

**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 2024 DISTRIBUTION INSPECTIONS SUBMITTED
PURSUANT TO GENERAL ORDER NO. 165**

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PURSUANT TO GENERAL ORDER NO. 165

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 2024 (“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.

As SCE has noted in prior Reports, 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 when entering 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, SCE is (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 and the ongoing work described in Section V, 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 deviations from the data presented in the table below.

I.

SUMMARY OF SCE'S DISTRIBUTION INSPECTIONS **DURING CALENDAR YEAR 2024**

Type of Inspection (1)	Due (2)	Outstanding (3)	Completed (4)
Patrols by Grid	17,423	1,656	15,767
Streetlight Patrols by Equipment	474,039	356	473,683
Overhead Detailed by Poles	194,174	2,338	191,836
Underground Detailed by Equipment	163,077	278	162,799
Wood Pole Intrusive by Pole	3,702	396	3,306

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 and underground detailed inspections account for each equipment and structure inspected. Intrusive pole inspections and overhead detailed 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 2024 are documented in SCE’s previous annual GO 165 reports (and any amendments thereto, as applicable), on file with the Commission and, for a trailing subset, below in Section V.

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 and, for a trailing subject, below in Section V.

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

2024

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 2024, SCE completed patrols on 15,767 urban and rural grids, which comprised approximately 90.5% 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 1,656 outstanding grid inspections, 1,187 are located in rural non-HFRA areas and are not due pursuant to GO 165. 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 2024, SCE patrolled 473,683 streetlights, which comprised approximately 99.9% of the streetlight patrols that were due.

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 191,836 of the 194,174 overhead detailed inspections due in 2024, which comprised approximately 98.8% of the inspections that were due. There was an outstanding count of 2,338 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 a result of its risk-based inspection program, SCE completed many more inspections in 2024 than were due pursuant to GO 165 requirements. Overall, SCE conducted 424,188 overhead detailed inspections in 2024.

B. Underground and Pad-Mounted Equipment Detailed Inspections

SCE completed 162,799 underground and pad-mounted equipment detailed inspections, which comprised approximately 99.8% of its underground and pad-mounted equipment due for inspection. As reflected in the Inspection Summary Table, there was an outstanding balance of 278 underground detailed inspections in 2024. 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.

C. Wood Pole Inspections (Intrusive and Visual)

A total of 3,702 wood poles were due for intrusive wood pole inspection in 2024, and SCE completed 89.3% of those due. There was an outstanding balance of 396 intrusive pole inspections in 2024 due to, among other things, a combination of access, environmental,² and obstruction issues. SCE completed more inspections in 2024 than were due pursuant to GO 165 requirements. Overall, SCE conducted 10,676 intrusive inspections (boring-type inspections)

² Environmental constraints that can affect the intrusive inspection program include protected habitats and designated protected lands, where overland travel has historically been restricted or prohibited.

and 224 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.

V.

UPDATE TO THE DECEMBER 2024 SUPPLEMENTAL FILING

On December 20, 2024, SCE filed a supplement to its previous GO 165 annual reports to identify 15,275 poles, equipment, and grids that were overdue for inspection as of year-end 2023 or earlier but may not have been included in prior reports. SCE has subsequently identified an additional population of 583 poles that were similarly overdue for inspection as of year-end 2023 or earlier and similarly may not have been included in prior reports. In its December 20, 2024 supplement, SCE committed to providing an update, in this GO 165 report, on its progress completing these inspections that may not have been timely reported. Accordingly, the table below provides an update, with data current as of June 9, 2025.³

The first column, “Type of Inspection,” identifies the type of inspection. The second column, “Population of Focus,” identifies the total number of poles, equipment, or grids that were found to potentially be lacking a timely distribution inspection record as of year-end 2023 and may not have been timely reported in prior annual reports. The first number in this column matches the numbers that were shown in SCE’s December 20, 2024 supplement, while the second number in parentheses reflects the subsequently identified population. The third column, “Not Applicable,” denotes the number of inspections within the Population of Focus that, based on additional research, SCE has now determined were data errors and/or structures replaced in the normal course of business for which no GO 165 inspection was needed (e.g., SCE has determined that the asset is no longer in the field or is not subject to GO 165 inspections). The fourth column, “Completed,” identifies the number of inspections within the Population of Focus

³ SCE has a longstanding practice of reporting on asset inspection status for the given year covered by the compliance report; in subsequent annual reports, SCE does not report on the prior year’s identified “Outstanding” inspections. Accordingly, this update only reflects SCE’s progress completing the inspections that were identified as potentially *not* being timely reported as “Outstanding” in prior GO 165 annual reports.

that have since been completed. Finally, the fifth column, “Outstanding,” identifies the number of inspections within the Population of Focus that are still outstanding, including due to as-yet unresolved data issues that could ultimately obviate the need for inspection, or due to access and obstruction issues.

Type of Inspection	Population of Focus*	Not Applicable	Completed*	Outstanding*
Overhead Detailed by Poles	2,671 (+ 574)	114	2,472 (+ 230)	85 (+ 344)
Streetlight Patrols by Equipment	11,535 (+ 2)	24	10,677	834 (+ 2)
Patrols by Grid	484	9	253	222
Underground Detailed by Equipment	525	5	515	5
Wood Pole Intrusive by Pole	544 (+ 7)	4	321	219 (+ 7)
Total	15,275 (+ 583)	155	14,229 (+ 230)	1,375 (+ 353)

* Numbers in parentheses reflect the subsequently identified population not included in SCE’s December 20, 2024 supplement.

SCE continues to prioritize resolution of the outstanding constraints (such as access restrictions) associated with the remaining overdue inspections. SCE can provide a further update on these efforts to the Commission’s Safety and Enforcement Division (“SED”) Staff at SED’s request.

Respectfully submitted,

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June 30, 2025

VERIFICATION

I am the Senior Vice President of Transmission & 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 28th day of June, 2025, at Pomona, California.



Heather Rivard

Senior Vice President - Transmission & Distribution
SOUTHERN CALIFORNIA EDISON COMPANY

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