



Melvin Stark
Principal Manager
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June 23, 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

Subject: EA2025-1283, Distribution Audit of SCE's Bishop District

Dear Mr. Daye:

Your letter, dated April 24, 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 Bishop District from March 24, 2025 to March 28, 2025.

Your letter requested a response by June 23, 2025. 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

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Calvin Choi, Utilities Engineer, Electric Safety and Reliability Branch, 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 September 2023 through December 2024, SCE had 214 annual grid patrol inspections and 358 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 September 2023 through December 2024, it had 214 annual grid patrols that were completed or pending completion past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes from September 2023 through December 2024, it had 358 overhead detailed inspections that were completed or 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 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 of these rules.

SCE's records indicated that from September 2023 through December 2024, SCE had 12 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 September 2023 through December 2024, it had 12 underground detailed inspections that were completed or 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 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 indicated that from September 2023 through December 2024, SCE had 930 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-B1 or GO 95, Rule 31.1, SCE responds as follows. Based on SCE's records, from September 2023 through December 2024, SCE had 930

overhead work orders that were completed or 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 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 September 2023 through December 2024, SCE had 113 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 September 2023 through December 2024, SCE had 113 underground work orders that were completed 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.

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	1827600E	Pole	Benton
2	1827599E	Pole	Benton
3	1827598E	Pole	Benton
4	4391375E	Pole	Benton
5	4391374E	Pole	Benton
6	1827595E	Pole	Benton
7	1827572E	Pole	Benton
8	1827571E	Pole	Benton
9	1827570E	Pole	Benton
10	1827569E	Pole	Benton
11	1827568E	Pole	Benton
12	4120534E	Pole	Benton
13	1827566E	Pole	Benton
14	1827565E	Pole	Benton
15	1827564E	Pole	Benton
16	2136582E	Pole	Bishop
17	2136581E	Pole	Bishop
18	2136580E	Pole	Bishop
19	2004509E	Pole	Bishop
20	2004510E	Pole	Bishop
21	2230570E	Pole	Bishop
22	4460737E	Pole	Bishop
23	4030581E	Pole	Bishop
24	4918595E	Pole	Bishop
25	1827690E	Pole	Bishop
26	4206741E	Pole	Bishop
27	2042769E	Pole	Bishop
28	4464199E	Pole	Bishop
29	1937585E	Pole	Bishop
30	1937586E	Pole	Bishop
31	2290298E	Pole	Bishop
32	4390226E	Pole	Bishop
33	1937589E	Pole	Bishop
34	4234631E	Pole	Bishop
35	1930364E	Pole	Wilkerson
36	1930365E	Pole	Wilkerson
37	2004378E	Pole	Wilkerson
38	1827742E	Pole	Wilkerson
39	2276783E	Pole	Bridgeport
40	2276784E	Pole	Bridgeport
41	2255189E	Pole	Bridgeport
42	27472CIT	Pole	Mono City

43	4951964E	Pole	Mono City
44	4999020E	Pole	Mono City
45	2292291E	Pole	Mono City
46	2276779E	Pole	Mono City
47	2292292E	Pole	Mono City
48	2276780E	Pole	Mono City
49	4573291E	Pole	June Lake
50	2292236E	Pole	June Lake
51	2255169E	Pole	June Lake
52	1875515E	Pole	June Lake
53	1875516E	Pole	June Lake
54	1709752E	Pole	Mammoth Lakes
55	1709753E	Pole	Mammoth Lakes
56	1618245E	Pole	Mammoth Lakes
57	1618246E	Pole	Mammoth Lakes
58	1618247E	Pole	Mammoth Lakes
59	1709754E	Pole	Mammoth Lakes
60	1709755E	Pole	Mammoth Lakes
61	1854230E	Pole	Crowley Lake
62	1735589E	Pole	Crowley Lake
63	4030758E	Pole	Crowley Lake
64	424287S	Pole	Crowley Lake
65	424288S	Pole	Crowley Lake
66	424289S	Pole	Crowley Lake
67	4234869E	Pole	Crowley Lake
68	424290E	Pole	Crowley Lake
69	5165994	Padmount	Crowley Lake
70	5334006	Padmount	Crowley Lake
71	5334005	Padmount	Crowley Lake
72	5334022	Padmount	Crowley Lake
73	5334021	Padmount	Crowley Lake
74	5334020	Padmount	Crowley Lake
75	5370531	Padmount	Crowley Lake
76	5370530	Padmount	Crowley Lake
77	5642249	Padmount	Bishop
78	5642248	Padmount	Bishop
79	5209185	Padmount	Bishop
80	5453190	Vault	Bishop
81	5579058	Padmount	Bishop
82	5642257	Vault	Bishop
83	5062684	Padmount	Bishop
84	5062685	Padmount	Bishop
85	5062686	Padmount	Bishop
86	5062687	Padmount	Bishop
87	5180409	Padmount	Bishop
88	5180410	Padmount	Bishop

89	5300790	Padmount	Bishop
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IV. Field Inspection – Violations List

We observed the following violations during the field inspections portion of the audit:

GO 95, Rule 51.6-A, Marking and Guarding, High Voltage Marking, 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. 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 Pole No. 2136580E were damaged.

SCE Response:

The above condition was previously recorded in SCE’s Work Management System, 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 2136580E – 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 primary and secondary down guy wires supporting Pole No. 4951964E were 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 4951964E – Loose Down Guy. **SCE Response:** Due on 6/12/2026.*

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 visibility strips on Pole No. 1618246E were damaged.

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 1618246E – Damaged visibility strips. **SCE Response:** Due on 06/12/2030.*

GO 95, Rule 35, Vegetation Management, states in part:

When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).

The secondary conductor attached to Pole No. 1618247E was strained and abraded due to a tree.

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 1618246E – Vegetation strain. **SCE Response:** Due on 6/12/2026.*

GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment.

The padmounted transformer No. P5741055 had a low oil level.

SCE Response:

SCE records indicate the correct structure number for the padmounted transformer is P5180410. The above condition was previously recorded in SCE's Work Management System, and it was addressed in accordance with SCE's maintenance program.

- *Padmount transformer P5180410 – Low oil level. **SCE Response:** Completed on 04/15/2025.*