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

December 19, 2024 EA2024-1260

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 Menifee 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) Menifee District from December 2, 2024, to December 6, 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 January 20, 2025, 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 November 2019 through October 2024, SCE completed 55 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 15 pending patrol inspections that were past SCE's scheduled due date.

SCE's records indicated that from November 2019 through October 2024, SCE completed 3,997 detail inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 201 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 November 2019 through October 2024, SCE completed 1,077 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 140 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 November 2019 through October 2024, SCE completed 1,924 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 1,976 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 November 2019 through October 2024, SCE completed 180 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 299 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	2347368E	Pole	Menifee
2	2347367E	Pole	Menifee
3	2347366E	Pole	Menifee
4	2347384E	Pole	Menifee
5	2347385E	Pole	Menifee
6	2347386E	Pole	Menifee
7	2347388E	Pole	Menifee
8	2347389E	Pole	Menifee
9	2347387E	Pole	Menifee
10	2347364E	Pole	Menifee
11	2347363E	Pole	Menifee
12	2347362E	Pole	Menifee
13	2347361E	Pole	Menifee
14	2347365E	Pole	Menifee
15	4615936E	Pole	Menifee
16	4414946E	Pole	Menifee
17	1964373E	Pole	Menifee
18	4365219E	Pole	Menifee
19	1964375E	Pole	Menifee
20	1964376E	Pole	Menifee
21	1964377E	Pole	Menifee
22	1964378E	Pole	Menifee
23	1964372E	Pole	Menifee
24	1964371E	Pole	Menifee
25	1796538E	Pole	Romoland
26	2199311E	Pole	Romoland
27	2199312E	Pole	Romoland
28	4773966E	Pole	Romoland
29	4773967E	Pole	Romoland
30	4773980E	Pole	Romoland
31	4773968E	Pole	Romoland
32	4703176E	Pole	Romoland
33	4656159E	Pole	Romoland
34	4656160E	Pole	Romoland
35	4537589E	Pole	Romoland
36	316450S	Pole	Romoland
37	4537590E	Pole	Romoland
38	77129S	Pole	Nuevo
39	77128S	Pole	Nuevo
40	4632121E	Pole	Nuevo
41	77127S	Pole	Nuevo
42	77126S	Pole	Nuevo
43	214286	Pole	Nuevo
44	2207003E	Pole	Nuevo

45	2207002E	Pole	Nuevo
46	2207004E	Pole	Nuevo
47	2207001E	Pole	Nuevo
48	2270420E	Pole	Nuevo
49	2289057E	Pole	Nuevo
50	3000007E	Pole	Perris
51	4523690E	Pole	Perris
52	4062113E	Pole	Perris
53	3000008E	Pole	Perris
54	3000671E	Pole	Perris
55	2352315E	Pole	Perris
56	2315579E	Pole	Perris
57	4062311E	Pole	Perris
58	2315580E	Pole	Perris
59	2315581E	Pole	Perris
60	1623126E	Pole	Perris
61	GT23771	Pole	Perris
62	GT23772	Pole	Perris
63	4944878E	Pole	Perris
64	GT23774	Pole	Perris
65	4860713E	Pole	Perris
66	4860712E	Pole	Perris
67	1594803E	Pole	Perris
68	4863012E	Pole	Perris
69	4223170E	Pole	Perris
70	4799676E	Pole	Lakeview
71	4714851E	Pole	Lakeview
72	4714853E	Pole	Lakeview
73	4714854E	Pole	Lakeview
74	4714855E	Pole	Lakeview
75	4234427E	Pole	Lakeview
76	4330620E	Pole	Lakeview
77	4234426E	Pole	Lakeview
78	4703195E	Pole	Lakeview
79	4234431E	Pole	Lakeview
80	4224539E	Pole	Lakeview
81	272412	Pole	Hemet
82	272413S	Pole	Hemet
83	272414S	Pole	Hemet
84	2020471E	Pole	Hemet
85	1743468E	Pole	Hemet
86	272416	Pole	Hemet
87	221473S	Pole	Hemet
88	1743469E	Pole	Hemet
89	318433S	Pole	Hemet
90	1804841E	Pole	Hemet
91	1587616E	Pole	Hemet
92	222784S	Pole	Hemet

93	1804825E	Pole	Hemet
94	1804826E	Pole	Hemet
95	221305S	Pole	Hemet
96	4232701E	Pole	San Jacinto
97	4232702E	Pole	San Jacinto
98	4232704E	Pole	San Jacinto
99	4232705E	Pole	San Jacinto
100	4232703E	Pole	San Jacinto
101	4065465E	Pole	San Jacinto
102	4771085E	Pole	San Jacinto
103	4771086E	Pole	San Jacinto
104	17722S	Pole	San Jacinto
105	17723S	Pole	San Jacinto
106	17725S	Pole	San Jacinto
107	17726S	Pole	San Jacinto
108	4491572E	Pole	San Jacinto
109	219606S	Pole	San Jacinto
110	18845S	Pole	San Jacinto
111	18950S	Pole	San Jacinto
112	17721S	Pole	San Jacinto
113	4523825E	Pole	San Jacinto
114	17682S	Pole	San Jacinto
115	17681S	Pole	San Jacinto
116	17680S	Pole	San Jacinto
117	2204625E	Pole	Winchester
118	2204626E	Pole	Winchester
119	2204627E	Pole	Winchester
120	2204628E	Pole	Winchester
121	2248448E	Pole	Winchester
122	4163038E	Pole	Winchester
123	4231280E	Pole	Winchester
124	2248449E	Pole	Winchester
125	2204641E	Pole	Winchester
126	2204624E	Pole	Winchester
127	2160940E	Pole	Winchester
128	4318106E	Pole	Winchester
129	4318107E	Pole	Winchester
130	318705S	Pole	Winchester
131	V5739463	Vault	Menifee
132	P5739466	Pad-mounted Transformer	Menifee
133	P5739465	Pad-mounted Switch	Menifee
134	5378482	Pad-mounted Transformer	Menifee
135	P5360235	Pad-mounted Transformer	Menifee
136	P5360239	Pad-mounted Transformer	Menifee
137	P5759123	Pad-mounted Transformer	Winchester
138	P5759121	Pad-mounted Switch	Winchester
139	5141403	BURD	Hemet
140	Next to 5141403	Handhole	Hemet

141	5141404	BURD	Hemet
142	5205165	BURD	Moreno Valley
143	5205128	BURD	Moreno Valley
144	P5307290	Pad-mounted Transformer	Moreno Valley

IV. Field Inspection – Violations List

We 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 each of the following poles required maintenance:

- Pole 4944878E – The ground wire was severed.
- Pole 4656160E – The service drop weather head and conduit at a structure located at 27491 Ethanac Rd. was broken and not secured.

An old SCE pole (buddy pole) next to each of the following poles was not yet removed after the transfer of lines:

- 4615936E
- 2207003E
- 219606S

The SCE down guy anchor for each of the following SCE poles was buried:

- 2347366E
- 219606S

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.*

An Unauthorized foreign attachment (two surveillance cameras) was attached to SCE pole 4537589E.

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

The SCE down guy wire attached to pole 272412 was in contact with a third-party communications conductor on the same pole.

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 down guy wire attached to pole 4062113E was in contact with an SCE secondary conductor on the same pole.

GO 95, Rule 44.1 - Installation and Reconstruction, states in part:

> *Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.*

The pole loading calculations supplied by SCE for pole 4523690E did not include third-party communication conductors at approximately 22 feet high, which were present at the time of the field inspection.

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:

- 2347384E
- 4062113E
- 3000008E
- 2352315E
- 2315579E
- GT23772
- 2204626E
- 2204628E
- 2204624E
- 4318107E

GO 95, Rule 56.2 - Overhead Guys, Anchor Guys and Span Wire Use, 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 SCE down guy wire supporting pole 4234426E was loose and not taut.

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 pad mounted transformer P5759123 had signs of oil leakage at the side of its enclosure.