



September 30, 2024

Shinjini Menon
Vice President Asset Management and Wildfire Safety
Southern California Edison
2244 Walnut Grove Avenue
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 28, 2024, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Santa Barbara. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.2.3.4.2- Dead and Dying Tree Removal Program (VM-4), SCE failed to provide accurate data regarding a tree removal near pole ID205829E at coordinates 34.452687, -119.707193. Energy Safety considers this violation for data accuracy to be in the "Minor" 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. 4-5

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
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³ Energy Safety Compliance Guidelines, pp. 4-5

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

⁵ Energy Safety Compliance Guidelines, p. 4



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. 3



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 |
| Report Number: | NOV ESD_SCE_RGA_20240828_1504 |
| Inspector: | Ricardo Garcia |
| WMP Year Inspected: | 2024 |
| Quarterly Data Report (QDR) Referenced: | Quarter 2 (Q2) |
| Inspection Selection: | Energy Safety inspected the locations based on SCE's Q2 QDR. |
| Relevant WMP Initiative(s): | 8.2.3.4.2 Dead and Dying Tree Removal Program (VM-4) |
| Date of inspection: | August 28, 2024 |
| City and/or County of Inspection: | Santa Barbara, 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 205829E | H032444130 01-2024_2 | 34.452687, -119.707193 | Tier 3 | 8.2.3.4.2- Dead and Dying Tree Removal Program | Data Accuracy | Minor | Failure to provide accurate data for tree removal program. |

Inspection Details

Violation:

Relevant Requirement:

SCE's WMP states the following regarding initiative number 8.2.3.4.2 Dead and Dying Tree Removal Program: "Dead and dying trees have a higher probability of failing, and if within striking distance of SCE lines and equipment can cause fault conditions, sparks, and ignition. Under this program, SCE conducts patrols in HFRA to identify and remove dead, dying, or diseased trees affected by drought conditions and/or insect infestation. All trees that are identified within strike distance of SCE overhead facilities that are dead or expected to die within one year are prescribed for removal."⁷

Finding:

SCE reported that work for the Dead and Dying Tree Removal Program (VM-4 WMP Initiative number 8.2.3.4.2) near pole 205829E had been completed. The inspector observed a Deodar Cedar at GPS coordinates 34.452687, -119.707193, with similar diameter at breast height and tree height in SCE's reported QDR. The subject tree was found to have uprooted and fallen over from apparent natural causes and not removed per SCE's Dead and Dying Tree Removal Program as claimed by SCE's reported Q2 QDR. Furthermore, SCE's Q2 QDR data indicated that the Deodar Cedar and the associated slash had been removed and destined for a green waste facility in April 2024. While speaking with the property owner of 2333 Las Canoas Road, Santa Barbara where the uprooted tree was located, the inspector verified that SCE did not remove the tree nor slash. Rather, the property owner stated they trimmed some of the smaller branches from the tree that had fallen over from natural causes. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1IA1Img1 and Item1IA1Img2 depict the nearest pole to the subject tree with the ID visible. Photos Item1IA1Img3 and Item1IA1Img4 depict the Deodar Cedar that uprooted and fell over.

Energy Safety concludes that this Violation is a "Minor" because SCE inaccurately claimed to have removed and completed slash management for this subject tree under initiative 8.2.3.4.2 which constitutes a failure to provide accurate data.

⁷ Southern California Edison "2023-2025 Wildfire Mitigation Plan" June 4, 2024. p 419. [online]: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: 205829E

Violation 1



Item1IA1img1: Pole 205829E behind fence of 2333 Los Canoas Road in Santa Barbara at GPS location 34.45268, -119.70709.



Item1IA1img2: Overall pole 205829E.



Item1IA1img3: Uprooted and fallen Deodar Cedar near driveway at 2333 Los Canoas Road in Santa Barbara. The property owner trimmed the smaller branches.

Item1IA1img4: Uprooted and fallen Deodar Cedar with some trimmed branches by the property owner.