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

March 4, 2024

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

EA2023-1057
Subject: Audit of Southern California Edison's (SCE) Thousand Oaks District

Dear Mr. Daye:

Your letter, dated February 2, 2024, requested that we advise you of actions taken by Southern California Edison Company (SCE) to address conditions identified during the Safety and Enforcement Division's (SED's) distribution audit of Thousand Oaks District from May 1-5, 2023.

Your letter requested a response by March 4, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

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

Enclosures: SED Audit Findings and SCE's Responses

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Mily Vaidya, Utilities, ESRB, SED, CPUC

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders.
- Pole load calculations
- Intrusive test records
- Safety hazard notifications
- 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 165, Section III-B, Distribution Facilities, Standards for Inspection, states:

> *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 insuring that they are in good condition so as to conform with these rules.*

SCE's records indicated that from May 2021 through April 2023, SCE completed 41 patrol inspections and 150 detailed inspections past SCE's scheduled due date.

SCE Response:

Without admitting that SCE violated GO 165, Section III-B or GO 95, Rule 31.2, SCE responds as follows. Based on SCE's records, from May 2021 through April 2023, SCE completed 40 annual grid patrol inspections past SCE's scheduled due date. Additionally, based on SCE's records, as of the date of the audit, SCE had 138 overhead detailed inspections that were completed or pending completion past SCE's scheduled due date. While SCE strives to complete inspections as close as possible to assigned dates, there are many factors that can affect the completion of scheduled inspections, such as storms, customer requests, resource constraints, access constraints, permitting or environmental constraints, among other reasons.

GO 165, Section III-B, Distribution Facilities, Standards for Inspection, states:

> *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 128, Rule 17.2, Inspection, states:

> *Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules.*

SCE's records indicated that from May 2021 through April 2023, SCE completed 95 underground inspections past SCE's scheduled due date.

SCE Response:

Without admitting that SCE violated GO 165, Section III-B or GO 128, Rule 17.2, SCE responds as follows. Based on SCE's records, from May 2021 through April 2023, SCE completed 159 underground detailed inspections past SCE's scheduled due date. While SCE strives to complete inspections as close as possible to assigned dates, there are many factors that can affect the completion of scheduled inspections, such as storms, customer requests, resource constraints, access constraints, permitting or environmental constraints, among other reasons.

III. Field Inspection

My staff inspected the following facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	793348E	Pole	Simi Valley
2	4910603E	Pole	Simi Valley
3	4831515E	Pole	Simi Valley
4	4910604E	Pole	Simi Valley
5	4215748E	Pole	Simi Valley
6	1444533E	Pole	Simi Valley
7	658410E	Pole	Simi Valley
8	4827700E	Pole	Simi Valley
9	4946827E	Pole	Simi Valley
10	4882218E	Pole	Simi Valley
11	4827699E	Pole	Simi Valley
12	4743086E	Pole	Simi Valley
13	4473434E	Pole	Simi Valley
14	2137083E	Pole	Simi Valley
15	767232H	Pole	Simi Valley
16	1238347E	Pole	Simi Valley
17	4473435E	Pole	Simi Valley
18	4860074E	Pole	Simi Valley
19	1344184E	Pole	Simi Valley
20	1709212E	Pole	Simi Valley
21	1709211E	Pole	Simi Valley
22	1709210E	Pole	Simi Valley
23	1709209E	Pole	Simi Valley
24	1709208E	Pole	Simi Valley
25	1709207E	Pole	Simi Valley
26	4743346E	Pole	Simi Valley
27	1709205E	Pole	Simi Valley
28	4734502E	Pole	Simi Valley
29	1709203E	Pole	Simi Valley
30	1709202E	Pole	Simi Valley
31	1709201E	Pole	Moorpark
32	4452669E	Pole	Moorpark
33	909664E	Pole	Moorpark
34	245258E	Pole	Moorpark
35	877821E	Pole	Moorpark
36	4047334E	Pole	Moorpark
37	4047333E	Pole	Moorpark
38	4047332E	Pole	Moorpark
39	4047331E	Pole	Moorpark
40	4047330E	Pole	Moorpark
41	4047329E	Pole	Moorpark
42	4047328E	Pole	Moorpark
43	1414909E	Pole	Newbury Park

44	1414908E	Pole	Newbury Park
45	1754220E	Pole	Newbury Park
46	1414906E	Pole	Newbury Park
47	1414905E	Pole	Newbury Park
48	1414904E	Pole	Newbury Park
49	GT3311Y	Pole	Newbury Park
50	1414903E	Pole	Newbury Park
51	1414902E	Pole	Newbury Park
52	1414901E	Pole	Newbury Park
53	1414600E	Pole	Newbury Park
54	1414599E	Pole	Newbury Park
55	4343381E	Pole	Thousand Oaks
56	1221637E	Pole	Thousand Oaks
57	4125099E	Pole	Thousand Oaks
58	4412807E	Pole	Thousand Oaks
59	1221645E	Pole	Thousand Oaks
60	4635381E	Pole	Thousand Oaks
61	1238212E	Pole	Thousand Oaks
62	1238213E	Pole	Thousand Oaks
63	1238227E	Pole	Thousand Oaks
64	1238226E	Pole	Thousand Oaks
65	1238228E	Pole	Thousand Oaks
66	4493985E	Pole	Thousand Oaks
67	1357001E	Pole	Thousand Oaks
68	4477000E	Pole	Thousand Oaks
69	4761776E	Pole	Thousand Oaks
70	4493986E	Pole	Thousand Oaks
71	4761777E	Pole	Thousand Oaks
72	4761778E	Pole	Thousand Oaks
73	4761779E	Pole	Thousand Oaks
74	4761780E	Pole	Thousand Oaks
75	4761781E	Pole	Thousand Oaks
76	1538901E	Pole	Thousand Oaks
77	1538958E	Pole	Thousand Oaks
78	1538903E	Pole	Thousand Oaks
79	1538904E	Pole	Thousand Oaks
80	1538959E	Pole	Thousand Oaks
81	1538906E	Pole	Thousand Oaks
82	P5481839	Padmount	Thousand Oaks
83	X5709541	Vault	Thousand Oaks
84	P5481840	Padmount	Thousand Oaks
85	P5481843	Padmount	Thousand Oaks
86	P5481842	Padmount	Thousand Oaks
87	5481845	Padmount	Thousand Oaks
88	P5481846	Padmount	Thousand Oaks
89	P5493832	Padmount	Thousand Oaks
90	5506057	Burd(Transformer)	Thousand Oaks
91	P5481847	Padmount	Thousand Oaks
92	5481848	Padmount	Thousand Oaks

93	P5167752	Padmount	Thousand Oaks
94	P5508484	Padmount	Newbury Park
95	P5487054	Padmount	Newbury Park
96	P5487055	Padmount	Newbury Park
97	5487057	Padmount	Newbury Park
98	5487048	Padmount	Newbury Park
99	5574611	Manhole	Newbury Park
100	5492002	Manhole	Newbury Park
101	P5498899	Padmount	Newbury Park
102	5498898	Padmount	Newbury Park
103	5498896	Padmount	Newbury Park

IV. Field Inspection – Violations List

We observed the following violations during the field inspections:

GO 95, Rule 31.1, 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.*

The ground moulding attached to the following poles was damaged:

- 1444533E
- 1709212E
- 4047333E
- 4047329E
- 1414901E
- 1538959E

SCE Response:
Two of the above conditions were previously recorded in SCE's Work Management System at the time of the audit, and they will be addressed in accordance with SCE's maintenance program. The remaining four conditions have been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program. Note: GO 95 did not require a due date for priority 3 (level 3) notifications created prior to 07/01/2019.

- *Pole 1444533E – Damaged Ground Moulding.* ***SCE Response:*** *The condition of this priority level 3 was entered in SCE's Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*
- *Pole 1709212E – Damaged Ground Moulding.* ***SCE Response:*** *The condition of this priority level 3 was entered in SCE's Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*
- *Pole 4047333E – Damaged Ground Moulding.* ***SCE Response:*** *Completed on 3/4/2024.*
- *Pole 4047329E – Damaged Ground Moulding.* ***SCE Response:*** *Completed on 3/4/2024.*
- *Pole 1414901E – Damaged Ground Moulding.* ***SCE Response:*** *Completed on 3/4/2024.*
- *Pole 1538959E – Damaged Ground Moulding.* ***SCE Response:*** *Completed on 3/4/2024.*

GO 95, Rule 51.6, 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 attached to each of the following SCE poles were missing or damaged:

- 1444533E
- 4761779E
- 1538904E
- 1538906E

SCE Response:

All of the above conditions were previously recorded in SCE's Work Management System at the time of the audit, and they will be addressed in accordance with SCE's maintenance program. Note: GO 95 did not require a due date for priority 3 (level 3) notifications created prior to 07/01/2019.

- *Pole 1444533E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *The condition of this priority level 3 was entered in SCE's Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*
- *Pole 4761779E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *The condition of this priority level 3 was entered in SCE's Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*
- *Pole 1538904E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *The condition of this priority level 3 was entered in SCE's Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*
- *Pole 1538906E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *The condition of this priority level 3 was entered in SCE's Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*

GO 95, Rule 38, Table 2, Case 19, Column C requires the minimum radial separation between communications service drops and guy wires passing conductors supported on the same pole to be 3 inches.

A third-party communications service drop attached to Pole number 4473434E was touching an SCE down guy wire.

SCE Response:

The above condition has been recorded in SCE's Work Management System and it will be addressed in accordance with SCE's maintenance program.

- *Pole 4473434E – third-party communications service drop contacting an SCE down guy*

wire. ***SCE Response:*** *Due on 9/4/2024.*

GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:

> *The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.*

The pole step attached to each of the following SCE poles was less than 8 feet from the ground line:

- 4047329E
- 4047328E

SCE Response:

One of the above conditions was previously recorded in SCE's Work Management System and it will be addressed in accordance with SCE's maintenance program. The remaining condition has been recorded in SCE's Work Management System and it will be addressed in accordance with SCE's maintenance program.

- *Pole 4047329E – Low Pole Step.* ***SCE Response:*** *Due on 4/21/2025.*
- *Pole 4047328E – Low Pole Step.* ***SCE Response:*** *Completed on 3/4/2024.*