December 1, 2025

Shinjini Menon Vice President, Asset Management and Wildlife Safety Southern California Edison Company 2244 Walnut Grove Ave 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 September 4, 2025, Energy Safety conducted an inspection of SCE's WMP initiatives in the vicinity of the Palos Verdes Peninsula, 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 tightening a guy wire on Pole ID 1232593E, Grid Hardening ID 412152966-1232593E at coordinates 33.796231, -118.360156. 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 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

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

deadline.<sup>2</sup> 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

Erick Sanchez, Energy Safety

erick.g.sanchez@sce.com

Alexander Scott, Energy Safety

alexander.scott@energysafety.ca.gov

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

<sup>&</sup>lt;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	Immediate resolution				
Moderate	<ul> <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	12 months or resolution scheduled in WMP update				

<sup>&</sup>lt;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_AXS_20250904_1343				
Inspector:	Alexander Scott				
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:	September 04, 2025				
City and/or County of Inspection:	Palos Verdes Peninsula, Los Angeles 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	1232593E	412152966- 1232593E	33.796231, - 118.360156	Tier 2	8.1.3.1 - Distribution High Fire Risk- Informed (HFRI) Inspections and Remediations	Minor	Failure to complete the tightening of guy wire

## **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."<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 8.1.3.1:5

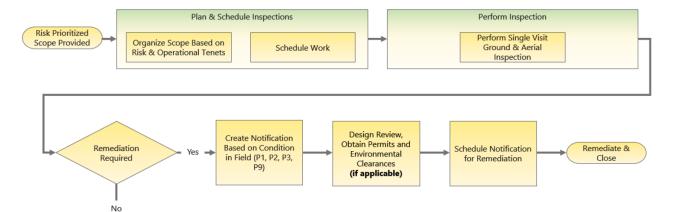


Figure 8-1a - Distribution Detailed Inspections and Remediations Workflow

<sup>&</sup>lt;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>&</sup>lt;sup>5</sup> Southern California Edison Company, "2023-25 Wildfire Mitigation Plan," October 26, 2023, p. 285. [Online]. Available: <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true</a>

#### Finding:

### Deficiency 1:

On Pole ID 1232593E, Grid Hardening ID 412152966-1232593E at 4200-4236 Via Alondra, Palos Verdes Peninsula, CA, 90274, USA, 33.796231, -118.360156, the inspector observed that the down guy wires were loose. The inspector's observation is documented in Deficiency 1 photographs, which are attached to this report. Photo numbers IA1Img1 and IA1Img2 depict loose guy wires. Per information provided by SCE to the Compliance Inbox on July 1, 2025, at 4:09 pm, the remediation work was completed.

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

- 1. Southern California Edison Company's 2025 WMP initiative number 8.1.3.1 Distribution Detailed Inspections and Remediations work identified that tightening of the guy wire was completed at this location.
- 2. The guy wires were loose.

# **Exhibits**

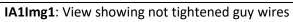
Exhibit A: Photo Log

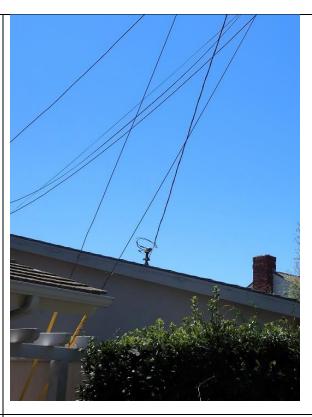
**Structure ID:** 1232593E

Deficiency 1









IA1Img2: View showing down guy not tightened