SOUTHERN CALIFORNIA EDISON®
An EDISON INTERNATIONAL® Company

**Melvin Stark**
Principal Manager
OE-T&D Compliance & Quality

April 10, 2023

Fadi Daye, P.E.
Program & Project Supervisor
Electric and Safety Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West 4th St., Ste. 500
Los Angeles, California 90013

EA2023-1045
Subject: Audit of Southern California Edison's Santa Barbara District

Dear Mr. Daye:

Your letter, dated March 9, 2023, requested that we advise you of actions taken by Southern California Edison Company (SCE) to address conditions identified during the Safety and Enforcement Division's (SED's) audit of the Santa Barbara District from February 13, 2022 to February 17, 2022.

Your letter requested a response by April 10, 2023. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Mel Stark
Principal Manager, T&D Compliance & Quality
1 Innovation Way
Pomona, CA 91768

Enclosure: SED Audit Findings and SCE's Responses

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 Clearances Records

### II. Records Review – Violations List

My staff observed the following violations during the records review 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 following pole load calculations were incorrect:

- The pole load calculation for pole 1675563E incorrectly shows a down-guy as a span-guy. It also recorded the span length in the direction of 41 degrees as 53 feet when the field measurement determined it to be approximately 76 feet.

***SCE Response:***
*The above condition has been corrected by SCE's district planning personnel. Updated pole loading calculations were submitted to the SED on 03/8/2023.*

**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 January 2013 through January 2023, SCE completed 79 patrol inspections past SCE's scheduled due date.

***SCE Response:***
*Without admitting that SCE violated GO 165, Section III-B or GO 95, Rule 31.2, SCE responds as follows. 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 or environmental constraints, among other reasons.*

- SCE's records indicated that from January 2013 through January 2023, SCE completed 4008 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 173 pending detailed inspections that were past SCE's scheduled due date.

***SCE Response:***
*Without admitting that SCE violated GO 165, Section III-B or GO 95, Rule 31.2, SCE responds as follows. 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 or environmental constraints, among other reasons.*

**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 January 2013 through January 2023, SCE completed 423 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 11 pending underground inspections that were 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. 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 or environmental constraints, among other reasons.*

**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 2018 through January 2023, SCE completed 1724 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 724 open overhead work orders that were past SCE's scheduled 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. Work orders may be pending or completed past their due dates for valid reasons per General Order 95, Rule 18, including but not limited to Permits, System Emergencies, and Customer Issues.*

**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 January 2018 through January 2023, SCE completed 310 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 328 open underground work orders that were past SCE's scheduled due date for corrective action.

***SCE Response:***
*Without admitting that SCE violated GO 128, Rule 17.1, SCE responds as follows. 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.*

## 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 | P5032449 | Pad-mounted transformer | Carpinteria |
| 2 | B5032509 | BURD transformer | Carpinteria |
| 3 | P5317163 | Pad-mounted transformer | Carpinteria |
| 4 | P5483498 | Pad-mounted transformer | Carpinteria |
| 5 | P5317210 | Pad-mounted transformer | Carpinteria |
| 6 | 2108858E | Pole | Carpinteria |
| 7 | 4365388E | Pole | Goleta |
| 8 | 4340069E | Pole | Goleta |
| 9 | 1324337E | Pole | Goleta |
| 10 | 1324344E | Pole | Goleta |
| 11 | 1324345E | Pole | Goleta |
| 12 | 1324346E | Pole | Goleta |
| 13 | 1324347E | Pole | Goleta |
| 14 | 1324313E | Pole | Goleta |
| 15 | 1324338E | Pole | Goleta |
| 16 | 1324339E | Pole | Goleta |
| 17 | 1324340E | Pole | Goleta |
| 18 | 13243141E | Pole | Goleta |
| 19 | S270454 | Pole | Goleta |
| 20 | 1324560E | Pole | Goleta |
| 21 | 1324559E | Pole | Goleta |
| 22 | 1482164E | Pole | Goleta |
| 23 | 1324558E | Pole | Goleta |
| 24 | 1324557E | Pole | Goleta |
| 25 | 1664545E | Pole | Goleta |
| 26 | 1523858E | Pole | Goleta |
| 27 | 4339723E | Pole | Goleta |
| 28 | 1523860E | Pole | Goleta |
| 29 | 1523861E | Pole | Goleta |
| 30 | 4427398E | Pole | Goleta |
| 31 | GT71323 | Pole | Goleta |
| 32 | 1133712E | Pole | Goleta |
| 33 | 1882441E | Pole | Goleta |
| 34 | 1324996E | Pole | Goleta |
| 35 | 4041704E | Pole | Goleta |
| 36 | 4452827E | Pole | Goleta |
| 37 | P5317237 | Pad-mounted transformer | Goleta |
| 38 | P5317240 | Pad-mounted transformer | Goleta |
| 39 | P5033294 | Pad-mounted transformer | Goleta |

| 40 | P5534868 | Pad-mounted switch | Goleta |
|---|---|---|---|
| 41 | P5534869 | Pad-mounted transformer | Goleta |
| 42 | P5534870 | Pad-mounted transformer | Goleta |
| 43 | GT254119 | Pole | Isla Vista |
| 44 | S27981Y | Pole | Isla Vista |
| 45 | 4946697E | Pole | Isla Vista |
| 46 | S23346Y | Pole | Isla Vista |
| 47 | 1217258E | Pole | Isla Vista |
| 48 | 1217257E | Pole | Isla Vista |
| 49 | 1256347E | Pole | Isla Vista |
| 50 | 1256348E | Pole | Isla Vista |
| 51 | 4944058E | Pole | Isla Vista |
| 52 | 1345333E | Pole | Isla Vista |
| 53 | 1256820E | Pole | Isla Vista |
| 54 | 1256605E | Pole | Isla Vista |
| 55 | 1286422E | Pole | Isla Vista |
| 56 | 1286421E | Pole | Isla Vista |
| 57 | 1345336E | Pole | Isla Vista |
| 58 | 1217659E | Pole | Isla Vista |
| 59 | 1217660E | Pole | Isla Vista |
| 60 | 1345334E | Pole | Isla Vista |
| 61 | 1217152E | Pole | Isla Vista |
| 62 | 1345338E | Pole | Isla Vista |
| 63 | 1481682E | Pole | Isla Vista |
| 64 | 1189344E | Pole | Montecito |
| 65 | 1189343E | Pole | Montecito |
| 66 | 4892903E | Pole | Montecito |
| 67 | 2178546E | Pole | Montecito |
| 68 | 1664670E | Pole | Montecito |
| 69 | 4428853E | Pole | Montecito |
| 70 | 4781354E | Pole | Montecito |
| 71 | 430216E | Pole | Montecito |
| 72 | 4339415E | Pole | Montecito |
| 73 | 4452152E | Pole | Montecito |
| 74 | 4424301E | Pole | Montecito |
| 75 | 4574192E | Pole | Montecito |
| 76 | 204617E | Pole | Montecito |
| 77 | 497829E | Pole | Santa Barbara |
| 78 | 4892687E | Pole | Santa Barbara |
| 79 | 1996171E | Pole | Santa Barbara |
| 80 | 428019E | Pole | Santa Barbara |
| 81 | 1453757E | Pole | Santa Barbara |
| 82 | 1453758E | Pole | Santa Barbara |
| 83 | 4371176E | Pole | Santa Barbara |
| 84 | 1129913E | Pole | Santa Barbara |

| | | | |
|---|---|---|---|
| 85 | 1129912E | Pole | Santa Barbara |
| 86 | 1129911E | Pole | Santa Barbara |
| 87 | GT60733 | Pole | Santa Barbara |
| 88 | 1189264E | Pole | Santa Barbara |
| 89 | 4882642E | Pole | Santa Barbara |
| 90 | 1524730E | Pole | Santa Barbara |
| 91 | 4476373E | Pole | Santa Barbara |
| 92 | 4790043E | Pole | Santa Barbara |
| 93 | 1947188E | Pole | Santa Barbara |
| 94 | 1675901E | Pole | Santa Barbara |
| 95 | 4591578E | Pole | Santa Barbara |
| 96 | 1675904E | Pole | Santa Barbara |
| 97 | 1828944E | Pole | Santa Barbara |
| 98 | 1829133E | Pole | Santa Barbara |
| 99 | 1675934E | Pole | Santa Barbara |
| 100 | B5032676 | BURD transformer | Santa Barbara |
| 101 | P5317246 | Pad-mounted transformer | Santa Barbara |
| 102 | 5446706 | Vault | Santa Barbara |
| 103 | 4128086E | Pole | Santa Barbara |
| 104 | 1675563E | Pole | Santa Barbara |
| 105 | 2296286E | Pole | Santa Barbara |
| 106 | 807892E | Pole | Santa Barbara |
| 107 | 90343E | Pole | Santa Barbara |
| 108 | 1256327E | Pole | Santa Barbara |
| 109 | B5514644 | BURD switch | Summerland |
| 110 | B5032310 | BURD transformer | Summerland |
| 111 | P5317852 | Pad-mounted transformer | Summerland |
| 112 | 4892458E | Pole | Toro Canyon |
| 113 | 4263188E | Pole | Toro Canyon |
| 114 | 4263189E | Pole | Toro Canyon |
| 115 | 4926384E | Pole | Toro Canyon |

## 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.*

Customer vegetation at the base of pole 1286421E obstructed the visibility strips.

***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 1286421E – Obstructed visibility strips.* ***SCE Response****: Due on 02/13/2026.*

**GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 19, Column C** requires the radial separation between guys and communications conductors supported on the same pole to be not less than 3 inches.

An SCE guy wire attached to pole 4926384E was in contact with a communication conductor.

***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 4926384E – SCE guy wire in contact with a communication conductor.* ***SCE Response****: Due on 01/05/2025.*

**GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 10, Column C** requires the vertical separation between a secondary conductor and communication conductor supported on the same pole to be not less than 48 inches.

A SCE secondary service drop was in contact with a communication service drop on pole 1256605E.

***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 1256605E – Secondary service drop in contact with communication service drop.* ***SCE Response****: SCE field personnel visited the site on 03/27/2023 and confirmed that the secondary service drop is not in contact with a communication service drop. No further action is required.*

**GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 10, Column D** requires the vertical separation between two secondary conductors supported on the same pole to be not less than 48 inches.

The separation between two SCE secondary conductors on pole 1453757E was less than 48 inches.

***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 1453757E – Separation between 2 secondary conductors less than 48 inches.* ***SCE Response****: Due on 03/25/2028.*

**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 on each of the following SCE poles were either missing or damaged:

- 4424301E
- 1828944E
- GT60733

***SCE Response:***
*Two 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 condition has been recorded in SCE's Work Management System and 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 4424301E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *SCE field personnel visited the aforementioned location on 03/27/2023 and confirmed pole ID 4424301E is a "guy pole" with only span guys and down guys attached to the pole. No further action is required. SCE notes that field personnel found that pole 4452152E, which is across the street from pole 4424301E, was missing high voltage signs. A notification for pole 4452152E was created in SCE's Work Management System and it will be addressed in accordance with SCEs maintenance program. Due on 03/25/2028.*
- *Pole 1828944E – 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 GT60733 – 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.*

**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 span guy wire on the following poles were loose and not taut:

- 1345333E
- 1345338E
- 1324346E

***SCE Response:***
*One of the above conditions 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. The remaining two conditions have been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.*

- *Pole 1345333E – Loose span guy wire.* ***SCE Response:*** *Due on 03/25/2028.*
- *Pole 1345338E – Loose span guy wire.* ***SCE Response:*** *Due on 03/25/2028.*
- *Pole 1324346E – Loose span guy wire.* ***SCE Response:*** *Due on 05/20/2025.*