



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

January 9, 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:** SA2024-1211, Substation Audit of Southern California Edison Orange County AOR

Dear Mr. Daye:

Your letter, dated December 9, 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) substation audit of Orange County Switching Center from November 4, 2024 to November 8, 2024.

Your letter requested a response by January 9, 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  
3 Innovation Way  
Pomona, CA 91768

Enclosures: SED Audit Findings and SCE's Responses

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Calvin Choi, Utilities Engineer, ESRB, SED, CPUC

## AUDIT FINDINGS

### I. Records Review

During the audit, my staff reviewed the following records:

- SCE GO 174 Substation Inspection Practices
- SCE Operators Manual, Section 6.9: Substation Inspections
- SCE's Substation Procedures
- Summary of SCE Orange County AOR Substation Operators Training Records
- Summary of Substation Inspections
- Inspection Checklists and One-Line Diagrams
- Pending and Completed Workorders
- Summary of results of Infrared Testing
- Summary of results from Substation Dissolved Gas Analysis

### II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

**GO 174, Rule 12, General**, states in part:

*Design, construction, and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.*

Between December 2023 and August 2024, SCE failed to complete 38 work orders by SCE's assigned due date.

#### ***SCE Response:***

*Without admitting that SCE violated GO 174, Rule 12, SCE responds as follows. Based on SCE's records, SCE completed 38 work orders past their scheduled due date for corrective action. Work orders may be pending or completed past their due dates for valid reasons including but not limited to Outage Constraints, System Emergencies, and Customer Issues.*

### III. Field Inspections

My staff inspected the following facilities during the field inspection:

| No. | Substation Name |
|-----|-----------------|
| 1   | Serrano         |
| 2   | Canyon          |
| 3   | Brea            |
| 4   | Olinda          |
| 5   | La Habra        |
| 6   | Parkwood        |
| 7   | Burris Pit      |
| 8   | Lewis           |
| 9   | Titans          |
| 10  | Fullerton       |
| 11  | Basta           |
| 12  | Gilbert         |
| 13  | Sunnyhills      |
| 14  | Ellis           |
| 15  | Hamilton        |
| 16  | Orcogen         |
| 17  | Recovery        |
| 18  | Soco            |
| 19  | Oceanview       |
| 20  | Brookhurst      |
| 21  | Team            |
| 22  | Cedarwood       |
| 23  | Lampson         |
| 24  | Las Lomas       |
| 25  | Irvine          |
| 26  | Limestone       |
| 27  | Chiquita        |
| 28  | Niguel          |
| 29  | Moulton         |

#### IV. Field Inspection - Violations List

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

**GO 174, Rule 12, General**, states in part:

*Substations shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service.*

*Design, construction and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.*

Facilities at the following substations were not maintained for their intended use:

##### **Brea**

- One cooling fan on the No. 2 Bank South Unit transformer was not starting.

##### ***SCE Response:***

*The condition listed above has been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.*

- *One cooling fan on the No. 2 Bank South Unit transformer not starting. **SCE Response: Due Date 05/21/2025.***

##### **Olinda**

- 2 bushings on the West Bus 66kV potential transformers had low oil readings.

##### ***SCE Response:***

*The condition listed above has been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.*

- *2 bushings on the West Bus 66kV potential transformers low oil readings. **SCE Response: Due Date 12/11/2030.***

##### **Titans**

- There were no warning signs on the West side perimeter wall.

##### ***SCE Response:***

*The condition listed above has been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.*

- *Missing warning signs on the West side perimeter wall. **SCE Response: Due Date 12/11/2030.***

### **Fullerton**

- One cooling fan on the No. 3 Bank South Unit transformer was not starting.

#### ***SCE Response:***

*The condition listed above was previously recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.*

- *One cooling fan on the No. 3 Bank South Unit transformer not starting. **SCE Response:** Due Date 09/05/2030.*

### **Gilbert**

- 2 cooling fans on the No. 1 Bank North Unit transformer were not starting.

#### ***SCE Response:***

*The condition listed above was previously recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.*

- *Two cooling fans on the No. 1 Bank North Unit transformer not starting. **SCE Response:** Due Date 2/23/2027.*

### **Oceanview**

- The Clearance Required gate bar was not securing the gate as intended on the No. 1 Cap Bank perimeter fence.

#### ***SCE Response:***

*The condition listed above has been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.*

- *Clearance Required gate bar not securing the gate on the No. 1 Cap Bank perimeter fence. **SCE Response:** Due Date 12/11/2030.*

### **Brookhurst**

- There was an oil leak from the radiator on the No. 1 Bank transformer. Additionally, one cooling fan was not starting.
- There was an oil leak from the radiator on the No. 2 Bank transformer.

#### ***SCE Response:***

*The conditions listed above have been recorded in SCE's Work Management System and they will be addressed in accordance with SCE's maintenance program.*

- *Oil leak from the radiator on the No. 1 Bank transformer. **SCE Response:** Due Date 12/9/2030.*
- *One cooling fan on the No. 1 Bank transformer not starting. **SCE Response:** Due Date 12/9/2030.*
- *Oil leak from the radiator on the No. 2 Bank transformer. **SCE Response:** Due Date 12/9/2030.*

## **Limestone**

- The Clearance Required gate bar was not securing the gate as intended on the 66kV Transfer Bus perimeter fence.

### ***SCE Response:***

*The condition listed above was recorded in SCE's Work Management System at the time of the audit and will be addressed in accordance with SCE's maintenance program.*

- *Clearance Required gate bar not securing the gate on the 66kV Transfer Bus perimeter fence. **SCE Response:** Due Date 11/05/2030.*

## **Chiquita**

- There was an oil leak from a valve near the top of the radiator on the No. 3 Bank West Unit transformer.

### ***SCE Response:***

*The condition listed above was previously recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.*

- *Oil leak from valve near the top of the radiator on the No. 3 Bank West Unit transformer. **SCE Response:** Due Date 10/20/2025.*

## **Niguel**

- One cooling fan on the No. 2 Bank transformer was not starting.
- The Clearance Required gate bar was not securing the gate as intended on the 66kV Operating Bus perimeter fence.

### ***SCE Response:***

*The conditions listed above have been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.*

- *One cooling fan on the No. 2 Bank transformer not starting. **SCE Response:** Due Date 11/05/2030.*
- *Clearance Required gate bar not securing the gate on the 66kV Operating Bus perimeter fence. **SCE Response:** Due Date 12/11/2030.*

## **Limestone**

- The Santiago-Limestone Transfer Bus potential transformer was leaking oil.

### ***SCE Response:***

*The condition listed above was recorded in SCE's Work Management System at the time of the audit and will be addressed in accordance with SCE's maintenance program.*

- *Oil leak from the Santiago-Limestone Transfer Bus potential transformer. **SCE Response:** Due Date 11/10/2025.*