



April 5, 2024

Shinjini Menon  
Vice President Asset Strategy and Wildfire Safety  
Southern California Edison Company  
2244 Walnut Grove Ave  
Rosemead, CA 91770

## NOTICE OF VIOLATION

Ms. Shinjini Menon:

Pursuant to Public Utilities Code section 326 and Government Code section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by Southern California Edison Company in accordance with its 2023 Wildfire Mitigation Plan (WMP) and determined the existence of one or more violations. Energy Safety therefore issues Southern California Edison Company a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the Office.<sup>1</sup>

On December 13, 2023, Energy Safety conducted an inspection of Southern California Edison Company's WMP initiatives in the vicinity of the city of Redlands, California. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.1 - Covered Conductor Installation, Southern California Edison Company failed to install covered conductor on pole ID 4679694E at coordinates 34.0275893802089, -117.138890036749. Energy Safety considers this violation for failure to complete the initiative to be in the Minor risk category.

### Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.<sup>2</sup> Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will

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<sup>1</sup> Cal. Code Regs., tit. 14, section 29302(b)(2)

<sup>2</sup> Energy Safety Compliance Guidelines, pp. 5-6

not correct the violation, including the reasoning or justification for inaction and all supporting documentation.<sup>3</sup>

This response shall be filed in the Energy Safety e-Filing system under the 2023 NOV Docket<sup>4</sup> and the associated file name(s) must begin with the NOV identification number provided above.

Pursuant to Government Code section 15475.4, if the electrical corporation intends to request a hearing “to take public comment or present additional information,” it must also do so within the 30-day timeframe. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.<sup>5</sup> Requests for informal conference with Energy Safety must be e-mailed to [compliance@energysafety.ca.gov](mailto:compliance@energysafety.ca.gov), with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation’s response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,

*Patrick Doherty*

Patrick Doherty  
Program Manager | Compliance Assurance Division  
Office of Energy Infrastructure Safety  
[Patrick.Doherty@energysafety.ca.gov](mailto:Patrick.Doherty@energysafety.ca.gov)

Cc:

Raymond Fugere  
[Raymond.Fugere@sce.com](mailto:Raymond.Fugere@sce.com)

Gary Chen  
[Gary.chen@sce.com](mailto:Gary.chen@sce.com)

Sunny Chu  
[Sunny.Chu@sce.com](mailto:Sunny.Chu@sce.com)

Elizabeth Leano  
[Elizabeth.leano@sce.com](mailto:Elizabeth.leano@sce.com)

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<sup>3</sup> Energy Safety Compliance Guidelines, pp. 6-7

<sup>4</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023%20NOV>

<sup>5</sup> Energy Safety Compliance Guidelines, p. 6

Johnny Parker

[Johnny.parker@sce.com](mailto:Johnny.parker@sce.com)

Cynthia Childs

[Cynthia.childs@sce.com](mailto:Cynthia.childs@sce.com)

Denise Harris

[Denise.Harris@sce.com](mailto:Denise.Harris@sce.com)

Anthony Trujillo, Energy Safety

[Anthony.Trujillo@energysafety.ca.gov](mailto:Anthony.Trujillo@energysafety.ca.gov)

Edward Chavez, Energy Safety

[Edward.Chavez@energysafety.ca.gov](mailto:Edward.Chavez@energysafety.ca.gov)

[Compliance@energysafety.ca.gov](mailto:Compliance@energysafety.ca.gov)



# INSPECTION REPORT

## Overview

### Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk.

A Notice of Violation (NOV) is issued for any instances of noncompliance discovered during an inspection related to an electrical corporation’s execution of its WMP initiatives.

### Correction Timelines

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.<sup>6</sup>

**Table 1. Risk Category and Correction Timelines**

Risk Category	Violation and defect correction timeline
Severe	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in High Fire Threat District (HFTD) Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tier 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months or resolution scheduled in WMP update</li></ul>

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<sup>6</sup> Energy Safety Compliance Guidelines, p. 5



# Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

***Table 2: Inspection Location and Initiative Summary***

Electrical Corporation:	Southern California Edison Company (SCE)
Report Number:	SCE_CAC12_20231213_0848
Inspector:	CAC12
WMP Year Inspected:	2023
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative:	Covered Conductor Installation (2023 WMP initiative number 8.1.2.1)
Date of inspection:	December 13, 2023
City and County of Inspection:	Redlands, San Bernardino County
Inspection Purpose:	Assess the accuracy of SCE’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

***Table 3: WMP Inspection Violation***

<b>Violation #</b>	<b>Structure ID</b>	<b>Lat/Long</b>	<b>HFTD</b>	<b>Initiative Number</b>	<b>Violation Type</b>	<b>Severity</b>	<b>Violation Description</b>
Violation 1	4679694E	34.0275893802089, -117.138890036749	Tier 2	8.1.2.1 - Covered Conductor Installation	Completeness	Minor	Failure to install covered conductor

# Inspection Details

## **Violation 1:**

### **Relevant Requirement:**

Southern California Edison Company's WMP states the following regarding initiative number 8.1.2.1 - Covered Conductor Installation:

1. "[Southern California Edison Company (SCE)] has continued to install [Covered Conductor (CC)] per the previous filing, and is targeting 1,100, 1,050 and 700 miles in years 2023, 2024 and 2025, respectively."<sup>7</sup>

### **Finding:**

Energy Safety arrived at the provided pole ID 4679694E at 670 La Mirada Dr, Redlands, CA, 92373, USA, 34.0275893802089, -117.138890036749, and found bare wire. No covered conductor was observed where covered conductor installation was reported as completed by SCE. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item10GIImg1, Item10GIImg2, Item10IA1Img1, and Item10IA1Img2 depict bare conductor where covered conductor installation was reported as completed.

Energy Safety concludes that Violation 1 is Minor because of these facts:

1. SCE reported that WMP initiative 8.1.2.1 - Covered Conductor Installation was completed at this location.
2. A bare conductor was observed at this location.
3. No covered conductor was observed at the provided location.

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<sup>7</sup> Southern California Edison Company, "SCE 2023-2025 Wildfire Mitigation Plan," Oct. 26, 2023. p. 252. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

# Exhibits

Exhibit A: Photo Log

Structure ID: 4679694E

Violation 1



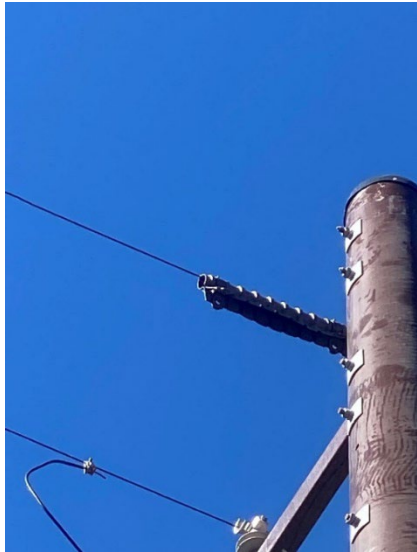
Item10GIimg1: Overall pole.



Item10GIimg2: Pole ID.



Item10IA1img1: View of bare wire construction where covered conductor installation was reported as completed.



Item10IA1img2: View of bare wire construction where covered conductor installation was reported as completed.