



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

March 21, 2024

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

EA2023-1107

SUBJECT: Audit of Southern California Edison's Wildomar District

Dear Mr. Daye:

Your letter, dated February 21, 2024, 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 Wildomar District from December 18, 2023 to December 22, 2023.

Your letter requested a response by March 21, 2024. 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: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Stacey Ocampo, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Patrol & Detailed Inspection records
- Repair Notifications
- Intrusive Testing Records
- Third Party Notifications
- 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 November 2018 through November 2023, SCE completed 36 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 5 pending patrol 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. Based on SCE's records, SCE notes that from November 2018 through November 2023, it completed 36 annual grid patrols past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from November 2018 through November 2023, it had 5 pending patrol 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.

SCE's records indicated that from November 2018 through November 2023, SCE completed 1,616 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 65 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. Based on SCE's records, SCE notes that from November 2018 through November 2023, it completed 1,616 overhead detailed inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from November 2018 through November 2023, it had 65 pending overhead 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, and system issues, 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 of these rules.

SCE's records indicated that from November 2018 through November 2023, SCE completed 995 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 17 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. Based on SCE's records, SCE notes that from November 2018 through November 2023, it completed 995 underground inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from November 2018 through November 2023, it had 17 pending underground 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 November 2018 through November 2023, SCE completed 370 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 498 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. Based on SCE's records, SCE notes that from November 2018 through November 2023, it completed 370 overhead work orders past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that from November 2018 through November 2023, it had 498 open overhead work orders past SCE's scheduled due date. 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 November 2018 through November 2023, SCE completed 109 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 130 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. Based on SCE's records, from November 2018 through November 2023, SCE completed 109 underground work orders past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that from November 2018 through November 2023, it had 130 open underground work orders past SCE's scheduled 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 Inspection

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

| No. | Structure ID. | Type of Structure | Location |
|-----|---------------|-------------------|------------|
| 1 | 2361667E | Pole | Winchester |
| 2 | 2361668E | Pole | Winchester |
| 3 | 2352535E | Pole | Winchester |
| 4 | 2352536E | Pole | Winchester |
| 5 | 4357334E | Pole | Winchester |
| 6 | 4065102E | Pole | Winchester |
| 7 | 4065104E | Pole | Winchester |
| 8 | 4065105E | Pole | Winchester |
| 9 | 2199528E | Pole | Wildomar |
| 10 | 2112638E | Pole | Wildomar |
| 11 | 2112637E | Pole | Wildomar |
| 12 | 2112636E | Pole | Wildomar |
| 13 | 2112635E | Pole | Wildomar |
| 14 | 2075095E | Pole | Wildomar |
| 15 | 2075094E | Pole | Wildomar |
| 16 | 2014458E | Pole | Wildomar |
| 17 | 2014459E | Pole | Wildomar |
| 18 | 2014457E | Pole | Wildomar |
| 19 | 2245830E | Pole | Temecula |
| 20 | 4275605E | Pole | Temecula |
| 21 | 2245831E | Pole | Temecula |
| 22 | 2347108E | Pole | Temecula |
| 23 | 1999162E | Pole | Temecula |
| 24 | 4357690E | Pole | Temecula |
| 25 | 4275606E | Pole | Temecula |
| 26 | 4275607E | Pole | Temecula |
| 27 | 1999167E | Pole | Temecula |
| 28 | 1999168E | Pole | Temecula |
| 29 | 4140059E | Pole | Temecula |
| 30 | 4140058E | Pole | Temecula |
| 31 | 4140057E | Pole | Temecula |
| 32 | 4140056E | Pole | Temecula |
| 33 | 4140055E | Pole | Temecula |
| 34 | 4140054E | Pole | Temecula |
| 35 | 4140053E | Pole | Temecula |
| 36 | 4140052E | Pole | Temecula |
| 37 | 4140051E | Pole | Temecula |
| 38 | 4140050E | Pole | Temecula |
| 39 | 4583170E | Pole | Murrieta |
| 40 | 2075397E | Pole | Murrieta |
| 41 | 4583171E | Pole | Murrieta |
| 42 | 4594324E | Pole | Murrieta |

| | | | |
|----|----------|------|---------------|
| 43 | 2075396E | Pole | Murrieta |
| 44 | 4870401E | Pole | Murrieta |
| 45 | 4865496E | Pole | Murrieta |
| 46 | 1885573E | Pole | Murrieta |
| 47 | 2307331E | Pole | Murrieta |
| 48 | 4865495E | Pole | Murrieta |
| 49 | 1930685E | Pole | Murrieta |
| 50 | 1930686E | Pole | Murrieta |
| 51 | 4060523E | Pole | Murrieta |
| 52 | 4060522E | Pole | Murrieta |
| 53 | 4060521E | Pole | Murrieta |
| 54 | 4060520E | Pole | Murrieta |
| 55 | 4534249E | Pole | Murrieta |
| 56 | 4060518E | Pole | Murrieta |
| 57 | 4060517E | Pole | Murrieta |
| 58 | 4060516E | Pole | Murrieta |
| 59 | 4752809E | Pole | Murrieta |
| 60 | 4140011E | Pole | Murrieta |
| 61 | 4776070E | Pole | Murrieta |
| 62 | 2206513E | Pole | Lake Elsinore |
| 63 | 1991000E | Pole | Lake Elsinore |
| 64 | 1990999E | Pole | Lake Elsinore |
| 65 | 1564256E | Pole | Lake Elsinore |
| 66 | 4715481E | Pole | Lake Elsinore |
| 67 | 1990998E | Pole | Lake Elsinore |
| 68 | 1971449E | Pole | Lake Elsinore |
| 69 | 1971446E | Pole | Lake Elsinore |
| 70 | 4535362E | Pole | Lake Elsinore |
| 71 | 4710873E | Pole | Lake Elsinore |
| 72 | 1971445E | Pole | Lake Elsinore |
| 73 | 2150202E | Pole | Wildomar |
| 74 | 2150201E | Pole | Wildomar |
| 75 | 1594431E | Pole | Wildomar |
| 76 | 1668045E | Pole | Wildomar |
| 77 | 4214053E | Pole | Wildomar |
| 78 | 1668046E | Pole | Wildomar |
| 79 | 2352576E | Pole | Wildomar |
| 80 | 1796537E | Pole | Wildomar |
| 81 | 2112831E | Pole | Wildomar |
| 82 | 2112832E | Pole | Wildomar |
| 83 | 2227882E | Pole | Menifee |
| 84 | 4056723E | Pole | Menifee |
| 85 | 4060159E | Pole | Menifee |
| 86 | 4113412E | Pole | Menifee |
| 87 | 4872691E | Pole | Menifee |
| 88 | 213103 | Pole | Wildomar |
| 89 | 4952093E | Pole | Wildomar |

| | | | |
|-----|----------|-------------------------|----------|
| 90 | 4059937E | Pole | Wildomar |
| 91 | 4871862E | Pole | Wildomar |
| 92 | 1853895E | Pole | Wildomar |
| 93 | 1853898E | Pole | Wildomar |
| 94 | 4715991E | Pole | Wildomar |
| 95 | 2181900E | Pole | Wildomar |
| 96 | 2181899E | Pole | Wildomar |
| 97 | 4908298E | Pole | Wildomar |
| 98 | 4908297E | Pole | Wildomar |
| 99 | 4532417E | Pole | Wildomar |
| 100 | 4222673E | Pole | Wildomar |
| 101 | P5477380 | Pad-mounted Transformer | Temecula |
| 102 | P5734140 | Pad-mounted Transformer | Temecula |
| 103 | P5656516 | Pad-mounted Switch | Temecula |
| 104 | P5541258 | Pad-mounted Switch | Temecula |
| 105 | P5656515 | Pad-mounted Switch | Temecula |
| 106 | 5493806 | Vault | Murrieta |
| 107 | P5502778 | Pad-mounted Switch | Murrieta |
| 108 | P5502779 | Pad-mounted Switch | Murrieta |
| 109 | 5493807 | Vault | Murrieta |
| 110 | P5466890 | Pad-mounted Transformer | Murrieta |

IV. Field Inspection – Violations List

We observed the following violations during the field inspections:

GO 95, Rule 18-A3, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards, A. Resolution of Potential Violations of General Order 95 and Safety Hazards, states in part:

(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such safety hazard(s) no later than 10 business days after the discovery.

For pole 2181900E, SCE needs to notify the third party to complete a pole transfer from a buddy pole.

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 2181900E – SCE to notify the third party to complete a pole transfer from a buddy pole. SCE Response: Due on 12/31/2024.*

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 facilities required maintenance:

- 4065105E – the down guy anchor supporting the pole was buried.
- 4357334E – the visibility strip was damaged and not fully attached to the pole.
- 1853898E – a “buddy pole” was not yet removed and left approximately a foot away from the pole.

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 they will be addressed in accordance with SCE's maintenance program.

- *Pole 4065105E – Buried down guy anchor. SCE Response: Due on 4/4/2026.*
- *Pole 4357334E – Damaged visibility strip. SCE Response: Completed on 03/20/2024.*
- *Pole 1853898E – “Buddy pole” not yet removed. SCE Response: Due on 9/30/2024.*

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:

- 4140057E
- 4140055E
- 4140054E
- 4140053E
- 2181899E

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 4140057E – 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 4140055E – 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 4140054E – 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 4140053E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 6/5/2025.*
- *Pole 2181899E – 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 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.

Unauthorized foreign attachments were observed on each of the following SCE poles:

- 4065102E – “WARNING – NEIGHBORHOOD WATCH PROGRAM IN FORCE” sign
- 4275605E – “SPEED LIMIT” sign
- 4140059E – “TRUST & WILL” advertisement sign
- 4594324E – “TRUST & WILL” advertisement sign
- 4865496E – “SLOW DOWN” sign
- 1991000E – light fixture
- 1564256E – “NOTICE – 24 HOUR VIDEO SURVEILLANCE” sign
- 4715481E – “PRIVATE PROPERTY” sign
- 4214053E – light fixture
- 2181900E – surveillance motion detector

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 eight conditions have been recorded in SCE’s Work Management System and will be addressed in accordance with SCE’s maintenance program.

- *Pole 4065102E – Unauthorized attachment. **SCE Response:** SCE field personnel visited the location on 03/20/2024 and confirmed that the condition no longer exists. No further action is required.*
- *Pole 4275605E – Unauthorized attachment. **SCE Response:** Due on 9/23/2024.*
- *Pole 4140059E – Unauthorized attachment. **SCE Response:** SCE field personnel visited the location on 03/20/2024 and confirmed that the condition no longer exists. No further action is required.*
- *Pole 4594324E – Unauthorized attachment. **SCE Response:** SCE field personnel visited the location on 03/20/2024 and confirmed that the condition no longer exists. No further action is required.*
- *Pole 4865496E – Unauthorized attachment. **SCE Response:** Due on 12/31/2024.*
- *Pole 1991000E – Unauthorized attachment. **SCE Response:** Due on 09/18/2024.*
- *Pole 1564256E – Unauthorized attachment. **SCE Response:** Due on 09/19/2024.*
- *Pole 4715481E – Unauthorized attachment. **SCE Response:** Due on 09/19/2024.*
- *Pole 4214053E – Unauthorized attachment. **SCE Response:** Due on 5/22/2028.*
- *Pole 2181900E – Unauthorized attachment. **SCE Response:** Due on 12/31/2024.*

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

An SCE down guy wire attached to pole 4222673E was in contact with a third-party communications 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 4222673E – SCE down guy wire in contact with a third-party communications conductor. **SCE Response:** Due on 11/30/2024.*

GO 95, Rule 44.1, Installation and Reconstruction, states in part:

Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.

The pole loading calculations supplied by SCE for the following poles contained incorrect information:

- 2227882E – The pole loading data incorrectly recorded a composite fiberglass class H3 pole, which was found out to be a wooden class H1 pole at the time of the field inspection.
- 1991000E – The pole loading data incorrectly recorded a wooden pole, which was found out to be a composite fiberglass pole at the time of the field inspection.

SCE Response:

The above conditions have been corrected by SCE's district planning personnel. Pole loading calculations for Pole 2227882E and Pole 1991000E were updated on 03/21/2024.

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 and not taut:

- 4594324E
- 2075094E

The span guy wire supporting pole 4060516E was loose and not taut.

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 it will be addressed in accordance with SCE's maintenance program.

- Pole 4594324E – Loose down guy wire. **SCE Response:** Due on 2/1/2026.
- Pole 2075094E – Loose down guy wire. **SCE Response:** Due on 3/21/2025.
- Pole 4060516E – Loose span guy wire. **SCE Response:** Due on 1/25/2026.

GO 95, Rule 56.9, Guy Marker (Guy Guard), states in part:

A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.

The outer most down guy wire attached to pole 4715991E did not have a guy marker.

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 4715991E – Missing down guy marker. **SCE Response:** Completed on 3/20/2024.

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 required working space on the following pad-mounted switch doors were obstructed by fences and could not be opened:

- P5656516
- P5541258

SCE Response:

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

- Pad-Mount Switch P5656516 – Obstructed working space. **SCE Response:** Due on 03/21/2026.
- Pad-Mount Switch P5541258 – Obstructed working space. **SCE Response:** Due on 03/21/2026.