



Melvin Stark
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June 26, 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

EA2023-1051
Subject: Distribution Audit of Southern California Edison's Foothill District

Dear Mr. Daye:

Your letter, dated May 24, 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) distribution audit of Foothill District from March 20, 2023, to March 24, 2023.

Your letter requested a response by June 26, 2023. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

A handwritten signature in black ink, appearing to read "Mel Stark".

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

Enclosures: SED Audit Findings and SCE's Responses

Cc: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- Intrusive test records
- SCE's documented inspection program.

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 165, Section III-B, 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 insuring that they are in good condition so as to conform with these rules.

SCE's records indicated from 2018 to 2022, SCE completed 6,997 overhead detailed inspections and 52 annual grid patrols 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. Based on SCE's records, SCE notes that from 2018 through 2022, it completed 6,666 overhead detailed inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from 2018 through 2022, it completed 51 annual grid patrols past SCE's scheduled due date. 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, 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 from 2018 to 2022, SCE completed 777 underground detailed inspections past their 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. Based on SCE's records, SCE notes that from 2018 through 2022, it completed 738 underground detailed inspections past SCE's scheduled due date. 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, 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 2018 to 2022, SCE completed 476 overhead work orders past SCE's 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. Based on SCE's records, from 2018 to 2022, SCE completed 601 overhead work orders past SCE's due date for corrective action. 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 2018 to 2023, SCE completed 498 underground work orders 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. Based on SCE's records, from 2018 to 2023, SCE completed 281 underground work orders past SCE's due date for corrective action. 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 Inspections

My staff inspected the following facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	359979E	Pole	Lytle Creek
2	359980E	Pole	Lytle Creek
3	359981E	Pole	Lytle Creek
4	359982E	Pole	Lytle Creek
5	359983E	Pole	Lytle Creek
6	4385961E	Pole	Lytle Creek
7	1811645E	Pole	Lytle Creek
8	1448472E	Pole	Lytle Creek
9	1448471E	Pole	Lytle Creek
10	2216793E	Pole	Lytle Creek
11	1745480E	Pole	Lytle Creek
12	4555091E	Pole	Lytle Creek
13	4895199E	Pole	Lytle Creek
14	1917559E	Pole	Devore
15	163342E	Pole	Devore
16	1917560E	Pole	Devore
17	4423731E	Pole	Devore
18	2284174E	Pole	Devore
19	4631047E	Pole	Devore
20	1714997E	Pole	Devore
21	1714996E	Pole	Devore
22	1714995E	Pole	Devore
23	1714994E	Pole	Devore
24	4961801E	Pole	Devore
25	2284289E	Pole	Devore
26	2284290E	Pole	Devore
27	2284291E	Pole	Devore
28	919195E	Pole	Fontana
29	919190E	Pole	Fontana
30	919189E	Pole	Fontana
31	919188E	Pole	Fontana
32	4088511E	Pole	Fontana
33	4102391E	Pole	Fontana
34	1389170E	Pole	Fontana
35	4102390E	Pole	Fontana
36	2137637E	Pole	Fontana
37	4102389E	Pole	Fontana
38	967704E	Pole	Fontana
39	207807S	Pole	Riverside
40	4862131E	Pole	Riverside

41	2169432E	Pole	Riverside
42	750296H	Pole	Riverside
43	6237S	Pole	Riverside
44	6315S	Pole	Riverside
45	1566895E	Pole	Riverside
46	690214H	Pole	Riverside
47	1014848H	Pole	Riverside
48	4794978E	Pole	Riverside
49	1904388E	Pole	Riverside
50	4893007E	Pole	Riverside
51	740117E	Pole	Riverside
52	740118E	Pole	Riverside
53	1115492E	Pole	Riverside
54	1115493E	Pole	Riverside
55	801482E	Pole	Riverside
56	449550E	Pole	Riverside
57	801446	Pole	Riverside
58	336299E	Pole	Bloomington
59	442722E	Pole	Bloomington
60	1029957H	Pole	Bloomington
61	540409E	Pole	Bloomington
62	1031630H	Pole	Bloomington
63	540410E	Pole	Bloomington
64	220309E	Pole	Bloomington
65	4599205E	Pole	Bloomington
66	2202310E	Pole	Bloomington
67	2158086E	Pole	Bloomington
68	2158087E	Pole	Bloomington
69	2158088E	Pole	Bloomington
70	2158089E	Pole	Bloomington
71	1389073E	Pole	Bloomington
72	1389072E	Pole	Bloomington
73	476748E	Pole	Bloomington
74	296592E	Pole	Bloomington
75	P5001240	Pad	Jurupa Valley
76	P5001242	Pad	Jurupa Valley
77	P5001241	Pad	Jurupa Valley
78	V5737856	Vault	Jurupa Valley
79	P5752901	Pad	Jurupa Valley
80	X5752898	Splice Box	Jurupa Valley
81	P5707161	Pad	Jurupa Valley
82	P5535036	Pad	Jurupa Valley
83	P5535037	Pad	Jurupa Valley
84	P5714594	Pad	Jurupa Valley
85	4628970E	Pole	Fontana

IV. Field Inspection Violations List

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

GO 95, Rule 51.6-A, 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 the following poles were either damaged or missing.

- Pole 750296H: the word "VOLTAGE" was missing from the primary crossarm.
- Pole 449550E: both the "HIGH" and "VOLTAGE" portions of the signs were illegible from one side and were missing from the other side of the primary crossarm.

SCE Response:

One of the above conditions was 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 750296H – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 06/05/2028.*
- *Pole 449550E – 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 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).

On each of the following poles, the ground moulding was either missing or damaged:

- Pole 4102391E: a 3-foot vertical section of ground wire was not covered by protective covering 8 feet above the ground.
- Pole 6315: an 8-inch vertical section of ground wire was not covered by protective covering near the ground level.

- Pole 740118E: a 3-foot section of ground moulding supported at the secondary level was separating from the surface of the pole, exposing the ground wire.
- Pole 2158088E: the ground moulding was damaged and deteriorated, exposing sections of the ground wire from 9-feet above the ground to the secondary level.

SCE Response:

Three 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 4102391E – 3-foot vertical section of ground wire was not covered. **SCE Response:** Due on 5/30/2027.*
- *Pole 6315 – 8-inch vertical section of ground wire was not covered. **SCE Response:** SCE field personnel confirmed the correct Pole ID for this location is 6315S. The aforementioned condition listed was completed on 3/21/2023.*
- *Pole 740118E – Damaged ground moulding. **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 2158088E – Damaged ground moulding. **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 54.6-E2, Risers, states in part:

All risers from underground cables or other conductors which pass through an unrelated conductor or cable level shall be covered or encased by material as described in Rule 54.6-E1 or by a suitable protective covering as described in Rule 22.8 from a distance of 8 feet above the ground

A PVC conduit on Pole 4599205E was not fully encasing a primary conductor, with a 2-inch separation at a reducer 10-feet above ground level.

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 4599205E – Riser not fully encasing a primary conductor. **SCE Response:** Due on 06/05/2028.*

GO 95, Rule 54.7, Climbing and Working Space states in part:

Climbing space shall be maintained from the ground level. Climbing space, measured from center line of pole, shall be provided on one side or in one quadrant of all poles or structures with dimensions....:

The climbing space on Pole number 4631047E was obstructed at the secondary level (below the transformer) by secondary jumpers and accessory equipment.

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 4631047E – Obstructed climbing space. **SCE Response:** Due on 06/05/2028.*

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 hole next to Padmounted Gas Switch P5714594 (GS6665), located at a commercial property, was covered by a plywood. Additionally, the plywood covering had nails and screws protruding outwards, creating a public hazard.

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.

- *Pad mount P5714594 – Incorrect cover. **SCE Response:** Due on 05/18/2024.*