

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 13, 2024

CPUC-ID: E20220819-01

Melvin Stark  
Principal Manager, T&D Compliance Integration  
Southern California Edison (SCE)  
[Melvin.Stark@sce.com](mailto:Melvin.Stark@sce.com)

Dear Mr. Stark:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) has reviewed SCE's response, dated April 29, 2024, to the Notice of Violation (NOV) issued to the utility on March 28, 2024, regarding the Ridge Fire incident.

SED's investigation of the Ridge Fire identified one (1) violation of General Order (GO) 95 Rule 31.1. SCE's response disagreed with the one (1) violation of Rule 31.1.

SED stands by its one (1) violation and provides additional clarification and contexts to address the arguments raised in SCE's response to the NOV. Attached is the summary of relevant code sections, SED's findings, SCE's responses, and SED's evaluation of SCE's response.

This letter serves as notice of SED's closure of the investigation of this incident and that SED will not be pursuing further enforcement action. If additional information is uncovered, SED reserves the right to re-open the investigation. Thank you for your cooperation in this investigation. If you have any questions concerning this evaluation, please contact Chris Lee at (415) 602-6477 or by email at [chris.lee@cpuc.ca.gov](mailto:chris.lee@cpuc.ca.gov).

Sincerely,

*Nathan Sarina*

Nathan Sarina, Program and Project Supervisor  
Wildfire Safety and Enforcement Branch  
Safety and Enforcement Division

CC:  
Lee Palmer, Director  
Safety and Enforcement Division

Anthony Noll, Program Manager  
Safety and Enforcement Division

Chris Lee, Senior Utilities Engineer  
Wildfire Safety and Enforcement Branch

**Ridge Fire**  
**Summary of Violations**

The table below summarizes SCE’s response and SED’s evaluation of that response for the one (1) violation listed in the NOV Letter for the Ridge Fire, issued on March 28, 2024.

Violation #	GO Rule	SCE Agree/Disagree	SED Evaluation
1.	Rule 31.1	Disagree	Disagrees with SCE’s Response

**Alleged Violation SCE Disputes**

**GO 95, Rule 31.1 – Design, Construction and Maintenance** states in part:

*For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.*

**Violation**

WSEB’s investigation determined that SCE did not properly oversee work performed by its contractor. When contractors perform work on behalf of the utilities, it is an accepted good practice for the utilities to ensure that the work is done correctly. As part of the wildfire mitigation project, a contractor replaced bare conductors on the east side of the Pole Number 4160275E with covered conductors and submitted a request for map revision to reflect the change. However, the proposed map revision erroneously included the adjacent span to the west of the Pole Number 4160275E. The adjacent span of conductors west of the Pole Number 4160275E was outside the scope of the wildfire mitigation project and should not have been included in the map revision of Circuit Map M3. Despite the error in the map revision, SCE approved its contractor’s request for the revision of Circuit Map M3 on June 7, 2022. As a result, WSEB found SCE in violation of General Order 95, Rule 31.1 for failure to recognize the incorrect revision of Circuit Map M3 by the contractor during the revision approval process.

***SCE’s Response to Violation***

“Your letter states that the Wildfire Safety and Enforcement Branch “found SCE in violation of General Order 95, Rule 31.1 for failure to recognize [an] incorrect revision of Circuit Map M3 by [a] contractor[.]” The letter states:

As part of the wildfire mitigation project, a contractor replaced bare conductors on the east side of the Pole Number 4160275E with covered conductors and submitted a request for map revision to reflect the change. However, the proposed map revision erroneously included the adjacent span to the west of the Pole Number 4160275E. The adjacent span of conductors west of the Pole Number 4160275E was outside the scope of the wildfire mitigation project and should not have been included in the map revision of Circuit Map M3.

Without admitting that SCE violated GO 95, Rule 31.1, SCE responds as follows. As noted in your letter, a contractor installed covered conductors on the east side of Pole Number 4160275E. This was done pursuant to SCE’s long span initiative, a wildfire mitigation strategy to replace spans of bare conductor that are 350 feet or longer with covered conductor. The wildfire

mitigation project was completed on June 6, 2022. The adjacent span of bare conductors to the west of Pole Number 4160275E was not part of the wildfire mitigation project because it was only 240 feet. The contractor that completed the project submitted a request to revise the circuit map to reflect the newly installed covered conductor; however, the contractor incorrectly included the span to the west of Pole Number 4160275E as having been part of the wildfire mitigation project. When the map was updated on June 7, 2022, it incorrectly reflected that covered conductor was installed west of Pole Number 4160275E. Although there was a paperwork discrepancy in the circuit map due to the contractor error, this discrepancy did not result in a safety issue as the underlying facilities were appropriately designed, constructed and maintained in accordance with accepted good practice for the intended use and known local conditions. Notwithstanding this, and as a preventive measure, SCE has implemented the requirement that Distribution employees that work with circuit maps confirm any revisions provided by contractors and Distribution employees before approving the revisions.

On August 19, 2022, the Ridge Fire began. There is no causal connection between the Ridge Fire and the wildfire mitigation project or the June 7, 2022 circuit map revision. Your letter does not assert such a connection. As a result of the Ridge Fire, the span to the west of Pole Number 4160275E required replacement. On August 20, 2022, SCE installed covered conductor on the span, consistent with SCE's standard to install covered conductor in High Fire Risk Areas when conductor replacement occurs. Upon installation of the covered conductor, the June 7, 2022 update to the circuit map was correct and no revision to the circuit map was necessary.

Finally, I note that SCE did not conduct patrol inspections of the span west of Pole Number 4160275E between June 7, 2022 and August 19, 2022. No patrol inspections were required during this period.”

### ***SED's Evaluation of SCE's Response to Violation***

SCE's implementation of the requirement for confirmation of map revision requests by contractors addresses the concern that SED expressed in the NOV. Nevertheless, SED stands by its violation.

SCE stated, “Although there was a paperwork discrepancy in the circuit map due to the contractor error, this discrepancy did not result in a safety issue ...” At the same time, SCE recognizes the potential risk of working with inaccurate circuit maps, expressed as follows in a document<sup>1</sup> which SCE provided SED in response to a document request:

There are several possible and serious consequences of working with inaccurate circuit maps. Most importantly, the safety of field personnel as well as that of the public can become jeopardized. Other potential issues include equipment operating errors...

Maintaining accurate records is important as working with inaccurate maps has potentially serious consequences. Any time a circuit is upgraded, the circuit map must be accurately revised. It is accepted good practice to confirm map revisions, especially revisions requested by contractors. At the time of the aforementioned wildfire mitigation project, SCE did not have in place a requirement to confirm map revisions. Therefore, SED still finds SCE in violation of General Order 95, Rule 31.1 for its failure to verify the accuracy of map revision.

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<sup>1</sup> Actions & Updates for Distribution Leaders, Vol. 1 Issue 8, September 19, 2023 (Bates SCE-SEDRIDGE00000646)