

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

March 25, 2025

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

EA2025-1281

Subject: Audit of Southern California Edison's Huntington Beach District

Dear Mr. Daye:

Your letter, dated February 25, 2025, requested that we advise you of actions taken by Southern California Edison Company (SCE) to address conditions identified during the Safety Enforcement Division's (SED's) distribution audit of SCE's Huntington Beach District from February 18, 2025 to February 21, 2025.

Your letter requested a response by March 25, 2025. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Sincerely,

Mel Stark Principal Manager, EHSQ-T&D Compliance & Quality 3 Innovation Way Pomona, CA 91768

Enclosures: SED Audit Findings and SCE's Responses

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC Kyle King, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- Intrusive test records
- SCE's documented inspection program.
- Vegetation Management Records

II. Records Review – Violations List

My staff observed the following violations during the records review portion 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 indicate that from 2022 to 2025, SCE completed 90 overhead work orders past SCE's due date for corrective action. Additionally, SCE's records indicate that from 2022 to 2025, SCE has 80 pending overhead work orders past SCE's 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 1/1/2022 to 12/31/2024, SCE had 43 overhead work orders that were completed past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that from 1/1/2022 to 12/31/2024, it had 80 overhead work orders that were pending completion past SCE's 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 Permits, System Emergencies, and Customer Issues.

GO 165, Section III-B, 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 indicate that from 2022 to 2025, SCE completed 3540 overhead detailed inspections and 24 patrol inspections past SCE's scheduled due date. Additionally, SCE's records indicate that from 2022 to 2025, SCE has 114 pending inspections past SCE's scheduled due dates.

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 1/1/2022 to 12/31/2024, it completed 3,050 overhead detailed inspections and 24 annual grid patrols past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from 1/1/2022 to 12/31/2024, SCE had 114 pending overhead detailed inspections that were pending completion 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, system issues or environmental constraints, among other reasons.

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 indicate that from 2022 to 2025, SCE completed 74 underground work orders past SCE's due date for corrective actions. Additionally, SCE's records indicate that from 2022 to 2025, SCE has 173 underground pending work orders past SCE's due date for corrective actions.

SCE Response:

Without admitting that SCE violated GO 128, Rule 17.1, SCE responds as follows. Based on SCE's records, from 1/1/2022 to 12/31/2024, SCE had 74 underground work orders that were completed past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, SCE

notes that from 1/1/2022 to 12/31/2024, it had 173 underground pending work orders that are pending completion past SCE's 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 Permits, System Emergencies, and Customer Issues.

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GO 165, Section III-B, 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 indicate that from 2022 to 2025, SCE completed 122 underground detailed inspections past SCE's scheduled due date. Additionally, SCE's records indicate that from 2022 to 2025, SCE had 7 pending late inspections 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 1/1/2022 to 12/31/2024, it had 122 underground inspections that were completed past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from 1/1/2022 to 12/31/2024, it had 7 underground pending work orders that are pending completion past SCE's scheduled due date for corrective action. 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, system issues or environmental constraints, among other reasons.

III. Field Inspections

	Structure No.	Structure Type	Location
1	4667142E	Utility Pole	Fountain Valley
2	1703443E	Utility Pole	Fountain Valley
3	1703444E	Utility Pole	Fountain Valley
4	1703445E	Utility Pole	Fountain Valley
5	2048494E	Utility Pole	Fountain Valley
6	2048495E	Utility Pole	Fountain Valley
7	2340280E	Utility Pole	Fountain Valley
8	4667140E	Utility Pole	Fountain Valley
9	2048498E	Utility Pole	Fountain Valley
10	2048499E	Utility Pole	Fountain Valley
11	4427226E	Utility Pole	Fountain Valley
12	4433369E	Utility Pole	Fountain Valley
13	4490699E	Utility Pole	Fountain Valley
14	4182432E	Utility Pole	Fountain Valley
15	4705411E	Utility Pole	Fountain Valley
16	1850851E	Utility Pole	Fountain Valley
17	1642133E	Utility Pole	Fountain Valley
18	1642132E	Utility Pole	Fountain Valley
19	1644572E	Utility Pole	Fountain Valley
20	1644573E	Utility Pole	Fountain Valley
21	1727717E	Utility Pole	Fountain Valley
22	1727718E	Utility Pole	Fountain Valley
23	1815728E	Utility Pole	Fountain Valley
24	1815727E	Utility Pole	Fountain Valley
25	1815726E	Utility Pole	Fountain Valley
26	1815725E	Utility Pole	Fountain Valley
27	4255850E	Utility Pole	Fountain Valley
28	1850858E	Utility Pole	Fountain Valley
29	1461919E	Utility Pole	Fountain Valley
30	1461920E	Utility Pole	Fountain Valley
31	1671201E	Utility Pole	Fountain Valley
32	1703441E	Utility Pole	Fountain Valley
33	2048696E	Utility Pole	Fountain Valley
34	1703439E	Utility Pole	Fountain Valley
35	2333970E	Utility Pole	Fountain Valley
36	4181949E	Utility Pole	Huntington Beach
37	1426063E	Utility Pole	Huntington Beach

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

38	X16921E	Utility Pole	Huntington Beach
39	C143172Y	Utility Pole	Huntington Beach
40	C143173Y	Utility Pole	Huntington Beach
41	C143174Y	Utility Pole	Huntington Beach
42	2340328E	Utility Pole	Huntington Beach
43	C143171Y	Utility Pole	Huntington Beach
44	C143170Y	Utility Pole	Huntington Beach
45	822215E	Utility Pole	Huntington Beach
46	2021120E	Utility Pole	Huntington Beach
47	4812551E	Utility Pole	Huntington Beach
48	4433584E	Utility Pole	Huntington Beach
49	C143187	Utility Pole	Huntington Beach
50	4812552E	Utility Pole	Huntington Beach
51	2249186E	Utility Pole	Huntington Beach
52	1039718E	Utility Pole	Huntington Beach
53	2340232E	Utility Pole	Huntington Beach
54	4812553E	Utility Pole	Huntington Beach
55	4602919E	Utility Pole	Huntington Beach
56	C143195Y	Utility Pole	Huntington Beach
57	C142998Y	Utility Pole	Huntington Beach
58	C143196	Utility Pole	Huntington Beach
59	1016469E	Utility Pole	Huntington Beach
60	C143197Y	Utility Pole	Huntington Beach
61	4346061E	Utility Pole	Huntington Beach
62	C142310Y	Utility Pole	Huntington Beach
63	1220476E	Utility Pole	Huntington Beach
64	C142309Y	Utility Pole	Huntington Beach
65	C142308Y	Utility Pole	Huntington Beach
66	2249530E	Utility Pole	Huntington Beach
67	4630565E	Utility Pole	Huntington Beach
68	4630576E	Utility Pole	Huntington Beach
69	4630577E	Utility Pole	Huntington Beach
70	1039737E	Utility Pole	Huntington Beach
71	4384765E	Utility Pole	Corona Del Mar
72	356333E	Utility Pole	Corona Del Mar
73	341173E	Utility Pole	Corona Del Mar
74	4208317E	Utility Pole	Corona Del Mar
75	1182739E	Utility Pole	Corona Del Mar
76	2016398E	Utility Pole	Corona Del Mar
77	341177E	Utility Pole	Corona Del Mar
78	4208311E	Utility Pole	Corona Del Mar

79	4818570E	Utility Pole	Corona Del Mar
80	1008667H	Utility Pole	Corona Del Mar
81	4633511E	Utility Pole	Corona Del Mar
82	645303E	Utility Pole	Corona Del Mar
83	1671346E	Utility Pole	Corona Del Mar
84	4826563E	Utility Pole	Corona Del Mar
85	4771033E	Utility Pole	Corona Del Mar
86	255672E	Utility Pole	Corona Del Mar
87	894712E	Utility Pole	Corona Del Mar
88	1645012E	Utility Pole	Corona Del Mar
89	835702E	Utility Pole	Corona Del Mar
90	2340303E	Utility Pole	Corona Del Mar
91	649334E	Utility Pole	Corona Del Mar
92	2050676E	Utility Pole	Corona Del Mar
93	5018948E	Utility Pole	Corona Del Mar
94	4000552E	Utility Pole	Corona Del Mar
95	472245E	Utility Pole	Corona Del Mar
96	4255884E	Utility Pole	Corona Del Mar
97	1183563E	Utility Pole	Corona Del Mar
98	86748E	Utility Pole	Newport Beach
99	86747E	Utility Pole	Newport Beach
100	86746E	Utility Pole	Costa Mesa
101	631539H	Utility Pole	Costa Mesa
102	4701775E	Utility Pole	Costa Mesa
103	1248998E	Utility Pole	Costa Mesa
104	931880E	Utility Pole	Costa Mesa
105	763901E	Utility Pole	Costa Mesa
106	763903E	Utility Pole	Costa Mesa
107	1285844E	Utility Pole	Costa Mesa
108	1142443E	Utility Pole	Westminster
109	1142444E	Utility Pole	Westminster
110	5435093	Underground Vault	Newport Beach
111	5153995	Underground Burd Switch	Newport Beach
112	P5499734	Padmounted Transformer	Newport Beach
113	P5435924	Padmounted Transformer	Newport Beach
114	P5435923	Padmounted Transformer	Newport Beach
115	5109172	Underground Burd Switch	Newport Beach
116	5709167	Underground Burd Switch	Newport Beach
		Underground Burd	
117	5122840	Transformer	Fountain Valley
		Underground Burd	Fountain Valley
118	5122837	Transformer	

		Underground Burd	Fountain Valley
119	5122838	Transformer	
120	P5136373	Padmounted Transformer	Westminster
121	P5435844	Padmounted Transformer	Westminster

IV. Field Inspection Violations List

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:

- 2048495E
- 2048498E
- 2048499E
- 4182432E
- 1642133E
- 1644573E
- 1815727E
- 2249530E
- 4630565E
- 341177E
- 4208311E
- 1671346E
- 1142443E

SCE Response:

Nine 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. Note: GO 95 did not require a due date for priority 3 (level 3) notifications created prior to 07/01/2019.

- Pole 2048495E 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 2048498E 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 2048499E 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 4182432E 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 1642133E 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 1644573E 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 1815727E 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 2249530E 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 1142443E 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.

Four of the above conditions have been recorded in SCE's Work Management System, and they will be addressed in accordance with SCE's maintenance program.

- Pole 4630565E High Voltage Sign Damaged/Missing. SCE Response: Due on 03/05/2030.
- Pole 341177E High Voltage Sign Damaged/Missing. SCE Response: Due on 03/05/2030.
- Pole 1434292E High Voltage Sign Damaged/Missing. SCE Response: Due on 03/05/2030.
- Pole 4740694E High Voltage Sign Damaged/Missing. SCE Response: Due on 2/08/2026.

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.

A down guy wire supporting SCE pole number 763901E was strained by vegetation.

SCE Response:

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

• Pole 763901E – Vegetation strain against SCE Down Guy. SCE Response: Due on 03/05/2028.

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 on each of the following SCE poles was damaged:

• 1703443E

2340280E

1642133E4812553E

1815727E2016398E

- 1183563E

SCE Response:

Two of the above conditions were recorded in SCE's work management system at the time of the Audit and they were remediated in accordance with SCE's maintenance program. Conditions in the field no longer exists.

- Pole 2016398E Damaged Ground Molding. SCE Response: Completed on 03/05/2025.
- Pole 4812553E Damaged Ground Molding. SCE Response: Completed on 03/05/2025.

Five 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. Note: GO 95 did not require a due date for priority 3 (level 3) notifications created prior to 07/01/2019.

- Pole 1703443E Damaged Ground Molding. 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 2340280E Damaged Ground Molding. 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 1183563E Damaged Ground Molding. 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 1642133E Damaged Ground Molding. 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 1815727E – Damaged Ground Molding. 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 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.

Pole 763901E had an unauthorized sign attached to it.

SCE Response:

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

• Pole 763901E – Unauthorized Attachment. SCE Response: Due on 03/05/2028.