STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

August 2, 2022 EA2022-976

Melvin Stark
Principle Manager, T&D Compliance Integration
Southern California Edison Company
1 Innovation Way
Pomona, CA 91786

Subject: Audit of Southern California Edison's Covina District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Saimon Islam and Richard Le of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Covina District from June 13, 2022 to June 17, 2022. The audit included a review of SCE's inspection and maintenance records and a field inspection of SCE's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than September 2, 2022, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Saimon Islam at (213) 326-2600 or saimon.islam@cpuc.ca.gov .

Sincerely,

Fadi Daye

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC
Richard Le, Utilities Engineer, ESRB, SED, CPUC

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Pole load calculations
- Intrusive test records
- Safety hazard notifications
- SCE's documented inspection program.
- Vegetation Management 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 ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

- SCE's records indicated that from December 2017 through December 2021, SCE completed 8777 overhead detailed inspections and 41 above ground patrol inspections past SCE's scheduled due date.

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 these rules.*

- SCE's records indicated that from April 2017 through September 2021, SCE completed 170 underground inspections past SCE's scheduled due date.

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 2017 to April 2022, SCE completed 578 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 241 open overhead work orders that were past SCE's scheduled due date for corrective action.

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 February 2017 to April 2022, SCE completed 289 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 40 open underground work orders that were past SCE's scheduled due date for corrective action.

III. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	4491632E	Pole	San Dimas
2	4491827E	Pole	San Dimas
3	4491631E	Pole	San Dimas
4	4491629E	Pole	San Dimas
5	4491630E	Pole	La Verne
6	1626840E	Pole	La Verne
7	1626839E	Pole	La Verne
8	1626841E	Pole	La Verne
9	1626838E	Pole	La Verne
10	1626837E	Pole	La Verne
11	4308783E	Pole	La Verne
12	1626835E	Pole	La Verne
13	1626834E	Pole	La Verne
14	1626833E	Pole	La Verne
15	4404244E	Pole	La Verne
16	1626831E	Pole	La Verne
17	1626868E	Pole	La Verne
18	289982E	Pole	Glendora
19	289983E	Pole	Glendora
20	1079002E	Pole	Glendora
21	1127076E	Pole	Glendora
22	4898984E	Pole	Glendora
23	143488E	Pole	Glendora
24	143487E	Pole	Glendora
25	4750162E	Pole	Glendora
26	996393E	Pole	Glendora
27	143490E	Pole	Glendora
28	4819836E	Pole	Glendora
29	780709E	Pole	Glendora
30	114803E	Pole	Glendora
31	147112E	Pole	Glendora
32	780712E	Pole	Glendora
33	741000E	Pole	Glendora
34	126949E	Pole	Glendora
35	1172345E	Pole	Glendora
36	4819645E	Pole	Glendora
37	940867E	Pole	Glendora
38	155312E	Pole	Glendora
39	1462828E	Pole	Glendora

No.	Structure ID.	Type of Structure	Location
40	4663829E	Pole	Glendora
41	4663830E	Pole	Glendora
42	810787E	Pole	Glendora
43	810786E	Pole	Glendora
44	155085E	Pole	Glendora
45	810785E	Pole	Glendora
46	2376843E	Pole	Covina
47	668672E	Pole	Covina
48	691804E	Pole	Covina
49	691805E	Pole	Covina
50	1273134E	Pole	Covina
51	2080150	Pole	Covina
52	4630446E	Pole	Covina
53	2209900E	Pole	Covina
54	4404182E	Pole	Covina
55	971593E	Pole	Covina
56	971592E	Pole	Covina
57	971591E	Pole	Covina
58	668671E	Pole	Covina
59	1053878E	Pole	Covina
60	1053879E	Pole	Covina
61	1053880E	Pole	Covina
62	4591624E	Pole	Covina
63	1186335E	Pole	Covina
64	1186336E	Pole	Covina
65	4423467E	Pole	Covina
66	4626929E	Pole	Covina
67	4154011E	Pole	Covina
68	4154012E	Pole	Covina
69	4154013E	Pole	Covina
70	4730305E	Pole	Covina
71	4595609E	Pole	Covina
72	1418304E	Pole	Covina
73	1552014E	Pole	Covina
74	1507871E	Pole	Covina
75	981910E	Pole	Covina
76	4463210E	Pole	Covina
77	4438895E	Pole	Covina
78	44632043E	Pole	Diamond Bar
79	4455888E	Pole	Diamond Bar
80	1418005E	Pole	Diamond Bar
81	1177350E	Pole	Diamond Bar
82	1177451E	Pole	Diamond Bar
83	1177452E	Pole	Diamond Bar

No.	Structure ID.	Type of Structure	Location
84	1177455E	Pole	Diamond Bar
85	1177456E	Pole	Diamond Bar
86	1177457E	Pole	Diamond Bar
87	1177458E	Pole	Diamond Bar
88	1177459E	Pole	Diamond Bar
89	140664E	Pole	Diamond Bar
90	140665E	Pole	Diamond Bar
91	1891447E	Pole	Diamond Bar
92	1891454E	Pole	Diamond Bar
93	1891448E	Pole	Diamond Bar
94	1891449E	Pole	Diamond Bar
95	4930158E	Pole	Diamond Bar
96	1462987E	Pole	Diamond Bar
97	1462943E	Pole	Diamond Bar
98	1462938E	Pole	Diamond Bar
99	1462939E	Pole	Diamond Bar
100	1462936E	Pole	Diamond Bar
101	1682960E	Pole	Diamond Bar
102	1683543E	Pole	Diamond Bar
103	802637E	Pole	Diamond Bar
104	411498E	Pole	Diamond Bar
105	4401255E	Pole	Diamond Bar
106	4372208E	Pole	Diamond Bar
107	1277601E	Pole	Diamond Bar
108	1476108E	Pole	Diamond Bar
109	1476109E	Pole	Diamond Bar
110	1476110E	Pole	Diamond Bar
111	1476111E	Pole	Diamond Bar
112	4591144E	Pole	Diamond Bar
113	1476113E	Pole	Diamond Bar
114	1476114E	Pole	Diamond Bar
115	1476115E	Pole	Diamond Bar
116	1476116E	Pole	Diamond Bar
117	1476117E	Pole	Diamond Bar
118	1476118E	Pole	Diamond Bar
119	1476119E	Pole	Diamond Bar
120	1598039E	Pole	Diamond Bar
121	1598040E	Pole	Diamond Bar
122	P5198545	Padmount	San Dimas
123	P5198549	Padmount	San Dimas
124	P5198548	Padmount	San Dimas
125	P5198547	Padmount	San Dimas
126	P5198546	Padmount	San Dimas
127	P5422196	Padmount	San Dimas

No.	Structure ID.	Type of Structure	Location
128	P5147589	Padmount	Covina
129	P5055908	Padmount	Covina
130	5055907	Switch	Covina
131	P5055495	Padmount	Baldwin Park
132	P5641002	Padmount	Baldwin Park
133	5641003	Enclosure	Baldwin Park
134	P5454314	Padmount	City of Industry
135	P5706731	Padmount	City of Industry
136	P5128919	Padmount	City of Industry
137	P5454640	Padmount	City of Industry
138	MH5127127	Manhole	West Covina
139	5127128	Manhole	West Covina
140	4909376E	Pole/Vegetation	Rowland Heights
141	698079E	Pole/Vegetation	Rowland Heights
142	1213539E	Pole/Vegetation	Rowland Heights
143	698076E	Pole/Vegetation	Rowland Heights
144	4854616E	Pole/Vegetation	Rowland Heights
145	1528639E	Pole/Vegetation	Rowland Heights
146	4181750E	Pole/Vegetation	Rowland Heights
147	1528647E	Pole/Vegetation	Rowland Heights
148	2132518E	Pole/Vegetation	Rowland Heights
149	1892504E	Pole/Vegetation	Rowland Heights

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections portion of the audit:

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 guy wire attached to pole No. 114803E was missing guy guard.
- The guy anchor attached to each of the following SCE poles was buried in the ground:
    - 4308783E
    - 810786E
    - 4591624E

GO 95, Rule 54.6-B, Ground Wires, states in part:

> *That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).*

The ground moulding attached to each of the following SCE poles was broken:

- 810786E
- 1891447E
- 1476108E

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.*

- had An unauthorized “Forest Department Notice” sign was attached to SCE pole No. 4491631E.

GO 95, Rule 51.6, Marking and Guarding, High Voltage Marking of Poles, 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. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible.*

The high voltage signs attached to each of the following SCE poles were either missing or damaged:

- 1172345E
- 810787E
- 4154011E
- 1891449E
- 1462938E
- 411498E
- 4401255E
- 1598039E

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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 down guy wire attached on each of the following SCE poles was loose and not taut:

- 1273134E
- 2099977E
- 1462939E

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 and communication conductors supported on the same poles to be 3 inches.

A guy wire attached to each of the following SCE poles was touching a communication conductor attached to the same pole.

- 1626868E
- 4401255E

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.*

- The oil gauge of switch 5055907 indicated low level of oil.