



August 12, 2024

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

NOTICE OF VIOLATION

Ms. 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 (SCE) in accordance with its 2023 Wildfire Mitigation Plan (WMP) and determined the existence of one or more violations. Energy Safety therefore issues SCE 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 June 18, 2024, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Trabuco Canyon, California. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.1.1 Covered Conductor, SCE failed to adhere to data accuracy on pole ID 4882983E at coordinates 33.66831158065607, - 117.56514540812104. Energy Safety considers this data accuracy violation to be in the Minor risk category.

Violation 2. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.1.1 Covered Conductor, SCE failed to adhere to data accuracy on pole ID X8485E at coordinates 33.66801439418881, - 117.56562608196106. Energy Safety considers this data accuracy violation to be in the Minor risk category.

Violation 3. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.1.1 Covered Conductor, SCE failed to adhere to data accuracy on pole ID 4617117E at coordinates 33.667179818333864, - 117.5669496338174. Energy Safety considers this data accuracy violation to be in the Minor risk category.

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

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 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,



Patrick Doherty
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
Patrick.doherty@energysafety.ca.gov

Cc:

Raymond Fugere, SCE
Raymond.Fugere@sce.com

² Energy Safety Compliance Guidelines, pp. 5-6

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
Report Number:	SCE_YLO_20240618_0914
Inspector:	Yana Loginova
WMP Year Inspected:	2023
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4)
Inspection Selection:	Energy Safety viewed the contents of the Q4 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.1.1 Covered Conductor
Date of inspection:	June 18, 2024
City and/or County of Inspection:	Trabuco Canyon, Orange 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	4882983E	33.66831158065607, - 117.56514540812104	Tier 3	Covered Conductor 8.1.2.1.1	Data Accuracy	Minor	Inaccurate data provided on covered conductor installation
Violation 2	X8485E	33.66801439418881, - 117.56562608196106	Tier 3	Covered Conductor 8.1.2.1.1	Data Accuracy	Minor	Inaccurate data provided on covered conductor installation
Violation 3	4617117E	33.667179818333864, - 117.5669496338174	Tier 3	Covered Conductor 8.1.2.1.1	Data Accuracy	Minor	Inaccurate data provided on covered conductor installation

Inspection Details

Violation 1:

Relevant Requirement:

Southern California Edison Company's WMP states the following regarding initiative number 8.1.2.1.1 Covered Conductor:

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."⁷

Version 3.1 of Energy Safety's Data Guidelines states the following with respect to data submitted by an electrical corporation when reporting on its 2023 WMP initiatives:

1. "Electrical corporations must ensure location accuracy in their [geographic information system] data submissions..."⁸

Finding:

On pole ID 4882983E at 32187-32197 Trabuco Creek Rd, Trabuco Canyon, CA, 92679, USA, 33.66831158065607, -117.56514540812104, the inspector observed that no covered conductor was present. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1IG1Img1, Item1IG1Img2 and Item1IA1Img1 depict that no covered conductor was installed at the location.

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

1. Southern California Edison Company's 2023 WMP Covered Conductor (8.1.2.1.1) work was identified as complete at this location.
2. Covered Conductor (8.1.2.1.1) was not installed.
3. Only communication cable was present on the pole.

⁷ Southern California Edison Company, "SCE 2023-25 Approved Wildfire Mitigation Plan," October 26, 2023, p. 252. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

⁸ Office of Energy Infrastructure Safety, "Data Guidelines, Version 3.1," Feb. 17, 2023, p. 10 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true>

Violation 2:

Relevant Requirement:

Southern California Edison Company's WMP states the following regarding initiative number 8.1.2.1.1 Covered Conductor:

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."⁹

Version 3.1 of Energy Safety's Data Guidelines states the following with respect to data submitted by an electrical corporation when reporting on its 2023 WMP initiatives:

1. "Electrical corporations must ensure location accuracy in their [geographic information system] data submissions..."¹⁰

Finding:

On pole ID X8485E at 32187-32197 Trabuco Creek Rd, Trabuco Canyon, CA, 92679, USA, 33.66801439418881, -117.56562608196106, the inspector observed that no covered conductor was present. The inspector's observation is documented in Violation 2 photographs, which are attachments to this report. Photo numbers Item2IG1Img1, Item2IG1Img2 and Item2IA1Img1 depict that no covered conductor was installed at the location.

Energy Safety concludes that Violation 2 is Minor because of these facts:

1. Southern California Edison Company's 2023 WMP Covered Conductor (8.1.2.1.1) work was identified as complete at this location.
2. Covered Conductor (8.1.2.1.1) was not installed.
3. Only communication cable was present on the pole.

⁹ Southern California Edison Company, "SCE 2023-25 Approved Wildfire Mitigation Plan," October 26, 2023, p. 252. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

¹⁰ Office of Energy Infrastructure Safety, "Data Guidelines, Version 3.1," Feb. 17, 2023, p. 10 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true>

Violation 3:

Relevant Requirement:

Southern California Edison Company's WMP states the following regarding initiative number 8.1.2.1.1 Covered Conductor:

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."¹¹

Version 3.1 of Energy Safety's Data Guidelines states the following with respect to data submitted by an electrical corporation when reporting on its 2023 WMP initiatives:

1. "Electrical corporations must ensure location accuracy in their [geographic information system] data submissions..."¹²

Finding:

On pole ID 4617117E at 32170-32180 Trabuco Creek Rd, Trabuco Canyon, CA, 92679, USA, 33.667179818333864, -117.5669496338174, the inspector observed that no covered conductor was present. The inspector's observation is documented in Violation 3 photographs, which are attachments to this report. Photo numbers Item3IG1Img1, Item3IG1Img2 and Item3IA1Img1 depict that no covered conductor was installed at the location.

Energy Safety concludes that Violation 3 is Minor because of these facts:

1. Southern California Edison Company's 2023 WMP Covered Conductor (8.1.2.1.1) work was identified as complete at this location.
2. Covered Conductor (8.1.2.1.1) was not installed.
3. Only communication cable was present on the pole.

¹¹ Southern California Edison Company, "SCE 2023-25 Approved Wildfire Mitigation Plan," October 26, 2023, p. 252. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>




¹² Office of Energy Infrastructure Safety, "Data Guidelines, Version 3.1," Feb. 17, 2023, p. 10 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: 4882983E

Violation 1

	
<p>Item1Gimg1: Pole ID</p>	<p>Item1Gimg2: Overall Pole</p>
	
<p>Item1IA1img1: No covered conductor present</p>	

Structure ID: X8485E

Violation 2



Item2GImg1: Missing Pole ID



Item2GImg2: Overall Pole



Item2IA1Img1: No covered conductor present

Structure ID: 4617117E

Violation 3



Item3GImg1: Missing Pole ID



Item3GImg2: Overall Pole



Item3IA1Img1: No covered conductor present