PUBLIC UTILITIES COMMISSION
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November 21, 2024, EA2024-1223

Melvin Stark
Principal Manager, T&D Compliance Integration
Southern California Edison Company (SCE)
1 Innovation Way
Pomona, CA 91786

Subject: Electric distribution audit of SCE's South Bay District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Eric Ujiiye of my staff conducted an electric distribution audit of SCE's South Bay District from August 26-30, 2024. 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). Included with this letter is a copy of the audit findings that itemize the violations discovered during the audit. Please advise me no later than December 23, 2024, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Eric Ujiiye at (213) 620-2598 or eric.ujiiye@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: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, ESRB, 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.

II. Records Review – Violations List

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

GO 165, Section III-B, 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 from February 1, 2022 to June 30, 2024, SCE completed 5911 overhead detailed inspections and 10 annual grid patrols past SCE's scheduled due date.

GO 165, Section III-B, 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 February 1, 2022 to June 30, 2024, SCE completed 177 underground detailed inspections past SCE's scheduled due date.

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 from February 1, 2022 to June 30, 2024, SCE completed 443 overhead work orders past SCE's scheduled due date for corrective action. Additionally, as of the date of the audit, SCE had 918 open overhead work orders that were past SCE's scheduled due date for corrective action.

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 from February 1, 2022 to June 30, 2024, SCE completed 121 underground work orders past SCE's scheduled due date for corrective action. Additionally, as of the date of the audit, SCE had 791 open underground work orders that were past SCE's scheduled due date for corrective action.

III. Field Inspections

My staff inspected the following facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	267603E	Pole	Manhattan Beach
2	4776627E	Pole	Manhattan Beach
3	913621E	Pole	Manhattan Beach
4	913622E	Pole	Manhattan Beach
5	840688E	Pole	Manhattan Beach
6	A7999Y	Pole	Manhattan Beach
7	840689E	Pole	Manhattan Beach
8	1035665E	Pole	West Torrance
9	1035449E	Pole	West Torrance
10	1035448E	Pole	West Torrance
11	1035447E	Pole	West Torrance
12	1035446E	Pole	West Torrance
13	1035445E	Pole	West Torrance
14	1035444E	Pole	West Torrance
15	1035443E	Pole	West Torrance
16	1892913E	Pole	Inglewood
17	4756317E	Pole	Inglewood
18	1836722E	Pole	Inglewood
19	293500E	Pole	Inglewood
20	1495645E	Pole	Inglewood
21	4579885E	Pole	Inglewood
22	1791452E	Pole	Inglewood
23	288667E	Pole	Inglewood
24	1714232E	Pole	Inglewood
25	1911029E	Pole	Ladera Heights
26	1911026E	Pole	Ladera Heights
27	1673996E	Pole	Inglewood
28	933542E	Pole	Inglewood
29	1673995E	Pole	Inglewood
30	1673994E	Pole	Inglewood
31	1560846E	Pole	Inglewood
32	1612403E	Pole	Inglewood
33	1612402E	Pole	Inglewood
34	1612401E	Pole	Inglewood
35	969124E	Pole	Inglewood
36	675997E	Pole	Inglewood
37	675996E	Pole	Inglewood
38	4856081E	Pole	Inglewood
39	769681H	Pole	Hawthorne
40	4470452E	Pole	Hawthorne
41	4470451E	Pole	Hawthorne
42	1204460E	Pole	Hawthorne
43	654855E	Pole	Hawthorne
44	654885E	Pole	Hawthorne

45	654856E	Pole	Hawthorne
46	173489E	Pole	Hawthorne
47	654857E	Pole	Hawthorne
48	173491E	Pole	Hawthorne
49	748084H	Pole	Gardena
50	515275H	Pole	Gardena
51	78332M	Pole	San Pedro
52	2064217E	Pole	San Pedro
53	2064218E	Pole	San Pedro
54	1231996E	Pole	San Pedro
55	1231997E	Pole	San Pedro
56	1393209E	Pole	San Pedro
57	2095078E	Pole	San Pedro
58	1157109E	Pole	San Pedro
59	3003241E	Pole	San Pedro
60	4718444E	Pole	San Pedro
61	815749H	Pole	San Pedro
62	2246262E	Pole	San Pedro
63	2246044E	Pole	San Pedro
64	1221507E	Pole	San Pedro
65	598304H	Pole	San Pedro
66	1156788E	Pole	San Pedro
67	1158255E	Pole	Palos Verde
68	1157142E	Pole	Palos Verde
69	1158253E	Pole	Palos Verde
70	1158252E	Pole	Palos Verde
71	1158251E	Pole	Palos Verde
72	A7660Y	Pole	Palos Verde
73	1140749E	Pole	Palos Verde
74	A5092Y	Pole	Palos Verde
75	4623309E	Pole	Torrance
76	1393660E	Pole	Torrance
77	1393661E	Pole	Torrance
78	1393662E	Pole	Torrance
79	1393663E	Pole	Torrance
80	1393664E	Pole	Torrance
81	1393665E	Pole	Torrance
82	1393652E	Pole	Torrance
83	1393653E	Pole	Torrance
84	1393655E	Pole	Torrance
85	1393656E	Pole	Torrance
86	1393657E	Pole	Torrance
87	1319510E	Pole	Torrance
88	1394753E	Pole	Manhattan Beach
89	1393862E	Pole	Manhattan Beach
90	A4102Y	Pole	Manhattan Beach
91	945219E	Pole	Manhattan Beach
92	945220E	Pole	Manhattan Beach
93	945221E	Pole	Manhattan Beach

94	945222E	Pole	Manhattan Beach
95	1318889E	Pole	Manhattan Beach
96	B5054380	BURD	Palos Verde
97	B5054381	BURD	Palos Verde
98	P5057125	Pad Mount Trans	Palos Verde
99	P5057123	Pad Mount Trans	Palos Verde
100	P5758589	Pad Mount Trans	Palos Verde
101	V5054467	Vault	Palos Verde
102	P5718208	Pad Mount Trans	Palos Verde
103	P5654420	Pad Mount Trans	Palos Verde
104	V5150757	Vault	Torrance
105	P5150758	Pad Mount Trans	Torrance
106	P5517328	Pad Mount Trans	Torrance
107	P5517327	Pad Mount Trans	Torrance
108	P5120796	Pad Mount Trans	Torrance
109	P5120797	Pad Mount Trans	Torrance
110	P5120447	Pad Mount Trans	Torrance
111	P5120798	Pad Mount Trans	Torrance

IV. Field Inspection Violations List

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

GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:

> *(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such safety hazard(s) no later than 10 business days after the discovery.*

The following safety hazards were not documented and reported to the responsible third party:

- Pole 267603E: A third-party service drop was abandoned and left hanging at the public level of the pole.
- Pole 1035665E: A severed third-party 6-foot section of span guy was attached to the communication level of the pole.
- Pole 1035444E: A third-party ground rod was exposed and protruding out of the ground 3-inches away from the base of the pole.

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 facilities attached to each of the following poles required maintenance:

- Pole 933542E: The pole supported a 6-foot section of the previous pole (a "buddy pole") that was attached and suspended at the communication level.
- Pole 1612403E: The pole supported an 8-foot section of the previous pole (a "buddy pole") that was attached and suspended at the communication level.

GO 95, Rule 31.6, Abandoned Lines, states:

> *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.*

Pole number 1673995E had a permanently abandoned down guy anchor located 6 feet from the base of the pole near the street.

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 evidence 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). Scuffing or polishing of the insulation or covering is not considered abrasion.*

The following poles supported SCE facilities that were strained by vegetation:

- Pole 1673996E: A service drop supported on the pole was strained and being deflected by a tree located in front of 231 W. Hillcrest Blvd. in the City of Inglewood.
- Pole 654856E: A service drop was strained and deflected by tree branches located in front of 11876 Gale Ave. in the City of Hawthorne.
- Pole 2246044E: A secondary triplex span was strained and deflected by a tree at midspan.

General Order 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 8 requires the vertical clearance between "0-750 Volts (Including Service Drops) and Trolley Feeders" and "Communication Conductors and Service Drops" supported on the same pole to have a minimum clearance of 12 inches.

- Pole 1035443E – an SCE service drop supported on the pole was touching a communication service drop near the attachment point of the serviced property.
- Pole 1495645E – an SCE service drop supported on the pole was touching multiple communication drops near the weatherhead of the serviced property.
- Pole 1673995E – an SCE service drop supported on the pole was touching and being deflected by a communications drop at the serviced property at 208 W. Hillcrest Blvd. in the City of Inglewood.

GO 95, Rule 58.5-B3b, Conductors Not Supported by Messengers, states in part:

> *All parts of street light drop wires, street lamps, and their supporting fixtures (including rods, braces and guys) shall not be less than 1 foot radially from all unprotected conductors not supported on messengers (including lead wires and taps) except the lead wires supplying the street lamps within 24 inches of their points of entrance to the street lighting equipment.*

On Pole 4776627E, a coil of secondary triplex (that was not in service) appeared to be zip-tied or otherwise attached to a street light support arm.

GO 95, Rule 51.6-A, 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.*

Each of the following poles had "HIGH VOLTAGE" signs that were damaged or missing:

- Pole 1035447E - The "HIGH VOLTAGE" sign was damaged.
- Pole 1035446E - The "HIGH VOLTAGE" sign was damaged.
- Pole 1035444E - The "HIGH VOLTAGE" sign was damaged.
- Pole 769681H - The "HIGH VOLTAGE" sign was damaged.
- Pole 4470452E - The "HIGH VOLTAGE" sign was missing.
- Pole 4470451E - The "HIGH VOLTAGE" sign was damaged and illegible.
- Pole 2064217E - The "HIGH VOLTAGE" sign was missing.
- Pole 2064218E - The "HIGH VOLTAGE" sign was missing.
- Pole 1393660E - The "HIGH VOLTAGE" sign was damaged.
- Pole 1393652E - The "HIGH VOLTAGE" sign was damaged.

GO 95, Rule 54.6-B, 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).*

A section of ground moulding on Pole A7999Y was detached from the surface of the pole, exposing the ground wire at 10 feet above ground level.

General Order 95, Rule 54.8, Service Drops, 0 – 750 Volts, Table 10: Minimum Allowable Clearance of Service Drops of 0-750 Volts from Buildings requires the minimum clearance between "Insulated Conductors (Rule 20.9-G) 0-750 Volts" and "All portions of building including metallic or non-metallic cornice, decorative appendage, eaves, roof or parapet wall of the building served" to be 0.5 inches.

The following poles supported an SCE service drop that had less than 0.5 inches of clearance above the roof of the building being served:

- Pole 1035449E: an SCE service drop supported on the pole was contacting the roof near the insulated anchor attachment location of the home being serviced.
- Pole 1035444E: an SCE service drop supported on the pole was contacting the roof near the weather head of the home being serviced.

- Pole 173489E: an SCE service drop supported on the pole was contacting the roof near the weather head of the home being serviced.