PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

October 21, 2024 EA2024-1259

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

SUBJECT: Audit of Southern California Edison's Thousand Oaks District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Norvik Ohanian of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Thousand Oaks District from October 7, 2024, to October 11, 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). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than November 22, 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, please contact Norvik Ohanian at (213) 660-5528 or Norvik.Ohanian@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: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Norvik Ohanian, 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 Detail Inspection Records
- Patrol Inspection Records
- SCE's Documented Inspection Program
- Repair Notifications
- Transformers, Switches and 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 September 2019 through August 2024, SCE completed 47 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 44 pending patrol inspections that were past SCE's scheduled due date.

SCE's records indicated that from September 2019 through August 2024, SCE completed 562 detail inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 21 pending detail inspections that were past SCE's scheduled due date.

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 September 2019 through August 2024, SCE completed 624 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 4,361 pending underground inspections that were 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 that from September 2019 through August 2024, SCE completed 2,569 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 1,046 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 that from September 2019 through August 2024, SCE completed 541 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 649 open underground work orders that were past SCE's scheduled due date for corrective action.

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	1879271E	Pole	Thousand Oaks
2	1879272E	Pole	Thousand Oaks
3	1585421E	Pole	Thousand Oaks
4	1879275E	Pole	Thousand Oaks
5	1585422E	Pole	Thousand Oaks
6	4537332E	Pole	Thousand Oaks
7	1585420E	Pole	Thousand Oaks
8	4297469E	Pole	Thousand Oaks
9	2137143E	Pole	Thousand Oaks
10	4934703E	Pole	Thousand Oaks
11	701185E	Pole	Thousand Oaks
12	4493985E	Pole	Thousand Oaks
13	1238228E	Pole	Thousand Oaks
14	1238226E	Pole	Thousand Oaks
15	1238227E	Pole	Thousand Oaks
16	1238213E	Pole	Thousand Oaks
17	1238212E	Pole	Thousand Oaks
18	1357001E	Pole	Thousand Oaks
19	4477000E	Pole	Thousand Oaks
20	4493986E	Pole	Thousand Oaks
21	4761777E	Pole	Thousand Oaks
22	4761778E	Pole	Thousand Oaks
23	1538903E	Pole	Thousand Oaks
24	1538904E	Pole	Thousand Oaks
25	1538959E	Pole	Thousand Oaks
26	1538906E	Pole	Thousand Oaks
27	1516828E	Pole	Moorpark
28	1516827E	Pole	Moorpark
29	1516826E	Pole	Moorpark
30	4673958E	Pole	Moorpark
31	4981365E	Pole	Moorpark
32	4557011E	Pole	Moorpark
33	1516829E	Pole	Moorpark
34	1516830E	Pole	Moorpark
35	1516831E	Pole	Moorpark
36	1516832E	Pole	Moorpark
37	1516833E	Pole	Moorpark
38	1516834E	Pole	Moorpark
39	1344182E	Pole	Simi Valley
40	1344183E	Pole	Simi Valley
41	1709212E	Pole	Simi Valley
42	1709211E	Pole	Simi Valley
43	1709209E	Pole	Simi Valley
44	1709208E	Pole	Simi Valley

45	1709207E	Pole	Simi Valley
46	4743346E	Pole	Simi Valley
47	1709205E	Pole	Simi Valley
48	4734502E	Pole	Simi Valley
49	1709203E	Pole	Simi Valley
50	1709202E	Pole	Simi Valley
51	1709201E	Pole	Simi Valley
52	1344184E	Pole	Simi Valley
53	1344189E	Pole	Simi Valley
54	1344190E	Pole	Simi Valley
55	4660531E	Pole	Chatsworth
56	1216615E	Pole	Chatsworth
57	1337859E	Pole	Chatsworth
58	1362847E	Pole	Chatsworth
59	4759394E	Pole	Chatsworth
60	1931806E	Pole	Chatsworth
61	3005215E	Pole	Chatsworth
62	423233E	Pole	Chatsworth
63	1879672E	Pole	Chatsworth
64	4557753E	Pole	Chatsworth
65	4759393E	Pole	Chatsworth
66	4939798E	Pole	Chatsworth
67	1337862E	Pole	Chatsworth
68	747810E	Pole	Chatsworth
69	4797750E	Pole	Chatsworth
70	4125982E	Pole	Chatsworth
71	4047316E	Pole	Chatsworth
72	4922877E	Pole	Chatsworth
73	4923694E	Pole	Chatsworth
74	2137079E	Pole	Chatsworth
75	4920127E	Pole	Chatsworth
76	2137120E	Pole	Chatsworth
77	2137121E	Pole	Chatsworth
78	4557188E	Pole	Chatsworth
79	4520929E	Pole	Chatsworth
80	797420E	Pole	Chatsworth
81	4216587E	Pole	Chatsworth
82	4081210E	Pole	Chatsworth
83	4482386E	Pole	Chatsworth
84	797421E	Pole	Chatsworth
85	795013E	Pole	Chatsworth
86	4299954E	Pole	Malibu
87	4743275E	Pole	Malibu
88	4860602E	Pole	Malibu
89	4832173E	Pole	Malibu
90	4682866E	Pole	Malibu
91	3006783E	Pole	Malibu
92	987811E	Pole	Malibu

93	987812E	Pole	Malibu
94	4790650E	Pole	Malibu
95	4561384E	Pole	Malibu
96	1330999E	Pole	Malibu
97	987815E	Pole	Malibu
98	987816E	Pole	Malibu
99	1909892E	Pole	Malibu
100	1909891E	Pole	Malibu
101	4836019E	Pole	Malibu
102	4836018E	Pole	Malibu
103	4499524E	Pole	Malibu
104	4743283E	Pole	Malibu
105	4831771E	Pole	Malibu
106	4831770E	Pole	Malibu
107	19031Y	Pole	Malibu
108	4863784E	Pole	Hidden Hills
109	9306E	Pole	Hidden Hills
110	4081005E	Pole	Hidden Hills
111	4658770E	Pole	Calabasas
112	1786210E	Pole	Calabasas
113	4734961E	Pole	Calabasas
114	4734960E	Pole	Calabasas
115	1409023E	Pole	Calabasas
116	1409024E	Pole	Calabasas
117	1409025E	Pole	Calabasas
118	1409026E	Pole	Calabasas
119	1409027E	Pole	Calabasas
120	1464047E	Pole	Calabasas
121	1464048E	Pole	Calabasas
122	4351644E	Pole	Calabasas
123	3005580E	Pole	Calabasas
124	4743911E	Pole	Calabasas
125	4251322E	Pole	Calabasas
126	4251321E	Pole	Calabasas
127	4251320E	Pole	Calabasas
128	920665E	Pole	Calabasas
129	5661519	RAG Switch Vault	Malibu
130	X5661574	Pull box	Malibu
131	B5043020	BURD	Malibu
132	S5043019	BURD Switch	Malibu
133	P5709100	Pad-mounted Gas Switch	Malibu
134	P5709102	Pad-mounted Transformer	Malibu
135	P5438101	Pad-mounted Transformer	Westlake Village
136	5027621	BURD	Westlake Village
137	Next to 5027621	Handhole	Westlake Village
138	P5438102	Pad-mounted Transformer	Westlake Village
139	P5306213	Pad-mounted Transformer	Westlake Village
140	P5306212	Pad-mounted Transformer	Westlake Village

141	S5027795	BURD Switch SS Structure	Westlake Village
142	P5404211	Pad-mounted Switch	Agoura Hills
143	5404212	Pad-mounted Transformer	Agoura Hills
144	5167582	BURD	Agoura Hills
145	5167581	BURD	Agoura Hills
146	Next to 5167581	Handhole	Agoura Hills

IV. Field Inspection – Violations List

We observed the following violations during the field inspections:

GO 95, Rule 18.A3 - Resolution of Potential Violation of General Order 95 and Safety Hazards, states in part:

> *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 ten (10) business days after the discovery.*

SCE did not notify the third-party communications of a safety hazard on the pole 4920127E for an unsecured pole transfer, where approximately 3 feet of the old pole was hanging by a rope from the new 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.*

The SCE down guy anchor supporting pole 4658770E was buried.

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.*

Unauthorized foreign attachments were observed on each of the following SCE poles:

- 423233E – “SLOW DOWN” sign
- 1879672E – “SLOW DOWN” sign
- 4499524E – “SECURITY ALERT” sign
- 4351644E – “NO DUMPING” sign and surveillance camera
- 4743911E – “NO DUMPING” sign

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 SCE secondary conductor attached to pole 4216587E was strained by vegetation.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 19, requires the minimum radial separation between 0-750 Volts conductors and guys supported on the same poles to be 3 inches.

The SCE secondary conductors on pole 4790650E were in contact with SCE down guy wire attached to the same pole.

GO 95, Rule 51.6A - 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. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible.*

The high voltage sign on each of the following poles was either missing or damaged:

- 1538904E
- 1538906E
- 1709207E

GO 128, Rule 17.1 - 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 [the] communication or supply lines and equipment.*

The BURD 5027621 structure cylinder and grade ring was damaged.