State of California – A Natural Resources Agency
Gavin Newsom, Governor

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 20th Floor | Sacramento, CA 95814
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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

NOV_ SCE ATJ_20220411-01

NOTICE OF VIOLATION

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 violations. In accordance with Government Code § 15475.2 and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2), noncompliance with an approved wildfire mitigation plan (WMP) or any law, regulation, or guideline within Energy Safety's authority is considered a violation.

Anthony Trujillo, Energy Safety staff, conducted a walking inspection in the city of Rolling Hills, California on April 11, 2022, and discovered the following violation(s):

1. Violation 1: Per SCE's 2021-Q2 quarterly data report (QDR), covered conductor was installed and terminated one structure over from structure numbered 683849E. However, upon inspection, it was found that covered conductor work terminated at this structure. Energy Safety considers this violation for data accuracy to be in the Minor risk category.
2. Violation 2: 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] Pole numbered 683849E did not have an anti-rotational clip installed on dead-end cover. Energy Safety considers this violation for failure of adhering to protocol to be in the Minor risk category.
3. Violation 3: Per SCE's Distribution Overhead Standards (DOH), section CC 190, page 3 of 11, install the "vibration damper onto the conductor by wrapping the damping section onto the conductor in a clockwise fashion. Maintain a minimum of 6 inches away from

[1] **SCE DOH, Table DC 535-01, SAP 10214048**

the splice side on the opposite side to the structure, or on the other end of the span." Pole number 683848E had a vibration damper installed but was found to be within six inches of an insulator. Energy Safety considers this violation for failure of adhering to protocol 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 violations relative to their risk category. Within 30 days from the issuance date of this notice of violation (NOV), August 22, 2022, advise Energy Safety of corrective actions taken or planned by SCE to remedy the above identified violation(s) and prevent recurrence. This response shall be filed in the Energy Safety e-Filing system under the 2022-NOV docket[2] and the associated file name(s) must begin with the NOV identification number provided above.

Table 1 Energy Safety Violation 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 NOV 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 NOV – August 22, 2022. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Pursuant to Public Utilities Code § 8389(g), following receipt of SCE's response to this NOV 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,

[2] **https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-NOV**

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July 22, 2022 NOV_ SCE ATJ_20220411-01

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Energy Safety Inspection Report

CALIFORNIA
OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY

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Report Name: SCE_ATJ_ 20220411-01
Date(s): April 11, 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,” findings of which are detailed in Table 2. 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.” 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 11, 2022, I performed a walking inspection of Southern California Edison (SCE) covered conductor installations, 2021 WMP initiative number 7.3.3.3.1, in the city of Rolling Hills, 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) • 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. WMP Initiative Inspections

Item	Structure ID	HFTD	Initiative Number	Violation Type	Severity	Violation Description
1	683849E	Tier 2	7.3.3.3.1	Data Accuracy	Minor	Data submitted by SCE indicates covered conductor work terminates one structure over. Covered conductor terminates at this structure.
2	683849E	Tier 2	7.3.3.3.1	Adherence to Protocol	Minor	Failure to install anti-rotational clip on dead-end cover
3	683848E	Tier 2	7.3.3.3.1	Adherence to Protocol	Minor	Vibration dampener within 6 inches of insulator

III. DISCUSSION

In its 2021, Q1-Q4 quarterly data reports (QDR) submissions, SCE provided initiative data indicating that a covered conductor installation project (WMP initiative number 7.3.3.3.1) in the city of Rolling Hills, CA was completed. This QDR submission represented the reporting periods of January through December (i.e., Q1-Q4) of 2021. Based on this information received from SCE, Energy Safety planned an inspection of select structures in this area to assess the accuracy of SCE data, the completeness of SCE's work, and whether SCE followed its protocols for covered conductor installation. Upon arriving to the inspection location, Energy Safety observed that covered conductor did not terminate at the reported structure, but at one structure over. This structure is noted in Table 2 above.

Energy Safety discovered a dead-end cover that was missing an anti-rotational clip. 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] Structures where this protocol was not followed are noted in Table 2 above.

Per SCE's Distribution Overhead Standards (DOH), Section CC 190, 3 of 11, the vibration damper must be installed to maintain a minimum of 6 inches away from the splice on the opposite side to the structure, or on the other end of the span. This structure is noted in Table 2 above.

IV. CONCLUSION

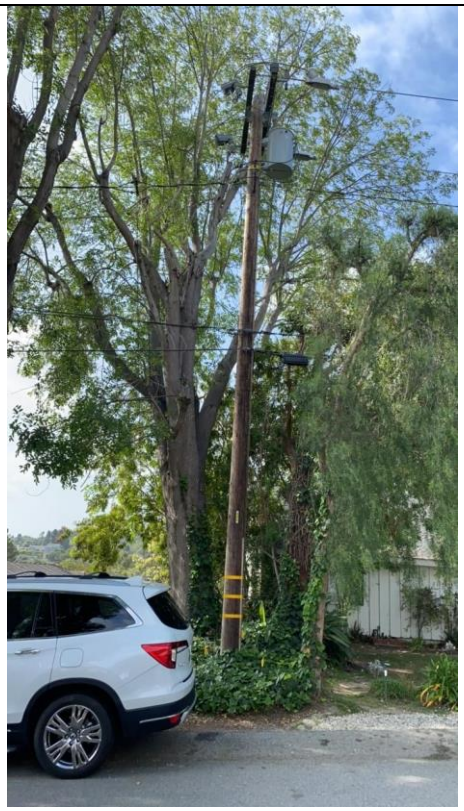
Pursuant to its objectives and statutory obligations, Energy Safety has completed the above referenced inspection and discovered violations and/or defects by Southern California Edison. Southern California Edison's required response to these non-compliances and options for hearing are detailed in the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

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

V. APPENDICES

APPENDIX A: Photo Log

Structure ID: 683849E
General Photo

	
Item1GImg1: Overall Pole	**Item1GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item1IA1Img1: Covered conductor installed at this pole	

Initiative Activity #2 Photo

	
Item1IA2Img1: No anti-rotational clip installed on dead-end cover	

Initiative Activity #3 Photo

	
: Structure tag	

Structure ID: 683848E

General Photo

	
Item2GImg1: Overall pole	**Item2GImg2**: Pole ID

Initiative Activity #1 Photo

	
Item2IA1Img1: Vibration dampener within 6 inches of insulator	