



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

May 27, 2026

Majed Ibrahim
Program & Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West 4th St., Ste. 500
Los Angeles, California 90013

Subject: TA2025-1280, Transmission Audit of Southern California Edison's Highland Grid

Dear Mr. Ibrahim:

Your letter, dated April 27, 2026, 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) transmission audit of Highland Grid from January 6, 2025 to January 10, 2025.

Your letter requested a response by May 27, 2026. 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
2 Innovation Way
Pomona, CA 91768

Enclosures: SED Audit Findings and SCE's Responses

Cc: Lee Palmer, Deputy Executive Director for Safety Enforcement, Safety Policy and Water, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, SED, CPUC
Mily Vaidya, Utilities Engineer, Electric Safety and Reliability Branch, SED, 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 165, Section IV, Transmission Facilities, states in part:

Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines.

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 inspection records indicated that from 2022 to 2024, SCE performed 308 patrol inspections and 56 detailed inspections past SCE's assigned inspection due dates.

SCE Response:

Without admitting that SCE violated GO 165, Section IV or GO 95, Rule 31.2, SCE responds as follows. Based on SCE's records, SCE notes that from 2022 to 2024, it had 308 annual grid patrols that were completed past SCE's scheduled due date and, as of the date of the audit, it had 56 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 95, Rule 18-A: Resolution of Safety Hazards and General Order 95 Nonconformances, states in part:

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

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 2022 to 2024, SCE had 89 repair notifications that were completed past SCE's scheduled due date for corrective action and 94 pending work orders past

SCE's scheduled 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, SCE notes that from 2022 to 2024, SCE had 729 overhead work orders that were completed past SCE's scheduled due date for corrective action. Additionally, as of the date of the audit, it had 215 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 per General Order 95, Rule 18, including but not limited to Permits, System Emergencies, and Customer Issues.

III. Field Inspections

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

No.	Structure ID	Circuit	Structure	Location
1	MO-T4 A	Teddy-Whirlwind 220 kV	Steel Tower	Rosamond
2	MO-T4	A Kingbird-Whirlwind 220 kV	Steel Tower	Rosamond
3	MO-T4	B Teddy-Whirlwind 220 kV	Steel Tower	Rosamond
4	MO-T4	B Kingbird-Whirlwind 220 kV	Steel Tower	Rosamond
5	MO- T4	A Avenue-Whirlwind 220 kV	Steel Tower	Rosamond
6	MO-T4	B Avenue-Whirlwind 220 kV	Steel Tower	Rosamond
7	MO-T4	A Roy Solar-Whirlwind 220kV	Steel Tower	Rosamond
8	MO-T4	B Roy Solar-Whirlwind 220kV	Steel Tower	Rosamond
9	MO-T3	A Rattlesnake-Whirlwind 220kV	Steel Tower	Rosamond
10	MO-T3	B Rattlesnake-Whirlwind 220kV	Steel Tower	Rosamond
11	MO-T3	A DesertStar-Whirlwind 220kV	Steel Tower	Rosamond
12	MO-T3	B DesertStar-Whirlwind 220kV	Steel Tower	Rosamond
13	787256E		Wood Pole	Tehachapi
14	4053109E		Wood Pole	Tehachapi
15	4837293E		Wood Pole	Tehachapi
16	178800E		Wood Pole	Tehachapi
17	4410479E		Wood Pole	Tehachapi
18	4793679E		Wood Pole	Tehachapi
19	4793678E		Wood Pole	Tehachapi
20	4793677E		Wood Pole	Tehachapi
21	4793676E		Wood Pole	Tehachapi
22	4793675E		Wood Pole	Tehachapi
23	4793674E		Wood Pole	Tehachapi
24	4793673E		Wood Pole	Tehachapi
25	4620582E		Steel Pole	Tehachapi
26	4620581E		Steel Pole	Tehachapi
27	4620580E		Steel Pole	Tehachapi
28	4620579E		Steel Pole	Tehachapi
29	4620578E		Steel Pole	Tehachapi
30	4620577E		Steel Pole	Tehachapi
31	4620576E		Steel Pole	Tehachapi
32	4605678E		Steel Pole	Tehachapi
33	2370730E		Steel Pole	Tehachapi
34	642749E		Steel Pole	Tehachapi
35	313748E		Steel Pole	Tehachapi
36	4053110E		Steel Pole	Tehachapi
37	4493449E		Steel Pole	Tehachapi
38	4756420E	Quartz Hill #2/ 66kV	Tubular Steel Pole (TSP)	Lancaster
39	4756420E	Quartz Hill #1/ 66kV	Tubular Steel Pole (TSP)	Lancaster
40	4756413E	Quartz Hill Shuttle 66 kV	Tubular Steel Pole (TSP)	Lancaster
41	4756413E	Anaverde Helijet 66 kV	Tubular Steel Pole (TSP)	Lancaster
42	4756406E	Ritter Ranch #1/ 66 kV	Tubular Steel Pole (TSP)	Lancaster

43	4756406E	Ritter Ranch #2/66 kV	Tubular Steel Pole (TSP)	Lancaster
44	V4714	Quartz Hill #2/ 66kV	Vault	Lancaster
45	V4714	Quartz Hill #1	Vault	Lancaster
46	V4711	Quartz Hill Shuttle 66 kV	Vault	Lancaster
47	V4711	Anaverde Helijet 66 kV	Vault	Lancaster
48	V4707	Ritter Ranch #1/ 66 kV	Vault	Lancaster
49	V4707	Ritter Ranch #2/66 kV	Vault	Lancaster
50	V4715	Quartz Hill #1/ 66kV	Vault	Lancaster
51	V4715	Quartz Hill #2/ 66kV	Vault	Lancaster
52	V4712	Quartz Hill Shuttle 66 kV	Vault	Lancaster
53	V4712	Anaverde Helijet 66 kV	Vault	Lancaster
54	V4708	Ritter Ranch #1/ 66 kV	Vault	Lancaster
55	V4708	Ritter Ranch #2/ 66 kV	Vault	Lancaster
56	V4709	Ritter Ranch #1/ 66 kV	Vault	Lancaster
57	V4709	Ritter Ranch #2/ 66 kV	Vault	Lancaster
58	V4716	Quartz Hill #1/ 66kV	Vault	Lancaster
59	V4716	Quartz Hill #2/ 66kV	Vault	Lancaster
60	V4713	Quartz Hill Shuttle 66 kV	Vault	Lancaster
61	V4713	Anaverde Helijet 66 kV	Vault	Lancaster

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 near to Pole 4793679E was abandoned.

SCE Response:

The above condition was previously recorded in SCE's Work Management System at the time of the audit, and it was addressed in accordance with SCE's maintenance program.

- *Pole 4793679E – Abandoned Anchor. **SCE Response:** Completed on 01/07/2025.*