



February 11, 2025

Shinjini Menon
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 January 28, 2025, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Ojai. 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 396394E at coordinates 34.447290, -119.278711 in a High Fire Threat District (HFTD) Tier 3 area. Energy Safety considers this violation for adherence to protocol 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

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 minor risk. SCE must correct the violation pursuant to the timeline 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 (SCE)
Report Number:	NOV_ESD_SCE_GCA_20250128_0957
Inspector:	Gary Candelas
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 3 (Q3)
Inspection Selection:	Energy Safety inspected the locations based on SCE's Q3 QDR.
Relevant WMP Initiative(s):	8.2.3.3.1 Expanded Clearing (VM-07)
Date of inspection:	January 28, 2025
City and/or County of Inspection:	Ventura County, 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 396394E	1WL4v000003O6 j9GAC-2024_3	34.447290, -119.278711	Tier 3	8.2.3.3.1-Expanded Clearing	Adherence to Protocol	Minor	12 Months	Failure to achieve required clearance along distribution lines.

Inspection Findings

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:

Energy Safety concludes that Violation 1 is "Minor" because the vegetation is encroaching into the minimum clearance requirements, however the conductor above the tree is covered and therefore does not present an immediate fire risk.

SCE's Q3 QDR data indicated that SCE trimmed an oak tree under its Expanded Clearing program (VM-07 WMP initiative number 8.2.3.3.1) at Vegetation Management Point (VMP) ID 1WL4v00000306j9GAC-2024_3, near GPS coordinates 34.447290, -119.278711, in August 2024. The inspector observed the subject oak tree at 0.4 span north of pole 396394E, behind 210 S Padre Juan Avenue in Ojai, growing under the covered conductor and had branches within the 4-foot clearance distance requirement as indicated in SCE's WMP. The inspector measured both the oak tree height and conductor height with the Nikon Forestry Pro II laser rangefinder. The oak tree measured 31.9 feet in height to the tallest branch directly under the conductor and the conductor height measured 35.5 feet in height. The distance between the highest oak branch directly underneath the conductor and the conductor was no more than 3.6 feet, which less than the four feet required by in SCE's WMP. The inspector's observation is documented in Violation 1 photographs, which are exhibits to this report. Photo numbers Item1IA1Img1 and Item1IA1Img2 depict the subject oak tree branches within four feet of the covered conductors. Photo number Item1GIImg1 depicts the Pole ID, and photo numbers Item1GIImg2 and Item1GIImg3 depict the tree's location.

⁷ Southern California Edison 2023-2025 WMP (Rev. #1.1, Jun. 4, 2024), p. 412-413
(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>, accessed February 7, 2025).

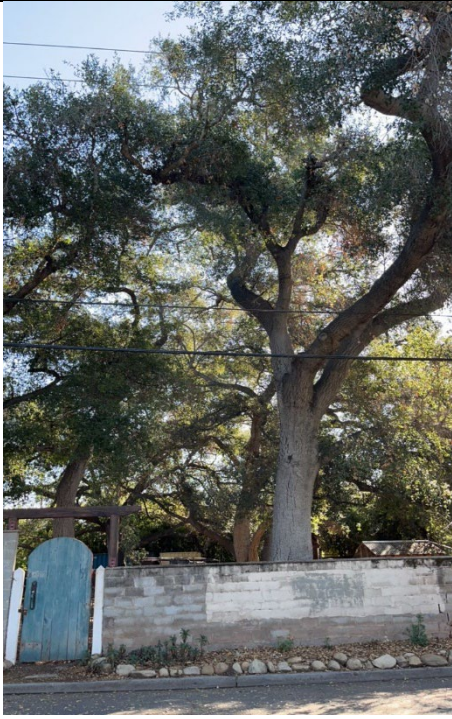
Exhibits

Exhibit A: Photo Log

Structure ID: 396394E

Violation 1

	
<p>Item1GImg1: Pole ID 396394E.</p>	<p>Item1GImg2: Oak tree north of pole 396394E.</p>



Item1GImg3: Subject oak tree to the right of the blue door, photograph taken from S Padre Juan Avenue.



Item1IA1Img1: Oak tree breaking minimum clearance requirements. Photograph was taken from Mesa Drive and S Padre Juan Avenue 49 feet away from the oak tree.



Item1IA1Img2: Image of oak tree breaking minimum clearance requirements. Photograph was taken from Mesa Drive and S Padre Juan Avenue 49 feet away from the oak tree.