Melvin Stark
Principal Manager
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August 30, 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

EA2024-1129

Subject: Electric distribution audit of SCE's Barstow District

Dear Mr. Daye:

Your letter, dated July 30, 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 Barstow District from April 8-12, 2024.

Your letter requested a response by August 30, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Mel Stark
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Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Jose Lastra, Utilities Engineer, Electric Safety and Reliability Branch, 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 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 June 2021 through May 2024, SCE completed 63 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 12 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 June 2021 through May 2024, it had 63 annual grid patrols that were completed past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 12 annual grid patrols that were 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.

SCE's records indicated that from June 2021 through May 2024, SCE completed 3,671 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 739 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 June 2021 through May 2024, it had 4,407 overhead detailed inspections that were completed past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 57 overhead detailed inspections that were pending completion past SCE 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 June 2021 through May 2024, SCE completed 54 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 1 pending underground inspection that was 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 June 2021 through May 2024, it had 54 underground inspections that were completed past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 1 pending underground inspection that was 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 June 2021 through May 2024, SCE completed 435 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 272 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-A or GO 95, Rule 31.1, SCE responds as follows. Based on SCE's records, from June 2021 through May 2024, SCE had 445 overhead work orders that were completed past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 272 open overhead work orders that were 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 June 2021 through May 2024, SCE completed 10 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 24 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 June 2021 through May 2024, SCE had 10 underground work orders that were completed past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, as of the date of the audit, SCE had 24 underground work orders that were 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 facilities during the field inspection portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	4956946E	Wood Pole	Barstow
2	4345560E	Wood Pole	Barstow
3	2345562E	Wood Pole	Barstow
4	2345561E	Wood Pole	Barstow
5	2260549E	Wood Pole	Barstow
6	430200S	Wood Pole	Barstow
7	430199S	Wood Pole	Barstow
8	429556S	Wood Pole	Barstow
9	429558S	Wood Pole	Barstow
10	1650527E	Wood Pole	Lenwood
11	1650528E	Wood Pole	Lenwood
12	1650526E	Wood Pole	Lenwood
13	4650525E	Wood Pole	Lenwood
14	1650524E	Wood Pole	Lenwood
15	36908CIT	Wood Pole	Lenwood
16	2109107E	Wood Pole	Lenwood
17	2109108E	Wood Pole	Lenwood
18	4429748E	Wood Pole	Lenwood
19	4845588E	Wood Pole	Lenwood
20	4236379E	Wood Pole	Newberry Springs
21	229937S	Wood Pole	Newberry Springs
22	229936S	Wood Pole	Newberry Springs
23	4015152E	Wood Pole	Newberry Springs
24	4045005E	Wood Pole	Newberry Springs
25	4015151E	Wood Pole	Newberry Springs
26	4015153E	Wood Pole	Newberry Springs
27	2236878E	Wood Pole	Newberry Springs
28	4639201E	Wood Pole	Newberry Springs
29	2236876E	Wood Pole	Newberry Springs
30	4572353E	Wood Pole	Dagget
31	4823678E	Wood Pole	Dagget
32	2069336E	Wood Pole	Dagget
33	2069337E	Wood Pole	Dagget
34	2069338E	Wood Pole	Dagget
35	2263431E	Wood Pole	Dagget
36	2069339E	Wood Pole	Dagget
37	2063639E	Wood Pole	Dagget
38	2263640E	Wood Pole	Dagget
39	4792057E	Wood Pole	Barstow
40	4924142E	Wood Pole	Barstow
41	4924143E	Wood Pole	Barstow
42	1 Pole East of 4924143E	Wood Pole	Barstow
43	4924144E	Wood Pole	Barstow
44	30295CIT	Wood Pole	Barstow

45	2179159E	Wood Pole	Barstow
46	30293CIT	Wood Pole	Barstow
47	4791966E	Wood Pole	Barstow
48	29497CIT	Wood Pole	Barstow
49	4572019E	Wood Pole	Dunn
50	1929270E	Wood Pole	Dunn
51	1929269E	Wood Pole	Dunn
52	2361458E	Wood Pole	Dunn
53	2361459E	Wood Pole	Dunn
54	2361460E	Wood Pole	Dunn
55	2361461E	Wood Pole	Dunn
56	2361462E	Wood Pole	Dunn
57	1929267E	Wood Pole	Dunn
58	1929266E	Wood Pole	Dunn
59	1929265E	Wood Pole	Dunn
60	1929264E	Wood Pole	Dunn
61	1929263E	Wood Pole	Dunn
62	4660025E	Wood Pole	Dunn
63	2236585E	Wood Pole	Yermo
64	1593974E	Wood Pole	Yermo/Calico
65	1593973E	Wood Pole	Yermo/Calico
66	1593972E	Wood Pole	Yermo/Calico
67	1594039E	Wood Pole	Yermo/Calico
68	4933972E	Wood Pole	Yermo/Calico
69	429647S	Wood Pole	Yermo/Calico
70	1543442E	Wood Pole	Yermo/Calico
71	429646S	Wood Pole	Yermo/Calico
72	429645S	Wood Pole	Yermo/Calico
73	2266771E	Wood Pole	Yermo/Calico
74	4853970E	Wood Pole	Yermo/Calico
75	429643S	Wood Pole	Yermo/Calico
76	429642S	Wood Pole	Yermo/Calico
77	328768S	Wood Pole	Barstow
78	2004113E	Wood Pole	Barstow
79	4015179E	Wood Pole	Barstow
80	4015178E	Wood Pole	Barstow
81	4015177E	Wood Pole	Barstow
82	4015180E	Wood Pole	Barstow
83	29498S	Wood Pole	Barstow
84	29497S	Wood Pole	Barstow
85	29496S	Wood Pole	Barstow
86	P5477123	Padmount Transformer	Barstow
87	P5477121	Padmount Switch, PME	Barstow
88	P5477124	Padmount Transformer	Barstow
89	P5477125	Padmount Transformer	Barstow
90	P5540232	Padmount Transformer	Barstow
91	P5540234	Padmount Transformer	Barstow
92	P5575167	Manhole	Barstow
93	P5444035	Vault	Barstow

94	P5764555	Padmount Transformer	Barstow
95	P5476973	Vault	Barstow

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.*

SCE's facilities on each of the following poles required maintenance:

- Pole 2069339E: there was a bird nest on the RAR (remote automatic recloser).
- Pole 1929266E: the bird guard was dislodged from the insulator and conductor.
- Pole 2236585E: the ground wire attached to the transformer was cut
- Pole 1593972E: the ground wire attached to the transformer was cut

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 2069339E – Birds Nest on Equipment.* ***SCE Response:*** *Due on 08/06/2027.*
- *Pole 1929266E – Avian Protection Loose.* ***SCE Response:*** *Due on 08/05/2029.*
- *Pole 2236585E – Ground Wire Cut / Vandalized.* ***SCE Response:*** *Due on 08/06/2027.*
- *Pole 1593972E – Ground Wire Cut / Vandalized.* ***SCE Response:*** *Due on 08/06/2027.*

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.

The radial clearance between an SCE down guy wire and a third-party communications conductor on Pole 4572019E was less than 3 inches.

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 4572019E – Down guy wires in contact with communications conductors.* ***SCE Response:*** *Due on 08/06/2027.*

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 SCE poles were damaged:

- 4345560E
- 2345562E
- 2260549E
- 430200S
- 429556S
- 1650527E
- 2109107E
- 4236379E
- 229937S
- 4015152E
- 2236878E
- 2236876E
- 30295CIT
- 30293CIT
- 1929269E
- 2361460E
- 1593974E
- 1593973E
- 429645S
- 2266771E
- 429643S
- 2004113E
- 4015177E
- 4015180E
- 29498S
- 29497S

SCE Response:
Four of 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 2109107E– High Voltage Sign Damaged/Missing.* ***SCE Response:*** *08/05/2029.*
- *Pole 4015152E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *08/05/2029.*
- *Pole 30293CIT– High Voltage Sign Damaged/Missing.* ***SCE Response:*** *08/05/2029.*
- *Pole 429643S– High Voltage Sign Damaged/Missing. SCE Response: 08/05/2029.*

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

- *Pole 4345560E – 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 2345562E– 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 2260549E – 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 430200S – 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 429556S– 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 1650527E – 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 4236379E– 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 229937S– 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 2236878E – 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 2236876E– 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 30295CIT– 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 1929269E– 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 2361460E– 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 1593974E– 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 1593973E– 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 429645S– 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 2266771E– 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 2004113E– 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 4015177E– 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 4015180E– 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 29498S– 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 29497S– 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 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:

- Pole 4015177E
- Pole 2236585E

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 4015177E – Ground Molding Damaged.* ***SCE Response:*** *Due on 08/06/2027.*
- *Pole 2236585E – Ground Molding Damaged.* ***SCE Response:*** *Due on 08/06/2027.*

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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 wires on each of the following poles was not maintained taut:

- Pole 1593973E: the down guy wire was loose.
- Pole 2236585E: the down guy wire was not connected.

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 1593973E – Loose Down guy wire.* ***SCE Response:*** *Due on 08/06/2027.*
- *Pole 2236585E – Down guy wire not connected.* ***SCE Response:*** *Due on 08/06/2027.*