



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

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Caroline Thomas Jacobs, Director

TRANSMITTED VIA ELECTRONIC MAIL

July 22, 2022

Erik Takayesu

NOD_SCE_ATJ_20220414-01

Vice President Asset Strategy and Planning

Southern California Edison

2244 Walnut Grove

Rosemead, CA 91770

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 April 14, 2022, Anthony Trujillo, Energy Safety staff, conducted a walking inspection near the city of Green Valley, California and discovered the following defect(s):

1. Defect 1: Pole numbered 4483794E had a dead-end cover that was upside down and did not have anti-rotational clip installed. The primary purpose of an equipment cover is to prevent contact between the equipment and foreign objects. When a dead-end cover rotates and exposes the top of the connection, it increases the risk of ignition. Energy Safety considers this defect to be in the Minor risk category.
2. Defect 2: Pole numbered 4483794E showed six dead end covers not having anti-rotational clips. Per SCE's DOH, Table DC 535-1: Wildlife Protection Material, SCE

requires that anti-rotation clips be used with Dead-End Clamp Covers.¹ 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](#)² 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 – 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,



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

Cc:

¹ [SCE DOH, Table DC 535-01, SAP 10214048](#)

² <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-NOD>

July 22, 2022

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Gary Chen, SCE

Elizabeth Leano, SCE

Diana Gallegos, SCE

Jonathon Chacon, SCE

Johnny Parker, SCE

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Edward Chavez, Energy Safety

Anthony Trujillo, Energy Safety

Energy Safety Inspection Report



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Report Name: SCE_ATJ_20220414-01

Date(s): April 14, 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 April 14, 2022, I performed an opportunistic inspection of Southern California Edison (SCE) previously installed covered conductor installations, near the city of Green Valley, 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	<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 and not in HFTD Tiers 2 or 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	4483794E	Tier 2	Cold End Hardware	Minor	Upside down dead-end cover
2	4483794E	Tier 2	Cold End Hardware	Minor	Failure to install anti-rotational clips on six dead-end covers



III. DISCUSSION

Energy Safety staff performed an opportunistic inspection on previously installed covered conductor and found the following. Per SCE's DDS, Section 10, 5.7.C.1.f. states, "Covered conductor systems shall be an all-covered system." Per SCE's DOH, Section CC 150.4, page 5 of 5, "All overhead equipment shall utilize appropriate wildlife covers. This means that wildlife covers shall be installed on dead-ends, terminations, connectors, equipment bushings, and any partially covered exposed conductor." Energy Safety observed a phase where a dead-end cover was upside down. This structure is noted in Table 2 above.

At the same structure, there were six dead-end covers that were missing anti-rotational devices. Per SCE's DOH, Table DC 535-1: Wildlife Protection Material, SCE requires that anti-rotation clips be used with Dead-End Clamp Covers.⁴ Structures where this protocol was not followed are noted in Table 2 above.

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

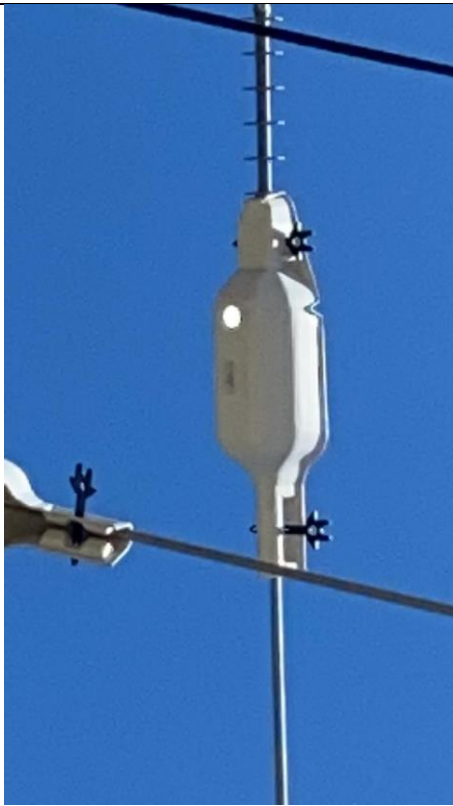
APPENDIX A: Photo Log

Structure ID: 4483794E

General Photo

	
<p>Item1Gimg1: Overall photo</p>	<p>Item1Gimg2: Pole ID</p>

Initiative Activity #1 Photo



Upside down dead-end cover

Initiative Activity #2 Photo



Overall photo of structure



Initiative Activity #3 Photo



Close up of dead-end cover having no anti-rotational device



Close up of another dead-end cover having no anti-rotational device