



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

March 6, 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

EA2023-1105  
SUBJECT: Audit of Southern California Edison's Menifee District

Dear Mr. Daye:

Your letter, dated February 6, 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 Menifee District from December 4, 2023 to December 8, 2023.

Your letter requested a response by March 6, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

A handwritten signature in black ink, appearing to read "Mel Stark", with a long horizontal flourish extending to the right.

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, Electric Safety and Reliability Branch, CPUC  
Stacey Ocampo, Utilities Engineer, Electric Safety and Reliability Branch, 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 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 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 October 2018 through October 2023, SCE completed 44 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 27 pending patrol inspections that were 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, SCE notes that from October 2018 through October 2023, it completed 44 annual grid patrols past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from October 2018 through October 2023, it had 27 pending patrol 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.*

- SCE's records indicated that from October 2018 through October 2023, SCE completed 5293 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 207 pending detailed inspections that were 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, SCE notes that from October 2018 through October 2023, it completed 5,293 overhead detailed inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from October 2018 through October 2023, it had 207 pending overhead 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.*

**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 October 2018 through October 2023, SCE completed 887 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 72 pending underground inspections that were 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, SCE notes that from October 2018 through October 2023, it completed 887 underground inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from October 2018 through October 2023, it had 72 pending underground 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.*

**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 October 2018 through October 2023, SCE completed 1440 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 1141 open overhead work orders that were past SCE's scheduled due date for corrective action.

***SCE Response:***

*Without admitting that SCE violated GO 95, Rule 18-B1 or GO 95, Rule 31.1, SCE responds as follows. Based on SCE's records, SCE notes that from October 2018 through October 2023, it completed 1,440 overhead work orders that were completed or pending completion past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that from October 2018 through October 2023, it had 1,141 open overhead work orders past SCE's scheduled due date. Work orders may be pending or completed past their due dates for valid reasons per General Order 95, Rule 18, including but not limited to Permits, System Emergencies, and Customer Issues.*

**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 October 2018 through October 2023, SCE completed 152 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 295 open underground work orders that were past SCE's scheduled due date for corrective action.

***SCE Response:***

*Without admitting that SCE violated GO 128, Rule 17.1, SCE responds as follows. Based on SCE's records, from October 2018 through October 2023, SCE completed 152 underground work orders past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that from October 2018 through October 2023, it had 295 open underground work orders past SCE's scheduled due date for corrective action. Work orders may be pending or completed past their due dates for valid reasons, including but not limited to Permits, System Emergencies, and Customer Issues.*

### III. Field Inspection

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

No.	Structure ID	Type of Structure	Location
1	4227982E	Pole	Hemet
2	3000216E	Pole	Hemet
3	4627685E	Pole	Hemet
4	1935482E	Pole	Hemet
5	1935483E	Pole	Hemet
6	1954699E	Pole	Hemet
7	1996751E	Pole	Hemet
8	1996752E	Pole	Hemet
9	1954700E	Pole	Hemet
10	2160696E	Pole	Hemet
11	1935658E	Pole	Hemet
12	4299352E	Pole	Hemet
13	4299351E	Pole	Hemet
14	4113256E	Pole	Hemet
15	4207186E	Pole	Hemet
16	220373	Pole	Hemet
17	4308784E	Pole	Hemet
18	220374	Pole	Hemet
19	2160694E	Pole	Hemet
20	1622408E	Pole	Hemet
21	1622409E	Pole	Hemet
22	220376S	Pole	Hemet
23	221142S	Pole	Hemet
24	221143S	Pole	Hemet
25	1857432E	Pole	Hemet
26	2308785E	Pole	Hemet
27	2308786E	Pole	Hemet
28	1857433E	Pole	Hemet
29	2328018E	Pole	Hemet
30	2328019E	Pole	Hemet
31	2248182E	Pole	Winchester
32	2248183E	Pole	Winchester
33	2248181E	Pole	Winchester
34	2248180E	Pole	Winchester
35	2248179E	Pole	Winchester
36	4230018E	Pole	Winchester
37	2133978E	Pole	Winchester
38	2133979E	Pole	Winchester
39	2134037E	Pole	Winchester
40	2134246E	Pole	Winchester

41	1971048E	Pole	Homeland
42	1964439E	Pole	Homeland
43	4955797E	Pole	Homeland
44	270457S	Pole	Homeland
45	64741S	Pole	Homeland
46	33949CWT	Pole	Homeland
47	4066426E	Pole	Homeland
48	270458S	Pole	Homeland
49	311884S	Pole	Homeland
50	270459S	Pole	Homeland
51	216723S	Pole	Homeland
52	312360S	Pole	Homeland
53	216724S	Pole	Homeland
54	4523849E	Pole	Homeland
55	216725S	Pole	Homeland
56	2075695E	Pole	Homeland
57	4524440E	Pole	Canyon Lake
58	4524439E	Pole	Canyon Lake
59	2014041E	Pole	Canyon Lake
60	2014040E	Pole	Canyon Lake
61	2112546E	Pole	Canyon Lake
62	2293625E	Pole	Canyon Lake
63	2293626E	Pole	Canyon Lake
64	2302088E	Pole	Canyon Lake
65	4524463E	Pole	Canyon Lake
66	4323917E	Pole	Canyon Lake
67	2302087E	Pole	Canyon Lake
68	3000071E	Pole	Winchester
69	1954420E	Pole	San Jacinto
70	1588078E	Pole	San Jacinto
71	317379S	Pole	San Jacinto
72	2160643E	Pole	San Jacinto
73	1588070E	Pole	San Jacinto
74	2178022E	Pole	San Jacinto
75	4968751E	Pole	San Jacinto
76	4698752E	Pole	San Jacinto
77	1954419E	Pole	San Jacinto
78	4818217E	Pole	Perris
79	315245S	Pole	Perris
80	2150289E	Pole	Perris
81	2150290E	Pole	Perris
82	4725743E	Pole	Perris
83	5135591	BURD	Hemet
84	5135590	BURD	Hemet
85	P5135592	Pad-mounted Transformer	Hemet
86	P5013394	Pad-mounted Transformer	Hemet

87	P5507194	Pad-mounted Transformer	Hemet
88	5302664	BURD Switch	Moreno Valley
89	P5389444	Pad-mounted Transformer	Moreno Valley
90	5535679	Vault	Perris
91	V5754510	Vault	Perris
92	5343955	BURD	Perris
93	5321258	BURD	Menifee

#### IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections portion of the audit:

**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.*

SCE's facilities on the following poles required maintenance:

- 4113256E - The "eye" of the SCE down guy anchor was buried.
- 220373 - The "eye" of the SCE down guy anchor was buried.

#### ***SCE Response:***

*The above conditions have been recorded in SCE's Work Management System and they will be addressed in accordance with SCE's maintenance program.*

- Pole 4113256E – Buried Down Guy Anchor. ***SCE Response: Completed on 03/06/2024.***
- Pole 220373 – Buried Down Guy Anchor. ***SCE Response: Completed on 03/06/2024.***

**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.*

Pole 4227982E had an unauthorized floodlight attached to it.

#### ***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 4227982E – Unauthorized attachment. ***SCE Response: Due on 09/04/2024.***

**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:

- 1857432E
- 2134037E
- 4323917E
- 2293626E

***SCE Response:***

*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 1857432E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 5/27/2025.*
- *Pole 2134037E – 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 4323917E – 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 2293626E – 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.*