



October 2, 2025

Shinjini Menon
Vice President, Asset Management and Wildfire Safety
Southern California Edison Company
2244 Walnut Grove
Rosemead, CA 91770

NOTICE OF NON-PERFORMANCE

Ms. Menon:

Pursuant to Government Code section 15472, et seq, 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 2025 Wildfire Mitigation Plan (WMP) and determined the existence of a non-performance requiring correction. Energy Safety therefore issues SCE a Notice of Non-Performance (NON), identifying non-performance with its approved WMP.

On August 14, 2025, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Perris, California. The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.1.3.1 - Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations (IN-1.1), SCE failed to complete the remediation of bird guards on Pole ID 4943605E, Grid Hardening ID 413373230-4943605E at coordinates 33.787633, -117.371744. Energy Safety considers this non-performance to be in the Minor risk category. SCE must complete a corrective action for this deficiency by 12 months from date of this notice.

Within 30 days from the issuance date of this NON, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified deficiency.

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket¹ and the associated file name(s) must begin with the NON identification number.

Prior to its response, the electrical corporation may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than five (5) business days before the response

¹ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

deadline.² Requests for informal conference with Energy Safety must be e-mailed to compliance@energysafety.ca.gov, with a copy sent to all Energy Safety staff identified in the NON.

Sincerely,

Patrick Doherty

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

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

² Energy Safety Compliance Guidelines, p. 4



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 Non-Performance (NON) is issued for any deficiencies discovered during an inspection related to an electrical corporation's performance of its WMP initiatives.

Correction Timelines

Deficiencies must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a deficiency. If Energy Safety assigns a risk category to a deficiency, an electrical corporation must correct the deficiency as required per the timelines provided in Table 1.³

Table 1. Risk Category and Correction Timelines

Risk Category	Deficiency 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

³ 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 deficiency or deficiencies found during the inspection. Details regarding the inspection that identified the deficiency or deficiencies 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_SIS_20250814_0654
Inspector:	Samuel Isaiah
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 1 (Q1)
Inspection Selection:	Energy Safety viewed the contents of the Q1 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:	August 14, 2025
City and/or County of Inspection:	Perris, Riverside County
Inspection Purpose:	Assess the accuracy of Southern California Edison Company's QDR data, completeness of its work, and performance of WMP requirements.

Table 3: WMP Inspection Deficiencies

Deficiency #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Severity	Deficiency Description
Deficiency 1	4943605E	413373230-4943605E	33.787633, -117.371744	Tier 2	8.1.3.1 Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations	Minor	Failure to complete bird guard repair

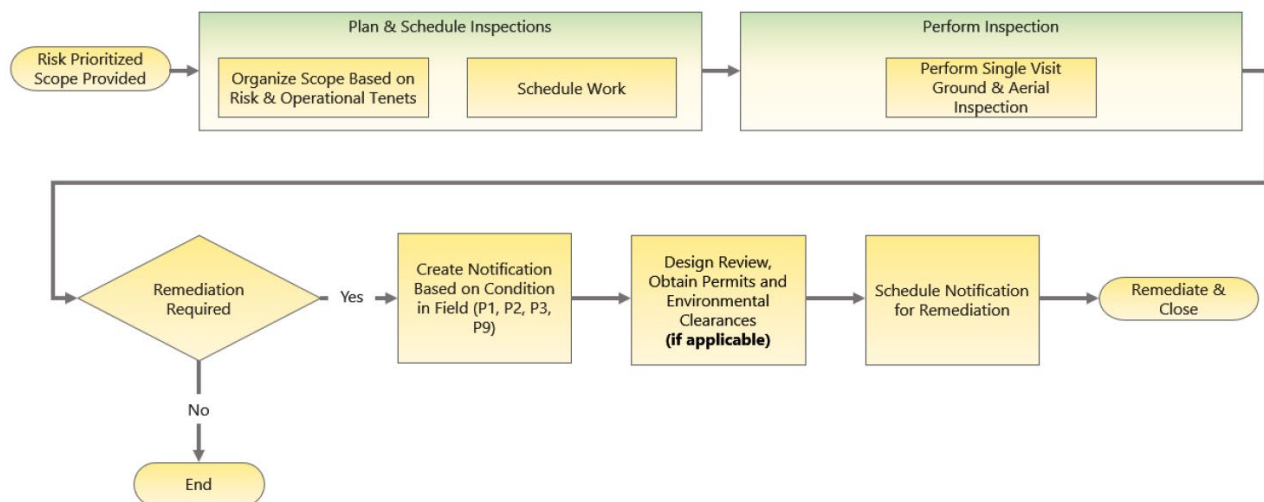
Inspection Details

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. "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."⁴
2. The following is a workflow diagram from SCE's WMP showing the conditions under which SCE will execute remediations under initiative number 8.1.3.1:⁵

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



⁴ 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>

⁵ 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:**Deficiency 1**

On Pole ID 4943605E, Grid Hardening ID 413373230-4943605E at 22781-22799 Rolling Meadows Dr, Perris, CA, 92570, 33.787633, -117.371744, the inspector observed that one of the bird guards was out of place. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers IA1Img1, IA1Img2, IA1Img3 and IA1Img4 depict one of the primary connection covers slipped down the conductor and connection device was exposed. Per information provided by SCE to the Compliance Inbox on August 12, 2025, at 11:25 am, two dead end bird guard covers were out of place, and that work to mitigate the condition was complete.

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


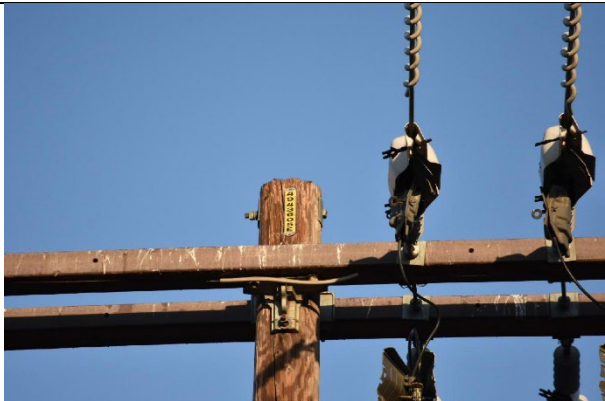

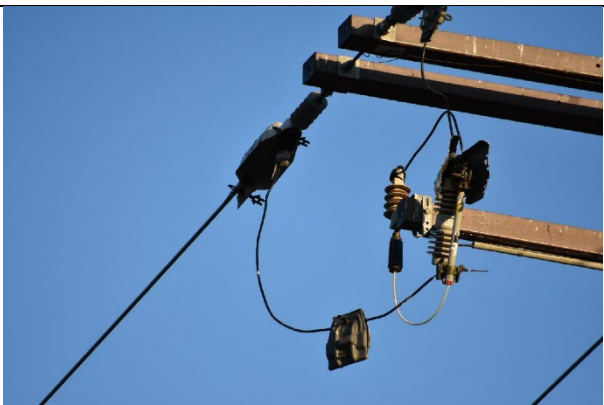
1. Southern California Edison Company's 2024 WMP 8.1.3.1 Distribution Detailed Inspections and Remediations work identified that the work to mitigate the bird guards that were out of place was completed.
2. The primary avian bird guard slipped down the conductor, and the connector was exposed.

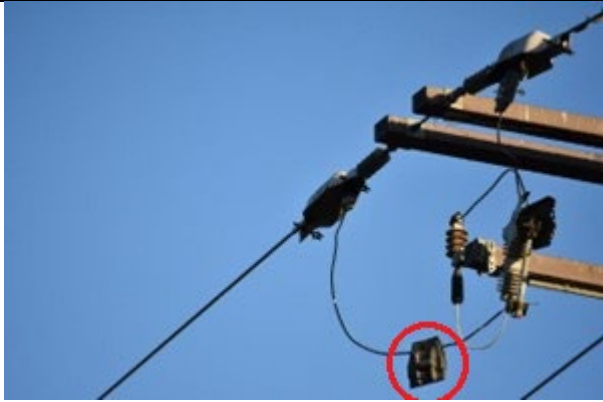
Exhibits

Exhibit A: Photo Log

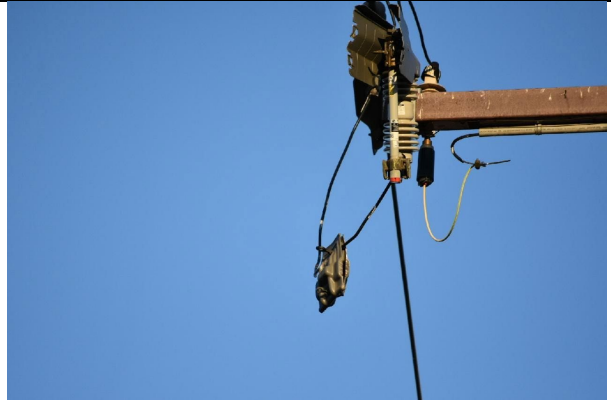
Structure ID: 4943605E

Deficiency 1

	
<p>GI1mg1: Overall Structure</p>	<p>GI1mg2: Structure ID</p>
	
<p>IA11mg1: Bird Guard Out of Place</p>	<p>IA11mg2: Bird Guard Out of Place</p>



IA1Img3: Bird Guard Out of Place



IA1Img4: Bird Guard Out of Place