



May 13, 2025

Shinjini Menon
Vice President, Asset Management and Wildfire Safety
Southern California Edison Company
2244 Walnut Grove
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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 January 31, 2025, Energy Safety conducted an inspection of Southern California Edison Company's WMP initiatives in the vicinity of the city of Tehachapi, California. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.3.1 - Distribution Detailed Inspections and Remediations (IN-1.1), SCE failed to complete the replacement of a damaged wildlife cover on Pole ID 1987176E, Grid Hardening ID 413816950-1987176E at coordinates 35.086770, -118.651642. Energy Safety considers this completeness 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 2024 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
Patrick.doherty@energysafety.ca.gov

Cc:

Raymond Fugere, SCE
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² Energy Safety Compliance Guidelines, pp. 3

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

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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 Tiers 2 or 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 Company
Report Number:	CAD_SCE_CAC12_20250131_1121
Inspector:	CAC12
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 3 (Q3)
Inspection Selection:	Energy Safety reviewed the contents of the Q3 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.3.1 - Distribution Detailed Inspections and Remediations (IN-1.1)
Date of inspection:	January 31, 2025
City and/or County of Inspection:	Tehachapi, 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	1987176E	413816950-1987176E	35.086770, -118.651642	Tier 3	8.1.3.1 Distribution Detailed Inspections and Remediations (IN-1.1)	Completeness	Minor	Failure to complete replacement of a damaged wildlife cover

Inspection Details

Violation 1:

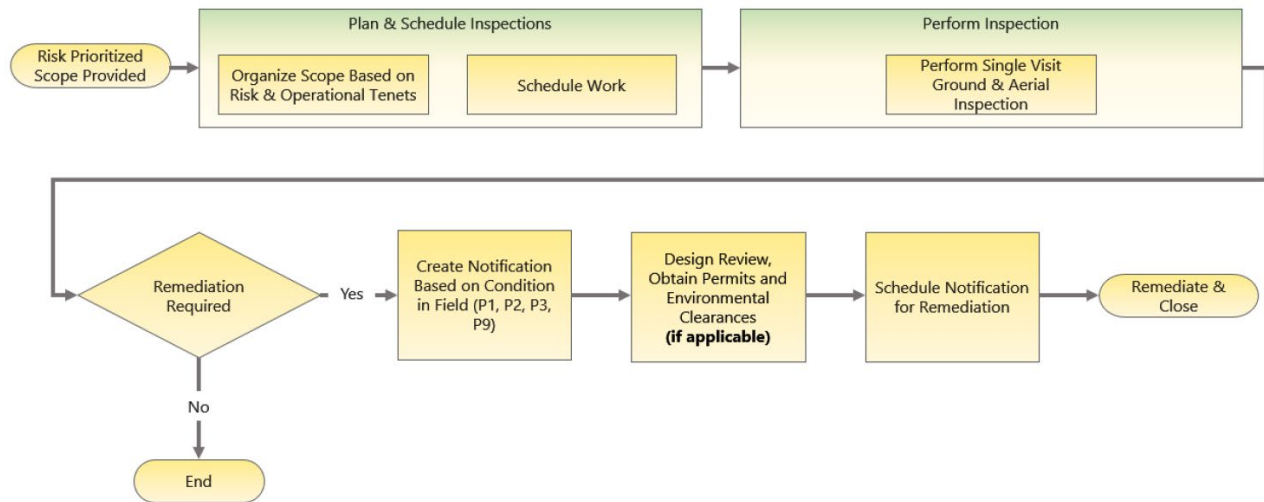
Relevant Requirement:

Southern California Edison Company's WMP states the following regarding initiative number 8.1.3.1

Distribution Detailed Inspections and Remediations (IN-1.1):

1. "The frequency of [High Fire Risk-Informed inspections] varies by the location-specific risk... within SCE's [High Fire Risk Area] and emergent conditions. Issues identified by inspectors during the detailed inspections are prioritized for remediation to be completed within [General Order 95] compliance timelines. Remediations can be repairs to or replacements of existing assets depending on asset condition. For example, SCE repairs ground molding with that is found to be broken/damaged with an exposed ground wire at the public level. Also, SCE replaces wood guy guards if found to be missing, damaged or outdated."⁷
2. The following is a workflow diagram from SCE's WMP showing the conditions under which SCE will execute remediations under initiative number 8.1.3.1:⁸

Figure 8-1a - Distribution Detailed Inspections and Remediations Workflow



⁷ Southern California Edison Company, "2023-25 Wildfire Mitigation Plan," October 26, 2023, p. 284. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

⁸ Southern California Edison Company, "2023-25 Wildfire Mitigation Plan," October 26, 2023, p. 285. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

Finding:

On Pole ID 1987176E, Grid Hardening ID 413816950-1987176E at 29260 Stallion Springs Drive, Tehachapi, California, GPS Coordinates 35.086770, -118.651642, the inspector observed a damaged wildlife cover (aka avian protection). The inspector's observation is documented in Violation 1 photographs, which are attached to this report. Photo number Item1IA1Img1 depicts a damaged wildlife cover. Per information provided by SCE to the Compliance Inbox on January 3, 2025, at 10:22 am, the replacement of damaged avian protection was complete.

Energy Safety concludes there is a violation because of these facts:

1. Southern California Edison Company's 2024 WMP 8.1.3.1 Distribution Detailed Inspections and Remediations work, replacement of damaged avian protection was identified as complete at this location.
2. The wildlife cover was damaged and appears to contain a large amount of foreign material.
3. SCE construction standard DC-535 (23 of 35) states, "... installing wildlife covers in the correct application will mitigate other contact-related faults from foreign materials. While wildlife covers were initially introduced to protect high priority wildlife, additional benefits are procured when discussing wildfire mitigation. By utilizing the correct wildlife covers, electrical events that may result in incandescent particles or other debris will likely be mitigated due to the added fire, track, and arc resistant protection."⁹

⁹ See Exhibit B, Southern California Edison Company, " Distribution Overhead Construction Standards (DOH) — 2024 Third Quarter Revision Package," Feb. 08, 2024. p.577 (DC 535 sheet 23 of 35). Unpublished.

Exhibits

Exhibit A: Photo Log

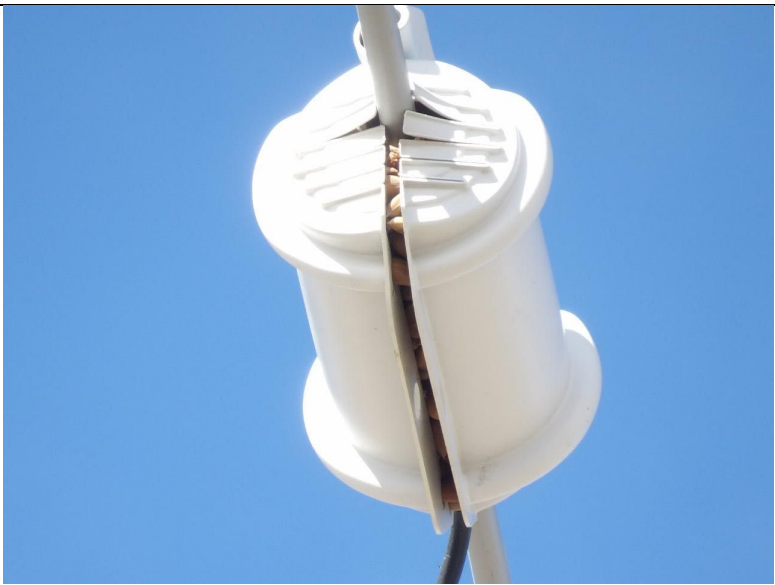
Structure ID: 1987176E

Violation 1




Item1GImg1: Overall pole.

Item1GImg2: Pole ID.



Item1IA1Img1: Close-up view of damaged wildlife cover

Exhibit B: Referenced Construction Standards


**SOUTHERN CALIFORNIA
EDISON®**

Distribution Overhead Construction Standards

5.0 Wildlife and Eagle Zones

5.1 Description

Wildlife protection is a catch all term that over the years has included variants Eagle, Avian, Raptor and/or Critter. Eagle Zones are specific geographical areas that contain high priority protected and endangered species. Measures taken for Wildlife protection may and are typically required in Eagle Zones including:

Wildlife-safe power line construction standards are intended to protect lines from wildlife and vice versa by constructing sufficient phase-to-phase and phase-to-ground clearances as well as installing approved protective materials on high voltages lines and equipment. In addition, installing wildlife covers in the correct application will mitigate other contact-related faults from foreign materials.

While wildlife covers were initially introduced to protect high priority wildlife, additional benefits are procured when discussing wildfire mitigation. By utilizing the correct wildlife covers, electrical events that may result in incandescent particles or other debris will likely be mitigated due to the added fire, track, and arc resistant protection.

See [Table DC 535–2](#) to determine if a district contains Eagle Zones.

5.2 Identification of Eagle Zones

For the most current Eagle Zone maps with the best resolution, please utilize the following interactive mapping systems:

- SCE GeoView (Use the HFRA Layer)
- AGOL

For Reference Only PDF maps can be found in the links below and in the subsequent pages of this chapter.

eWorld.sce.com

PDF Maps of HFRA are accessible via the below link:

<https://edisonintl.sharepoint.com/:f/t/apparatusstandards-TD/EhijW-qs6O9Dv7ZYF8MmDwYBE6E8pzv5iM6CKa0XhkAISA?e=s5Zj3J>

The subsequent pages will show HFRA by:

- SCE Service Territory
- SCE Districts
- California Counties


Please find the links to SCE GeoView and AGOL below:

SCE GeoView:

<https://scegeoview.sce.com/SCEGeoView/>

AGOL:

<https://sce2.maps.arcgis.com/home/item.html?id=cb845d68a29a4f8f932fe47b18c57ca8>

Approved by: 	Wildlife-Safe Power Line Construction	DC 535
Effective Date: 02-08-2024	What's Changed?	Sheet 23 of 35 DOH