



September 6, 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 2023 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 8, 2024, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Lake Isabella, 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 provide accurate data in reporting that covered conductor was installed on Pole ID 4583938E, Grid Hardening ID TD1827254-4583938E, at coordinates 35.644931, -118.460862. 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
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Cc:

Raymond Fugere, SCE
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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:	CADSCE_CAC12_20240808_1514
Inspector:	CAC12
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:	August 8, 2024
City and/or County of Inspection:	Lake Isabella, Kern 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	4583938E	TD1827254-4583938E	35.644931, -118.460862	Tier 3	8.1.2.1.1 Covered Conductor	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:

2. "Electrical corporations must ensure location accuracy in their [Geographic Information System (GIS)] data submissions..."⁸

Finding:

On Pole ID 4583938E, Grid Hardening ID TD1827254-4583938E, near the Auxiliary Dam Campground at Lake Isabella, CA, 35.644931, -118.460862, the inspector observed bare conductor where covered conductor was reported as installed. Pole ID 4583938E was inside the Auxiliary Dam Campground. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1GImg1, Item1GImg2, Item1IA1Img1, and Item1IA1Img2 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 was not installed.

⁷ Southern California Edison Company, "SCE 2023-25 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," February 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: 4583938E

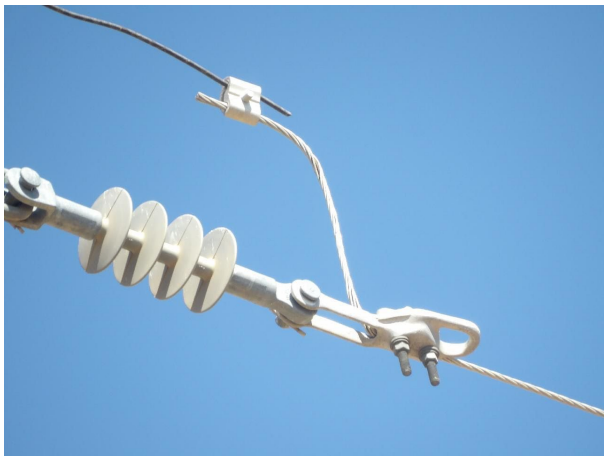
Violation 1



Item1G1mg1: Overall Pole



Item1G1mg2: Pole ID



Item1IA1mg1: No Covered Conductor Present



Item1IA1mg2: No Covered Conductor Present