



Melvin Stark
Principal Manager
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May 21, 2025

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

EA2025-1282

Subject: Audit of Southern California Edison's Valencia District

Dear Mr. Daye:

Your letter, dated April 21, 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 Valencia District from March 3, 2025 to March 7, 2025.

Your letter requested a response by May 21, 2025. 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", with a long horizontal flourish extending to the right.

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

Enclosures: CPUC Audit Findings and SCE's Responses

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, 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 January 2024 to February 2025, SCE completed 1908 overhead work orders past SCE's due date for corrective action. Additionally, SCE's records indicate that from January 2024 to February 2025, SCE has 848 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 January 1, 2024 to February 30, 2025, SCE had 1908 overhead work orders that were completed past SCE's due date for corrective action. Additionally, based on SCE's records, from January 1, 2024 to February 30, 2025, SCE had 848 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 January 2024 to February 2025, SCE completed 2 overhead detailed inspections and 5 patrol inspections past SCE's scheduled due date. Additionally, SCE's records indicate that from January 2024 to February 2025, SCE has 9 pending inspections and 48 pending patrol 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, from January 1, 2024 to February 30, 2025, SCE completed 2 overhead detailed inspections and 5 annual grid patrols past SCE's scheduled due date. Additionally, based on SCE's records, from January 1, 2024 to February 30, 2025 SCE had 9 pending overhead detailed inspections that were pending completion past SCE's scheduled due date and 48 pending patrol inspections past SCE's scheduled due dates. 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 January 2024 to February 2025, SCE completed 53 underground work orders past SCE's due date for corrective actions. Additionally, SCE's records indicate that from January 2024 to February 2025, SCE has 416 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 January 1, 2024 to February 30, 2025, SCE had 53 underground work orders that were completed past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, from January 1, 2024 to February 30, 2025, SCE had 416 underground pending 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 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 January 2024 to February 2025, SCE completed 87 underground detailed inspections past SCE's scheduled due date. Additionally, SCE's records indicate that from January 2024 to February 2025, SCE had 6 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, from January 1, 2024 to February 30, 2025, SCE had 87 underground inspections that were completed past SCE's scheduled due date. Additionally, based on SCE's records, from January 1, 2024 to February 30, 2025, SCE had 6 underground pending work orders that were 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

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

	Structure No.	Structure Type	Location
1	4647305E	Utility Pole	Newhall
2	2320439E	Utility Pole	Newhall
3	2320438E	Utility Pole	Newhall
4	4305414E	Utility Pole	Newhall
5	2320436E	Utility Pole	Newhall
6	4877511E	Utility Pole	Newhall
7	4544836E	Utility Pole	Newhall
8	2320434E	Utility Pole	Newhall
9	2320433E	Utility Pole	Newhall
10	2320432E	Utility Pole	Newhall
11	2320431E	Utility Pole	Newhall
12	4777362E	Utility Pole	Newhall
13	2265293E	Utility Pole	Newhall
14	4080345E	Utility Pole	Newhall
15	2265292E	Utility Pole	Newhall
16	4997812E	Utility Pole	Newhall
17	2265703E	Utility Pole	Newhall
18	2320441E	Utility Pole	Newhall
19	2320442E	Utility Pole	Newhall
20	2321887E	Utility Pole	Newhall
21	1843646E	Utility Pole	Newhall
22	2321888E	Utility Pole	Newhall
23	1843645E	Utility Pole	Newhall
24	2321889E	Utility Pole	Newhall
25	2321886E	Utility Pole	Newhall
26	2321890E	Utility Pole	Newhall
27	4544956E	Utility Pole	Newhall
28	2321892E	Utility Pole	Newhall
29	4257418E	Utility Pole	Newhall
30	4257425E	Utility Pole	Newhall
31	4257417E	Utility Pole	Newhall
32	4257419E	Utility Pole	Newhall
33	4843044E	Utility Pole	Newhall
34	1482673E	Utility Pole	Newhall
35	4257420E	Utility Pole	Newhall
36	1020414H	Utility Pole	Newhall
37	4257421E	Utility Pole	Newhall

38	259404E	Utility Pole	Newhall
39	4257424E	Utility Pole	Newhall
40	1028530H	Utility Pole	Newhall
41	4789381E	Utility Pole	Newhall
42	4257426E	Utility Pole	Newhall
43	189960E	Utility Pole	Santa Clarita
44	1774922E	Utility Pole	Santa Clarita
45	2101014E	Utility Pole	Santa Clarita
46	1865780E	Utility Pole	Santa Clarita
47	2101222E	Utility Pole	Santa Clarita
48	189961E	Utility Pole	Santa Clarita
49	4155029E	Utility Pole	Santa Clarita
50	610776E	Utility Pole	Santa Clarita
51	1865964E	Utility Pole	Santa Clarita
52	4155033E	Utility Pole	Santa Clarita
53	4155032E	Utility Pole	Santa Clarita
54	4155031E	Utility Pole	Santa Clarita
55	4155030E	Utility Pole	Santa Clarita
56	4155035E	Utility Pole	Santa Clarita
57	4155037E	Utility Pole	Santa Clarita
58	4155036E	Utility Pole	Santa Clarita
59	4104404E	Utility Pole	Santa Clarita
60	4104405E	Utility Pole	Santa Clarita
61	643875E	Utility Pole	Santa Clarita
62	1424060E	Utility Pole	Santa Clarita
63	2335010E	Utility Pole	Santa Clarita
64	2229528E	Utility Pole	Santa Clarita
65	643874E	Utility Pole	Santa Clarita
66	1580004E	Utility Pole	Canyon Country
67	1580005E	Utility Pole	Canyon Country
68	1580006E	Utility Pole	Canyon Country
69	1580007E	Utility Pole	Canyon Country
70	1580008E	Utility Pole	Canyon Country
71	GT200565	Utility Pole	San Fernando
72	111511E	Utility Pole	San Fernando
73	4779515E	Utility Pole	San Fernando
74	GT200451	Utility Pole	San Fernando
75	4728186E	Utility Pole	San Fernando
76	836837E	Utility Pole	San Fernando
77	836885E	Utility Pole	San Fernando
78	836884E	Utility Pole	San Fernando

79	4824647E	Utility Pole	San Fernando
80	GT200228	Utility Pole	San Fernando
81	4728187E	Utility Pole	San Fernando
82	1902156E	Utility Pole	San Fernando
83	1482761E	Utility Pole	San Fernando
84	2367854E	Utility Pole	San Fernando
85	2367855E	Utility Pole	San Fernando
86	189367E	Utility Pole	San Fernando
87	1671858E	Utility Pole	San Fernando
88	1671860E	Utility Pole	San Fernando
89	189365E	Utility Pole	San Fernando
90	491404E	Utility Pole	San Fernando
91	948908E	Utility Pole	San Fernando
92	2265352E	Utility Pole	San Fernando
93	2265353E	Utility Pole	San Fernando
94	189362E	Utility Pole	San Fernando
95	1362839E	Utility Pole	San Fernando
96	1123468E	Utility Pole	San Fernando
97	1123467E	Utility Pole	San Fernando
98	4235697E	Utility Pole	San Fernando
99	4235696E	Utility Pole	San Fernando
100	102009E	Utility Pole	San Fernando
101	4832010E	Utility Pole	San Fernando
102	1935106E	Utility Pole	San Fernando
103	1123465E	Utility Pole	San Fernando
104	1123464E	Utility Pole	San Fernando
105	1090777E	Utility Pole	San Fernando
106	2265948E	Utility Pole	San Fernando
107	4856183E	Utility Pole	San Fernando
108	2265310E	Utility Pole	San Fernando
109	2265853E	Utility Pole	San Fernando
110	2265852E	Utility Pole	San Fernando
111	P5365797	Padmounted Switch	Newhall
112	5403811	Underground Splice Box	Newhall
113	P5403812	Padmounted Transformer	Newhall
114	P5403813	Padmounted Transformer	Newhall
115	P5365956	Padmounted Transformer	Newhall
116	P5766429	Padmounted Transformer	Newhall
117	P5766430	Padmounted Transformer	Newhall
118	P5766432	Padmounted Transformer	Newhall
119	P5766431	Padmounted Transformer	Newhall

120	P5766438	Padmounted Transformer	Newhall
121	P5766437	Padmounted Transformer	Newhall
122	P5766435	Padmounted Transformer	Newhall
123	P5766434	Padmounted Transformer	Newhall
124	P5773525	Padmounted Switch	Newhall
125	P5726557	Padmounted Transformer	Newhall
126	P5746555	Padmounted Switch	Newhall

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:

- 111511E
- GT200451
- 4728187E
- 1902156E
- 2367854E
- 189367E
- 189365E
- 2265352E
- 4235697E
- 2265853E
- 2265852E

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

- *Pole 2265852E – 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.*

Ten 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 111511E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 03/04/2030.*
- *Pole GT200451 – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/4/2030.*
- *Pole 4728187E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/4/2030.*
- *Pole 1902156E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/4/2030.*
- *Pole 2367854E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/4/2030.*
- *Pole 189367E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/4/2030.*
- *Pole 189365E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/4/2030.*
- *Pole 2265352E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/4/2030.*

- Pole 4235697E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/4/2030.
- Pole 2265853E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/4/2030.

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 visibility strip attached to SCE pole number 948908E was damaged.

SCE Response:

The above condition was recorded in SCE's work management system at the time of the Audit and was remediated on the same day during the Audit. Condition in field no longer exist.

- Pole 948908E – Damaged visibility strip. **SCE Response:** Completed 3/4/2025.

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:

- 1935106E
- 2265852E

SCE Response:

Two 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 1935106E – Damaged Ground Molding. **SCE Response:** Due on 05/05/2030.
- Pole 2265852E – Damaged Ground Molding. **SCE Response:** Due on 05/05/2030.

GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, 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 Pole 2265310E was loose.

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 2265310E – Loose SCE down guy. **SCE Response:** Due on 3/4/2030.

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 attachments were attached to each of the following SCE poles:

- Pole 11511E – there was an unauthorized sign attached to the pole.
- Pole 2321887E – there was an unauthorized sign attached to the pole.
- Pole 2321890E – there was an unauthorized sign attached to the pole.

SCE Response:

Two of the above condition has been recorded in SCE's Work Management System and they will be addressed in accordance with SCE's maintenance program.

- *Pole 1115111E – Unauthorized attachment (sign). **SCE Response:** Due on 3/4/2030.*
- *Pole 2321887E – Unauthorized attachment (sign). **SCE Response:** Due on 3/3/2030.*

One of the above conditions was recorded in SCE's work management system at the time of the Audit and was remediated on the same day during the Audit. Condition in the field no longer exists.

- *Pole 2321890E – Unauthorized attachment (sign). **SCE Response:** Completed 3/4/2025.*