



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

July 22, 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: TA2024-1120, Transmission Audit of Southern California Edison's San Jacinto Grid

Dear Mr. Daye:

Your letter, dated June 20, 2024, requested that we advise you of actions taken by Southern California Edison Company (SCE) to address conditions identified during the Safety and Enforcement Division's (SED's) transmission audit of San Jacinto Grid from February 26, 2024 to March 1, 2024.

Your letter requested a response by July 22, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

A handwritten signature in black ink, appearing to read "Mel Stark", with a long horizontal stroke extending to the right.

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, ESRB, CPUC
Mily Vaidya, Utilities Engineer, ESRB, CPUC
Jose Lastra, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Circuit facility inspection records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Tower Structure Analysis Records
- 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 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 January 2022 to March 2023, SCE had 35 "pending" work orders that were past SCE's scheduled due date for corrective action. Additionally, from January 2022 to March 2023, SCE completed 26 work orders 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, SCE notes that from January 2022 through March 2023, it had 25 overhead repair notifications that were pending completion past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from January 2022 through March 2023, it completed 26 overhead repair notifications past SCE's scheduled due date. Work orders may be pending or completed past their due dates for valid reasons per General Order 95, Rule 18, including but not limited to Permits, System Emergencies, and Customer Issues.

III. Field Inspections

My staff inspected the following facilities during the field inspection:

No.	Structure ID	Structure	Location
1	2335152E	Wood Pole	Romoland
2	2335153E	Wood Pole	Romoland
3	2335154E	Wood Pole	Romoland
4	40/02 T1	Steel Tower	Romoland
5	40/02 T1	Steel Tower	Romoland
6	2335155E	Wood Pole	Romoland
7	2335156E	Wood Pole	Romoland
8	2335157E	Wood Pole	Romoland
9	233158E	Wood Pole	Romoland
10	40/03 T1	Steel Tower	Romoland
11	40/03 T2	Steel Tower	Romoland
12	4233671E	Wood Pole	Romoland
13	4157396E	Wood Pole	Romoland
14	1820521E	Wood Pole	Romoland
15	4233670E	Wood Pole	Romoland
16	1820520E	Wood Pole	Romoland
17	4233669E	Wood Pole	Romoland
18	40/04 T1	Steel Tower	Romoland
19	40/04 T2	Steel Tower	Romoland
20	4233668E	Wood Pole	Romoland
21	4410199E	Wood Pole	Romoland
22	4531857E	Wood Pole	Romoland
23	4233667E	Wood Pole	Romoland
24	1820517E	Wood Pole	Romoland
25	4233666E	Wood Pole	Romoland
26	4233665E	Wood Pole	Romoland
27	1820516E	Wood Pole	Romoland
28	4558750E	Steel Pole	Menifee
29	4558749E	Steel Pole	Menifee
30	4558748E	Steel Pole	Menifee
31	4558747E	Steel Pole	Menifee
32	4558746E	Steel Pole	Menifee
33	4558745E	Steel Pole	Menifee
34	4558744E	Steel Pole	Menifee
35	4558743E	Steel Pole	Menifee
36	4558742E	Steel Pole	Menifee
37	4558741E	Steel Pole	Menifee
38	4171131E	Steel Pole	Temecula
39	4269877E	Wood Pole	Temecula
40	4269878E	Wood Pole	Temecula
41	4269879E	Wood Pole	Temecula
42	4269880E	Wood Pole	Temecula
43	4269881E	Wood Pole	Temecula
44	4269882E	Wood Pole	Temecula

45	4269883E	Wood Pole	Temecula
46	4269885E	Wood Pole	Temecula
47	4269884E	Wood Pole	Temecula
48	4402114E	Wood Pole	Temecula
49	4402115E	Wood Pole	Temecula
50	4402116E	Wood Pole	Temecula
51	4402117E	Wood Pole	Temecula
52	4402118E	Wood Pole	Temecula
53	4402119E	Wood Pole	Temecula
54	4402120E	Wood Pole	Temecula
55	4402121E	Wood Pole	Temecula
56	4402122E	Wood Pole	Temecula
57	4402123E	Wood Pole	Temecula
58	4402124E	Wood Pole	Temecula
59	4425470E	Wood Pole	Murrieta
60	4063313E	Wood Pole	Murrieta
61	4063312E	Wood Pole	Murrieta
62	4063311E	Wood Pole	Murrieta
63	4063310E	Wood Pole	Murrieta
64	4063309E	Wood Pole	Murrieta
65	4063308E	Wood Pole	Murrieta
66	4063307E	Wood Pole	Murrieta
67	4063306E	Wood Pole	Murrieta
68	4063305E	Wood Pole	Murrieta
69	4063304E	Wood Pole	Murrieta
70	4063303E	Wood Pole	Murrieta
71	37/04	Steel Tower	Nuevo
72	38/02	Steel Tower	Nuevo
73	38/04	Steel Tower	Nuevo
74	4528621E	Wood Pole	Homeland
75	4768500E	Steel Pole	Menifee
76	1975899E	Wood Pole	Moreno Valley
77	1975900E	Wood Pole	Moreno Valley
78	VT6001555	Vault	Winchester
79	VT6001551	Vault	Romoland
80	VT6001550	Vault	Romoland
81	VT6001603	Vault	Menifee
82	VT6001595	Vault	Lake Elsinore
83	VT6001592	Vault	Lake Elsinore
84	VT6001585	Vault	Temescal Valley
85	VT6001584	Vault	Temescal Valley

IV. Field Inspection Violations List

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

GO 95, Rule 51.6, Marking and Guarding, 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.

The high voltage signs on each of the following poles were either missing or damaged:

- 4063311E
- 4063306E
- 4063305E

SCE Response:

The conditions listed above were recorded in SCE's Work Management System and were addressed in accordance with SCE's maintenance program and GO 95.

- *Pole 4063311E – Damaged/Missing High Voltage Signs. SCE Response: Completed on 7/16/2024.*
- *Pole 4063306E - Damaged/Missing High Voltage Signs. SCE Response: Completed on 7/16/2024.*
- *Pole 4063305E - Damaged/Missing High Voltage Signs. SCE Response: Completed on 7/16/2024.*

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).

The ground moulding attached to following poles was missing or damaged:

- 4157396E
- 1820516E
- 4063313E

SCE Response:

The conditions listed above were recorded in SCE's Work Management System and were addressed in accordance with SCE's maintenance program and GO 95.

- *Pole 4157396E – Damaged/Missing Ground Moulding. SCE Response: Completed on 7/17/2024.*

- *Pole 1820516E - Damaged/Missing Ground Moulding. SCE Response: Completed on 7/17/2024.*
- *Pole 4063313E - Damaged/Missing Ground Moulding. SCE Response: Completed on 7/17/2024.*