September 15, 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 July 10, 2025, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Temecula, 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 the pole ID4063880E, Grid Hardening ID 414050312-4063880E at coordinates 33.477834, -117.220148.

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

Raymond.Fugere@sce.com

Patrick Doherty

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

Gary Chen, SCE

Gary.Chen@sce.com

Sunny Chu, SCE

Sunny.Chu@sce.com

Elizabeth Leano, SCE

Elizabeth.Leano@sce.com

Cynthia Childs, SCE

Cynthia.Childs@sce.com

Raghu Rayalu, SCE

Raghu.Rayalu@sce.com

Yana Loginova, Energy Safety

Yana.Loginova@energysafety.ca.gov

Samuel Isaiah, Energy Safety

Samuel.Isaiah@energysafety.ca.gov

Shannon Greene, Energy Safety

Shannon.Greene@energysafety.ca.gov

Compliance@energysafety.ca.gov

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	Immediate resolution					
Moderate	 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	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_YLO_20250710_1459				
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:	July 10, 2025				
City and/or County of Inspection:	Temecula, 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 #	Structur e ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	4063880E	414050312- 4063880E	33.477834, - 117.220148	Tier 3	Distribution High Fire Risk- Informed (HFRI) Inspections and	Data Accuracy	N/A	Failure to report accurate data
					Remediations			

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."

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..."8

Finding:

On pole ID 4063880E, Grid Hardening ID 414050312-4063880E at 45801 Sandia Creek Dr, Temecula, CA 92590, 33.477834, -117.220148, the inspector observed that no wildlife covers were installed. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers IA1Img1, IA1Img2, IA1Img3, depict that no wildlife covers are installed. Per information provided by SCE to the Compliance Inbox on April 3, 2025, at 12:15 pm, the repair of a wildlife cover was completed at the inspection location.

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

- 1. Southern California Edison Company's 2024 8.1.3.1 Distribution Detailed Inspections and Remediations (IN-1.1) work to repair a wildlife cover was identified as complete at the location.
- 2. The wildlife cover was not installed.

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

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

Exhibits

Exhibit A: Photo Log
Structure ID: 4063880E

Violation 1



Glmg1: Overall Structure



GImg2: Structure ID



IA1Img1: View showing no wildlife covers



IA1Img2: View showing no wildlife covers



IA1Img3: View showing no wildlife covers