STATE OF CALIFORNIA Gavin Newsom, *Governor*

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

February 5, 2025 EA2024-1274

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

Subject: Audit of Southern California Edison's Santa Ana District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), James Miller of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Santa Ana District from July 15, 2024 to July 19, 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 March 5, 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, you can contact James Miller at (213) 660-8898 or James.Miller@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: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records.
- Late Inspections
- Work Orders Created from Inspections
- Repair Work Orders
- 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 ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

SCE's records indicated that from calendar year 2021 through June 2024, SCE had 8748 overhead detailed inspections and 23 above ground patrol inspections which had either been completed after SCE's scheduled due date, or were past due and had not yet been completed at the time 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 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 calendar year 2021 through June 2024, SCE had 255 underground detailed inspections which had either been completed after SCE's scheduled due date, or were past due and had not yet been completed at the time of the audit.

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 June 2023 through May 2024, SCE completed 195 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 148 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 June 2023 through May 2024, SCE completed 100 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 112 open underground work orders that were past SCE's scheduled due date for corrective action.

GO95, 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.*

SED staff discovered a discrepancy between SCE's pole loading records and conditions in the field. SCE's record indicated a span length of 123 feet for the SCE conductors between Pole No. 1510081E and the next pole north of it, but SED staff measured the span length to be approximately 155 feet.

III. Field Inspections

My staff inspected the following structures during the field inspection portion of the audit:

No.	Facility Identification	Facility Type	Location
1	719046E	Pole	Santa Ana
2	719045E	Pole	Santa Ana
3	719044E	Pole	Santa Ana
4	719043E	Pole	Santa Ana
5	2256630E	Pole	Santa Ana
6	211431E	Pole	Santa Ana
7	211432E	Pole	Santa Ana
8	211433E	Pole	Santa Ana
9	211434E	Pole	Santa Ana
10	211435E	Pole	Santa Ana
11	979766E	Pole	Santa Ana
12	1212220E	Pole	Santa Ana
13	211437E	Pole	Santa Ana
14	211438E	Pole	Santa Ana
15	1150412E	Pole	Santa Ana
16	4566996E	Pole	Santa Ana
17	4714066E	Pole	Santa Ana
18	1150420E	Pole	Santa Ana
19	4601102E	Pole	Santa Ana
20	1212212E	Pole	Santa Ana
21	1276314E	Pole	Santa Ana
22	998686E	Pole	Santa Ana
23	4264520E	Pole	Santa Ana
24	1350991E	Pole	North Tustin
25	4024345E	Pole	North Tustin
26	1350989E	Pole	North Tustin
27	1350988E	Pole	North Tustin
28	1350987E	Pole	North Tustin
29	4724141E	Pole	North Tustin
30	1350985E	Pole	North Tustin
31	1350984E	Pole	North Tustin
32	1350982E	Pole	North Tustin
33	1350981E	Pole	North Tustin
34	1350979E	Pole	North Tustin
35	1350978E	Pole	North Tustin
36	2249972E	Pole	North Tustin
37	7878481E	Pole	Orange
38	493221E	Pole	Orange

39	916232E	Pole	Orange
40	493220E	Pole	Orange
41	1614108E	Pole	Orange
42	588536H	Pole	Orange
43	4299004E	Pole	Orange
44	4194791E	Pole	Orange
45	1064523E	Pole	Orange
46	4248250E	Pole	Orange
47	769999H	Pole	Irvine Park
48	4194514E	Pole	Irvine Park
49	4094984E	Pole	Irvine Park
50	769910H	Pole	Irvine Park
51	4094985E	Pole	Irvine Park
52	4299007E	Pole	Irvine Park
53	4094989E	Pole	Irvine Park
54	1447446E	Pole	Irvine Park
55	1447445E	Pole	Irvine Park
56	147444E	Pole	Irvine Park
57	4110910E	Pole	Irvine Park
58	4813941E	Pole	Irvine Park
59	1836965E	Pole	Irvine Park
60	4606144E	Pole	Orange
61	1549731E	Pole	Orange
62	1679573E	Pole	Orange
63	1679572E	Pole	Orange
64	882319E	Pole	Orange
65	1510079E	Pole	Orange
66	1510080E	Pole	Orange
67	1510081E	Pole	Orange
68	1505030E	Pole	Santa Ana
69	1642247E	Pole	Garden Grove
70	1642246E	Pole	Garden Grove
71	1192342E	Pole	Garden Grove
72	4711465E	Pole	Garden Grove
73	1679461E	Pole	Garden Grove
74	1679462E	Pole	Garden Grove
75	1679463E	Pole	Garden Grove
76	1575295E	Pole	Garden Grove
77	4502331E	Pole	Garden Grove
78	4611646E	Pole	Garden Grove
79	1192341E	Pole	Garden Grove
80	1192340E	Pole	Garden Grove
81	4502330E	Pole	Garden Grove

82	1192334E	Pole	Garden Grove
83	1642248E	Pole	Garden Grove
84	4431836E	Pole	Villa Park
85	2320249E	Pole	Villa Park
86	2023223E	Pole	Villa Park
87	71557E	Pole	Villa Park
88	2023222E	Pole	Villa Park
89	1276407E	Pole	Villa Park
90	100190E	Pole	Villa Park
91	537719E	Pole	Villa Park
92	2256821E	Pole	Villa Park
93	740145H	Pole	Villa Park
94	2215522E	Pole	Villa Park
95	4813272E	Pole	Villa Park
96	1679967E	Pole	Villa Park
97	678350E	Pole	Villa Park
98	1510803E	Pole	Villa Park
99	740147H	Pole	Villa Park
100	718988	Pole	Villa Park
101	718990	Pole	Villa Park
102	818316H	Pole	Villa Park
103	818320H	Pole	Villa Park
104	4699468E	Pole	Villa Park
105	215602E	Pole	Villa Park
106	5328792	BURD Switch	Santa Ana
107	P5328791	Padmounted Transformer	Santa Ana
108	5071636	Vault with Gas Switch, Fuse Cabinet, and Transformers	Orange
109	P5521773	Padmounted Transformer	Orange
110	P5521774	Padmounted Transformer	Orange
111	P5309466	Padmounted Transformer (3-Phase)	Orange
112	P5506398	Padmounted Transformer	Orange
113	5435470	BURD Transformer	Tustin
114	5435471	BURD Transformer	Tustin
115	5471752	BURD Transformer	Tustin
116	5078779	CST Transformer	Tustin
117	5078982	BURD Transformer	Tustin
118	5078983	BURD Transformer	Tustin
119	P5328720	Padmounted Transformer (3-Phase)	Tustin

IV. Field Inspection Violations List

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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 .*

Down guys attached to each of the following poles were not taut:

- 2249972E
- 1447446E

Two span guys attached to Pole No. 1510080E were not taut.

A span guy between Pole Nos. 1350991E and 4024345E was not taut.

GO 95, Rule 91.3 Stepping, B. Location of Steps, 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. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.*

The lowest pole step on each of the following poles was located at a height of less than eight feet:

- 588536H
- 1679572E
- 2023222E
- 2256821E
- 678350E

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 the following poles:

- Pole Nos. 719043E, 4714066E, 1575295E, and 1150420E each had an unauthorized "Cash for Junk Cars" sign attached to them.

- Pole No. 4264520E had an unauthorized sign attached to it advertising the availability of after school jobs for teenagers.
- Pole No. 1510079E had both a "We Buy Junk Cars" sign as well as a "Missing Cat" sign.

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 overhead facilities required maintenance:

- The ground moulding on Pole No. 719044E was damaged.
- Secondary insulator mountings were damaged on Pole Nos. 211433E and 211435E.
- The guy guard on a down guy attached to Pole No. 719043E had slipped out of place and did not cover the lowest four feet of the guy.
- Pole No. 1350982E had a cut ground wire.
- The visibility strips on Pole Nos. 1192341E, 4601102E, 1276314E, and 998686E were damaged.

General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 19 requires the minimum radial clearance between guys and span wires passing supply conductors of 0-750 volts supported on the same poles to be three inches.

An SCE down guy wire was in contact with a pole-to-pole secondary triplex conductors near each of the following poles:

- 1212220E
- 2023223E

GO 95, Rule 51.6, 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.*

"High Voltage" signs on each of the following poles were either missing or damaged:

- 1350987E
- 1350979E
- 7878481E
- 916232E
- 588536H
- 1192242E
- 1192341E
- 1192340E