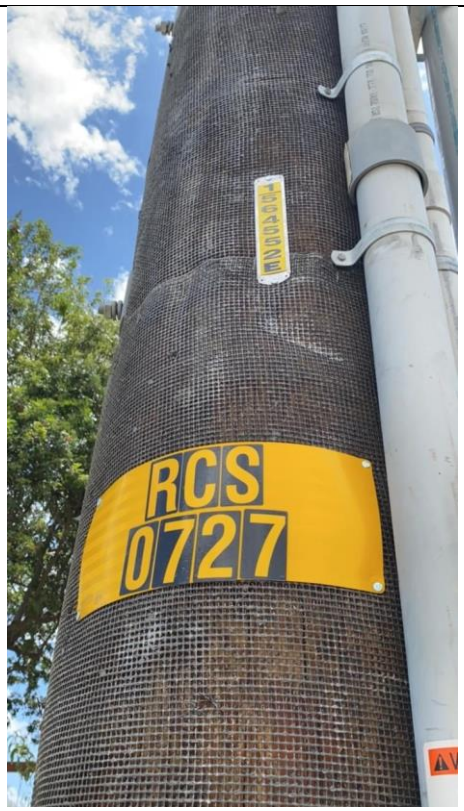
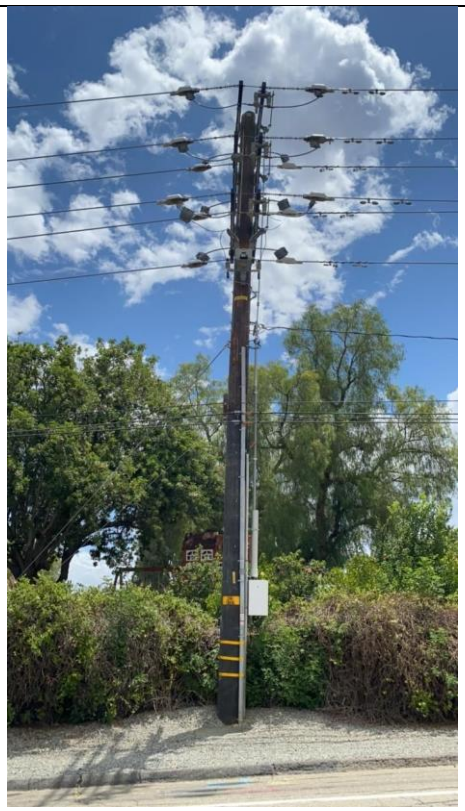
Item7GW1Img3: Loose down guys in motion



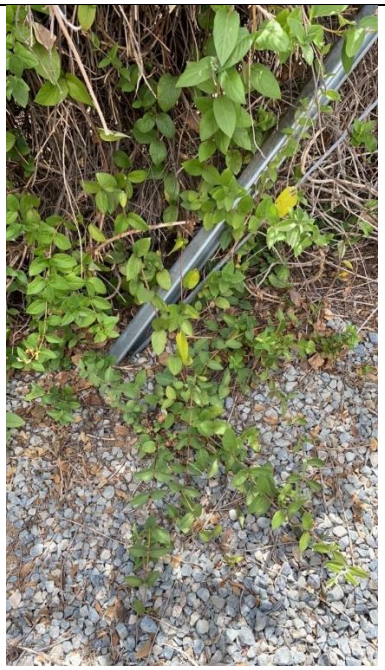
Item7GW1Img4: Two buried guy anchors

Structure ID: 1564552E

General Photo

	
Item8GImg1: Pole ID	**Item8GImg2**: Overall pole

Guy Wire Question #1 Photo

	
Item8GW1Img1: Buried guy anchor	