



April 23, 2025

Shinjini Menon  
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Southern California Edison Company  
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## NOTICE OF VIOLATION

Ms. Shinjini 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.<sup>1</sup>

On March 25, 2025, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of La Habra in High Fire Threat District (HFTD) Tier 3. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.2.3.3.1-Distribution Expanded Clearing, SCE failed to adhere to its protocol of wood and slash management at pole ID 207593781 at coordinates 33.955028374965, -117.976980405418. Energy Safety considers this violation to be in the "Minor" risk category.

### Response Options

In accordance with Energy Safety Guidelines,<sup>2</sup> within 30 days from the issuance of this NOV, SCE must provide a response informing Energy Safety of corrective actions taken or plans 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

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<sup>1</sup> Cal. Code Regs., tit. 14, section 29302(b)(2)

<sup>2</sup> Energy Safety Compliance Guidelines, pp 4-5

supporting documentation.<sup>3</sup> This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket<sup>4</sup> 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.<sup>5</sup> Requests for informal conference with Energy Safety must be e-mailed to [environmentalscience@energysafety.ca.gov](mailto:environmentalscience@energysafety.ca.gov), with a copy sent to [Akiko.Masuda@energysafety.ca.gov](mailto:Akiko.Masuda@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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<sup>3</sup> Energy Safety Compliance Guidelines, pp. 4-5

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

<sup>5</sup> 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 a minor risk. SCE must correct the violation pursuant to the timeline provided in Table 1.<sup>6</sup>

**Table 1. Risk Category and Correction Timelines**

Risk Category	Violation correction timeline
Severe	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in High Fire Threat District (HFTD) Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tier 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months or resolution scheduled in WMP update</li></ul>

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<sup>6</sup> 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
Report Number:	NOV_ESD_SCE_MAZ_20250325_1004
Inspector:	Max Zazzeron
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4)
Inspection Selection:	Energy Safety inspected the locations based on SCE's Q4 QDR.
Relevant WMP Initiative(s):	8.2.3.2.1-Reduction or adjustment of dead fuel, including all downed wood and "slash" generated from VM activities
Date of inspection:	March 25, 2025
City and/or County of Inspection:	La Habra, 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 #	Near Structure ID	VMP ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Correction Timeline	Violation Description
Violation 1	207593781	1WL4v00003QkFWGA0-2024_4	33.955028374965, -117.976980405418	Tier 3	8.2.3.2.1-Reduction or adjustment of dead fuel, including all downed wood and “slash” generated from VM activities	Adherence to Protocol	Minor	12 Months	Failure to manage slash

# Inspection Findings

## Violation 1

### Relevant Requirement:

SCE's WMP states the following regarding initiative number 8.2.3.2.1-Reduction or adjustment of dead fuel, including all downed wood and "slash" generated from vegetation management activities:

"SCE reduces slash (e.g., cut limbs and other woody debris) from Vegetation Management activities by chipping and hauling the material away to be disposed or recycled by pruning/removal contractors."<sup>7</sup> SCE continues, "SCE's contract crews strive to remove all wood and material resulting from mitigation for Routine Line Clearing, Structure Brushing (pole brushing), Hazard Tree Mitigation Program (HTMP), and the Dead and Dying Tree Program typically within 100 feet of a dirt or paved road, subject to site conditions. On private property, crews will typically strive to remove all wood, providing that crews are able to maneuver and operate their equipment close enough to the area (e.g., skid steers)."<sup>8</sup>

### Finding:

Energy Safety considers Violation 1 "Minor" because slash resulting from mitigation for Routine Line Clearing was left on site, creating a potential fuel source for wildfire.

SCE's Q4 QDR data indicated that SCE trimmed two California pepper trees (*Schinus molle*) under its Distribution Expanded Clearing (VM-07 WMP initiative number 8.2.3.3.1) at vegetation management point (VMP) ID 1WL4v000003QkFWGA0-2024\_4. The reported location provided by SCE indicated that work was completed in December 2024. Near pole ID 207593781 at 1718 Le Flore Drive, La Habra, CA, 90631, at GPS coordinates 33.955028374965, -117.976980405418, the inspector confirmed the distribution clearance work on two California pepper trees (10 feet and 16 feet). The inspector observed slash was left in canopy of the trimmed trees and on the ground directly under pole. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers 1-5 depict slash associated with SCE's distribution expanded clearance work left on site.

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<sup>7</sup> SCE's 2023-2025 WMP (Rev. #1.1, June. 4, 2024), p. 411  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>, accessed April. 7, 2025).

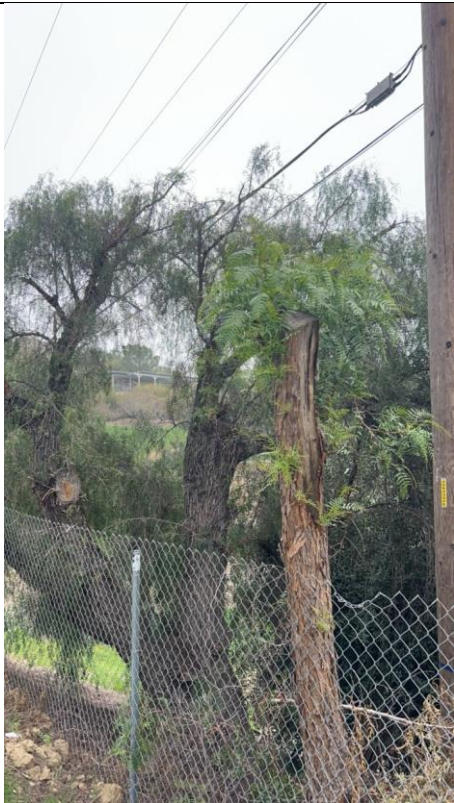
<sup>8</sup> SCE's 2023-2025 WMP (Rev. #1.1, June. 4, 2024), p. 411  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>, accessed April. 7, 2025).

# Exhibits

Exhibit A: Photo Log

Structure ID: 207593781

Violation 1



**Photo 1:** Overall view of the two California pepper trees after vegetation clearance work.



**Photo 2:** Closer view of one of the trimmed California pepper tree with slash left within its canopy.





**Photo 3:** Photo of slash left on the ground directly beneath reported clearance work.



**Photo 4:** Photo of the California paper tree slash left within the tree canopy, taken from south of Pole ID 207593781 facing north.



**Photo 5:** Photo of the California paper tree and the slash left within the tree canopy, taken from north of Pole ID 207593781 facing south.