

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 28, 2024

E20220819-01

Melvin Stark
Principal Manager, T&D Compliance Integration
Southern California Edison
Melvin.Stark@sce.com

Dear Mr. Stark:

The Wildfire Safety and Enforcement Branch (WSEB) of the Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submits the following **Notice of Violation (NOV)** as part of its investigation of an incident that occurred on August 19, 2022, in Azusa, California, at the intersection of San Gabriel Canyon Road (State Highway 39) and Old San Gabriel Canyon Road. This incident resulted in the Ridge Fire, which burned 6 acres, deenergized 95 customers on Jarvis 12kV Distribution Circuit, and caused \$26,197.41 in damage to utility equipment.

SED found one instance in which Southern California Edison (SCE) violated GENERAL ORDER 95.

Please provide a response to the violation(s) within 30 calendar days. Include all corrective actions and preventive measures taken by SCE to remedy and prevent the recurrence of such violation(s). If you have any questions concerning this NOV, please contact Chris Lee at 415-602-6477 or by email at chris.lee@cpuc.ca.gov.

Sincerely,

Anthony Noll, Program Manager
Wildfire Safety and Enforcement Branch
Safety and Enforcement Division

Enclosure

CC:
Lee Palmer, Director
Safety and Enforcement Division

Chris Lee, Senior Utilities Engineer
Wildfire Safety and Enforcement Branch

Violation

General Order 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.



Melvin Stark
Principal Manager
T&D Compliance & Quality

April 29, 2024

Anthony Noll
Program Manager
California Public Utilities Commission
Wildfire Safety and Enforcement Branch
Safety and Enforcement Division
320 West 4th St., Ste. 500
Los Angeles, California 90013

CPUCID: E20220819-01
Regarding: Notice of Violation
Location: Pole Number 4160275E, Old San Gabriel Canyon Road in Azusa

Dear Mr. Noll:

On behalf of the Southern California Edison Company (SCE), please accept this letter as acknowledgement of and response to your letter dated March 28, 2024, regarding the above-referenced notice of 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.

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, T&D Compliance & Quality
1 Innovation Way
Pomona, CA 91768

CC: Lee Palmer
Chris Lee
Layla Labagh
Irene Moosen
Amy Yip-Kikugawa