



July 15, 2025

Shinjini Menon  
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Southern California Edison Company  
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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.<sup>1</sup>

On May 7, 2025, Energy Safety conducted an inspection of Southern California Edison Company's WMP initiatives in the vicinity of the city of Moreno Valley, 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 Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to provide accurate data for the initiative on pole ID4491254E, Grid Hardening ID 410903686-4491254E at coordinates 33.8924261093468, -117.079745617984.

**Violation 2.** Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to provide accurate data for the initiative on pole ID4491255E, Grid Hardening ID 410903687-4491255E at coordinates 33.8920208848202, -117.079111135204.

**Violation 3.** Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to provide accurate data for the initiative on pole ID4409334E, Grid Hardening ID 410902961-4409334E at coordinates 33.8917967942612, -117.078374286702.

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

**Violation 4.** Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to provide accurate data for the initiative on pole ID4491252E, Grid Hardening ID 410903684-4491252E at coordinates 33.893433561885, -117.080986133899.

**Violation 5.** Energy Safety observed that in implementing 2024 WMP initiative Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations, SCE failed to provide accurate data for the initiative on pole ID4491253E, Grid Hardening ID 410903685-4491253E at coordinates 33.8927718583486, -117.080268679126.

## Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.<sup>2</sup> 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.<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.

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.<sup>5</sup> Requests for informal conference with Energy Safety must be e-mailed to [compliance@energysafety.ca.gov](mailto: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](mailto:Patrick.doherty@energysafety.ca.gov)

Cc:

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<sup>2</sup> Energy Safety Compliance Guidelines, pp. 3

<sup>3</sup> Energy Safety Compliance Guidelines, pp. 4-5

<sup>4</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023%20NOV>

<sup>5</sup> 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.<sup>6</sup>

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

Risk Category	Violation and defect 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 Tiers 2 or 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

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_YLO_20250507_1048
Inspector:	Yana Loginova
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4)
Inspection Selection:	Energy Safety viewed the contents of the Q4 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:	May 07, 2025
City and/or County of Inspection:	Moreno Valley, Riverside 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	4491254E	410903686-4491254E	33.8924261093468, -117.079745617984	Tier 2	Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations	Data Accuracy	N/A	Distribution initiative was reported on the pole which did not have distribution line, and had transmission lines only
Violation 2	4491255E	410903687-4491255E	33.8920208848202, -117.079111135204	Tier 2	Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations	Data Accuracy	N/A	Distribution initiative was reported on the pole which did not have distribution line, and had transmission lines only
Violation 3	4409334E	410902961-4409334E	33.8917967942612, -117.078374286702	Tier 2	Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations	Data Accuracy	N/A	Distribution initiative was reported on the pole which did not have distribution line, and had transmission lines only
Violation 4	4491252E	410903684-4491252E	33.893433561885, -117.080986133899	Tier 2	Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations	Data Accuracy	N/A	Distribution initiative was reported on the pole which did not have distribution line, and had transmission lines only
Violation 5	4491253E	410903685-4491253E	33.8927718583486, -117.080268679126	Tier 2	Distribution High Fire Risk-Informed	Data Accuracy	N/A	Distribution initiative was reported on the pole which did not

					(HFRI) Inspections and Remediations			have distribution line, and had transmission lines only
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# Inspection Details

## 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. "SCE performs visual detailed inspections of distribution facilities as part of its routine practices throughout its service area in compliance with GO 165."<sup>7</sup>

Version 3.2 of Energy Safety's Data Guidelines states the following with respect to data submitted by an electrical corporation when reporting on its 2024 WMP initiatives:

1. "An electrical corporation must ensure location accuracy in their [geographic information system] data submissions..."<sup>8</sup>

## Findings:

Violation 1: On pole ID 4491254E, Grid Hardening ID 410903686-4491254E at 15759-15859 Gilman Springs Rd, Moreno Valley, CA, 92555, USA, 33.8924261093468, -117.079745617984, the inspector observed that the tower carried only transmission infrastructure, even though a distribution infrastructure-related initiative was reported completed at the location. The inspector's observation is documented in Violation 1 photographs, which are an attachment to this report. Photo number Item1IA1Img1 depicts only transmission infrastructure, and no distribution infrastructure, while the distribution infrastructure-related initiative was reported complete at the location.

Violation 2: On pole ID 4491255E, Grid Hardening ID 410903687-4491255E at 15759-15859 Gilman Springs Rd, Moreno Valley, CA, 92555, USA, 33.8920208848202, -117.079111135204, the inspector observed that the tower carried only transmission infrastructure, even though a distribution infrastructure-related initiative was reported completed at the location. The inspector's observation is documented in Violation 2 photographs, which are an attachment to this report. Photo number Item2IA1Img1 depicts only transmission infrastructure, and no distribution infrastructure, while the distribution infrastructure-related initiative was reported complete at the location.

Violation 3: On pole ID4409334E, Grid Hardening ID 410902961-4409334E at 16043-16813 Gilman Springs Rd, Moreno Valley, CA, 92555, USA, 33.8917967942612, -117.078374286702, the inspector observed that the tower carried only transmission infrastructure, even though a distribution infrastructure-related initiative was reported completed at the location. The inspector's observation is documented in Violation 3 photographs,

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<sup>7</sup> Southern California Edison Company, "2023-25 Wildfire Mitigation Plan," October 26, 2023, p. 282. [Online]. Available: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>

<sup>8</sup> Office of Energy Infrastructure Safety, "Data Guidelines, Version 3.2," January 20, 2024, p. 11 [Online]. Available: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56226&shareable=true>

which are an attachment to this report. Photo number Item3IA1Img1 depicts only transmission infrastructure, and no distribution infrastructure, while the distribution infrastructure-related initiative was reported complete at the location.

Violation 4: On pole ID4491252E, Grid Hardening ID 410903684-4491252E at 15759-15859 Gilman Springs Rd, Moreno Valley, CA, 92555, USA, 33.893433561885, -117.080986133899, the inspector observed that the tower carried only transmission infrastructure, even though a distribution infrastructure-related initiative was reported completed at the location. The inspector's observation is documented in Violation 4 photographs, which are an attachment to this report. Photo number Item4IA1Img1 depicts only transmission infrastructure, and no distribution infrastructure, while the distribution infrastructure-related initiative was reported complete at the location.

Violation 5: On pole ID4491253E, Grid Hardening ID 410903685-4491253E at 15759-15859 Gilman Springs Rd, Moreno Valley, CA, 92555, USA, 33.8927718583486, -117.080268679126the inspector observed that the tower carried only transmission infrastructure, even though a distribution infrastructure-related initiative was reported completed at the location. The inspector's observation is documented in Violation 5 photographs, which are an attachment to this report. Photo number Item5IA1Img1 depicts only transmission infrastructure, and no distribution infrastructure, while the distribution infrastructure-related initiative was reported complete at the location.

Energy Safety concludes that there are violations because of these facts:

1. Southern California Edison Company's 2024 8.1.3.1 Distribution Detailed Inspections and Remediations (IN-1.1) work was identified as complete at the locations identified above.
2. The work identified as complete could only be completed on distribution infrastructure, not infrastructure that is exclusively used for transmission.
3. The locations of the violations contain infrastructure exclusively used for transmission.

Exhibits

Exhibit A: Photo Log

Structure ID: 4491254E

Violation 1



	
Item1GImg1: Overall pole	Item1GImg2: Pole ID
	
Item1IA1Img1: Transmission only line, no distribution present	

Exhibit B: Photo Log

Structure ID: 4491255E

Violation 2



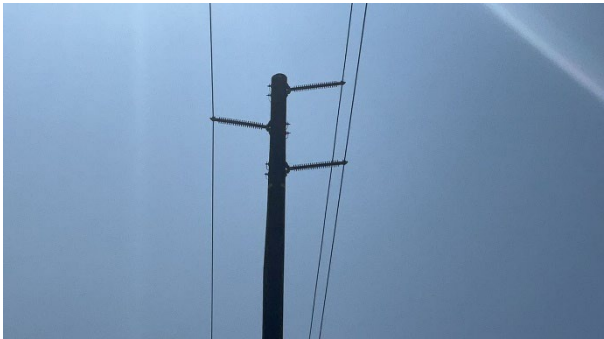
	
Item2GImg1: Overall pole	Item2GImg2: Pole ID
	
Item2IA1Img1: Transmission only line, no distribution present	

Exhibit C: Photo Log

Structure ID: 4409334E

Violation 3

	
<p>Item3GImg1: Overall pole</p>	<p>Item3GImg2: Pole ID</p>
	
<p>Item3IA1Img1: Transmission only line, no distribution present</p>	



Exhibit D: Photo Log

Structure ID: 4491252E

Violation 4






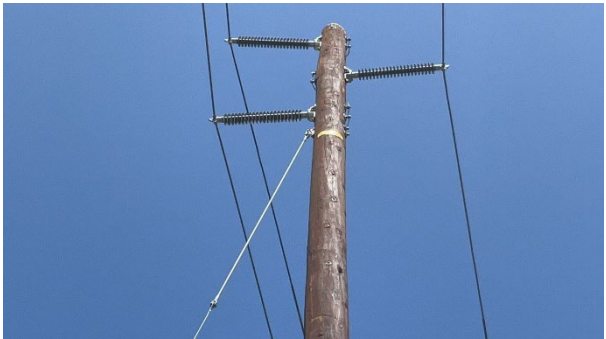
 A photograph showing a tall utility pole standing on the side of a paved road. Several power lines are strung across the pole. In the background, a yellow and black diamond-shaped traffic sign is visible. The sky is clear and blue.	 A close-up photograph of the lattice structure of the utility pole. A yellow identification tag is attached to the pole, displaying the number '4491252E'. The lattice is dark and shows some signs of weathering or rust.
<p>Item4GImg1: Overall pole</p>	<p>Item4GImg2: Pole ID</p>
 A close-up photograph of the transmission line hardware on the pole, showing insulators and the arrangement of the power lines. The background is a clear blue sky.	
<p>Item4IA1Img1: Transmission only line, no distribution present</p>	

Exhibit E: Photo Log

Structure ID: 4491253E

Violation 5

	
<p>Item5GIimg1: Overall pole</p>	<p>Item5GIimg2: Pole ID</p>
	
<p>Item5IA1img1: Transmission only line, no distribution present</p>	