



October 31, 2024

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Vice President Asset Management and Wildfire Safety
Southern California Edison Company
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 (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 8.2.3.3.1 - Expanded Clearing (VM-07), SCE failed to adhere to its protocol of maintaining vegetation clearance for distribution lines near pole ID 1413461 at coordinates 34.461689, -119.819312 in High Fire Threat District (HFTD) Tier 3. 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

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

² Energy Safety Compliance Guidelines, pp 4-5

Safety a response stating it disagrees with the violation, the reason or justification for the disagreement and all 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 an 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

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), 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.

Energy Safety has designated this violation as moderate risk. SCE must correct the violation pursuant to the timelines provided in Table 1.⁶

Table 1. Risk Category and Correction Timelines

Risk Category	Violation 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

The inspection location and WMP initiative summary is included in Table 2. The WMP inspection violation is included in Table 3.

Table 2: Inspection Location and WMP Initiative Summary

Electrical Corporation:	Southern California Edison Company (SCE)
Report Number:	NOV ESD_SCE_CAC23_20240828_0917
Inspector:	CAC23
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):	8.2.3.3.1 Expanded Clearing (VM-07)
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

Violation #	Structure ID	VMP ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Correction Timeline	Violation Description
Violation 1	Near Pole 1413461	1WL4v00 0003K2TP GA0- 2024_2	34.461689, -119.819312	Tier 3	8.2.3.3.1 - Expanded Clearing	Adherence to Protocol	Moderate	2 Months	Failure to achieve required clearance along distribution lines.

Inspection Findings

Violation:

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's Q2 QDR data indicated that SCE trimmed the subject palm in April 2024 under SCE's Expanded Clearing program (VM-07 WMP initiative number 8.2.3.3.1). At 0.4 span to the west of pole ID 1413461 toward pole ID 1413462 on 5570 Camino Cerralvo in Santa Barbara, at GPS coordinates 34.461689, -119.819312 in HFRA, the inspector observed a Canary Island date palm (*Phoenix canariensis*) within the four-foot required clearance distance. This location is in HFTD Tier 3 and HFRA. The inspector measured both the palm height and conductor height with the Nikon Forestry Pro II laser rangefinder. The palm measured 48 feet in height to the tallest frond, and the conductor height measured 34 feet, with the closest palm frond measuring two feet to the side of the conductor, which conflicts with the four feet requirement stated in SCE's WMP. The inspector's observation is documented in Violation 1 photographs, which are exhibits to this report. Photo numbers Item1IA1Img1, Item1IA1Img2, Item1IA1Img3 depict the palm that was measured within 2 feet from 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 palm.

⁷ Southern California Edison "2023-2025 Wildfire Mitigation Plan" June 4, 2024, pp. 412-413 [online]: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>.

Exhibits

Exhibit A: Photo Log

Structure ID: 1413461

Violation 1



Item1G1mg1: Pole ID.



Item1G1mg2: Overall pole.



Item1IA1mg1: Photograph was taken facing southeast. Photograph depicts a view of the two-foot distance between the palm and conductors.



Item1IA1mg2: Photograph was taken looking up at horizontal distance. Photograph depicts a view of the two-foot distance between the palm and conductors.



Item1IA1img3: Photograph was taken facing northwest. Photograph depicts a view of the two-foot distance between the palm and conductors.