



May 13, 2025

Shinjini Menon
Vice President, Asset Management and Wildfire Safety
Southern California Edison Company
2244 Walnut Grove
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 February 3, 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 Remediations (IN-1.1), SCE failed to complete remediation of the loose transformer hanger bolt on Pole ID 1898072E, Grid Hardening ID 414080465-1898072E, at coordinates 35.142054, -118.512856. 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_20250203_1607 |
| 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 | 1898072E | 414080465-1898072E | 35.142054, -118.512856 | Tier 3 | 8.1.3.1 Distribution Detailed Inspections Remediations (IN-1.1) | Completeness | Minor | Failure to complete remediation of the loose transformer through bolt hardware |

Inspection Details

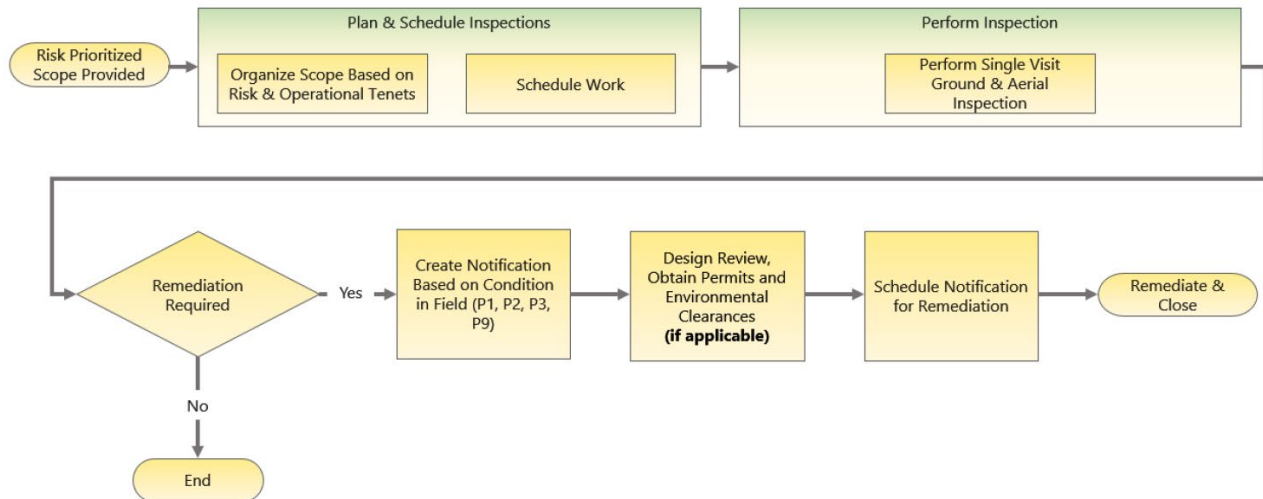
Violation 1:

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.energy.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.energy.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

Finding:

On Pole ID1898072E, Grid Hardening ID 414080465-1898072E, at 21508 Country Club Drive, Tehachapi, California, GPS Coordinates 35.142054, -118.512856, the inspector observed a loose transformer bolt. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo number Item1IA1Img1 depicts a loose transformer bolt. Per information provided by SCE on September 16, 2024, the notification concerning the loose transformer bolt was completed.

Energy Safety concludes that 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, remediation of a loose transformer bolt was reported complete at this location.
2. The transformer is loose, and the top hanging bracket is not flush with the pole.
3. SCE Distribution Construction Standard SL-515 (sheet 8 of 8) depicts a side profile image of a pole mounted transformer, and demonstrates proper installation of top and bottom hanging brackets that are flush with the pole.⁹

⁹See Exhibit B, Southern California Edison Company, "Distribution Overhead Construction Standards (DOH) — 2024 Third Quarter Revision Package," SL 515 sheet 8 of 8, July, 29, 2022. p.1228. Unpublished.

Exhibits

Exhibit A: Photo Log

Structure ID: 1898072E

Violation 1



Item1GImg1: Overall pole.



Item1GImg2: Pole ID.



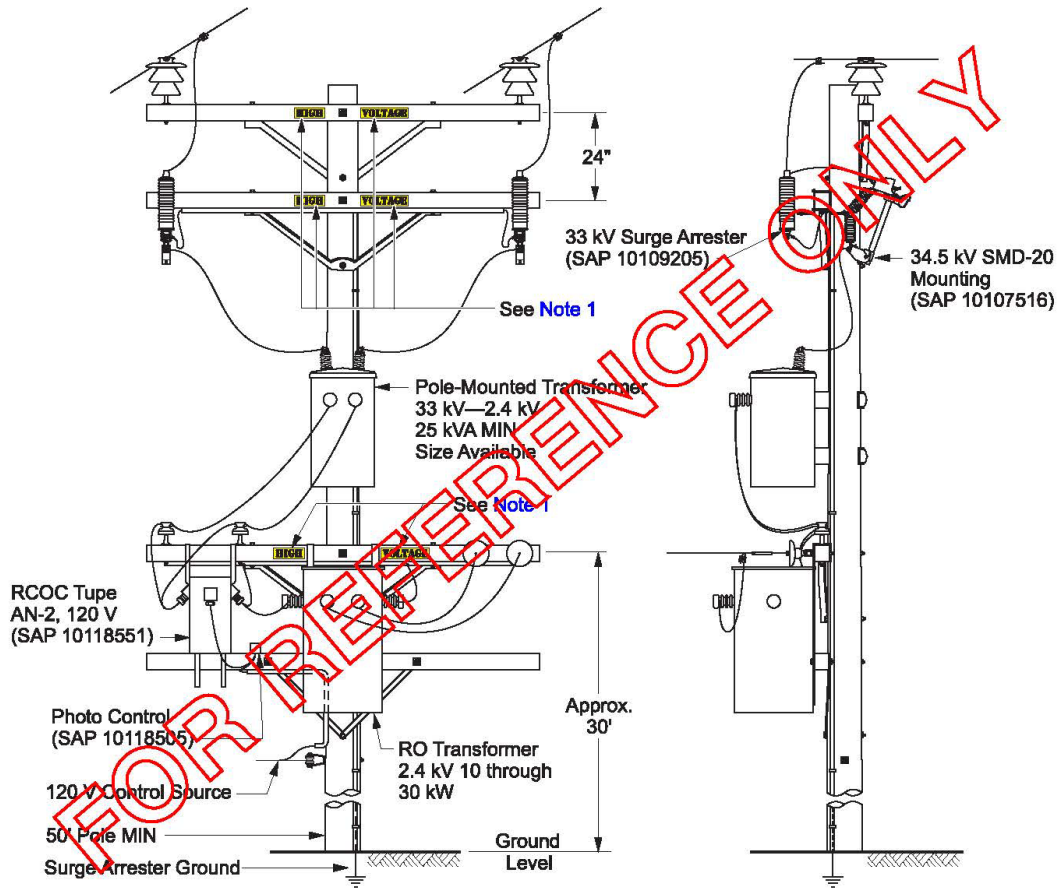
Item1IA1mg1: Loose transformer bolt hardware

Exhibit B: Referenced Construction Standard



Scope SL 515.3 6.6 "A" RO Transformer — 33 kV–2.4 kV

Figure SL 515–7: 6.6 "A" RO Transformer — 33 kV–2.4 kV (Using RCOC Switch)



Note(s):

1. See [PO 120](#) for HIGH VOLTAGE sign installation requirements.

| | | |
|---------------|---|---|
| SL 515 | 6.6 "A" RO Transformer Installation — 33 kV | Approved by:  |
| Sheet 8 of 8 | What's Changed? | Effective Date: |
| DOH | | 07-29-2022 |