



August 28, 2024

Shinjini Menon
Vice President Asset Management and Wildfire Safety
Southern California Edison Company
2244 Walnut Grove
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 2024 Wildfire Mitigation Plan (WMP) and determined the existence of a violation. 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 August 7, 2024, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Simi Valley. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.2.3.3.1- Expanded Clearing (VM-07), SCE failed to adhere to its protocol of maintaining vegetation clearance for distribution lines near pole ID 201853632 at coordinates 34.2746819995355, -118.664670000336. Energy Safety considers this violation for adherence to protocol to be in the "Moderate" risk category.

Response Options

In accordance with Energy Safety Guidelines,² within 30 days from the issuance of this NOV, SCE must provide a response informing Energy Safety of corrective actions taken or planned to remedy the above identified violation and prevent recurrence. Alternatively, should SCE disagree with the NOV, SCE must submit to Energy Safety a response stating it disagrees with the violation, the reason or justification for the disagreement and all

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

² Energy Safety Compliance Guidelines, pp 6-7

supporting documentation.³ This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket⁴ and the associated file name(s) must begin with the NOV identification number provided above.

SCE may also request an informal conference with Energy Safety's Environmental Science Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the 30-day response deadline.⁵ Requests for informal conference with Energy Safety must be e-mailed to environmentalscience@energysafety.ca.gov, with a copy sent to Elizabeth.McAlpine@energysafety.ca.gov. Pursuant to Government Code section 15475.4, if SCE 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.

Pursuant to Public Utilities Code section 8389(g), Energy Safety may refer this matter to the California Public Utilities Commission for consideration of potential enforcement action.

Sincerely,



Sheryl Bilbrey
Program Manager | Environmental Science Division
Office of Energy Infrastructure Safety
Sheryl.Bilbrey@energysafety.ca.gov

Cc:

Johnny Parker, Southern California Edison
Johnny.Parker@sce.com

Cynthia Childs, Southern California Edison
Cynthia.childs@sce.com

Raymond Fugere, Southern California Edison
Raymond.Fugere@sce.com

Sunny Chu, Southern California Edison
Sunny.Chu@sce.com

Elizabeth Leano, Southern California Edison
Elizabeth.Leano@sce.com

³ Energy Safety Compliance Guidelines, pp. 6-7

⁴ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NOV>

⁵ Energy Safety Compliance Guidelines, p. 6

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: | NOV_ESD_SCE_GCA_20240807_0650 |
| Inspector: | Gary Candelas |
| WMP Year Inspected: | 2024 |
| Quarterly Data Report (QDR) Referenced: | Quarter 1 (Q1) |
| Inspection Selection: | Energy Safety inspected the locations based on SCE's Q1 QDR. |
| Relevant WMP Initiative(s): | 8.2.3.3.1 Expanded Clearing (VM-07) |
| Date of inspection: | August 7, 2024 |
| City and/or County of Inspection: | Simi Valley, California |
| 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(s)

| Violation # | Structure ID | VMP ID | Lat/Long | HFTD | Initiative Number | Violation Type | Severity | Violation Description |
|-------------|------------------------|---|--|--------|--------------------------------|--------------------------|----------|---|
| Violation 1 | Near pole 201853632 | {00B97929- 9856-4288- 99A2- 08D05EC1AF E1}-2024_1 | 34.2746819995355, -118.664670000336 | Tier 3 | 8.2.3.3.1-Expanded Clearing | Adherence to Protocol | Moderate | Failure to achieve required clearance along distribution lines. |

Inspection Details

Violation 1:

Relevant Requirement:

SCE's WMP states the following regarding initiative number 8.2.3.3.1 Expanded Clearing: "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."⁷

Finding:

SCE reported that work for the Expanded Clearing program (VM-7 WMP initiative number 8.2.3.3.1) in this area had been completed. SCE's Q1 QDR data indicated that the subject palms were trimmed in March 2024. At 0.2 span in the northeast from pole ID 1538971E (behind 2127 Cheam Avenue in Simi Valley), near GPS coordinates 34.274415870592, -118.66467334529254, the inspector observed two California palms (*Washingtonia filifera*) growing under the conductor and had fronds that were within the 4-foot clearance distance requirement as indicated in SCE's WMP. The inspector measured both the palm height and conductor height with the Nikon Forestry Pro II laser rangefinder. The palms measured 28.1 feet in height to the tallest fronds, and the pole at the conductor height at the insulator measured 30.8 feet. The difference between the highest palm frond and the conductor was no more than 2.7 feet, which conflicted with the 4 feet requirement stated in SCE's WMP. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1IA1Img1, Item1IA1Img2, Item1IA1Img3 depict the two California palms that were within 4 feet of the conductors.

Energy Safety concludes that Violation 1 is "Moderate" because the vegetation encroaching into the minimum clearance requirements may contact the conductor before SCE next inspects and trims or removes the palms.

⁷ Southern California Edison "2023-2025 Wildfire Mitigation Plan" October 23, 2023. p 412-413. [online]: <https://www.sce.com/sites/default/files/AEM/Wildfire%20Mitigation%20Plan/2023-2025/SCE%202023%20WMP%20R1.pdf>.

Exhibits

Exhibit A: Photo Log

Structure ID: Near pole 201853632

Violation 1



Item1IA1Img1: California palms breaking minimum clearance requirements. Photograph was taken from the north side of the sidewalk along Cheam Avenue facing 298.3 degrees northwest.



Item1IA1Img2: California palms breaking minimum clearance requirements. Photograph was taken from the south side of the sidewalk along Cheam Avenue facing 319.8 degrees northwest.



Item1IA1mg3: California palms breaking minimum clearance requirements. Photograph was taken from the north side of the sidewalk along Cheam Avenue facing 355.8 degrees north.