



Melvin Stark
Principal Manager
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April 24, 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: EA2026-1381, Audit of SCE's Monrovia District

Dear Mr. Ibrahim:

Your letter, dated March 25, 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) distribution audit of Monrovia District from March 16, 2026 to March 20, 2026.

Your letter requested a response by April 25, 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, CPUC
SM Arafat Kamal, 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 January 2021 to January 2026, SCE completed 85 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 2 pending patrol inspections that were 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 January 2021 to January 2026, it had 85 annual grid patrols that were completed past SCE's scheduled due date and, as of the date of the audit, it had 2 annual grid patrols 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.

SCE's records indicated that from January 2021 to January 2026, SCE completed 8165 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 26 pending detailed inspections that were 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 January 2021 to January 2026, it had 8,165 overhead detailed inspections that were completed past SCE's scheduled due date and, as of the date of the audit, it had 26 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 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 January 2021 to January 2026, SCE completed 240 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 9 pending underground inspections that were 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 January 2021 to January 2026, it had 240 underground detailed inspections that were completed past SCE's scheduled due date and, as of the date of the audit, it had 9 underground 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-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 January 2021 to January 2026, SCE completed 1508 overhead work orders past SCE's due date for corrective action. Also, as of the date of the audit, SCE had 175 open overhead work orders that were 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 January 2021 to January 2026, SCE had 1,508 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 175 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 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 January 2021 to January 2026, SCE completed 147 underground work orders past SCE's due date for corrective action. Also, as of the date of the audit, SCE had 34 open underground work orders that were 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 January 2021 to January 2026, SCE had 147 underground work orders that were completed past SCE's scheduled due date for corrective action. Additionally, as of the date of the audit, it had 34 underground 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.

III. Field Inspection

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

No.	Structure ID.	Type of Structure	Location	GPS Coordinates
1	1705264E	Pole	Bradbury	34.15611956, -117.9544154
2	1429410E	Pole	Bradbury	34.15570944, -117.9547067
3	1429411E	Pole	Bradbury	34.15553666, -117.9542952
4	1429412E	Pole	Bradbury	34.15525035, -117.9539398
5	1429409E	Pole	Bradbury	34.15533668, -117.955277
6	1429408E	Pole	Bradbury	34.1549574, -117.9558436
7	1429407E	Pole	Bradbury	34.1545683, -117.9564472
8	1224654E	Pole	Bradbury	34.15426859, -117.956917
9	1224653E	Pole	Bradbury	34.15393895, -117.9574006
10	1224665E	Pole	Bradbury	34.15360045, -117.9579314
11	1429406E	Pole	Bradbury	34.15318666, -117.9582623
12	1429405E	Pole	Bradbury	34.15272543, -117.9581518
13	1224663E	Pole	Bradbury	34.15240347, -117.9577456
14	1224475E	Pole	Bradbury	34.15255409, -117.9577649
15	38305CTW	Pole	Bradbury	34.1523195, -117.9573573
16	963512E	Pole	Duarte	34.14498375, -117.9430589
17	4362951E	Pole	Duarte	34.14514577, -117.9427181
18	963510E	Pole	Duarte	34.14523634, -117.9424138
19	922549E	Pole	Duarte	34.14538716, -117.9423916
20	4585975E	Pole	Duarte	34.14534673, -117.9424716
21	963667E	Pole	Duarte	34.14482405, -117.944055
22	963668E	Pole	Duarte	34.14523681, -117.9440306
23	963669E	Pole	Duarte	34.14571387, -117.9440125
24	963670E	Pole	Duarte	34.1460771, -117.9440234
25	963671E	Pole	Duarte	34.14646051, -117.9440719
26	4161807E	Pole	Monrovia	34.12852482, -118.0040124
27	4006800E	Pole	Monrovia	34.12865471, -118.003897
28	1705437E	Pole	Monrovia	34.12817434, -118.0039144
29	4161814E	Pole	Monrovia	34.12778332, -118.0039791
30	885013E4	Pole	Monrovia	34.12779837, -118.0037968
31	4161477E	Pole	Monrovia	34.12740882, -118.0037944
32	1182878E	Pole	Monrovia	34.12723194, -118.0036756
33	223472E	Pole	Monrovia	34.12721373, -118.0039002
34	791640E	Pole	Monrovia	34.12748612, -118.0039101
35	4161813E	Pole	Monrovia	34.12781044, -118.0043115
36	4161812E	Pole	Monrovia	34.12777713, -118.0048337

37	4161811E	Pole	Monrovia	34.12780957, -118.0049006
38	4161810E	Pole	Monrovia	34.12820982, -118.0050684
39	4693484E	Pole	Monrovia	34.12853962, -118.0049615
40	4518358E	Pole	Monrovia	34.12869859, -118.0049906
41	1323746E	Pole	Monrovia	34.12899841, -118.0049865
42	1323747E	Pole	Monrovia	34.1292952, -118.0050052
43	575835E	Pole	Monrovia	34.12969587, -118.0049958
44	4736618E	Pole	Monrovia	34.13018377, -118.0049696
45	902705E	Pole	Monrovia	34.12852092, -118.0045963
46	4161808E	Pole	Monrovia	34.12844196, -118.0043974
47	261129E	Pole	Arcadia	34.15124661, -118.0285167
48	261130E	Pole	Arcadia	34.15153165, -118.0285091
49	4739419E	Pole	Arcadia	34.15150045, -118.0289318
50	4502907E	Pole	Arcadia	34.15152089, -118.0294192
51	791648E	Pole	Arcadia	34.15168631, -118.0294151
52	2220183E	Pole	Arcadia	34.15151498, -118.0300116
53	4528108E	Pole	Arcadia	34.15149646, -118.0304149
54	267051E	Pole	Arcadia	34.15146197, -118.0309379
55	4141794E	Pole	Sierra Madre	34.17291125, -118.0410004
56	4209474E	Pole	Sierra Madre	34.17252609, -118.0409151
57	129775E	Pole	Sierra Madre	34.17241308, -118.0409515
58	326292E	Pole	Sierra Madre	34.1717702, -118.0411664
59	4209473E	Pole	Sierra Madre	34.17175711, -118.0411121
60	185702E	Pole	Sierra Madre	34.17137744, -118.0406999
61	185701E	Pole	Sierra Madre	34.17110182, -118.0406435
62	129685E	Pole	Sierra Madre	34.17285514, -118.0414617
63	515946E	Pole	Sierra Madre	34.17253948, -118.0417282
64	4209475E	Pole	Sierra Madre	34.17232317, -118.0421581
65	2077701E	Pole	Sierra Madre	34.17261226, -118.0421489
66	458745E	Pole	Sierra Madre	34.17261365, -118.0420641
67	4555399E	Pole	Pasadena	34.16851486, -118.0799521
68	1349686E	Pole	Pasadena	34.16793823, -118.0800903
69	1349685E	Pole	Pasadena	34.16741365, -118.0801522
70	1349682E	Pole	Pasadena	34.16697645, -118.080362
71	4666070E	Pole	Pasadena	34.16691059, -118.0805478
72	884329E	Pole	Pasadena	34.16682869, -118.0806433
73	884330E	Pole	Pasadena	34.16720449, -118.080698
74	884331E	Pole	Pasadena	34.167577, -118.0806967
75	4819709E	Pole	Pasadena	34.16796486, -118.0807206
76	4570461E	Pole	Baldwin Park	34.07747535, -117.9627585
77	1740658E	Pole	Baldwin Park	34.07750495, -117.9613545

78	1740657E	Pole	Baldwin Park	34.07712923, -117.9617805
79	1740656E	Pole	Baldwin Park	34.07683622, -117.9620991
80	1711189E	Pole	Baldwin Park	34.07716637, -117.9615356
81	834710E	Pole	Altadena	34.18218024, -118.1220388
82	1798277E	Pole	Altadena	34.18214054, -118.1214711
83	4081786E	Pole	Altadena	34.18219136, -118.122528
84	8347088E	Pole	Altadena	34.18216901, -118.1231499
85	4668648E	Pole	Altadena	34.18225902, -118.1232841
86	608731E	Pole	Altadena	34.18196432, -118.1232885
87	1049409E	Pole	Altadena	34.18169101, -118.1232784
88	608723E	Pole	Altadena	34.18185818, -118.1234005
89	4860366E	Pole	South Pasadena	34.10869055, -118.171072
90	4535767E	Pole	South Pasadena	34.108807, -118.1709211
91	1206454E	Pole	South Pasadena	34.10875974, -118.170509
92	4758752E	Pole	South Pasadena	34.10888386, -118.1700279
93	1206742E	Pole	South Pasadena	34.1093565, -118.1697224
94	1206743E	Pole	South Pasadena	34.10957855, -118.1692907
95	200385E	Pole	South Pasadena	34.10972765, -118.1688141
96	200384E	Pole	South Pasadena	34.10982004, -118.1683589
97	4353389E	Pole	South Pasadena	34.10991048, -118.167965
98	4860359E	Pole	South Pasadena	34.10955037, -118.1676838
99	4571667E	Pole	South Pasadena	34.10940778, -118.1675169
100	4860351E	Pole	South Pasadena	34.10916284, -118.1673549
101	879014E	Pole	South Pasadena	34.10888518, -118.167751
102	879013E	Pole	South Pasadena	34.10860023, -118.1678475
103	4724406E	Pole	South Pasadena	34.10849944, -118.1715968
104	1388010E	Pole	South Pasadena	34.1086113, -118.1719301
105	1388009E	Pole	South Pasadena	34.10874145, -118.1722888
106	4758763E	Pole	South Pasadena	34.10881636, -118.1725842
107	2222226E	Pole	South Pasadena	34.10918683, -118.1726862
108	2222225E	Pole	South Pasadena	34.10919587, -118.1728875
109	1206460E	Pole	South Pasadena	34.10915075, -118.1731614
110	1206459E	Pole	South Pasadena	34.10898396, -118.1731056
111	1388012E	Pole	South Pasadena	34.10865064, -118.1734453
112	1388013E	Pole	South Pasadena	34.10829871, -118.1737276
113	4597374E	Pole	South Pasadena	34.10791715, -118.1738353
114	2078318E	Pole	South Pasadena	34.10796089, -118.1738743
115	2354460E	Pole	South Pasadena	34.10781242, -118.1742791
116	4695658E	Pole	Altadena	34.21158293, -118.1634615
117	805977E	Pole	Altadena	34.21169006, -118.1630027

118	834519E	Pole	Altadena	34.21196459, -118.1627508
119	834520E	Pole	Altadena	34.21222389, -118.1625602
120	4353448E	Pole	Altadena	34.21246264, -118.1623261
121	834522E	Pole	Altadena	34.21286305, -118.1618921
122	834523E	Pole	Altadena	34.21325004, -118.1619386
123	8434524E	Pole	Altadena	34.21350784, -118.1617977
124	834525E	Pole	Altadena	34.2138036, -118.1613952
125	834526E	Pole	Altadena	34.21403237, -118.161142
126	645468H	Pole	La Canada Flintridge	34.23337059, -118.2264297
127	4160270E	Pole	La Canada Flintridge	34.23322234, -118.2268064
128	4868217E	Pole	La Canada Flintridge	34.23353898, -118.2269443
129	4159903E	Pole	La Canada Flintridge	34.23378057, -118.2267117
130	4458750E	Pole	La Canada Flintridge	34.23373025, -118.2266356
131	1091942E	Pole	La Canada Flintridge	34.23274809, -118.2266646
132	645469H	Pole	La Canada Flintridge	34.2332643, -118.2258584
133	645471H	Pole	La Canada Flintridge	34.23362115, -118.225632
134	645470H	Pole	La Canada Flintridge	34.23321714, -118.2252985
135	1505779E	Pole	La Canada Flintridge	34.23314793, -118.225048
136	1505780E	Pole	La Canada Flintridge	34.23322712, -118.2249178
137	5164829	Vault	Temple City	34.10560252, -118.0694635
138	V5003216	Vault	San Marino	34.12653616, -118.127255
139	V5003484	Vault	San Marino	34.12781162, -118.1050848
140	5007587	Vault	Monrovia	34.14770342, -118.0016327
141	P5365497	Pad-mounted Transformer	Monrovia	34.14748006, -118.0021171
142	P5201690	Pad-mounted Transformer	Monrovia	34.14748693, -118.0029034
143	P5399845	Pad-mounted Transformer	Monrovia	34.09852855, -117.9816768
144	5436223	Pad-mounted Transformer	Baldwin Park	34.09830443, -117.9817934
145	P5399830	Pad-mounted Transformer	Baldwin Park	34.09851784, -117.9816334
146	P5333248	Pad-mounted Switch	Baldwin Park	34.09849581, -117.9817728
147	P5372019	Pad-mounted Transformer	Baldwin Park	34.09851893, -117.9825679
148	P5333240	Pad-mounted Transformer	Baldwin Park	34.09850655, -117.9826099

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection 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 sign on each of the following poles was either missing and/or damaged:

- Pole No. 4693484E
- Pole No. 4666070E
- Pole No. 1740658E
- Pole No. 1740657E
- Pole No. 1740656E
- Pole No. 834708E
- Pole No. 1505779E

SCE Response:

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 4693484E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 11/16/2026.*
- *Pole 4666070E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 03/06/2030.*
- *Pole 1740658E – 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 1740657E – 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 1740656E – 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 834708E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 02/26/2029.*
- *Pole 1505779E – 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, 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 SCE down guy wire supporting each of the following poles was loose and not taut:

- Pole No. 1224654E
- Pole No. 1049409E
- Pole No. 1206460E

SCE Response:

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 1224654E – Loose Down Guy. SCE Response: Due on 03/25/2031.*
- *Pole 1049409E – Loose Down Guy. SCE Response: Due on 03/25/2031.*
- *Pole 1206460E – Loose Down Guy. SCE Response: Due on 03/25/2031.*

GO 95, Rule 56.9, Guy Marker (Guy Guard), states in part:

A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.

The guy guard for anchor guy attached to Pole No. 4209475E was missing.

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 4209475E – Missing Guy Guard. SCE Response: Due on 03/25/2031.*

GO 95, Rule 54.8 – C.4, From Communication Service Drops, states in part:

The radial clearance between supply service drop conductors and communication service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15

feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.

An SCE service drop on Pole No. 4739419E was touching communications service drop.

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 4739419E – Service drop contacting third party communications cable. SCE Response: Due on 04/21/2029.*

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.

The SCE down guy anchor supporting the Pole No. 1049409E was buried.

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 1049409E – Buried Anchor. SCE Response: Due on 03/25/2031.*

GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communications conductors supported on the same pole to be three inches.

An SCE primary down guy wire on Pole No. 884329E was in contact with SCE secondary crossarm supported by the same pole.

SCE Response:

The above condition 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.

- *Pole 884329E – Primary down guy contacting secondary crossarm. SCE Response: Due on 04/28/2028.*