

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

Order Instituting Investigation Into the Rates, Charges, Service And Practices of Pacific Gas and Electric Company.	Investigation 95-02-015
Application of Pacific Gas And Electric Company for Authority Among Other Things, To Decrease its Rates And Charges for Electric and Gas Service, and Increase Rates and Charges for Pipe Expansion Service.	Application 94-12-005
Order Instituting Rulemaking for Electric Distribution Facility Standard Setting.	Rulemaking 96-11-004

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
ANNUAL REPORT OF 2023 DISTRIBUTION INSPECTIONS SUBMITTED
PURSUANT TO GENERAL ORDER NO. 165**

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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 (the “Commission”), Southern California Edison Company (“SCE”) respectfully submits its Annual Report of distribution inspections completed in calendar year 2023 (“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.

Also, 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 or tablets), virtually none of these individuals are experts or specialists in data entry. Moreover, due in part to the fact that, over the many decades that SCE has served its customers, 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 (on an appropriately ongoing basis) continuing to migrate to newer software platforms as warranted for the field tools (laptop computers and tablets) that field personnel utilize to record and transmit inspection and maintenance information into WMS. Those changes can affect how data gets 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 likely retrieve data that contains minor deviations from the data presented in the table below.

I.

SUMMARY OF SCE'S DISTRIBUTION INSPECTIONS **DURING CALENDAR YEAR 2023**

Type of Inspection (1)	Due (2)	Outstanding (3)	Completed (4)
Patrols by Grid	16,993	673	16,320
Streetlight Patrols by Equipment	463,242	20,451	442,791
Overhead Detailed by Poles	198,887	7,312	191,575
Underground Detailed by Equipment	188,841	507	188,334
Wood Pole Intrusive by Pole	1,628	236	1,392

Notes on the Summary Table:

Column Number 1: Each inspection type is defined by the basis for 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, overhead detailed inspections and underground detailed inspections account for each equipment and structure inspected. Intrusive pole inspections account for each individual pole inspected.

Column Number 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 2023 are documented in SCE’s previous annual GO 165 reports (and any amendments thereto, as applicable), on file with the Commission.

Column Number 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 (and any amendments thereto, as applicable), on file with the Commission.

Column 4: This column reports all completed inspections for the reporting period for each program.

II.

DETAILS OF SCE’S DISTRIBUTION INSPECTIONS DURING CALENDAR YEAR

2023

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

III.

PATROLS

A. 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, and biennial patrols in non-high fire rural areas. In 2023, SCE completed patrols on 16,320 urban and rural grids, which comprised approximately 96.0% of its grids due for patrol-type inspections.

Under SCE's internal procedures, each grid is inspected annually. However, pursuant to GO 165, grid inspections sited in non-HFRA rural areas are required every other year.¹ Of the 673 outstanding grid inspections, 62 are located in non-HFRA rural areas. SCE is continuing to complete the remaining grids.

B. Streetlight Patrols (Urban and Rural)

GO 165 requires annual patrols of all urban streetlights, and biennial patrols of all rural streetlights. In 2023, SCE patrolled 442,791 streetlights, which comprised approximately 95.6% of the streetlight patrols that were due. SCE also notes as an additional point of reference that as of the filing of this report, 20,376 of the remaining 20,451 streetlight patrols were completed during the first half of 2024.

IV.

DETAILED INSPECTIONS

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

¹ A Rural area is one in which the population density consists of less than 1,000 persons per square mile.

A. Overhead Detailed Inspections by Pole (“ODI”)

SCE completed a total of 191,575 of the 198,887 overhead detailed inspections due in 2023, which comprised approximately 96.3% of the inspections that were due. There was an outstanding count of 7,312 overhead detailed inspections by pole that may have been held up due to a combination of access and obstructions and various system issues. These 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, SCE has inspected approximately 2,849 of the 7,312 overhead detailed inspections outstanding from 2023. As a result of its risk-based inspection program, SCE completed many more inspections in 2023 than were due pursuant to GO 165 requirements. Overall, SCE conducted 406,696 overhead detailed inspections in 2023.

In late 2022, it came to SCE’s attention that a portion of overhead detailed inspection records from years 2020-2022 appeared to have potential discrepancies. To summarize, in 2020 SCE implemented an enhanced inspection form (the “Survey”) as part of its overhead detailed inspection efforts. Implementation or use of the Survey was not required for regulatory compliance with GO 165 or other order of the Commission. The Survey was intended to collect additional information on equipment in the field to further enhance the quality of SCE’s inspection processes. Implementation of the Survey resulted in certain inspection items appearing to be inconsistent as between SCE’s Work Management System and the Survey.

SCE implemented a system enhancement in April 2023 to mitigate discrepancies going forward. SCE also self-reported the potential issue to the Commission’s Safety and Enforcement Division (“SED”) on April 25, 2023 and self-reported to the Office of Energy Infrastructure Safety (“OEIS”) on May 5, 2023. In addition, SCE discussed this issue in SCE’s last GO 165 Report, as filed in July 2023. Moreover, SCE filed amended GO 165 Reports for work completed in calendar years 2020 and 2021; SCE adjusted the completion rate to be lower for these years.²

² The GO 165 Report for calendar year 2022 did not require an amendment because the potential issue was discovered prior to filing.

On April 29, 2024 SCE met with SED Staff to provide an update on this matter. During that meeting, SCE stated that it had decided to expand the scope to include non-HFRA³ inspections where SCE appeared to have no record of a Survey. SCE further advised that because the inspections in this expanded scope already had a record of inspection in SAP and re-inspection would be performed out of an abundance of caution, SCE was not planning to amend prior GO 165 reports based on the expanded scope. At the meeting, SED Staff did not object to this approach.

Accordingly, SCE has voluntarily proceeded to expand the scope of structures encompassed by SCE's follow-up efforts as described below.

Region	Appearance of Inconsistency Between SAP Record and WMS Record	No WMS Record Apparently Found
HFRA	Original Scope	Original Scope
Non-HFRA	Original Scope	Expanded Scope

Approximately 34,000 structures over the period of time from 2020 through Q1 2023 appeared to be potentially affected (including those referenced in the expanded scope). All of these structures were reassigned for inspection. As of June 3, 2024, SCE had completed approximately 97% of these inspections.⁴ The remaining 3% have a combination of access and obstruction issues. SCE has deployed an Exception Strike Team with dedicated workstreams to address each type of remaining exception. The inspections will be conducted as soon as the access/obstruction issues are resolved. SCE plans to update SED Staff at an appropriate juncture

³ The original scope included any inspection where the Survey record potentially conflicted with WMS record, regardless of whether the structure was in HFRA or non-HFRA. It also included inspections in HFRA areas where SCE appeared to have no record of a Survey.

⁴ In some cases, an inspection is no longer required when, for example, the asset has been removed from the field.

regarding the status of this matter, and in the meantime SCE is available at Staff's convenience to further discuss as Staff may wish.

B. Underground and Pad-Mounted Equipment Detailed Inspections

SCE completed 188,334 underground and pad-mounted equipment detailed inspections, which comprised approximately 99.7% of its underground and pad-mounted equipment due for inspection. As reflected in the Inspection Summary Table, there was an outstanding balance of 507 underground detailed inspections in 2023. These inspections may have been held up due to a combination of access and obstructions and various system issues. The underground detailed inspections will be conducted as soon as the various issues are remedied, or access /obstruction issues are resolved. As of May 2, 3 of the 507 remaining UDI 2023 inspections have been completed.

C. Wood Pole Inspections (Intrusive and Visual)

A total of 1,628 wood poles were due for intrusive wood pole inspection in 2023, and SCE completed 85.5% of those due. There was an outstanding balance of 236 intrusive pole inspections in 2023 due to a combination of access, environmental, and obstruction issues. SCE completed more inspections in 2023 than were due pursuant to GO 165 requirements. Overall, SCE conducted 64,092 intrusive inspections (boring-type inspections) and 15,718 visual inspections. 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/ Kris G. Vyas

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July 1, 2024

VERIFICATION

I am the Vice President of Vegetation, Inspections & Operational Services 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 26th day of June, 2024, at Pomona, California.

/s/ Tracy Sanders

Tracy Sanders
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