

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

TA2023-1055

Subject: Transmission Audit of Southern California Edison's Metro East Grid

Dear Mr. Daye:

Your letter, dated May 25, 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) transmission audit of Metro East Grid from April 17, 2023 to April 21, 2023.

Your letter requested a response by June 26, 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

Enclosures: SED Audit Findings and SCE's Responses

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

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Circuit facility inspection records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Tower Structure Analysis Records
- 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 IV, Transmission Facilities, states in part:

Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines.

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 inspection records indicated that from 2016 to 2022, SCE performed 5 underground detailed inspections past SCE's assigned inspection due dates.

SCE Response:

Without admitting that SCE violated GO 165, Section IV or GO 95, Rule 31.2, SCE responds as follows. Based on SCE's records, SCE completed 5 underground detailed inspections past their 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.

III. Field Inspections

My staff inspected the following facilities during the field inspection:

No.	Structure ID	Circuit	Structure	Location
1	7028297 (M27/T4)	Mesa-Vincent and Rio Hondo-Vincent No. 2	Tower	Duarte
2	M54 / T3	Rio Hondo-Vincent No. 1	Tower	Duarte
3	M55 / T1	Rio Hondo-Vincent No. 1	Tower	Duarte
4	7028298 (M28 / P1)	Mesa-Vincent and Rio Hondo-Vincent No. 2	Pole	Duarte
5	M55 / T1A	Rio Hondo-Vincent No. 1	Tower	Duarte
6	M55 / T2	Rio Hondo-Vincent No. 1	Tower	Duarte
7	7028299 (M28 / P2)	Mesa-Vincent and Rio Hondo-Vincent No. 2	Pole	Duarte
8	1567359E	Rio Hondo-Dalton-Finance-Lark Ellen	Pole	Irwindale
9	1567358E	Rio Hondo-Dalton-Finance-Lark Ellen	Pole	Irwindale
10	4864754E	Rio Hondo-Dalton-Finance-Lark Ellen	Pole	Irwindale
11	1567357E	Rio Hondo-Dalton-Finance-Lark Ellen	Pole	Irwindale
12	1567356E	Rio Hondo-Dalton-Finance-Lark Ellen	Pole	Irwindale
13	1567355E	Rio Hondo-Dalton-Finance-Lark Ellen	Pole	Irwindale
14	1557947E	Rio Hondo-Aero Jet-Azusa-Brew	Pole	Irwindale
15	1557948E	Rio Hondo-Aero Jet-Azusa-Brew	Pole	Irwindale
16	1557949E	Rio Hondo-Aero Jet-Azusa-Brew	Pole	Irwindale
17	1557950E	Rio Hondo-Aero Jet-Azusa-Brew	Pole	Irwindale
18	1508761E	Rio Hondo-Aero Jet-Azusa-Brew	Pole	Irwindale
19	1508762E	Rio Hondo-Aero Jet-Azusa-Brew	Pole	Irwindale
20	1508763E	Rio Hondo-Aero Jet-Azusa-Brew	Pole	Irwindale
21	7027146 (M4/T2)	Chino-Mira Loma No.1, Chino-Mira Loma No. 2	Tower	Rancho Cucamonga
22	M228/T3N	Chino-Mira Loma No.1	Tower	Rancho Cucamonga
23	7026145 (M4/T1)	Chino-Mira Loma No.1, Chino-Mira Loma No. 2	Tower	Rancho Cucamonga
24	7009125 (M228/T4)	Chino-Mira Loma No.1	Tower	Rancho Cucamonga
25	7027144 (M3/T5)	Chino-Mira Loma No.1, Chino-Mira Loma No. 2	Tower	Rancho Cucamonga
26	M229/T1N	Chino-Mira Loma No.1	Tower	Rancho Cucamonga
27	7027143	Chino-Mira Loma No.1, Chino-Mira Loma No. 2	Tower	Rancho Cucamonga
28	M229/T2N	Chino-Mira Loma No.1	Tower	Rancho Cucamonga
29	7027142 (M3/T3)	Chino-Mira Loma No.1, Chino-Mira Loma No. 2	Tower	Rancho Cucamonga

30	M229/T3	Chino-Mira Loma No.1	Tower	Rancho Cucamonga
31	7027141 (M3/T2)	Chino-Mira Loma No.1, Chino-Mira Loma No. 2	Tower	Rancho Cucamonga
32	M229/T4N	Chino-Mira Loma No.1	Tower	Rancho Cucamonga
33	M3/T1	Chino-Mira Loma No.1, Chino-Mira Loma No. 2	Tower	Rancho Cucamonga
34	M229/T5N	Chino-Mira Loma No.1	Tower	Rancho Cucamonga
35	M2/T5	Chino-Mira Loma No.1, Chino-Mira Loma No. 2	Tower	Rancho Cucamonga
36	M11/T6	Padua-Rancho Vista No.2	Tower	Upland
37	M11/T6	Padua-Rancho Vista No.1	Tower	Upland
38	M11/T5	Padua-Rancho Vista No.2, Padua-Rancho Vista No. 1	Tower	Upland
39	M11/T4	Padua-Rancho Vista No.2, Padua-Rancho Vista No. 1	Tower	Upland
40	M11/T3	Padua-Rancho Vista No.2, Padua-Rancho Vista No. 1	Tower	Upland
41	7009524 (M11/T7)	Padua-Rancho Vista No.2	Tower	Upland
42	7009522 (M11/T7)	Padua-Rancho Vista No.1	Tower	Upland
43	M12/T1	Padua-Rancho Vista No.2, Padua-Rancho Vista No. 1	Tower	Upland
44	4461286E	Walnut-Hillgen-Industry-Mesa-Reno	Pole	City of Industry
45	4461287E	Walnut-Hillgen-Industry-Mesa-Reno	Pole	City of Industry
46	4461288E	Walnut-Hillgen-Industry-Mesa-Reno	Pole	City of Industry
47	4461289E	Walnut-Hillgen-Industry-Mesa-Reno	Pole	City of Industry
48	M11/T8	Walnut-Hillgen-Industry-Mesa-Reno	Tower	City of Industry
49	M11/T7	Walnut-Hillgen-Industry-Mesa-Reno	Tower	City of Industry
50	M11/T6	Walnut-Hillgen-Industry-Mesa-Reno	Tower	City of Industry
51	M11/T5	Walnut-Hillgen-Industry-Mesa-Reno	Tower	City of Industry
52	7028450 (M43/T2)	Mesa-Mira Loma	Tower	La Puente Hills
53	7010620 (M8/T2)	Center-Linda, Mesa-Walnut	Tower	La Puente Hills

54	7028452 (M44/T1)	Mesa-Mira Loma	Tower	La Puente Hills
55	7010619 (M8/T1)	Center-Linda, Mesa-Walnut	Tower	La Puente Hills
56	M8/T9	Walnut-Hillgen-Industry-Mesa-Reno	Tower	La Puente Hills
57	4607915E	Walnut-Hillgen-Industry-Mesa-Reno	Pole	La Puente Hills
58	M8/T7	Mesa-Narrows	Tower	La Puente Hills
59	M8/T6	Mesa-Narrows	Tower	La Puente Hills
60	7014074 (M66/T1)	Mesa-Rio Hondo No.1, Mesa- Rio Hondo No. 2	Tower	La Puente Hills
61	7028410 (M39/T1)	Mesa-Vincent	Tower	La Puente Hills
62	4327223E	Rio Hondo-Amador-Jose-Mesa	Pole	La Puente Hills
63	4787845E	Rio Hondo-Amador-Jose-Mesa	Pole	La Puente Hills
64	M66/T1A	Mesa-Rio Hondo No.1, Mesa- Rio Hondo No. 2	Tower	La Puente Hills
65	VT6001182	Walnut-Nogales-Railroad No.2, Diamond Bar-Grand Crossing-Sopipe	Vault	Walnut
66	4607921E	Walnut-Nogales-Railroad No.2, Diamond Bar-Grand Crossing-Sopipe	Pole	Walnut
67	VT6001181	Walnut-Nogales-Railroad No.2, Diamond Bar-Grand Crossing-Sopipe	Vault	Walnut
68	VT6001180	Walnut-Nogales-Railroad No.2, Diamond Bar-Grand Crossing-Sopipe	Vault	Walnut
69	VT6001178	Walnut-Nogales-Railroad No.2, Diamond Bar-Grand Crossing-Sopipe	Vault	Walnut
70	VT600120481	Mira Loma - Vincent	Vault	Chino
71	VT6001349	Chino-Peyton-Soquel, Chino-Soquel	Vault	Chino
72	VT6001352	Chino-Ganesha-Plastic	Vault	Chino
73	VT6001346	Chino-Diamond Bar-Ganesha	Vault	Chino
74	43210 (6001347)	Chino-Diamond Bar-Ganesha, Chino-Ganesha-Peyton	Vault	Chino

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.

The following SCE transmission facilities were damaged and required maintenance:

- A leg of Tower M55/T1 of the Rio Hondo-Vincent No. 1 circuit was missing a nut and a bolt near the footing.
- A steel member near the base of Tower M229/T4N of the Chino-Mira Loma No.1 circuit was damaged.
- A footing attachment point of Tower M229/T1 of the Chino-Mira Loma No.1, Chino-Mira Loma No. 2 was buried.
- Two insulator bells and one insulator bell on another string of insulators supported on Tower M11/T6 of the Padua-Rancho Vista No.2 circuit were damaged.
- The base of Tower M11/T6 of the Padua-Rancho Vista No.1 circuit was covered in heavy vegetation, not allowing clear access to the base of the tower.
- A footing attachment point of Tower M11/T3 of the Padua-Rancho Vista No.2, Padua-Rancho Vista No. 1 was buried.
- A steel member near the base of Tower M11/T7 of the Walnut-Hillgen-Industry-Mesa-Reno circuit was damaged.

SCE Response:

Five 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. One of the remaining conditions has been addressed, and the other 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.

- *Rio Hondo/Vincent No.1 – Mile 55/Tower 1: Missing hardware. **SCE Response:** Due on 06/23/2026.*
- *Chino/Mira Loma No. 1 – Mile 229/Tower 4: Damaged steel member. **SCE Response:** Due on 6/14/2028.*
- *Chino/Mira Loma No. 1, Chino/Mira Loma No. 2 – Mile 229/Tower 1: Buried footing. **SCE Response:** SCE field personnel visited the site on 6/19/2023 and confirmed that the footing attachment point is no longer buried. No further action is required.*
- *Padua/Rancho Vista No. 2 – Mile 11/Tower 6: Damaged insulators. **SCE Response:** Due on 9/18/2025.*

- *Padua/Rancho Vista No. 1 – Mile 11/Tower 6: Vegetation obstructing tower base. SCE Response: Due on 5/9/2024.*
- *Padua/Rancho Vista No. 2 – Mile 11/Tower 3: Buried footing. SCE Response: Due on 4/21/2027.*
- *Walnut/Hillgen/Industry/Mesa/Reno – Mile 11/Tower 7: Damaged steel member. SCE Response: Due on 6/17/2026.*

GO 95, Rule 61.6, Marking and Guarding, states in part:

All towers shall be equipped with signs designed to warn the public of the danger of climbing same. Additionally, such signs shall include a graphic depiction of the dangers of falling or electrocution associated with climbing the towers. Such signs shall be placed and arranged so that they may be read from the four corners of the tower.

The warning signs on each of the following SCE transmission towers and structures could not be read from all four corners of the tower or structures.

- Vegetation obstructed the warning sign attached to Tower 7028297 (M27/T4) from being seen from all four corners of the tower.
- The warning sign attached to Tower M54/T3 of the Rio Hondo-Vincent No. 1 circuit could not be seen from all four corners of the tower.

SCE Response:

The conditions listed above have been recorded in SCE’s Work Management System and will be addressed in accordance with SCE’s maintenance program and GO 95.

- *Tower 7028297 (Mile 27/Tower 4) - Obstructed warning sign. SCE Response: Due on 6/13/2024.*
- *Rio Hondo/Vincent No.1 – Mile 54/Tower 3: The warning sign could not be read from all four corners of the tower. SCE Response: Due on 12/18/2023.*