



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

September 4, 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

EA2023-1079

Subject: Audit of Southern California Edison's Long Beach District

Dear Mr. Daye:

Your letter, dated August 2, 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 Long Beach District from July 10, 2023, to July 14, 2023.

Your letter requested a response by August 4, 2023. Attached are the conditions mentioned in your letter, our responses and corresponding actions.

A handwritten signature in black ink, appearing to read "Mel Stark", with a long horizontal stroke extending to the right.

Mel Stark
Principal Manager, OE-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
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC
Kyle King, 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. Field Inspection

My staff inspected the following facilities during the field inspection:

| No. | Structure Identification | Structure Type | Location |
|-----|--------------------------|----------------|------------|
| 1 | 1334568E | Pole | Long Beach |
| 2 | 1334569E | Pole | Long Beach |
| 3 | 2382396E | Pole | Long Beach |
| 4 | 2382395E | Pole | Long Beach |
| 5 | 2382394E | Pole | Long Beach |
| 6 | 2382392E | Pole | Long Beach |
| 7 | 2381574E | Pole | Long Beach |
| 8 | 2382391E | Pole | Long Beach |
| 9 | 2382390E | Pole | Long Beach |
| 10 | 2382144E | Pole | Long Beach |
| 11 | 1568554E | Pole | Long Beach |
| 12 | 1568855E | Pole | Long Beach |
| 13 | 1568856E | Pole | Long Beach |
| 14 | 1568857E | Pole | Long Beach |
| 15 | 1568858E | Pole | Long Beach |
| 16 | B11553Y | Pole | Long Beach |
| 17 | 2276667E | Pole | Long Beach |
| 18 | 4527596E | Pole | Long Beach |
| 19 | 907000E | Pole | Long Beach |
| 20 | 1568853E | Pole | Long Beach |

| | | | |
|----|----------|------|------------------|
| 21 | I0588Y | Pole | Long Beach |
| 22 | 4228256E | Pole | Long Beach |
| 23 | 4228257E | Pole | Long Beach |
| 24 | 4228258E | Pole | Long Beach |
| 25 | 797563 | Pole | Long Beach |
| 26 | 4374081E | Pole | Long Beach |
| 27 | 4379525E | Pole | Long Beach |
| 28 | 4379518E | Pole | Long Beach |
| 29 | 4379513E | Pole | Long Beach |
| 30 | 1813084E | Pole | Long Beach |
| 31 | 2006064E | Pole | Lakewood |
| 32 | 4469334E | Pole | Lakewood |
| 33 | 4607561E | Pole | Lakewood |
| 34 | 2006069E | Pole | Lakewood |
| 35 | 4717388E | Pole | Lakewood |
| 36 | 2006067E | Pole | Lakewood |
| 37 | 2006066E | Pole | Lakewood |
| 38 | 1812971E | Pole | Lakewood |
| 39 | 1812970E | Pole | Lakewood |
| 40 | 1812969E | Pole | Lakewood |
| 41 | 1746783E | Pole | Lakewood |
| 42 | 1774382E | Pole | Lakewood |
| 43 | 1746782E | Pole | Lakewood |
| 44 | 1731586E | Pole | Lakewood |
| 45 | 1731587E | Pole | Lakewood |
| 46 | 1731588E | Pole | Lakewood |
| 47 | 1731589E | Pole | Lakewood |
| 48 | 1731590E | Pole | Lakewood |
| 49 | 1731591E | Pole | Lakewood |
| 50 | 1746779E | Pole | Lakewood |
| 51 | 1774502E | Pole | Hawaiian Gardens |
| 52 | 1710444E | Pole | Hawaiian Gardens |
| 53 | 1710443E | Pole | Hawaiian Gardens |
| 54 | 1710442E | Pole | Hawaiian Gardens |
| 55 | 1710441E | Pole | Hawaiian Gardens |
| 56 | 1710440E | Pole | Hawaiian Gardens |
| 57 | 1710434E | Pole | Hawaiian Gardens |

| | | | |
|----|----------|------------------------|------------|
| 58 | 4417801E | Pole | Seal Beach |
| 59 | 790819E | Pole | Seal Beach |
| 60 | 1642672E | Pole | Seal Beach |
| 61 | 790812E | Pole | Seal Beach |
| 62 | 1881362E | Pole | Seal Beach |
| 63 | 790811E | Pole | Seal Beach |
| 64 | 1183664E | Pole | Seal Beach |
| 65 | 4345817E | Pole | Seal Beach |
| 66 | 599007E | Pole | Seal Beach |
| 67 | 9830Y | Pole | Seal Beach |
| 68 | 4527733E | Pole | Seal Beach |
| 69 | 2046064E | Pole | Seal Beach |
| 70 | 1503057E | Pole | Seal Beach |
| 71 | 1503056E | Pole | Seal Beach |
| 72 | 1503055E | Pole | Seal Beach |
| 73 | 1503054E | Pole | Seal Beach |
| 74 | 1503053E | Pole | Seal Beach |
| 75 | 1503052E | Pole | Seal Beach |
| 76 | P5352658 | Padmounted Transformer | Long Beach |
| 77 | PME6654 | Padmounted Switch | Long Beach |
| 78 | P5051740 | Padmounted Transformer | Lakewood |
| 79 | 5133271 | Vault | Long Beach |
| 80 | M5133268 | Manhole | Long Beach |
| 81 | V5133272 | Vault | Long Beach |
| 82 | P5479974 | Padmounted Transformer | Long Beach |
| 83 | P5479909 | Padmounted Transformer | Long Beach |
| 84 | V5133998 | Vault | Long Beach |
| 85 | V5135806 | Vault | Long Beach |
| 86 | 645923E | Pole | Long Beach |
| 87 | 139254E | Pole | Long Beach |
| 88 | 694725E | Pole | Long Beach |
| 89 | B13411Y | Pole | Long Beach |
| 90 | 4189322E | Pole | Long Beach |
| 91 | 4717924E | Pole | Long Beach |
| 92 | 1108601E | Pole | Lakewood |
| 93 | 924500E | Pole | Lakewood |

III. Field Inspection – Violations List

My staff observed the following violations during the field inspection 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.

Facilities on the following poles needed maintenance:

- I568855E: a visibility strip was damaged.
- 1334568E: a guy guard was damaged.
- 4374081E: a visibility strip was damaged.
- 4379525E: a visibility strip was damaged.

SCE Response:

The above conditions have been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.

- *Pole I568855E – visibility strip was damaged. SCE Response: Due on 08/16/2028.*
- *Pole 1334568E – guy guard was damaged. SCE Response: Due on 10/20/2027.*
- *Pole 4374081E – visibility strip was damaged. SCE Response: Due on 08/16/2028.*
- *Pole 4379525E – visibility strip was damaged. SCE Response: Due on 08/16/2028.*

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.

An unauthorized sign was attached to Pole number 1334569E.

SCE Response:

The above condition has been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.

- *Pole 1334569E – unauthorized attachment. SCE Response: Due on 08/14/2028.*

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” sign or band on each of the following poles was missing or damaged:

- 1568554E • 4228258E • 1746783E
- 1568855E • 4374081E • 1774382E
- 2276667E • 4379525E • 1746782E
- 1568853E • 4379518E • 1731590E
- I0588Y • 4379513E • 1183664E
- 4228256E • 1813084E • 1503054E
- 4228257E • 1812969E • 1108601E

SCE Response:

Thirteen 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 conditions have 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 1568554E – High Voltage Sign. **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 1568855E – High Voltage Sign. **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 2276667E – High Voltage Sign. **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 1568853E – High Voltage Sign. **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 I0588Y – High Voltage Sign. **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 4228256E – High Voltage Sign. **SCE Response:** Due on 08/16/2028.*
- *Pole 4228257E – High Voltage Sign. **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 4228258E – High Voltage Sign. **SCE Response:** Due on 08/16/2028.*
- *Pole 4374081E – High Voltage Sign. **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 4379525E – High Voltage Sign. **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 4379518E – High Voltage Sign. **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 4379513E – High Voltage Sign. **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 1813084E – High Voltage Sign. **SCE Response:** Due on 08/16/2028.*
- *Pole 1812969E – High Voltage Sign. **SCE Response:** Due on 08/16/2028.*
- *Pole 1746783E – High Voltage Sign. **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 1774382E – High Voltage Sign. **SCE Response:** Due on 08/16/2028.*
- *Pole 1746782E – High Voltage Sign. **SCE Response:** Due on 08/16/2028.*
- *Pole 1731590E – High Voltage Sign. **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 1183664E – High Voltage Sign. **SCE Response:** Due on 08/16/2028.*
- *Pole 1503054E – High Voltage Sign. **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 1108601E – High Voltage Sign. **SCE Response:** Due on 08/16/2028.*

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 on each of the following poles was damaged:

- 1334568E
- 1503055E
- 1108601E

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 1334568E – damaged ground moulding. **SCE Response:** Due on 08/16/2028.*
- *Pole 1503055E – 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 1108601E – 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 128, Rule 17.1, 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 [the] communication or supply lines and equipment.

Vegetation was obstructing the opening of padmounted transformer P5352658.

SCE Response:

The condition listed above was remediated on 07/13/2023.