Melvin Stark
Principal Manager
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April 25, 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

TA2025-1255

Subject: Transmission Audit of Southern California Edison's Metro West Transmission Grid

Dear Mr. Daye:

Your letter, dated March 25, 2025, 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) transmission audit of Metro West Grid from January 21, 2025, to January 24, 2025.

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

Mel Stark
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1 Innovation Way
Pomona, CA 91768

Enclosures: SED Audit Findings and SCE's Responses

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Ujiiye, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Circuit facility inspection records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Tower Structure Analysis Records
- Safety hazard notifications.
- Intrusive test records
- SCE's documented inspection program.

II. Records Review – Violations List

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

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.*

GO 95, Rule 44.1, Installation and Reconstruction, states in part:

> *Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.*

The following SCE facilities had less than the minimum required safety factor:

- The "AS-IS" Pole load report for Pole 1765051E of project packet TD2157990 contained a guy wire component that was below the minimum required safety factor. The SCE guy wire labeled as "GUY #3" showed a safety factor of 0.79, which is below the minimum safety factor of 2 allowed for "Guys" in GO 95 Table 4, "Strength Requirements for All Classes of Lines" for grade "A" construction

SCE Response:

The pole load for Pole 4534710E was recalculated based on current field conditions and the safety factor for Guy #3 is passing for in-service construction, however, other guys were identified as failing the in-service safety factor. The above conditions will be remediated upon completion of an anticipated customer-driven project.

- The “AS-IS” Pole loading report for Pole 311443M of project packet TD1787993 showed a pole load safety factor of 1.27 which is below the minimum safety factor of 4 as required by GO 95, Table 4, “Strength Requirements for All Classes of Lines” for a grade “A” pole.

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 311443M – Spida failure pertaining to point load guy wire.* ***SCE Response:*** *Due on 4/22/2026.*

The “AS-IS” Pole loading report for Pole 4534710M of project packet TD2163711 showed a pole load safety factor of 1.56 which is below the minimum safety factor of 4 as required by GO 95, Table 4, “Strength Requirements for All Classes of Lines” for a grade “A” pole. In addition, the pole load calculation contained an SCE guy wire labeled as “Span Guy #1” that displayed a safety factor of 1, which is below the minimum safety factor of 2 allowed for “Guys” in GO 95 Table 4, “Strength Requirements for All Classes of Lines” for grade “A” construction.

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 4534710E – Spida failure pertaining to Span Guy and point load guy wire.* ***SCE Response:*** *Due on 4/21/2026.*

III. Field Inspections

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

No.	Structure ID	Circuit	Structure	Location
1	M7/T6 (7010563)	Center – Mesa / Center - Olinda	Tower	Pico Rivera
2	M7/T5 (7010561)	Center – Mesa / Center - Olinda	Tower	Pico Rivera
3	M7/T4 (7010560)	Center – Mesa / Center - Olinda	Tower	Pico Rivera
4	M7/T3 (7010557)	Center – Mesa / Center - Olinda	Tower	Pico Rivera
5	M7/T2 (7010556)	Center – Mesa / Center - Olinda	Tower	Pico Rivera
6	M7/T1 (7010555)	Center – Mesa / Center - Olinda	Tower	Pico Rivera
7	1673837E	Hathaway Injunction	Wood Pole	Long Beach
8	1673838E	Hathaway Injunction	Wood Pole	Long Beach
9	1673836E	Hathaway Injunction	Wood Pole	Long Beach
10	1673835E	Hathaway Injunction	Wood Pole	Long Beach
11	1673834E	Hathaway Injunction	Wood Pole	Long Beach
12	4007877E	Hathaway Injunction	Wood Pole	Long Beach
13	4007478E	Hathaway Injunction	Wood Pole	Long Beach
14	4007510E	Hathaway Injunction	Wood Pole	Long Beach
15	1879200E	Alamitos - College	Wood Pole	Long Beach
16	1283146E	Alamitos - College	Wood Pole	Long Beach
17	1283147E	Alamitos - College	Wood Pole	Long Beach
18	2278751E	Alamitos - College	Wood Pole	Long Beach
19	1478149E	Alamitos - College	Wood Pole	Long Beach
20	1478148E	Alamitos - College	Wood Pole	Long Beach
21	1478147E	Alamitos - College	Wood Pole	Long Beach
22	1478146E	Alamitos - College	Wood Pole	Long Beach
23	844043E	Alamitos - College	Wood Pole	Long Beach
24	4007780E	Alamitos - College	Wood Pole	Long Beach
25	4007779E	Alamitos - College	Wood Pole	Long Beach
26	844046E	Alamitos - College	Wood Pole	Long Beach
27	844047E	Alamitos - College	Wood Pole	Long Beach
28	844048E	Alamitos - College	Wood Pole	Long Beach
29	844050E	Alamitos - College	Wood Pole	Long Beach
30	843947E	Alamitos - College	Wood Pole	Long Beach
31	M0/T1	Alamitos – Barre	Tower	Long Beach
32	1809001E	Alamitos – Broadway	Wood Pole	Long Beach
33	1722834E	Alamitos – Broadway	Steel Pole	Long Beach
34	1722827E	Alamitos - College	Steel Pole	Long Beach
35	1722828E	Alamitos – Clark – Del Amo	Steel Pole	Long Beach
36	209061115	Alamitos – Nor Seal	Steel Pole	Long Beach
37	M0/T1	Alamitos – Barre No. 1	Tower	Long Beach
38	M5/T5 (2012788)	Del Amo – Clark – Alamitos	Tower	Long Beach
39	2056109E	Alamitos Hathaway	Steel Pole	Long Beach
40	2099745E	Alamitos Barre No. 2	Steel Pole	Long Beach

41	2099746E	Alamitos – Barre No. 2	Steel Pole	Long Beach
42	M0/T2	Alamitos – Center, Alamitos - Lighthipe	Tower	Long Beach
43	M0/T2	Alamitos – Barre No. 1	Tower	Long Beach
44	VT 44045 (6000655)	La Cienega - Beverly - Culver, La Cienega - Culver	Vault	Culver City
45	VT44048 (6000322)	La Cienega – Beverly – Colorado - MWD, La Cienega – Culver - Song	Vault	Culver City
46	1949780E	La Cienega – Beverly – Colorado - MWD	Steel Pole	Culver City
47	1949781E	La Cienega - Beverly - Culver	Steel Pole	Culver City
48	2056382E	La Cienega – Beverly – Colorado - MWD	Steel Pole	Culver City
49	2056383E	La Cienega - Beverly - Culver	Steel Pole	Culver City
50	2056388E	El Nido – Felton – La Cienega	Steel Pole	Culver City
51	821260E	El Nido – Felton – La Cienega	Wood Pole	Culver City
52	821261E	El Nido – Felton – La Cienega	Wood Pole	Culver City
53	1477205E	El Nido – Felton – La Cienega	Wood Pole	Culver City
54	821262E	El Nido – Felton – La Cienega	Wood Pole	Culver City
55	1764666E	Culver - Sawtelle	Wood Pole	Santa Monica
56	1765051E	Culver - Sawtelle	Wood Pole	Santa Monica
57	1765052E	Culver - Sawtelle	Wood Pole	Santa Monica
58	1765053E	Culver - Sawtelle	Wood Pole	Santa Monica
59	1765054E	Culver - Sawtelle	Wood Pole	Santa Monica
60	1765055E	Culver - Sawtelle	Wood Pole	Santa Monica

IV. Field Inspection Violations List

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

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 connection eyelet of the down guy anchor (supporting the transmission level on the pole) nn Pole 1283147E, was buried.

SCE Response:
The condition listed above has been recorded in SCE's Work Management System and it will be addressed in accordance with SCE's maintenance program and GO 95.

- *Pole 1283147E – Buried Anchor.* ***SCE Response:*** *Due on 4/09/2028.*

GO 95, Rule 51.6-A, 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 transmission poles were damaged or missing:

- Pole 1673837E – The wrap around attached at the transmission level was damaged, displaying only the "VOL" portion of the sign from one side of the pole.
- Pole 1673838E – The wrap around attached at the transmission level was damaged, displaying only the "HIGH" portion of the sign from one side of the pole.
- Pole 1673834E – The wrap around attached at the transmission level did not approximately encircle the pole.
- Pole 4007478E – The upper and lower cross arms of the transmission level supported damaged and partial "HIGH VOLTAGE" signs.
- Pole 4007510E – The "HIGH VOLTAGE" sign was missing from the steel transmission pole.
- Pole 844050E – The wrap around attached at the transmission level was damaged, displaying only the "HIGH" portion of the sign from one side of the pole.
- Pole 2056388E – The "HIGH VOLTAGE" sign was missing from the steel transmission pole.

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 and GO 95.

- *Pole 1673837E – Damaged/Missing High Voltage Signs.* ***SCE Response:*** *Due on 4/09/2030.*
- *Pole 1673838E - Damaged/Missing High Voltage Signs.* ***SCE Response:*** *Due on 4/09/2030.*
- *Pole 1673834E - Damaged/Missing High Voltage Signs.* ***SCE Response:*** *Due on 4/09/2030.*
- *Pole 4007478E – Damaged/Missing High Voltage Signs.* ***SCE Response:*** *Due on 4/10/2030.*
- *Pole 4007510E - Damaged/Missing High Voltage Signs.* ***SCE Response:*** *Due on 1/19/2028.*
- *Pole 844050E - Damaged/Missing High Voltage Signs.* ***SCE Response:*** *Due on 4/09/2030.*
- *Pole 2056388E – Damaged/Missing High Voltage Signs.* ***SCE Response:*** *Due on 4/09/2030.*