



April 19, 2024

Shinjini Menon
Southern California Edison Company
Vice President, Asset Management and Wildfire Safety
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.¹

On December 19, 2023, Energy Safety conducted an inspection of Southern California Edison Company's WMP initiatives in the vicinity of the city of Beaumont, California. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2023 WMP initiative number 8.2.3.3.1 – Expanded Clearance, Southern California Edison Company failed to adhere to a required protocol for vegetation clearance near primary conductors, near pole ID 1248323E at coordinates 33.9724233305095, -116.992083439283. Energy Safety considers this violation for failure to adhere to protocol 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.² 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

¹ Cal. Code Regs., tit. 14, section 29302(b)(2)

² Energy Safety Compliance Guidelines, pp. 5-6

violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction and all supporting documentation.³

This response shall be filed in the Energy Safety e-Filing system under the 2023 NOV Docket⁴ 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.⁵ Requests for informal conference with Energy Safety must be e-mailed to 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,



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³ Energy Safety Compliance Guidelines, pp. 6-7

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

⁵ Energy Safety Compliance Guidelines, p. 6

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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 1.⁶

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 High Fire Threat District (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

⁶ 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_CAC15_20231219_0851
Inspector:	CAC15
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(s):	Expanded Clearance (WMP initiative number 8.2.3.3.1)
Date of inspection:	December 19, 2023
City and/or County of Inspection:	Beaumont, Riverside County
Inspection Purpose:	Assess the accuracy of Southern California Edison Company’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

Table 3: WMP Inspection Violation(s)

Violation #	Structure ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	1248323E	33.9724233305095, -116.992083439283	Tier 2	8.2.3.3.1 – Expanded Clearance	Adherence to Protocol	Minor	Failure to achieve required clearance

Inspection Details

Violation 1:

Relevant Requirement:

Southern California Edison Company's WMP states the following regarding initiative number 8.2.3.3.1 – Expanded Clearance on primary conductors:

1. "SCE utilizes the Grid Resiliency Clearance Distance (GRCD) to verify whether an expanded clearance has been obtained. In [High Fire Risk Area (HFRA)], SCE strives to obtain expanded clearances of 12 feet for Distribution lines, and 30 feet for Transmission lines. At a minimum, SCE's Routine Line Clearing work within HFRA maintains at least the required four feet clearance for Distribution lines and the required 10 feet clearance for Transmission lines for a full annual inspection cycle. Where GRCD has been achieved historically, SCE strives to maintain the expanded clearance thereafter. Additionally, within the wire-zone, fast-growing species are targeted for removal if the species has the capability to encroach into the wire zone."⁷

Finding:

Near pole ID 1248323E at 38390 Vineland Street, Beaumont, CA 92223, USA, 33.9724233305095, -116.992083439283, the inspector observed that vegetation was growing within four feet of the distribution lines. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item4GImg1, Item4GImg2, Item4IA2Img1, and Item4IA2Img2 depict vegetation growing within four feet of the distribution lines.

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

1. Southern California Edison Company's WMP clearance work was identified as complete at this location.
2. The tree is in the HFRA.
3. The tree is within SCE's required four feet of clearance for distribution lines.

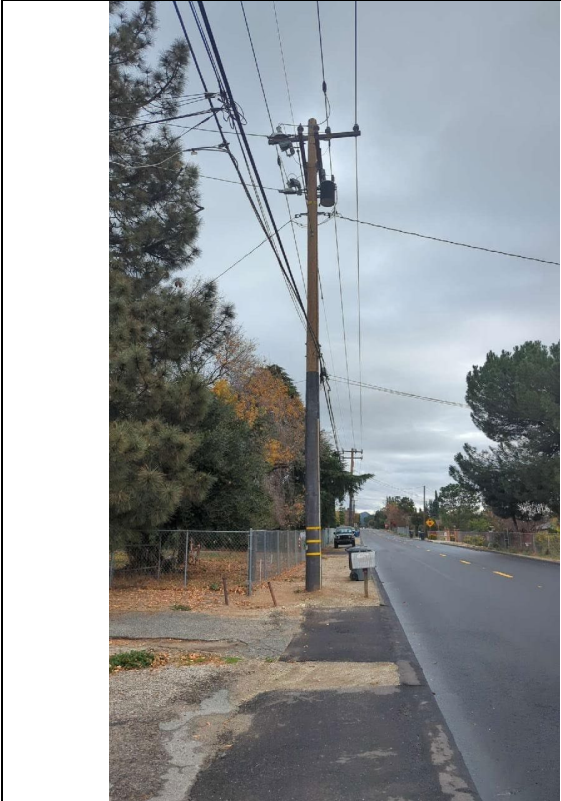
⁷ Southern California Edison Company, "SCE 2023-2025 Wildfire Mitigation Plan," March 27, 2023. pp. 412-413. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53492&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: 1248323E

Violation 1



Item4Gimg1: Overall pole.



Item4Gimg2: Pole ID.



Item4IA2Img1: View of vegetation within four feet from the distribution line.



Item4IA2Img2: View of vegetation within four feet from the distribution line.