



Melvin Stark
Principal Manager
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November 30, 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

EA2023-1091
Subject: Audit of Southern California Edison's Whittier District

Dear Mr. Daye:

Your letter, dated October 30, 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 Whittier District from September 18, 2023 to September 22, 2023.

Your letter requested a response by November 30, 2023. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Sincerely,

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

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

Enclosures: SED Audit Findings and SCE's Responses

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Kyle King, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records
- Late Inspections
- Work Orders Created from Inspections
- Repair Work Orders
- Intrusive Testing Records
- Third Party Notifications
- Vegetation Management Records
- Pole Loading Calculation 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 insuring that they are in good condition so as to conform with these rules.

SCE's records indicated that from 2018 through 2022, SCE had 17 annual grid patrol inspections and 7342 overhead detailed inspections that were completed or pending completion 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 7,342 overhead detailed inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from 2018 through 2022, it completed 17 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, 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 2018 through 2022, SCE had 78 underground detailed inspections that were completed or pending completion 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. Based on SCE's records, SCE notes that from 2018 through 2022, it completed 144 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-A: Resolution of Safety Hazards and General Order 95 Nonconformances, states in part:

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

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 had 1 annual grid patrol notification and 395 overhead notifications that were completed or pending completion past SCE's scheduled due date for corrective action.

SCE Response:

Without admitting that SCE violated GO 95, Rule 18-A or GO 95, Rule 31.1, SCE responds as follows. Based on SCE's records, from 2018 to 2022, SCE completed 1 annual grid patrol past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from 2018 through 2022, it completed 662 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 through 2022, SCE had 156 underground notifications that were completed or pending completion 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 2022, SCE completed 240 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 structures during the field inspection portion of the audit:

	Structure No.	Structure Type	Location
1	790623E	Utility Pole	Downey
2	790624E	Utility Pole	Downey
3	790625E	Utility Pole	Downey
4	4426884E	Utility Pole	Downey
5	2217424E	Utility Pole	Downey
6	2217423E	Utility Pole	Downey
7	4899702E	Utility Pole	Downey
8	2217414E	Utility Pole	Downey
9	2317659E	Utility Pole	Downey
10	2217427E	Utility Pole	Downey
11	2217428E	Utility Pole	Downey
12	2317697E	Utility Pole	Downey
13	4624536E	Utility Pole	Downey
14	790621E	Utility Pole	Downey
15	790622E	Utility Pole	Downey
16	833076E	Utility Pole	Downey
17	M13224Y	Utility Pole	Downey
18	M10065Y	Utility Pole	Downey
19	790637E	Utility Pole	Downey
20	790636E	Utility Pole	Downey
21	2217435E	Utility Pole	Downey
22	2217437E	Utility Pole	Downey
23	2217438E	Utility Pole	Downey
24	2217439E	Utility Pole	Downey
25	2217440E	Utility Pole	Downey
26	2217441E	Utility Pole	Downey
27	2217442E	Utility Pole	Downey
28	2217443E	Utility Pole	Downey
29	2217444E	Utility Pole	Downey
30	2217446E	Utility Pole	Downey
31	2217447E	Utility Pole	Downey
32	2317698E	Utility Pole	Downey
33	2217429E	Utility Pole	Downey
34	4767901E	Utility Pole	Downey
35	1352766E	Utility Pole	Downey
36	1352765E	Utility Pole	Downey
37	1352764E	Utility Pole	Downey

38	4085042E	Utility Pole	Downey
39	M8672Y	Utility Pole	Downey
40	1914626E	Utility Pole	Downey
41	4861600E	Utility Pole	Whittier
42	1321077E	Utility Pole	Whittier
43	4623975E	Utility Pole	Whittier
44	197938E	Utility Pole	Whittier
45	899190E	Utility Pole	Whittier
46	4264615E	Utility Pole	Whittier
47	4607879E	Utility Pole	Whittier
48	762887E	Utility Pole	Whittier
49	197933E	Utility Pole	Whittier
50	4468925E	Utility Pole	Whittier
51	680834E	Utility Pole	Whittier
52	4607878E	Utility Pole	Whittier
53	790423E	Utility Pole	Whittier
54	790424E	Utility Pole	Whittier
55	790425E	Utility Pole	Whittier
56	790426E	Utility Pole	Whittier
57	790428E	Utility Pole	Whittier
58	899194E	Utility Pole	Whittier
59	899192E	Utility Pole	Whittier
60	899193E	Utility Pole	Whittier
61	4743125E	Utility Pole	Whittier
62	1321079E	Utility Pole	Whittier
63	711918E	Utility Pole	Whittier
64	941901E	Utility Pole	Whittier
65	4425847E	Utility Pole	Whittier
66	1321080E	Utility Pole	Whittier
67	4374531E	Utility Pole	Whittier
68	4659321E	Utility Pole	Whittier
69	4469219E	Utility Pole	Whittier
70	790588E	Utility Pole	Whittier
71	790589E	Utility Pole	Whittier
72	4469220E	Utility Pole	Whittier
73	4576873E	Utility Pole	Whittier
74	941906E	Utility Pole	Whittier
75	941905E	Utility Pole	Whittier
76	941904E	Utility Pole	Whittier
77	941903E	Utility Pole	Whittier
78	941902E	Utility Pole	Whittier

79	1353198E	Utility Pole	La Mirada
80	1353197E	Utility Pole	La Mirada
81	1353196E	Utility Pole	La Mirada
82	1385951E	Utility Pole	La Mirada
83	1353151E	Utility Pole	La Mirada
84	4579897E	Utility Pole	La Mirada
85	1353157E	Utility Pole	La Mirada
86	1353158E	Utility Pole	La Mirada
87	1353176E	Utility Pole	La Mirada
88	1353177E	Utility Pole	La Mirada
89	1573614E	Utility Pole	La Mirada
90	P5554715	Padmounted Transformer	Norwalk
91	P5554714	Padmounted Transformer	Norwalk
92	P5554737	Padmounted Transformer	Norwalk
93	P5554712	Padmounted Switch	Norwalk
94	P5554713	Padmounted Switch	Norwalk
95	P5554716	Padmounted Transformer	Norwalk
96	5700295	Padmounted Transformer	Norwalk
97	P5700296	Padmounted Transformer	Norwalk
98	P5126191	Padmounted Transformer	Santa Fe Springs
99	P5126188	Padmounted Transformer	Santa Fe Springs
100	P5126187	Padmounted Transformer	Santa Fe Springs
101	P5434757	Padmounted Transformer	Santa Fe Springs
102	P5155409	Padmounted Transformer	La Mirada
103	P5178979	Padmounted Transformer	La Mirada
104	P5355533	Padmounted Transformer	La Mirada
105	P5058199	Padmounted Transformer	La Mirada
106	538240E	Utility Pole	Whittier
107	610136E	Utility Pole	Whittier
108	4726810E	Utility Pole	Whittier
109	610132E	Utility Pole	Whittier

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.

Pole number 1353197E had a damaged visibility strip.

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 1353197E – Damaged visibility strip. **SCE Response:** Due on 11/25/2028.*

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 poles were either missing or damaged:

- 790625E
- 833076E
- 2217435E
- 2217440E
- 2217444E
- 941904E

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 three 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 790625E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 4/28/2025.*
- *Pole 833076E – 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 2217435E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 11/25/2028.*
- *Pole 2217440E – 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 2217444E – 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 941904E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 11/25/2028.*

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 790426.

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 790426 – Unauthorized sign attached. **SCE Response:** SCE field personnel confirmed the correct Pole ID for this location is 790426E. The aforementioned condition listed is due on 11/27/2025.*

GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wire 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 supporting each of the following poles was loose:

- 1353151E
- 2217435E

SCE Response:

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. Note: GO 95 did not require a due date for priority 3 (level 3) notifications created prior to 07/01/2019.

- *Pole 1353151E – Loose down guy wire. **SCE Response:** Due on 8/31/2025.*
- *Pole 2217435E – Loose down guy wire. **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).

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

- 790637E
- 2217447E

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 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 790637E – 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 2217447E – Damaged ground moulding. **SCE Response:** Due on 11/25/2028.*

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.

The following Padmounted Transformers had bolts that were missing from the enclosure frame:

- P5554715

- P5155409

SCE Response:

The above conditions were previously recorded in SCE's Work Management System at the time of the audit, and were addressed in accordance with SCE's maintenance program.

- *Padmounted Transformer P5554715 – Missing bolts. **SCE Response:** Completed on 9/20/2023.*
- *Padmounted Transformer P5155409 – Missing bolts. **SCE Response:** Completed on 9/20/2023.*