



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

January 16, 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

EA2023-1098

Subject: Audit of Southern California Edison's Bishop District

Dear Mr. Daye:

Your letter, dated December 14, 2023, 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) distribution audit of Bishop District from October 30, 2023 to November 3, 2023.

Your letter requested a response by January 15, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mel Stark".

Mel Stark
Principal Manager, OE-T&D Compliance & Quality
1 Innovation Way
Pomona, CA 91768

Enclosure: SED Audit Findings and SCE's Responses

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Calvin Choi, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Patrol & Detailed Inspection records
- Repair Notifications
- 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 2021 through 2023, SCE had 73 annual grid patrol inspections and 395 overhead detailed inspections that were completed or pending completion past SCE's scheduled due date.

SCE Response:

Without admitting that SCE violated GO 165, Section III-B or GO 95, Rule 31.2, SCE responds as follows. Based on SCE's records, SCE notes that from 2021 through 2023, it completed 73 annual grid patrols past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from 2021 through 2023, it completed 395 overhead detailed inspections past SCE's scheduled due date. While SCE strives to complete inspections as close as possible to assigned dates, there are many factors that can affect the completion of scheduled inspections, such as storms, customer requests, resource constraints, access constraints, permitting or environmental constraints, among other reasons.

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 2021 through 2023, SCE had 10 underground detailed inspections that were completed or pending completion past SCE's scheduled due date.

SCE Response:

Without admitting that SCE violated GO 165, Section III-B or GO 128, Rule 17.2, SCE responds as follows. Based on SCE's records, SCE notes that from 2021 through 2023, it completed 10 underground detailed inspections past SCE's scheduled due date. While SCE strives to complete inspections as close as possible to assigned dates, there are many factors that can affect the completion of scheduled inspections, such as storms, customer requests, resource constraints, access constraints, permitting or environmental constraints, among other reasons.

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 2021 to 2023, SCE had 1127 overhead repair notifications that were completed or pending completion 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, from 2021 to 2023, SCE had 1,164 overhead work orders that were completed or pending completion past SCE's due date for corrective action. 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.

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 2021 through 2023, SCE had 98 underground repair notifications that were completed or pending completion past SCE's scheduled due date for corrective action.

SCE Response:

Without admitting that SCE violated GO 128, Rule 17.1, SCE responds as follows. Based on SCE's records, from 2021 to 2023, SCE had 120 underground work orders that were completed or pending completion past SCE's due date for corrective action. Work orders may be pending or completed past their due dates for valid reasons, including but not limited to Permits, System Emergencies, and Customer Issues.

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	1901486E	Pole	Mesa
2	1901485E	Pole	Mesa
3	1854214E	Pole	Mesa
4	1954213E	Pole	Mesa
5	1854212E	Pole	Mesa
6	1854211E	Pole	Mesa
7	1792086E	Pole	Mesa
8	1792085E	Pole	Mesa
9	4879371E	Pole	Bishop
10	4843916E	Pole	Bishop
11	4234656E	Pole	Bishop
12	1827727E	Pole	Bishop
13	81637CIC	Pole	Bishop
14	4879374E	Pole	Bishop
15	3007633E	Pole	Bishop
16	4271373E	Pole	Bishop
17	3007635E	Pole	Bishop
18	4823552E	Pole	Bishop
19	3007636E	Pole	Bishop
20	CTC81241	Pole	Bishop
21	3007637E	Pole	Bishop
22	81716CTC	Pole	Bishop
23	2357594E	Pole	Bishop
24	3007638E	Pole	Bishop
25	4879222E	Pole	Bishop
26	4854861E	Pole	Bishop
27	3007640E	Pole	Bishop
28	1901458E	Pole	Bishop
29	1901457E	Pole	Bishop
30	1791456E	Pole	Bishop
31	1901455E	Pole	Bishop
32	CTC81616	Pole	Bishop
33	1901454E	Pole	Bishop
34	4843913E	Pole	Bishop
35	4843909E	Pole	Bishop
36	4650708E	Pole	Bishop
37	1709886E	Pole	Bishop
38	2004431E	Pole	Bishop
39	1994550E	Pole	Bishop
40	1994547E	Pole	Bishop
41	1901345E	Pole	Bishop

42	4464393E	Pole	Bishop
43	1543544E	Pole	Bishop
44	1651075E	Pole	Bishop
45	1650932E	Pole	Bishop
46	1735761E	Pole	Bishop
47	1735762E	Pole	Bishop
48	18277112E	Pole	Bishop
49	4781509E	Pole	Bishop
50	4460744E	Pole	Bishop
51	2054126E	Pole	Bishop
52	1937525E	Pole	Mammoth Lakes
53	4951961E	Pole	Mammoth Lakes
54	1827751E	Pole	Mammoth Lakes
55	2004450E	Pole	Mammoth Lakes
56	4840583E	Pole	Mammoth Lakes
57	1937565E	Pole	Mammoth Lakes
58	4140380E	Pole	Mammoth Lakes
59	4140381E	Pole	Mammoth Lakes
60	345540S	Pole	Mammoth Lakes
61	4918483E	Pole	Mammoth Lakes
62	2172192E	Pole	Mammoth Lakes
63	345542S	Pole	Mammoth Lakes
64	345543S	Pole	Mammoth Lakes
65	1735508E	Pole	Mammoth Lakes
66	4869926E	Pole	Mammoth Lakes
67	4924011E	Pole	Mammoth Lakes
68	4892884E	Pole	Mammoth Lakes
69	1875563E	Pole	Mono City
70	1875560E	Pole	Mono City
71	4965730E	Pole	Mono City
72	445105S	Pole	Mono City
73	4951946E	Pole	Mono City
74	4965728E	Pole	Mono City
75	4868327E	Pole	Mono City
76	4868329E	Pole	Mono City
77	4885496E	Pole	Mono City
78	4664637E	Pole	Bridgeport
79	4865566E	Pole	Bridgeport
80	4865564E	Pole	Bridgeport
81	4093049E	Pole	Bridgeport
82	1709875E	Pole	Bridgeport
83	4924854E	Pole	Bridgeport
84	445048S	Pole	Bridgeport
85	445050S	Pole	Bridgeport
86	4844780E	Pole	Bridgeport
87	4844779E	Pole	Bridgeport

88	224550	Pole	Bridgeport
89	1618082E	Pole	Bridgeport
90	1618081E	Pole	Bridgeport
91	1618083E	Pole	Bridgeport
92	4093023E	Pole	Bridgeport
93	4460662E	Pole	Bridgeport
94	5023112	Padmount	Mammoth Lakes
95	5023113	Padmount	Mammoth Lakes
96	5023111	Padmount	Mammoth Lakes
97	5180403	Padmount	Mammoth Lakes
98	5566626	Padmount	Mammoth Lakes
99	5333986	BURD	Mammoth Lakes
100	5333985	Padmount	Mammoth Lakes
101	5194690	Padmount	Mammoth Lakes
102	5194689	Padmount	Mammoth Lakes
103	5449355	Padmount	Mammoth Lakes
104	5044262	Padmount	Mammoth Lakes
105	5044261	Padmount	Mammoth Lakes
106	5062623	Padmount	Mammoth Lakes
107	5462125	Padmount	Mammoth Lakes
108	5558048	Vault	Mammoth Lakes
109	5018129	Padmount	Mammoth Lakes
110	5018112	Padmount	Mammoth Lakes
111	5018111	Padmount	Mammoth Lakes
112	5018110	Padmount	Mammoth Lakes
113	5333995	Padmount	Mammoth Lakes
114	5333996	Padmount	Mammoth Lakes
115	5333997	Padmount	Mammoth Lakes
116	5370521	Padmount	Mammoth Lakes

IV. Field Inspection – Violations List

We observed the following violations during the field inspections:

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.

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

- 1901485E
- 1854214E
- 1954213E
- 1792086E
- 1792085E

SCE Response:

Four of the above conditions were previously recorded in SCE’s Work Management System at the time of the audit, and they will be addressed in accordance with SCE’s maintenance program. The remaining condition has been recorded in SCE’s Work Management System and will be addressed in accordance with SCE’s maintenance program. Note: GO 95 did not require a due date for priority 3 (level 3) notifications created prior to 07/01/2019.

- *Pole 1901485E – High Voltage Sign Damaged/Missing. **SCE Response:** The condition of this priority level 3 was entered in SCE’s Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*
- *Pole 1854214E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 6/01/2024.*
- *Pole 1954213E – High Voltage Sign Damaged/Missing. **SCE Response:** The condition of this priority level 3 was entered in SCE’s Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*
- *Pole 1792086E – High Voltage Sign Damaged/Missing. **SCE Response:** The condition of this priority level 3 was entered in SCE’s Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*
- *Pole 1792085E – High Voltage Sign Damaged/Missing. **SCE Response:** The condition of this priority level 3 was entered in SCE’s Work Management System before 7/1/2019 and*

has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.

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 down guy wire supporting each of the following poles was loose:

- 4823552E
- 1791456E
- 2054126E
- 1827751E
- 2004450E
- 1937565E
- 4965730E
- 445105S
- 4868327E
- 1709875E

SCE Response:

Three of the above conditions were previously recorded in SCE's Work Management System at the time of the audit, and they will be addressed in accordance with SCE's maintenance program. The remaining seven conditions have been recorded in SCE's Work Management System and they will be addressed in accordance with SCE's maintenance program. Note: GO 95 did not require a due date for priority 3 (level 3) notifications created prior to 07/01/2019.

- *Pole 4823552E – Loose Down Guy Wire. **SCE Response:** Due on 1/1/2026.*
- *Pole 1791456E – Loose Down Guy Wire. **SCE Response:** Due on 11/2/2028.*
- *Pole 2054126E – Loose Down Guy Wire. **SCE Response:** Due on 1/1/2026.*
- *Pole 1827751E – Loose Down Guy Wire. **SCE Response:** Due on 10/31/2028.*
- *Pole 2004450E – Loose Down Guy Wire. **SCE Response:** The condition of this priority level 3 was entered in SCE's Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*
- *Pole 1937565E – Loose Down Guy Wire. **SCE Response:** Due on 1/1/2026.*
- *Pole 4965730E – Loose Down Guy Wire. **SCE Response:** Due on 1/1/2026.*
- *Pole 445105S – Loose Down Guy Wire. **SCE Response:** Due on 10/31/2028.*
- *Pole 4868327E – Loose Down Guy Wire. **SCE Response:** Due on 3/7/2027.*
- *Pole 1709875E – Loose Down Guy Wire. **SCE Response:** Due on 7/10/2024.*

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 facilities required maintenance:

- 1792086E - the down guy anchors supporting the pole was completely buried.
- 1994547E - the down guy anchors supporting the pole was completely buried.
- 4844779E - the down guy anchors supporting the pole was completely buried.
- 4869926E - the queen's post supporting the down guy wire was bent.

SCE Response:

One of the above conditions was previously recorded in SCE's Work Management System at the time of the audit, and it will be addressed in accordance with SCE's maintenance program. The remaining three conditions have been recorded in SCE's Work Management System and they will be addressed in accordance with SCE's maintenance program.

- *Pole 1792086E – Buried down guy anchor. **SCE Response:** Due on 7/2/2024.*
- *Pole 1994547E – Buried down guy anchor. **SCE Response:** Due on 1/1/2026.*
- *Pole 4844779E – Buried down guy anchor. **SCE Response:** Due on 9/27/2024.*
- *Pole 4869926E – Damaged Queen's Post. **SCE Response:** Due on 1/1/2026.*