



August 28, 2024

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Southern California Edison Company  
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## 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.<sup>1</sup>

On July 2, 2024, Energy Safety conducted an inspection of Southern California Edison Company's WMP initiatives in the city of Valencia, California. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2023 WMP initiative Rapid Earth Fault Current Limiter (REFCL) Grounding Conversion (2023 WMP initiative 8.1.2.6.2), Southern California Edison Company failed to provide accurate data in reporting that REFCL Grounding Conversion was installed on structure ID 4179230E, Grid Hardening ID TD2100529, at coordinates 34.44441856776136, -118.54160303972672. Energy Safety considers this data accuracy violation 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

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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

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.<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  
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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

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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.<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
Report Number:	SCE_ATJ_20240702_0752
Inspector:	Anthony Trujillo
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):	Rapid Earth Fault Current Limiter (REFCL) Grounding Conversion (2023 WMP initiative number 8.1.2.6.2)
Date of inspection:	July 2, 2024
City and/or County of Inspection:	Valencia, Los Angeles 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	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	4179230E	TD2100529	34.44441856776136, -118.54160303972672	Tier 3	REFCL Grounding Conversion 8.1.2.6.2	Data Accuracy	Minor	Inaccurate data provided on REFCL grounding conversion installation

# Inspection Details

## Violation 1:

### **Relevant Requirement:**

Southern California Edison Company's WMP states the following regarding initiative number 8.1.2.6.2 - Rapid Earth Fault Current Limiter (REFCL) Grounding Conversion:

1. "Grounding conversions for distribution circuitry outside of the substation is also possible in two variations. First the application of isolation transformers and, second the application of what SCE calls 'pole tops.' Traditionally 'poletop' transformers were located on the top of a pole as depicted in Figure SCE 8-12, below, however many newer installs use padmounted equipment."<sup>7</sup>

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:

2. "Electrical corporations must ensure location accuracy in their [geographic information system] data submissions..."<sup>8</sup>

### **Finding:**

On pole ID 4179230E, Grid Hardening ID TD2100529, at 27343 Blueridge Dr, Valencia, CA, 91354, USA, 34.44441856776136, -118.54160303972672, the inspector observed no overhead assets (poles) or pad mounted equipment. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1GImg1 and Item1IA1Img1 depict a home lawn with no REFCL Ground Conversion equipment installed.

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

1. Southern California Edison Company's 2023 WMP REFCL Ground Conversion (8.1.2.6.2) work was identified as complete at this location.
2. A pad mounted isolation transformer or pole top transformer were not observed.
3. REFCL Ground Conversion (8.1.2.6.2) equipment was not observed.

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<sup>7</sup> Southern California Edison Company, "SCE 2023-25 Approved Wildfire Mitigation Plan," October 26, 2023, p. 269. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

<sup>8</sup> 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: 4179230E

Violation 1



**Item1Gimg1:** Overall view of location showing a street light pole with no electrical equipment



**Item1IA1img1:** Closeup of irrigation device