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Melvin Stark
Principal Manager
OE-T&D Compliance & Quality

November 13, 2023

Fadi Daye, P.E.
Program and Project Supervisor,
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West 4th St., Ste. 500
Los Angeles, California 90013

CPUCID: E20201026-01
Regarding: Notice of Violation
Location: East Santiago Canyon Road, Silverado, CA

Dear Mr. Daye:

This letter responds to the Electric Safety and Reliability Branch's (ESRB) October 10, 2023 Notice of Violation (NOV) to Southern California Edison Company (SCE). The NOV addresses the clearance between two SCE 12 kV conductors and a T-Mobile communications wire spanning pole nos. 1419541E and 1419546E (the "Subject Span") in Silverado, California. ESRB alleges the 12 kV conductors and T-Mobile wire did not meet the GO 95, Rule 38 minimum clearance standard and that SCE violated GO 95, Rule 31.1 because "SCE should have ensured that the clearance between SCE's 12 kV [conductors] and T-Mobile's facilities… would always meet the requirement of GO 95, Rule 38 [and that] its 12 kV [conductors] and T-Mobile's facilities would not contact each other or come close to contacting each other."

The alleged clearance violations appear to be based on measurements SCE provided ESRB in response to a data request.[1] The measurements were taken on October 28, 2020, two days after the start of the Silverado Fire. Without admitting SCE violated GO 95, Rules 38 or 31.1, SCE replaced pole nos. 1419541E and 1419546E in December 2020. SCE acknowledges that the October 28, 2020 post-incident measurements show a ***vertical clearance*** as low as 5.5 feet (66 inches) between the T-Mobile wire and the middle 12 kV conductor and a vertical clearance as low as 4.8 feet (57.6 inches) between the T-Mobile wire and the southernmost 12 kV conductor.[2]

However, the measurements also show that the actual clearance, or ***radial clearance***, between the T-Mobile wire and the 12 kV conductors was greater than the vertical clearances throughout

[1] *See* confidential table of measurements provided in response to ESRB data request 06-16 on August 6, 2022.
[2] As alleged in the NOV, the GO 95, Rule 38 minimum vertical clearance applicable to the SCE 12 kV conductors and T-Mobile wire is 68.4 inches.

the Subject Span.[3] The radial clearances were measured directly from the T-Mobile wire to each of the 12 kV conductors. The vertical clearances, on the other hand, were measured on a vertical line running straight up from the T-Mobile wire to the horizontal plane that each 12 kV conductor occupies.

Because it is the actual distance between wires, radial clearance is the relevant measurement for determining the likelihood a conductor and communications wire could come in contact. GO 95, Rule 38 implicitly recognizes that a radial clearance of 5.7 feet (68.4 inches) between a communications wire and 12 kV conductor is acceptable because it complies with the minimum vertical clearance in a configuration in which a 12 kV conductor is located directly above a communications wire (a configuration in which the vertical clearance equals the radial clearance).

Here, the measurements provided to ESRB demonstrate each of SCE's 12 kV conductors was at least 5.7 feet (68.4 inches) from the T-Mobile wire throughout the Subject Span, with one exception: 209 feet from pole no. 1419541E on the middle 12 kV conductor, SCE measured the radial clearance at 5.6 feet, a variance of only .1 feet (1.2 inches). There were no heat marks on the middle 12 kV conductor 209 feet from pole no. 1419541E, indicating the T-Mobile wire (or a lashing wire) did not make contact with the conductor at that point. The measurements demonstrate the clearance between SCE's 12 kV conductors and T-Mobile's wire throughout the Subject Span was such that they would not contact each other and would not come close to contacting each other in the ordinary course of operations and absent broken lashing wires on T-Mobile's communication lines.

Thank you for providing the opportunity to respond to the NOV. Please do not hesitate to contact me if you have any questions about this response.

Sincerely,

Mel Stark
Principal Manager, OE-T&D Compliance & Quality
1 Innovation Way
Pomona, CA 91768

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Richard Le, Utilities Engineer, ESRB, CPUC

[3] On the table of measurements, the radial clearances are shown in the columns labeled Y-RADIAL, Z-RADIAL, and X-RADIAL; the vertical clearances are shown in the columns labeled Y-VERT, Z-VERT, and W-VERT; and the horizontal clearances are shown in the columns labeled Y-HORZ, Z-HORZ, and W-HORZ.