STATE OF CALIFORNIA Gavin Newsom, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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Melvin Stark
Principle Manager, T&D Compliance Integration
Southern California Edison Company
1 Innovation Way
Pomona, CA 91786

Subject: Audit of Southern California Edison's Bishop District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Kyle King, Saimon Islam, and Richard Le of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Bishop District from December 7, 2020 to December 11, 2020. The audit included a review of SCE's records and field inspections of SCE's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than June 28, 2021, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Kyle King at (213)-222-3260 or Kyle.King@cpuc.ca.gov.

Sincerely,

Fadi Daye

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Kyle King, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- Intrusive test records
- SCE's documented inspection program.
- Vegetation Management Records

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 95, Rule 18-B1, Maintenance Programs, states in part:

> *Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate …*

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.*

SCE's records indicated that from 2015 to 2020, SCE completed 98 work orders past their due date for corrective actions. Additionally, as of the date of the audit, SCE had 42 open work orders that were past their scheduled due date for corrective actions.

GO 165, Standard III-B, Distribution Facilities, Standards for Inspections, states in part:

> *Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table-1.*

GO 95, Rule 31.2, Inspection of Lines, states in part:

> *Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

SCE's records indicated that from 2015 to 2020, SCE completed 46 overhead detailed inspections past their scheduled due dates.

GO 128, Rule 17.1, Design Construction and Maintenance, states in part:

> *Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

SCE's records indicated that from 2015 to 2020, SCE completed 48 work orders past their due date for corrective actions. Additionally, as of the date of the audit, SCE had 26 open work orders that were past their scheduled due date for corrective action.

III. Field Inspections

My staff inspected the following structures during the field inspection portion of the audit:

	Structure No.	Structure Type	Location
1	1735740E	Utility Pole	Bishop
2	1735741E	Utility Pole	Bishop
3	2290300E	Utility Pole	Bishop
4	1735743E	Utility Pole	Bishop
5	1735744E	Utility Pole	Bishop
6	1735745E	Utility Pole	Bishop
7	1735746E	Utility Pole	Bishop
8	1735747E	Utility Pole	Bishop
9	1735748E	Utility Pole	Bishop
10	1791975E	Utility Pole	Bishop
11	4885415E	Utility Pole	Bishop
12	2004492E	Utility Pole	Bishop
13	4885416E	Utility Pole	Bishop
14	2004493E	Utility Pole	Bishop
15	2004494E	Utility Pole	Bishop
16	4885417E	Utility Pole	Bishop
17	2004495E	Utility Pole	Bishop
18	2004496E	Utility Pole	Bishop
19	4329003E	Utility Pole	Bishop
20	20863CIT	Utility Pole	Bishop
21	2136587E	Utility Pole	Bishop
22	2136588E	Utility Pole	Bishop
23	4460729E	Utility Pole	Bishop
24	4593942E	Utility Pole	Bishop
25	2042767E	Utility Pole	Bishop
26	19594 CIT	Utility Pole	Bishop
27	42087055	Utility Pole	Bishop
28	1875571E	Utility Pole	Bishop
29	4234648E	Utility Pole	Bishop
30	4234649E	Utility Pole	Bishop
31	524655	Utility Pole	Bishop
32	4329042E	Utility Pole	Bishop
33	4329041E	Utility Pole	Bishop
34	4329040E	Utility Pole	Bishop
35	2290098E	Utility Pole	Tom’s Place
36	4030768E	Utility Pole	Tom’s Place

	Structure No.	Structure Type	Location
37	1609387E	Utility Pole	Tom's Place
38	4030767E	Utility Pole	Tom's Place
39	424451S	Utility Pole	Tom's Place
40	424452S	Utility Pole	Tom's Place
41	4030768E	Utility Pole	Tom's Place
42	4030765E	Utility Pole	Tom's Place
43	2144204E	Utility Pole	Tom's Place
44	524605S	Utility Pole	Tom's Place
45	524604S	Utility Pole	Tom's Place
46	4030776E	Utility Pole	Tom's Place
47	4030775E	Utility Pole	Tom's Place
48	4030774E	Utility Pole	Tom's Place
49	1875573E	Utility Pole	Tom's Place
50	4206732E	Utility Pole	Crowley Lake
51	4460665E	Utility Pole	Crowley Lake
52	4749996E	Utility Pole	Crowley Lake
53	2357581E	Utility Pole	Crowley Lake
54	524510	Utility Pole	Crowley Lake
55	1600189E	Utility Pole	Mammoth Lakes
56	4923501E	Utility Pole	Mammoth Lakes
57	1600188I	Utility Pole	Mammoth Lakes
58	1600187I	Utility Pole	Mammoth Lakes
59	4329026E	Utility Pole	Mammoth Lakes
60	424989	Utility Pole	Mammoth Lakes
61	2230598E	Utility Pole	Mammoth Lakes
62	4867454E	Utility Pole	Mammoth Lakes
63	1792305E	Utility Pole	Mammoth Lakes
64	1735611E	Utility Pole	Mammoth Lakes
65	1735610E	Utility Pole	Mammoth Lakes
66	1709913E	Utility Pole	Mammoth Lakes
67	1709837E	Utility Pole	Mammoth Lakes
68	1709838E	Utility Pole	Mammoth Lakes
69	424178S	Utility Pole	Crowley Lake
70	424286	Utility Pole	Crowley Lake
71	1709875E	Utility Pole	Bridgeport
72	4093049E	Utility Pole	Bridgeport
73	4865566E	Utility Pole	Bridgeport
74	4865564E	Utility Pole	Bridgeport
75	4664637E	Utility Pole	Bridgeport
76	4924854E	Utility Pole	Bridgeport

	Structure No.	Structure Type	Location
77	4271386E	Utility Pole	Bridgeport
78	4390223E	Utility Pole	Bridgeport
79	1870911E	Utility Pole	Bridgeport
80	P5462076	Pad-mounted Transformer	Mammoth Lakes
81	P5462077	Pad-mounted Transformer	Mammoth Lakes
82	PM55462174	Pad-mounted Switch	Mammoth Lakes
83	P5462176	Pad-mounted Transformer	Mammoth Lakes
84	P5502834	Pad-mounted Transformer	Mammoth Lakes
85	P5018129	Pad-mounted Transformer	Mammoth Lakes
86	V5558048	Vault	Mammoth Lakes
87	P5503358	Pad-mounted Transformer	Mammoth Lakes
88	P5462114	Pad-mounted Transformer	Mammoth Lakes
89	PM5062603	Pad-mounted Transformer	Convict Lake
90	P5062625	Pad-mounted Transformer	Convict Lake
91	PM5062601	Pad-mounted Transformer	Convict Lake
92	1687482E	Utility Pole Vegetation	Mammoth Lakes
93	1650985E	Utility Pole Vegetation	Mammoth Lakes
94	24895S	Utility Pole Vegetation	June Lake
95	45008	Utility Pole Vegetation	June Lake
96	1875594E	Utility Pole Vegetation	June Lake
97	524440S	Utility Pole Vegetation	June Lake

IV. Field Inspection - Violations List

GO 95, Rule 51.6, Marking and Guarding, High Voltage Marking of Poles, states in part:

> *Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible.*

The high voltage signs on each of the following SCE poles were either missing or damaged:

- 524605S
- 1735610E
- 24895S

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.*

The guy anchors attached to the following SCE poles were buried in the ground:

- 2004493E
- 2136588E

GO 95, Rule 34, Foreign Attachments, states in part**:**

> *Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*

An unauthorized light was attached to Pole 1875573E.

GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, states in part:

> *Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety* factors of Rule 44.

The down guy wire attached on each of the following SCE poles was loose and not taut:

- 4867454E
- 1735610E

GO 95, Rule 31.6, Abandoned Lines, states in part:

> *Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.*

An abandoned anchor guy was still attached to Pole 1709838E.

GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 8, Column D, states in part:

> *Vertical separation between communication conductor and secondary conductor service drops at different levels on the same pole must not be less than 48 inches apart.*

An SCE secondary service drop attached to Pole 24895S was touching a communications service drop.

GO 128, Rule 17.1, Design Construction and Maintenance, states in part:

> *Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

Padmount transformer PM5062603 had shrubs and bushes encroaching the outside of the enclosure and making it hard to open and inspect.