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

March 29, 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

EA2024-1119
SUBJECT: Audit of SCE's Yucca Valley District

Dear Mr. Daye:

Your letter, dated February 27, 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 Yucca Valley District from February 12, 2024 to February 16, 2024.

Your letter requested a response by March 29, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Mel Stark
Principal Manager, OE-T&D Compliance & Quality
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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
Calvin Choi, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Patrol & Detailed Inspection records
- Repair Notifications
- Intrusive Testing Records
- Third Party Notifications
- Pole Loading Calculation 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 2020 through 2023, SCE had 20 annual grid patrol inspections and 11,279 overhead detailed inspections that were completed or pending completion 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 2020 through 2023, it had 20 annual grid patrols that were completed or pending completion past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, SCE notes that from 2020 through 2023, it had 11,510 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, system issues 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 of these rules.

SCE's records indicated that from 2020 through 2023, SCE had 30 underground detailed inspections that were completed or pending completion 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 2020 through 2023, it had 30 underground inspections that were completed or pending completion past SCE's scheduled due date for corrective action. 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-A: Resolution of Safety Hazards and General Order 95 Nonconformances, states in part:

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

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 2021 to 2023, SCE had 653 overhead repair notifications that were completed or pending completion past SCE's scheduled due date for corrective action.

SCE Response:
Without admitting that SCE violated GO 95, Rule 18-A or GO 95, Rule 31.1, SCE responds as follows. Based on SCE's records, SCE notes that from 2021 to 2023, it had 627 overhead work

orders that were completed or pending completion past SCE's scheduled due date for corrective action. 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 2021 through 2023, SCE had 6 underground repair notifications that were completed or pending completion 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 2021 through 2023, SCE had 4 underground work orders that were completed or pending completion 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 structures during the field inspection portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	342562S	Pole	Yucca Valley
2	342561S	Pole	Yucca Valley
3	342560S	Pole	Yucca Valley
4	4883267E	Pole	Yucca Valley
5	4855594E	Pole	Yucca Valley
6	4823090E	Pole	Yucca Valley
7	342354S	Pole	Yucca Valley
8	1574276E	Pole	Yucca Valley
9	4714233E	Pole	Yucca Valley
10	1941322E	Pole	Yucca Valley
11	1941323E	Pole	Yucca Valley
12	1941325E	Pole	Yucca Valley
13	4666187E	Pole	Yucca Valley
14	1941326E	Pole	Yucca Valley
15	1941327E	Pole	Yucca Valley
16	2073217E	Pole	Yucca Valley
17	4741430E	Pole	Yucca Valley
18	2231371E	Pole	Yucca Valley
19	2231370E	Pole	Yucca Valley
20	2231369E	Pole	Yucca Valley
21	2231368E	Pole	Yucca Valley
22	2231367E	Pole	Yucca Valley
23	2231366E	Pole	Yucca Valley
24	4034205E	Pole	Yucca Valley
25	4034204E	Pole	Yucca Valley
26	4034203E	Pole	Yucca Valley
27	4034577E	Pole	Yucca Valley
28	4034578E	Pole	Yucca Valley
29	4034579E	Pole	Yucca Valley
30	4037394E	Pole	Pioneertown
31	4037393E	Pole	Pioneertown
32	4967154E	Pole	Pioneertown
33	41649S	Pole	Pioneertown
34	4967157E	Pole	Pioneertown
35	1685814E	Pole	Yucca Valley
36	1685813E	Pole	Yucca Valley
37	1605643E	Pole	Yucca Valley
38	25902CWT	Pole	Yucca Valley
39	4036072E	Pole	Yucca Valley
40	243352S	Pole	Yucca Valley
41	4922061E	Pole	Yucca Valley

42	4972203E	Pole	Yucca Valley
43	1801336E	Pole	Yucca Valley
44	1685811E	Pole	Yucca Valley
45	1685812E	Pole	Yucca Valley
46	4844575E	Pole	Yucca Valley
47	243135S	Pole	Yucca Valley
48	4824876E	Pole	Yucca Valley
49	4967909E	Pole	Yucca Valley
50	2231595E	Pole	Yucca Valley
51	1883382E	Pole	Yucca Valley
52	2231594E	Pole	Yucca Valley
53	2231593E	Pole	Yucca Valley
54	2231592E	Pole	Yucca Valley
55	2231591E	Pole	Yucca Valley
56	2231590E	Pole	Yucca Valley
57	2231589E	Pole	Yucca Valley
58	2231588E	Pole	Yucca Valley
59	240317S	Pole	Yucca Valley
60	4878850E	Pole	Yucca Valley
61	4749006E	Pole	Yucca Valley
62	240314S	Pole	Yucca Valley
63	240313S	Pole	Yucca Valley
64	4746307E	Pole	Yucca Valley
65	240311S	Pole	Yucca Valley
66	4855548E	Pole	Yucca Valley
67	240371S	Pole	Yucca Valley
68	4880041E	Pole	Yucca Valley
69	341023S	Pole	Yucca Valley
70	341024S	Pole	Yucca Valley
71	2087055E	Pole	Yucca Valley
72	1941666E	Pole	Yucca Valley
73	4676975E	Pole	Yucca Valley
74	4961427E	Pole	Yucca Valley
75	2232347E	Pole	Yucca Valley
76	4726565E	Pole	Yucca Valley
77	1975201E	Pole	Yucca Valley
78	4796298E	Pole	Yucca Valley
79	4769458E	Pole	Yucca Valley
80	4769457E	Pole	Yucca Valley
81	4741404E	Pole	Yucca Valley
82	4612254E	Pole	Joshua Tree
83	4726584E	Pole	Joshua Tree
84	4726583E	Pole	Joshua Tree
85	4726582E	Pole	Joshua tree
86	4726581E	Pole	Joshua Tree
87	4726580E	Pole	Joshua Tree

88	240467S	Pole	Joshua Tree
89	4037302E	Pole	Joshua Tree
90	240468S	Pole	Joshua Tree
91	2154033E	Pole	Joshua Tree
92	2154032E	Pole	Joshua Tree
93	2231177E	Pole	Joshua Tree
94	4766327E	Pole	Joshua Tree
95	4733886E	Pole	Joshua Tree
96	4661397E	Pole	Joshua Tree
97	4766326E	Pole	Joshua Tree
98	4918274E	Pole	Joshua Tree
99	4918428E	Pole	Joshua Tree
100	4034838E	Pole	Joshua Tree
101	41903S	Pole	Joshua Tree
102	41904S	Pole	Joshua Tree
103	41905S	Pole	Joshua Tree
104	4744880E	Pole	29 Palms
105	2311505E	Pole	29 Palms
106	243702S	Pole	29 Palms
107	2231446E	Pole	29 Palms
108	243703S	Pole	29 Palms
109	2231447E	Pole	29 Palms
110	243704S	Pole	29 Palms
111	243705S	Pole	29 Palms
112	25302CWT	Pole	29 Palms
113	2153841E	Pole	29 Palms
114	1606287E	Pole	29 Palms
115	1606288E	Pole	29 Palms
116	25916CWT	Pole	29 Palms
117	4612279E	Pole	29 Palms
118	43870S	Pole	29 Palms
119	43871S	Pole	29 Palms
120	340457S	Pole	29 Palms
121	340458S	Pole	29 Palms
122	4765834E	Pole	29 Palms
123	340460S	Pole	29 Palms
124	43506S	Pole	29 Palms
125	340461S	Pole	29 Palms
126	4878441E	Pole	29 Palms
127	2231979E	Pole	29 Palms
128	4661225E	Pole	29 Palms
129	4532006E	Pole	29 Palms
130	4532007E	Pole	29 Palms
131	4532008E	Pole	29 Palms
132	4532009E	Pole	29 Palms
133	2351661E	Pole	29 Palms

134	2351660E	Pole	29 Palms
135	4833745E	Pole	29 Palms
136	4850430E	Pole	29 Palms
137	4850431E	Pole	29 Palms
138	2031006E	Pole	29 Palms
139	241524S	Pole	29 Palms
140	43181S	Pole	29 Palms
141	GT26431	Pole	29 Palms
142	4851024E	Pole	29 Palms
143	43182S	Pole	29 Palms
144	27307CWT	Pole	29 Palms
145	43183S	Pole	29 Palms
146	4036041E	Pole	29 Palms
147	1544523E	Pole	29 Palms
148	1544524E	Pole	29 Palms
149	1544525E	Pole	29 Palms
150	4831203E	Pole	29 Palms
151	40459S	Pole	29 Palms
152	4661444E	Pole	29 Palms
153	25373CWT	Pole	29 Palms
154	43613S	Pole	29 Palms
155	43612S	Pole	29 Palms
156	43611S	Pole	29 Palms
157	43610S	Pole	29 Palms
158	43609S	Pole	29 Palms
159	4920911E	Pole	29 Palms
160	43607S	Pole	29 Palms
161	241023S	Pole	29 Palms
162	43606S	Pole	29 Palms
163	2369702E	Pole	29 Palms
164	V5190914	Vault	Yucca Valley
165	P5527553	Padmount Transformer	Yucca Valley
166	P5527550	Padmount Transformer	Yucca Valley
167	P5520792	Padmount Transformer	Yucca Valley

IV. Field Inspection – Violations List

We observed the following violations during the field inspections portion of the audit:

GO 95, Rule 51.6-A, Marking and Guarding, High Voltage Marking, 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. 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 poles were damaged:

- 243352S
- 240371S
- 341023S
- 341024S
- 4726565E
- 4741404E
- 240467S
- 4037302E
- 2154032E
- 2231177E
- 4034838E
- 41905S
- 2311505E
- 243702S
- 2231446E
- 2231447E
- 243704S
- 25302CWT
- 1606287E
- 1606288E
- 25916CWT
- 4612279E
- 241524S
- 43181S
- 43182S
- 27307CWT
- 43183S
- 4036041E
- 1544525E
- 40459S
- 25373CWT
- 43612S
- 43607S
- 2369702E

SCE Response:
Twenty-eight 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 six conditions have been recorded in SCE's Work Management System 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 243352S – 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 240371S – 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 341023S – 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 341024S – 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 4726565E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 3/26/2029.*
- *Pole 4741404E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 3/26/2029.*
- *Pole 240467S – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 3/26/2029.*
- *Pole 4037302E – 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 2154032E – 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 2231177E – 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 4034838E – 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 41905S – 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 2311505E – 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 243702S – 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 2231446E – 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 2231447E – 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 243704S – 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 25302CWT – 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 1606287E – 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 1606288E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 3/26/2029.*
- *Pole 25916CWT – 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 4612279E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 11/19/2026.*
- *Pole 241524S – 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 43181S – 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 43182S – 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 27307CWT – 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 43183S – 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 4036041E – 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 1544525E – 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 40459S – 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 25373CWT – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 3/26/2029.*
- *Pole 43612S – 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 43607S – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 3/26/2029.*
- *Pole 2369702E – 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 56.2, Overhead Guys, Anchor Guys and Span Wire, 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 supporting each of the following poles was loose:

- 4666187E
- 4037393E
- 4880041E
- 4796298E
- 4612279E
- 4878441E
- 4833745E

SCE Response:
Three 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 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 4666187E – Loose down guy wire.* ***SCE Response:*** *Due on 9/27/2028.*
- *Pole 4037393E – Loose down guy wire.* ***SCE Response:*** *Due on 3/26/2029.*
- *Pole 4880041E – Loose down guy wire.* ***SCE Response:*** *Due on 3/26/2029.*
- *Pole 4796298E – Loose down guy wire.* ***SCE Response:*** *Due on 3/26/2029.*
- *Pole 4612279E – Loose down guy wire.* ***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 4878441E – Loose down guy wire.* ***SCE Response:*** *Due on 3/26/2029.*
- *Pole 4833745E – Loose down guy wire.* ***SCE Response:*** *Due on 3/21/2026.*

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 following facilities required maintenance:

- 342562S – the down guy anchors supporting the pole was completely buried.
- 1941327E – the down guy anchors supporting the pole was completely buried.
- 4796298E – the down guy anchors supporting the pole was completely buried.
- 2231177E – the down guy anchors supporting the pole was completely buried.
- 4714233E – the bolt on the overhead transformer mounted on the pole needs to be tightened.
- 43183S – the down guy wires supporting the pole are twisted together.

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 they will be addressed in accordance with SCE's maintenance program.

- *Pole 342562S – Buried down guy anchors.* ***SCE Response:*** *Due on 10/11/2026.*
- *Pole 1941327E – Buried down guy anchors.* ***SCE Response:*** *Due on 3/25/2025.*
- *Pole 4796298E – Buried down guy anchors.* ***SCE Response:*** *Completed on 3/27/2024.*
- *Pole 2231177E – Buried down guy anchors.* ***SCE Response:*** *Completed on 3/27/2024.*

- *Pole 4714233E – Loose transformer bolt.* ***SCE Response:*** *Due on 3/25/2025.*
- *Pole 43183S – Twisted down guy wires.* ***SCE Response:*** *Due on 2/16/2026.*

GO 95, Rule 54.6-B, Vertical and Lateral Conductors, Ground Wires, states in part:

> *That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).*

The ground moulding on the following poles was damaged/missing:

- 240371S
- 341024S
- 243704S
- 43181S
- 27307CWT
- 241023S

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 240371S – Ground Moulding Damaged/Missing.* ***SCE Response:*** *Due on 3/15/2027.*
- *Pole 341024S – Ground Moulding 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 243704S – Ground Moulding 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 43181S – Ground Moulding Damaged/Missing.* ***SCE Response:*** *Due on 2/14/2026.*
- *Pole 27307CWT – Ground Moulding Damaged/Missing.* ***SCE Response:*** *Due on 2/16/2028.*
- *Pole 241023S – Ground Moulding 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 54.6-E.1, Vertical and Lateral Conductors, Risers, Encased from Ground Level to 8 Feet above the Ground, states in part:

> *Risers from underground cables or other conductors shall be encased from the ground level to a level not less than 8 feet above the ground…*

The SCE riser on Pole 1574276E was exposed at ground level from a gap between the ground and the conduit due to erosion of the ground.

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 1574276E – SCE Riser exposed at ground level.* ***SCE Response:*** *Due on 6/27/2024.*

GO 95, Rule 35, Vegetation Management, states in part:

> *When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).*

The service drops attached to each of the following poles showed strain/abrasion from vegetation:

- 4676975E
- 43613S
- 43606S

SCE Response:
One of the above conditions was previously recorded in SCE's Work Management System at the time of the audit, and was addressed in accordance with SCE's maintenance program. The remaining two conditions have been recorded in SCE's Work Management System and they will be addressed in accordance with SCE's maintenance program.

- *Pole 4676975E – Service drops showed strain/abrasion from vegetation.* ***SCE Response:*** *Completed on 3/8/2024.*
- *Pole 43613S – Service drops showed strain/abrasion from vegetation.* ***SCE Response:*** *Due on 3/27/2027.*
- *Pole 43606S – Service drops showed strain/abrasion from vegetation.* ***SCE Response:*** *Due on 3/27/2025.*

GO 95, Rule 91.3-C, Poles, Towers and Structures, Stepping, 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.*

The lowest pole step on Pole 27307CWT and 43607S was less than eight feet above the ground line.

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.

- *Pole 27307CWT – Low pole step.* ***SCE Response:*** *Due on 2/16/2028.*
- *Pole 43607S – Low pole step.* ***SCE Response:*** *Due on 2/16/2028.*