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

June 5, 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: EA2026-1388, Audit of Southern California Edison's San Joaquin District

Dear Mr. Ibrahim:

Your letter, dated May 5, 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 San Joaquin District from April 27, 2026 to May 1, 2026.

Your letter requested a response by June 5, 2026. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

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, Safety Enforcement, Safety Policy, and Water,
CPUC Eric Wu, Program Manager, Electric Safety & Reliability Branch, CPUC
Kyle King, Utilities Engineer, Electric Safety & Reliability Branch, 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.

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 May 2025 to January 2026, SCE completed 581 overhead work orders past SCE's due date for corrective action. Additionally, SCE's records indicate that from May 2025 to January 2026, SCE had 1382 pending overhead work orders past SCE's 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 May 2025 to January 2026, SCE had 581 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 1,382 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 May 2025 to January 2026, SCE completed 365 overhead detailed inspections and 145 above ground patrol inspections past SCE's scheduled due date. Additionally,

SCE's records indicate that from May 2025 to January 2026, SCE has 32 pending 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, SCE notes that from May 2025 to January 2026, it had 365 overhead detailed inspections that were completed past SCE's scheduled due date and, as of the date of the audit, it had 32 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 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 May 2025 to January 2026, SCE completed 92 underground work orders past SCE's due date for corrective actions. Additionally, SCE's records indicate that from May 2025 to January 2026, SCE has 326 pending underground 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 May 2025 to January 2026, SCE had 92 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 326 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.

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 of these rules.*

SCE's records indicate that from May 2025 to January 2026, SCE completed 164 underground detailed inspections past SCE's scheduled due date. Additionally, SCE's records indicate that from May 2025 to January 2026, SCE had 4 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, SCE notes that from May 2025 to January 2026, it had 164 underground detailed inspections that were completed past SCE's scheduled due date and, as of the date of the audit, it had 4 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.

III. Field Inspections

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

No.	Structure ID	Structure Type	City	Latitude	Longitude
1	1299382E	pole	Hanford	36.3277287176218	-119.706828659512
2	1643822E	pole	Hanford	36.3279631144347	-119.70685760372
3	1533111E	pole	Hanford	36.3279688513185	-119.706103437897
4	1411419E	pole	Hanford	36.3279599260702	-119.705623718055
5	1907533E	pole	Hanford	36.3279725012613	-119.705018186428
6	353574E	pole	Hanford	36.3279499291029	-119.704511169391
7	353573E	pole	Hanford	36.3279667010408	-119.703777444683
8	4665753E	pole	Hanford	36.3279705775594	-119.703055604361
9	4672247E	pole	Hanford	36.3279550935709	-119.702285622659
10	353570E	pole	Hanford	36.3279604399506	-119.701774803373
11	353569E	pole	Hanford	36.3279716634662	-119.701115915009
12	1475356E	pole	Hanford	36.3279639495436	-119.700019387488
13	4889145E	pole	Visalia	36.371071514625	-119.364456240413
14	4957674E	pole	Visalia	36.3709193475494	-119.364085945092
15	4957673E	pole	Visalia	36.3709198984073	-119.363238229642
16	4957672E	pole	Visalia	36.3709271366789	-119.362390464685
17	4957671E	pole	Visalia	36.3709163027048	-119.361555616242
18	4957670E	pole	Visalia	36.3709268562339	-119.360688230361
19	4957669E	pole	Visalia	36.3709251997564	-119.359842939019
20	4957668E	pole	Visalia	36.3709275098325	-119.359229414089
21	4957667E	pole	Visalia	36.3709251368199	-119.358820243399
22	4957666E	pole	Visalia	36.3709355484926	-119.358135803502
23	4957665E	pole	Visalia	36.3709362713721	-119.357294748468
24	752498E	pole	Visalia	36.3712139637232	-119.358991300904
25	4363405E	pole	Three Rivers	36.4575131843206	-118.886080663762
26	4494825E	pole	Three Rivers	36.4299696218608	-118.912522383685
27	4490428E	pole	Three Rivers	36.4300563024132	-118.912796939911
28	4919032E	pole	Three Rivers	36.4299443942363	-118.912103547788
29	4594396E	pole	Three Rivers	36.429931393044	-118.911771229568
30	4022835E	pole	Exeter	36.2969497119405	-119.118235413697
31	4622283E	pole	Exeter	36.2968583271892	-119.118501823622
32	2032179E	pole	Exeter	36.2968612366903	-119.119647145799
33	4551918E	pole	Exeter	36.2968842284529	-119.120522229109
34	1322949E	pole	Exeter	36.296886989173	-119.120919401669

35	4571679E	pole	Exeter	36.2969005853938	-119.121789696464
36	2253546E	pole	Exeter	36.2969149149665	-119.12270065354
37	2230236E	pole	Exeter	36.2969187896358	-119.123517193264
38	1020464E	pole	Exeter	36.2971405096295	-119.123538164058
39	4680512E	pole	Exeter	36.2969355678499	-119.124346905488
40	1807132E	pole	Exeter	36.2969426034707	-119.125103336189
41	4044317E	pole	Exeter	36.2969415245836	-119.125927762904
42	1181180E	pole	Exeter	36.2969322741428	-119.12690962078
43	4252958E	pole	Lindsay	36.196193086319	-119.083125921782
44	548009E	pole	Lindsay	36.1961864378015	-119.083802625109
45	451358E	pole	Lindsay	36.1962154080505	-119.082530669368
46	75705Y	pole	Lindsay	36.1958988963882	-119.082320489094
47	4430377E	pole	Lindsay	36.1954849859754	-119.082307906265
48	75706Y	pole	Lindsay	36.1950917894691	-119.082294727113
49	2019966E	pole	Lindsay	36.1952389628951	-119.08204362791
50	282221E	pole	Lindsay	36.1962995046408	-119.08204890737
51	364089E	pole	Lindsay	36.1963083689137	-119.08153104095
52	2282222E	pole	Lindsay	36.1963618171305	-119.082372356749
53	1030409E	pole	Lindsay	36.1968167237795	-119.082354468316
54	P5488967	underground transformer	Visalia	36.3491177581621	-119.344418816565
55	P5488966	underground switch	Visalia	36.3490867125483	-119.344511721145
56	P5488971	underground transformer	Visalia	36.3483098921274	-119.342720438318
57	P5488972	underground transformer	Visalia	36.3477377718857	-119.343476347871
58	P5488973	underground transformer	Visalia	36.3477602786209	-119.344559133147
59	P5488970	underground transformer	Visalia	36.3485488672595	-119.343450651888
60	P5488969	underground transformer	Visalia	36.3485366445224	-119.344524157111
61	5741210	vault	Visalia	36.3411557765682	-119.345126333455
62	5741209	vault	Visalia	36.3417139574669	-119.348408838612
63	P5504196	underground transformer	Visalia	36.3413641832162	-119.348761249786
64	P5514656	underground transformer	Visalia	36.3396552083929	-119.34931615203
65	P5514655	underground transformer	Visalia	36.3396118036833	-119.349320856233
66	P5514657	underground transformer	Visalia	36.3399533076246	-119.347528337965
67	V5549384	vault	Visalia	36.3389091717055	-119.367876525771
68	V5014332	vault	Visalia	36.33947122412	-119.367823901222

69	P5768590	underground switch	Visalia	36.3381236718037	-119.368191109128
70	P5524740	underground transformer	Tulare	36.2222919048452	-119.315118388304
71	5524736	Splice Box	Tulare	36.222266985704	-119.315074883455
72	5013578	underground switch	Tulare	36.2220302441134	-119.315204424256
73	V5591140	vault	Tulare	36.2234705438227	-119.313209586668
74	5580959	Underground Splice Box	Tulare	36.2233714419573	-119.313270014747
75	P5664312	underground transformer	Tulare	36.2186091234561	-119.310993812784
76	P5713731	underground switch	Tulare	36.2184022068314	-119.311316126661
77	X5713732	Underground Splice Box	Tulare	36.2181908852093	-119.311359637874
78	P5713733	underground transformer	Tulare	36.2181388298554	-119.311402709326
79	P5736598	underground transformer	Tulare	36.218000070894	-119.311568666399
80	P5736599	underground transformer	Tulare	36.2172501493143	-119.311584299982
81	1706629E	pole	McFarland	35.6802740972821	-119.204848213232
82	4680618E	pole	McFarland	35.6794144346598	-119.204847213539
83	1706631E	pole	McFarland	35.6785672963451	-119.204835346238
84	754854E	pole	McFarland	35.6778059599515	-119.204829254043
85	1706632E	pole	McFarland	35.6769772495788	-119.204823878527
86	1706633E	pole	McFarland	35.6761527136309	-119.204827854602
87	1706634E	pole	McFarland	35.6753256075392	-119.204813093832
88	2321125E	pole	McFarland	35.6745137732003	-119.204821337907
89	4587586E	pole	McFarland	35.6743495570381	-119.204804773896
90	854159E	pole	McFarland	35.674253332337	-119.204800584456
91	1706628E	pole	McFarland	35.6810957643767	-119.204853064827
92	1144800E	pole	McFarland	35.681907706077	-119.205080613543
93	754856E	pole	McFarland	35.6819311143233	-119.204851777201
94	957239E	pole	McFarland	35.6819195801301	-119.204545456597
95	4485836E	pole	Delano	35.8196448750383	-119.053406837834
96	908354E	pole	Porterville	36.0363237284076	-119.107394560311
97	5020688E	pole	Porterville	36.0363335669228	-119.107591226276
98	756231E	pole	Porterville	36.1383572009872	-119.111739218306
99	2185768E	pole	Porterville	36.1383231193303	-119.111759968892
100	4700869E	pole	Visalia	36.3431689672405	-119.242423168117
101	4674030E	pole	Visalia	36.3436048540794	-119.237535091948
102	4257056E	pole	Visalia	36.3428568287438	-119.237550103132
103	4434119E	pole	Visalia	36.3419762344275	-119.237537526342

104	1771251E	pole	Visalia	36.3444794520139	-119.237579744222
105	4097746E	pole	Visalia	36.3444447676376	-119.237893610704
106	2282484E	pole	Visalia	36.3440732356457	-119.239085587925
107	2272675E	pole	Visalia	36.3437676134155	-119.240048762809
108	2272674E	pole	Visalia	36.3434648928442	-119.240984143947

IV. Field Inspection Violations List

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.*

Padmount P5488971 had vegetation growing against the back of the padmounted transformer.

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.

- *Padmount P5488971 – Vegetation clearance.* ***SCE Response:*** *Due on 04/30/2027.*

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 following SCE facilities required maintenance:

- 1907533E: visibility strip was damaged
- 752498E: The down guy wire and anchor were buried.
- 4680512E: visibility strip was damaged
- 1807132E: visibility strip was damaged
- 282221E: visibility strips were damaged
- 364089E: visibility strips were damaged
- 2282222E: visibility strips were damaged

SCE Response:
Six of the above conditions were previously recorded in SCE's Work Management System, and were addressed during the audit. The remaining condition was recorded in SCE's Work Management System, and it will be addressed in accordance with SCE's maintenance program.

- *Pole 1907533E – Damaged/Missing Visibility Strips.* ***SCE Response:*** *Completed on 04/30/2026.*
- *Pole 752498E – Buried Anchor.* ***SCE Response:*** *Due on 11/19/2028.*
- *Pole 4680512E – Damaged/Missing Visibility Strips.* ***SCE Response:*** *Completed on 04/30/2026.*
- *Pole 1807132E – Damaged/Missing Visibility Strips.* ***SCE Response:*** *Completed on 04/30/2026.*

- *Pole 2822221E – Damaged/Missing Visibility Strips.* ***SCE Response:*** *Completed on 04/30/2026.*
- *Pole 364089E – Damaged/Missing Visibility Strips.* ***SCE Response:*** *Completed on 04/30/2026.*
- *Pole 2282222E – Damaged/Missing Visibility Strips.* ***SCE Response:*** *Completed on 04/30/2026.*

GO 95, Rule 31.6: Abandoned Lines, states in part:

> *Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.*

Pole 957239E had abandoned transformer equipment.

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 957239E – Idle transformer.* ***SCE Response:*** *Due on 11/19/2028.*

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.*

The following SCE poles had unauthorized attachments:

- 1181180E
- 1771251E

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.

- *Pole 1181180E – Unauthorized attachment.* ***SCE Response:*** *Due on 11/19/2028.*
- *Pole 1771251E – Unauthorized attachment.* ***SCE Response:*** *Due on 06/16/2028.*

GO 95, Rule 51.6-A: 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 following SCE poles had damaged High Voltage signs:

- 353574E
- 4665753E
- 4957670E
- 1322949E
- 1181180E
- 75705Y
- 4430377E
- 75706Y
- 1706629E
- 754854E
- 1706628E
- 957239E
- 4434119E
- 1771251E
- 2272674E
- 364089E

SCE Response:
Thirteen of 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. The remaining three conditions have been recorded in SCE's Work Management System, 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 353574E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 12/09/2030.*
- *Pole 4665753E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 12/09/2030.*
- *Pole 4957670E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 06/05/2031.*
- *Pole 1322949E – 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 1181180E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 06/05/2031.*

- *Pole L5705Y – 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 4430377E – 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 L5706Y – 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 1706629E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 01/29/2030.*
- *Pole 754854E – 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 1706628E – 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 957239E – 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 4434119E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 06/05/2028.*
- *Pole 1771251E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 06/05/2031.*
- *Pole 2272674E – 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 364089E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 01/31/2029.*

GO 95, Rule 56.2: 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 following SCE poles had loose down guy wires.

- 4889145E
- 1020464E
- 548009E
- 4674030E

SCE Response:
Three 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. SCE confirmed the remaining condition does not exist.

- *Pole 4889145E – Loose Down Guy.* ***SCE Response:*** *SCE field personnel completed an overhead detailed inspection on 04/13/2026 and no down guy was identified during the inspection. Pole will continue to be inspected and maintained in accordance with SCE's inspection and maintenance program. No further action is required.*
- *Pole 1020464E – Loose Down Guy.* ***SCE Response:*** *Due on 06/05/2028.*
- *Pole 548009E – Loose Down Guy.* ***SCE Response:*** *Due on 06/05/2028.*
- *Pole 4674030E – Loose Down Guy.* ***SCE Response:*** *Due on 06/05/2028.*