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

July 10, 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

EA2024-1115

Subject: Audit of Southern California Edison's Antelope Valley District

Dear Mr. Daye:

Your letter, dated June 10, 2024, requested that we advise you of actions taken by Southern California Edison Company (SCE) to address conditions identified during the Safety Enforcement Division's (SED's) distribution audit of SCE's Antelope Valley District from May 28, 2024 to May 31, 2024.

Your letter requested a response by July 10, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Mel Stark
Principal Manager, EHSQ-T&D Compliance & Quality
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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
Derek Fong, Senior Utilities Engineer, Supervisor, ERB, SED, CPUC
Kyle King, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- Patrol and 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 117 annual grid patrol inspections and 7620 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 calendar year 2018 through 2022, it had 123 annual grid patrols that were completed or pending completion past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from calendar year 2018 through 2022, it had 8,552 overhead detailed inspections that were completed or pending completion 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, system issues 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 223 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 calendar year 2018 through 2022, it had 337 underground inspections that were completed or pending completion 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, system issues 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 66 annual grid patrol notifications and 1084 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 calendar year 2018 to 2022, SCE had 106 annual grid patrol work orders that were completed or pending completion past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, SCE notes that from calendar year 2018 to 2022, it had 8,375 overhead work orders that were completed or pending completion 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.

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 525 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 calendar year 2018 through 2022, SCE had 329 underground work orders that were completed or pending completion 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 Inspections

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

	Structure No.	Structure Type	Location
1	911496E	Utility Pole	Lancaster
2	911495E	Utility Pole	Lancaster
3	911252E	Utility Pole	Lancaster
4	4614054E	Utility Pole	Lancaster
5	911254E	Utility Pole	Lancaster
6	911255E	Utility Pole	Lancaster
7	911256E	Utility Pole	Lancaster
8	1021783E	Utility Pole	Lancaster
9	911257E	Utility Pole	Lancaster
10	911258E	Utility Pole	Lancaster
11	907795E	Utility Pole	Lancaster
12	1218448E	Utility Pole	Lancaster
13	907797E	Utility Pole	Lancaster
14	907798E	Utility Pole	Lancaster
15	1434388E	Utility Pole	Lancaster
16	907799E	Utility Pole	Lancaster
17	907800E	Utility Pole	Lancaster
18	K9094Y	Utility Pole	Lancaster
19	4767137E	Utility Pole	Lancaster
20	1587131E	Utility Pole	Lancaster
21	K9090Y	Utility Pole	Lancaster
22	K9089Y	Utility Pole	Lancaster
23	K9088Y	Utility Pole	Lancaster
24	938032E	Utility Pole	Lancaster
25	1022068E	Utility Pole	Lancaster
26	4938643E	Utility Pole	Lancaster
27	1022069E	Utility Pole	Lancaster
28	1121628E	Utility Pole	Lancaster
29	K7708Y	Utility Pole	Lancaster
30	K9087Y	Utility Pole	Lancaster
31	K9086Y	Utility Pole	Lancaster
32	K9085Y	Utility Pole	Lancaster
33	1021384E	Utility Pole	Lancaster
34	1185017E	Utility Pole	Lancaster
35	4615598E	Utility Pole	Lancaster
36	4033704E	Utility Pole	Acton
37	4189928E	Utility Pole	Acton

38	676685E	Utility Pole	Acton
39	676686E	Utility Pole	Acton
40	676687E	Utility Pole	Acton
41	676688E	Utility Pole	Acton
42	676689E	Utility Pole	Acton
43	2294811E	Utility Pole	Acton
44	4339012E	Utility Pole	Acton
45	626696E	Utility Pole	Acton
46	4393837E	Utility Pole	Acton
47	2124105E	Utility Pole	Acton
48	2124106E	Utility Pole	Acton
49	2180786E	Utility Pole	Acton
50	2124107E	Utility Pole	Acton
51	4814258E	Utility Pole	Acton
52	2180785E	Utility Pole	Acton
53	2265759E	Utility Pole	Acton
54	1078861E	Utility Pole	Acton
55	4078475E	Utility Pole	Acton
56	4033705E	Utility Pole	Acton
57	676684E	Utility Pole	Acton
58	2229375E	Utility Pole	Acton
59	2229376E	Utility Pole	Acton
60	4814255E	Utility Pole	Acton
61	2229377E	Utility Pole	Acton
62	4820725E	Utility Pole	Acton
63	2366407E	Utility Pole	Acton
64	676682E	Utility Pole	Acton
65	1912785E	Utility Pole	Acton
66	1912786E	Utility Pole	Acton
67	1912787E	Utility Pole	Acton
68	583452H	Utility Pole	Acton
69	676680E	Utility Pole	Acton
70	4958414E	Utility Pole	Acton
71	676679E	Utility Pole	Acton
72	4914499E	Utility Pole	Acton
73	10T9973H	Utility Pole	Acton
74	676678E	Utility Pole	Acton
75	4777755E	Utility Pole	Acton
76	4958413E	Utility Pole	Acton
77	676675E	Utility Pole	Acton
78	1123470E	Utility Pole	Acton

79	1123471E	Utility Pole	Acton
80	1403770E	Utility Pole	Acton
81	1403771E	Utility Pole	Acton
82	4205692E	Utility Pole	Acton
83	4176194E	Utility Pole	Acton
84	1403772E	Utility Pole	Acton
85	4777819E	Utility Pole	Acton
86	1434292E	Utility Pole	Acton
87	4740694E	Utility Pole	Acton
88	1434294E	Utility Pole	Acton
89	4622665E	Utility Pole	Acton
90	4454049E	Utility Pole	Acton
91	563849E	Utility Pole	Acton
92	2273841E	Utility Pole	Acton
93	1121558E	Utility Pole	Acton
94	1121559E	Utility Pole	Acton
95	4622657E	Utility Pole	Acton
96	4777757E	Utility Pole	Acton
97	536213E	Utility Pole	Acton
98	536187E	Utility Pole	Acton
99	4434794E	Utility Pole	Palmdale
100	4434795E	Utility Pole	Palmdale
101	4434796E	Utility Pole	Palmdale
102	2208404E	Utility Pole	Palmdale
103	4434797E	Utility Pole	Palmdale
104	4747502E	Utility Pole	Palmdale
105	4747501E	Utility Pole	Palmdale
106	1840701E	Utility Pole	Palmdale
107	P5396305	Padmounted Transformer	Palmdale
108	P5396304	Padmounted Transformer	Palmdale
109	P5414599	Padmounted Switch	Palmdale
110	P5736460	Padmounted Transformer	Palmdale
111	P5451486	Padmounted Switch	Palmdale
112	P5451485	Padmounted Transformer	Palmdale
113	P5451489	Padmounted Transformer	Palmdale
114	P5396309DF	Padmounted Transformer	Palmdale
115	P5396308	Padmounted Transformer	Palmdale
116	P5382750	Padmounted Transformer	Palmdale
117	P5396312	Padmounted Transformer	Palmdale
118	P5576476	Padmounted Transformer	Palmdale
119	PMS5158529	Padmounted Switch	Lancaster

120	P5157975	Padmounted Transformer	Lancaster
121	X5157677	Padmounted Splice Box	Lancaster
122	B5321794	Underground Burd Transformer	Lancaster
123	B5321793	Underground Burd Transformer	Lancaster
124	B5321792	Underground Burd Transformer	Lancaster
125	V5750664	Underground Vault	Lancaster

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 guy guard attached to Pole 1022068E was damaged.

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 1022068E – Damaged guy guard.* ***SCE Response:*** *Due on 06/26/2029.*

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:

- 676687E
- K9086Y
- K9085Y
- 1021384E
- 907797E
- 907799E
- 907800E
- 911496E
- 911254E
- 911255E
- 911258E

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 676687E – 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 K9086Y– 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 K9085Y – 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 1021384E – 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 907797E – 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 907799E – 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 907800E – 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 911496E – 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 911254E– 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 911255E – 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 911258E – 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.*

An unauthorized sign was attached to Pole number 536213E.

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 536213E – Unauthorized Attachment.* ***SCE Response:*** *Due on 12/02/2024.*

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:

- 536213E
- 563849E
- 1434292E
- 4740694E
- 2265759E
- 1185017E
- 1022068E

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.

- *Pole 536213E – Loose Down guy wire.* ***SCE Response:*** *Due on 12/02/2024.*
- *Pole 563849E – Loose Down guy wire.* ***SCE Response:*** *Due on 12/02/2024.*

- *Pole 1434292E – Loose Down guy wire.* ***SCE Response:*** *Due on 12/02/2024.*
- *Pole 4740694E – Loose Down guy wire.* ***SCE Response:*** *Due on 12/02/2024.*
- *Pole 2265759E – Loose Down guy wire.* ***SCE Response:*** *Due on 12/02/2024.*
- *Pole 1185017E – Loose Down guy wire.* ***SCE Response:*** *Due on 06/26/2029.*
- *Pole 1022068E – Loose Down guy wire.* ***SCE Response:*** *Due on 06/26/2029.*

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:

- 911256E
- 907800E
- K9090Y
- K9088Y
- 1022069E
- K9086Y
- 907795E

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.

- *Pole 911256E – Damaged Ground Molding.* ***SCE Response:*** *Due on 06/30/2027.*
- *Pole 907800E – Damaged Ground Molding.* ***SCE Response:*** *Due on 6/26/29.*
- *Pole K9090Y – Damaged Ground Molding.* ***SCE Response:*** *Due on 06/30/2029.*
- *Pole K9088Y – Damaged Ground Molding.* ***SCE Response:*** *Due on 06/30/2029.*
- *Pole 1022069E – Damaged Ground Molding.* ***SCE Response:*** *Due on 06/30/2029.*
- *Pole K9086Y – Damaged Ground Molding.* ***SCE Response:*** *Due on 06/26/2029.*
- *Pole 907795E – Damaged Ground Molding.* ***SCE Response:*** *Due on 06/30/2029.*

General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum clearance of "Communication Conductors (Including Open Wire, Cables and Service Drops)" from guy and span wires supporting conductors on the same pole to be 3 in.

An SCE down guy wire was touching a third-party communications conductor on each of the following SCE poles:

- 907800E
- K9087Y
- 4078475E

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 907800E – Down guy wires in contact with communications conductors.* ***SCE Response:*** *Due on 06/26/2029.*
- *Pole K9087Y– Down guy wires in contact with communications conductors.* ***SCE Response:*** *Due on 06/30/2029.*
- *Pole 4078475E – Down guy wires in contact with communications conductors.* ***SCE Response:*** *Due on 12/02/2024.*