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

August 30, 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

SUBJECT: EA2024-1137, Audit of SCE's San Joaquin District

Dear Mr. Daye:

Your letter, dated July 30, 2024, requested that we advise you of actions taken by Southern California Edison Company (SCE) to address conditions identified during the Safety Enforcement Division's (SED's) distribution audit of SCE's San Joaquin District from June 3, 2024 to June 7, 2024.

Your letter requested a response by August 30, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Mel Stark
Principal Manager, EHSQ-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
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 2019 through March 2024, SCE had 160 annual grid patrol inspections and 24,253 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 calendar year 2019 through March 2024, it had 160 annual grid patrols that were completed or pending completion past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from calendar year 2019 through March 2024, it had 23,953 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 2019 through March 2024, SCE had 734 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 calendar year 2019 through March 2024, it had 734 underground 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 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 2019 to March 2024, SCE had 5,174 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, from calendar year 2019 through March 2024, SCE had 5,174 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, 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 2019 through March 2024, SCE had 715 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 calendar year 2019 through March 2024, SCE had 715 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	4362768E	Pole	Tulare
2	1637007E	Pole	Tulare
3	4512635E	Pole	Tulare
4	1637006E	Pole	Tulare
5	2052801E	Pole	Tulare
6	4276817E	Pole	Tulare
7	1688074E	Pole	Tulare
8	10260T	Pole	Tulare
9	10259T	Pole	Tulare
10	1340608E	Pole	Tulare
11	323595E	Pole	Tulare
12	133893E	Pole	Tulare
13	133892E	Pole	Tulare
14	1688075E	Pole	Tulare
15	133889E	Pole	Tulare
16	1250581E	Pole	Strathmore
17	2081060E	Pole	Strathmore
18	4402362E	Pole	Strathmore
19	4402363E	Pole	Strathmore
20	2081062E	Pole	Strathmore
21	2104578E	Pole	Strathmore
22	4632076E	Pole	Exeter
23	4451165E	Pole	Exeter
24	1464393E	Pole	Exeter
25	4622929E	Pole	Exeter
26	1464395E	Pole	Exeter
27	4142754E	Pole	Exeter
28	4369158E	Pole	Exeter
29	4060943E	Pole	Exeter
30	1824024E	Pole	Exeter
31	4044563E	Pole	Exeter
32	4451163E	Pole	Exeter
33	4861565E	Pole	Visalia
34	4565944E	Pole	Visalia
35	4473799E	Pole	Visalia
36	1377520E	Pole	Visalia
37	4861566E	Pole	Visalia
38	4861567E	Pole	Visalia
39	4861568E	Pole	Visalia
40	2125708E	Pole	Visalia
41	4565943E	Pole	Visalia

42	4861569E	Pole	Visalia
43	4780849E	Pole	Visalia
44	4519442E	Pole	Visalia
45	4540888E	Pole	Visalia
46	135149E	Pole	Visalia
47	4490057E	Pole	Visalia
48	371533E	Pole	Visalia
49	1842558E	Pole	Visalia
50	1644067E	Pole	Hanford
51	318841E	Pole	Hanford
52	1644066E	Pole	Hanford
53	371474E	Pole	Hanford
54	371473E	Pole	Hanford
55	641631E	Pole	Hanford
56	318836E	Pole	Hanford
57	4339891E	Pole	Hanford
58	4292928E	Pole	Hanford
59	4544494E	Pole	Tulare
60	4544493E	Pole	Tulare
61	4540045E	Pole	Tulare
62	4540044E	Pole	Tulare
63	2146808E	Pole	Delano
64	895512E	Pole	Delano
65	895513E	Pole	Delano
66	511120E	Pole	Delano
67	896010E	Pole	Delano
68	896009E	Pole	Delano
69	896008E	Pole	Delano
70	511119E	Pole	Delano
71	1637590E	Pole	Delano
72	4353999E	Pole	Delano
73	4671298E	Pole	Delano
74	1170600E	Pole	Delano
75	1761028E	Pole	Delano
76	1761029E	Pole	Delano
77	1761030E	Pole	Delano
78	852924E	Pole	Delano
79	4274396E	Pole	Delano
80	548215E	Pole	Delano
81	4600731E	Pole	Delano
82	4569239E	Pole	Delano
83	2139196E	Pole	Delano
84	4600729E	Pole	Delano
85	2331305E	Pole	Delano
86	318613E	Pole	Delano
87	995389E	Pole	Earlimart

88	1895644E	Pole	Earlimart
89	2191004E	Pole	Earlimart
90	934920E	Pole	Earlimart
91	4342321E	Pole	Earlimart
92	818389E	Pole	Earlimart
93	1235820E	Pole	Pixley
94	1235819E	Pole	Pixley
95	1235818E	Pole	Pixley
96	4363807E	Pole	Pixley
97	1235816E	Pole	Pixley
98	4540222E	Pole	Pixley
99	1235814E	Pole	Pixley
100	4663743E	Pole	Tipton
101	4696217E	Pole	Tipton
102	2366235E	Pole	Tipton
103	775437E	Pole	Tipton
104	775438E	Pole	Tipton
105	P5205259	Padmounted Transformer	Hanford
106	P5642478	Padmounted Transformer	Hanford
107	5015849	Vault	Hanford
108	P5015928	Padmounted Transformer	Hanford
109	5156308	BURD	Tulare
110	5156307	BURD	Tulare
111	5169833	Vault	Tulare
112	P5441510	Padmounted Transformer	Pixley
113	P5441509	Padmounted Switch	Pixley
114	X5441533	Handhole	Pixley
115	P5441511	Padmounted Transformer	Pixley
116	5460894	Vault	Delano
117	P5393428	Padmounted Transformer	Delano
118	P5351198	Padmounted Switch	Delano
119	P5393427	Padmounted Switch	Delano

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:

- 323595E
- 133892E
- 1824024E
- 4044563E
- 1761028E
- 934920E
- 4342321E
- 4363807E
- 2366235E
- 775438E

SCE Response:

Nine 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 condition has been recorded in SCE's Work Management System and it 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 323595E – 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 133892E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 8/05/2029.*
- *Pole 1824024E – 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 4044563E – 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 1761028E – 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 934920E – 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 4342321E – 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 4363807E – 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 2366235E – 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 775438E – 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 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 each of the following poles was damaged/missing:

- 1761028E
- 995389E
- 1895644E
- 1235819E

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 1761028E – 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 995389E – 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 1895644E – 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 1235819E – 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 56.9, Guy Marker (Guy Guard), states in part:

> *A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.*

The guy marker for the outermost SCE anchor guy attached to Pole No. 4274396E was damaged.

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 4274396E – Damaged Guy Marker.* ***SCE Response:*** *Due on 8/05/2029.*

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.*

There was an unauthorized attachment on Pole No. 2366235E.

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

- *Pole 2366235E – Unauthorized Attachment.* ***SCE Response:*** *Completed on 7/09/2024.*