



November 10, 2025

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## 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 2024 Wildfire Mitigation Plan (WMP) and determined the existence of non-performance requiring correction. Energy Safety therefore issues SCE a Notice of Non-Performance (NON), identifying non-performance with its approved WMP.

On June 17, 2025, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the city of Porterville, California. The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2024 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 installing wildlife covers on Pole ID 4022820E, Grid Hardening ID 409837801-4022820E at 35.98584646688619, -118.9218473827965. 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 2024 NON Docket<sup>1</sup> 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

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<sup>1</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NON>

deadline.<sup>2</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 staff identified in the NON.

Sincerely,

*Patrick Doherty*

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<sup>2</sup> 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.<sup>3</sup>

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

Risk Category	Deficiency 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>3</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 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_LOK_20250617_1137
Inspector:	Lovepreet Kaur
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter Q4 (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:	June 17, 2025
City and/or County of Inspection:	Porterville, Tulare 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 Deficiencies***

Deficiency #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Severity	Deficiency Description
Deficiency 1	4022820E	409837801-4022820E	35.98584646688619, -118.9218473827965	Tier 2	8.1.3.1 - Distribution High Fire Risk-Informed (HFRI) Inspections and Remediations	Minor	Failure to complete the installation of wildlife covers

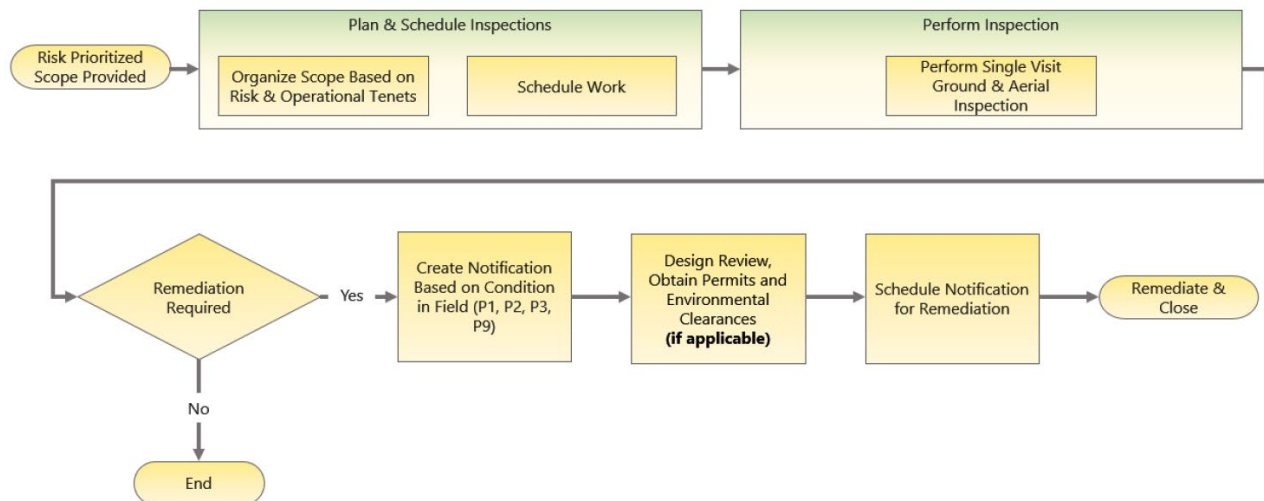
# Inspection Details

## Relevant Requirement:

SCE'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."<sup>4</sup>
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:<sup>5</sup>

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



<sup>4</sup> 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>

<sup>5</sup> 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:****Deficiency 1**

On Pole ID 4022820E, Grid Hardening ID 409837801-4022820E at 27707-27707 Deer Creek Dr, Porterville, CA, 93257, USA, 35.98584646688619, -118.9218473827965, the inspector observed that no wildlife covers were installed. The inspector's observation is documented in Deficiency 1 photographs, which are attached to this report. Photo number IA1Img1 depicts that no wildlife covers are installed. Per information provided by SCE to the Compliance Inbox on April 3, 2025, at 12:15 pm, the remediation was completed.

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 remediation of wildlife covers was completed at this location.
2. The wildlife covers were not installed.

# Exhibits

Exhibit A: Photo Log

Structure ID: 4022820E

Deficiency 1

	
<p><b>G1mg1:</b> Overall Structure</p>	<p><b>G1mg2:</b> Structure ID</p>
	
<p><b>IA11mg1:</b> View showing no wildlife covers</p>	