

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Commission Order Instituting Investigation into Rates, Charges, Service and Practices of Pacific Gas & Electric Company.	Investigation 95-02-015
Commission Order Instituting Rulemaking, to Develop Standards for Electric System Reliability and Safety Pursuant to D96-09-073.	Rulemaking 96-11-004

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL REPORT
OF 2021 DISTRIBUTION INSPECTIONS SUBMITTED PURSUANT TO
GENERAL ORDER NO. 165**

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Dated: **June 27, 2022**

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Pursuant to General Order No. 165 (“GO 165”) and Decision No. (“D.”) 97-03-070 issued by the California Public Utilities Commission (“Commission”), Southern California Edison Company (“SCE”) respectfully submits its Annual Report of distribution inspections completed in 2021 (“Report”). SCE submits this Report in accordance with D.12-01-032, issued in Rulemaking (“R.”) 08-11-005. That decision amended the GO 165 reporting requirements, effective January 12, 2012.

The data in this Report is based on information retrieved from SCE’s Work Management System (“WMS”) at a particular juncture. SCE’s overhead and underground electric distribution system is large and dynamic. Equipment quantities, system configurations, and system conditions are continually changing as a result of many factors, including but not limited to: (1) customer-related issues or constraints; (2) weather and environmental conditions; (3) the addition and/or removal of equipment to accommodate new customer connections and load growth; (4) requests from customers, cities, and governmental agencies to relocate facilities; (5) the sale and/or acquisition of existing distribution systems; and (6) the retirement and replacement of aging plant. In addition, minor errors may occur in the entry of data into WMS. For example, a large amount of

data is entered into WMS by linemen, troublemen, and other field personnel that work on our electrical system. Although these field personnel receive training on the field tools (such as laptop computers), virtually none of these individuals are experts or specialists in data entry. Moreover, due in part to the fact that SCE has served its customers over many decades, SCE has inherited certain grid assets from other utilities. SCE may occasionally discover an asset that was not mapped into SCE’s records and thus may not have full information regarding the asset.

Additionally, we are continuing to migrate to new software platforms for the field tools (laptop computers and tablets) used by field personnel to record and transmit inspection and maintenance information into WMS. Those changes affected how data was created, utilized, and managed.

As a result of the above factors, the data in the WMS changes on a daily basis as new entries and corrections are made and as assets are entered or removed from the system. Accordingly, a query to the WMS performed in the future will retrieve data that contains minor deviations from the data presented in the table below.

I. SUMMARY OF SCE’S DISTRIBUTION INSPECTIONS DURING CALENDAR YEAR 2021

Type of Inspection¹	Due²	Outstanding³	Completed⁴ (4)
Patrols by Grid	17,311	248	17,063
Streetlight Patrols by Equipment	503,373	0	503,373
Overhead Detailed by Pole	210,089	3,661	206,428
Underground Detailed by Equipment	172,864	31	172,833
Wood Pole Intrusive by Pole	4,558	388	4,170

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- ¹ Each inspection type is defined by the basis for actually reporting “units” of the inspection. Patrols account for each grid inspected, where a grid is a defined geographical area averaging about three quarters of a square mile. Streetlight patrols and underground detailed inspections account for each equipment and structure inspected. Intrusive pole inspections and overhead detailed inspections account for each individual pole inspected.
 - ² This column reports total inspections due in the reporting period and does not include outstanding inspections from prior years. Inspection records for years prior to 2021 are documented in SCE’s previous annual GO 165 reports, on file with the Commission.
 - ³ This column reports total required inspections that were not completed in the reporting period. It does not include outstanding inspections from prior years. That information is documented in SCE’s previous annual GO 165 reports, as submitted to the Commission.
 - ⁴ This column reports all completed inspections for the reporting period for each program.

II. DETAILS OF SCE'S DISTRIBUTION INSPECTIONS DURING CALENDAR YEAR 2021

SCE includes below a narrative summary of the required GO 165 annual inspection performance data.

A. Patrols

1. Grid Patrols (Urban and Rural)

As defined in GO 165, a patrol is a simple visual inspection of applicable utility equipment and structures. A patrol is designed to identify obvious structural problems and hazards. GO 165 requires annual patrols of applicable utility equipment and structures in urban areas and all high fire hazard areas, along with biennial patrols in non-high fire rural areas. In 2021, SCE completed patrols on 17,063 urban and rural grids, which comprised 98% of its grids due for patrol type inspections. There was an outstanding count of 248 grid patrol inspections to be conducted in 2022.

Please note that pursuant to GO 165, of the 248 outstanding grid inspections, 101 of the grids are located in rural areas, whereas the population density consists of less than 1,000 persons per square mile. Per GO 165, grids inspections located in rural areas are required every other year. However, under SCE's internal procedures, each grid is inspected annually.

Additionally, the remaining 248 outstanding grid inspections are historically difficult to access and many of the remaining grids require air patrol, governmental land access, and customer cooperation to fully inspect. SCE is continuing to complete the 2021 remaining grids and will fully complete the scope in June 2022. As of the filing of this report all 248 outstanding grids have been completed.

2. Streetlight Patrols (Urban and Rural)

GO 165 requires annual patrols of all urban streetlights and biennial patrols of all rural streetlights. In 2021, SCE patrolled 503,373 streetlights, which comprised of 100% of the Streetlight Patrols that were due.

B. Detailed Inspections

Pursuant to the GO 165 requirements for specific types of equipment, SCE performs more extensive inspections when conducting detailed inspections on overhead and underground assets.

1. Overhead Detailed Inspections by Pole (ODI)

SCE completed a total of 206,428 of the 210,089 overhead detailed inspections (ODI) due in 2021, which comprised 98.2% of inspections that were due. There was an outstanding count of 3,661 ODI by pole that were not inspected due to a combination of lack of access, obstructions, and various system issues. The overhead detailed inspections will be conducted as soon as the various system issues are remedied or access/obstruction issues are resolved. As of the filing of this report 440 inspections of the 3,661 have been completed for a total of 206,868 completed of the 210,089 due. Please note that the overall completed ODI inspections conducted in 2021 by SCE was 390,784, which is more than 184,356 inspections beyond what was due in 2021.

2. Underground and Pad-Mounted Equipment Detailed Inspections

SCE completed 172,833 underground and pad-mounted equipment detailed inspections which comprised 99.98% of its underground and pad-mounted equipment due for inspections. There was an outstanding balance of 31 underground detailed inspections in 2021. SCE believes that these inspections were delayed as a result of third-party constraints or other factors.

3. Wood Pole Inspections (Intrusive and Visual)

In 2021, SCE was able to continue the grid-based inspection program that it commenced in 2009. Under this program, we align our wood pole inspection cycles so that all poles located within the same grid share the same cycle. In other words, we perform intrusive inspections on all poles within a grid, and not just those poles that happened to be due for intrusive inspection. As a result, in any given year, the number of poles inspected will exceed the number of poles due to be inspected in the year.

A total of 4,558 wood poles were due for intrusive wood pole inspection in 2021. There were 388 outstanding wood pole inspections; these inspections were held up as a result of third-party constraints such as access or obstruction issues. As of May 31, 2022 - 135 inspections of those 388 outstanding have been completed. The 253 intrusive pole inspections remaining will be conducted as soon as the third-party constraints and access or obstruction issues are resolved.

As a result of its grid-based inspection program, SCE completed many more inspections in 2021 than were due pursuant to GO 165 requirements. Specifically, SCE completed more than 99,114 actual intrusive inspections (boring-type inspections) and more than 34,525 visual inspections than required under GO 165. A visual inspection includes sounding the pole using a tool such as a hammer and visually examining the pole rather than boring into the pole using a drill.

Respectfully submitted,

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/s/ Gloria M. Ing

By: Gloria M. Ing

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June 27, 2022

VERIFICATION

I am a Senior Vice President of Transmission and Distribution for Southern California Edison Company, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of June, 2022, at Pomona, California.

/s/ Heather D. Rivard

Heather D. Rivard

Senior Vice President, Transmission & Distribution
SOUTHERN CALIFORNIA EDISON COMPANY