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

July 29, 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

EA2024-1138

Subject: Audit of Southern California Edison's Kernville District

Dear Mr. Daye:

Your letter, dated June 27, 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 Kernville District from June 10th – 14th, 2024.

Your letter requested a response by July 29, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Mel Stark
Principal Manager, EHSQ-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
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 & 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 2022 through 2023, SCE completed 258 overhead detailed inspections 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 2022 through 2023, it completed 108 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, 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 2022 through 2023, SCE completed 17 underground detailed inspections 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 2022 through 2023, it completed 4 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, 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 2022 to 2023, SCE had 1 annual grid patrol notification that was late. SCE's records indicated that from 2022 to 2023, SCE had 41 overhead detailed inspection notifications that were pending late for corrective action.

SCE Response:

Without admitting that SCE violated, or GO 95, Rule 18A or GO 95, Rule 31.1, SCE responds as follows. Based on SCE's records, SCE notes that from calendar year 2022 through 2023, it had 258 overhead detailed notifications that were completed past SCE's scheduled due date.

Additionally, based on SCE's records, SCE notes that from calendar year 2022 through 2023, it had 41 overhead detailed notifications 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.

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 2022 to 2023, SCE had 5 underground detailed inspection notifications that were pending late for corrective action.

SCE Response:

Without admitting that SCE violated GO 128, Rule 17.1, SCE responds as follows. Based on SCE's records, SCE notes that from calendar year 2022 through 2023, it had 4 underground inspections 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.

III. Field Inspections

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

	Structure No.	Structure Type	Location
1	5180131	Underground Burd Switch	South Lake
2	5180115	Underground Burd Transformer	South Lake
3	5180114	Underground Burd Transformer	South Lake
4	5180113	Underground Burd Transformer	South Lake
5	P5127303	Padmounted Transformer	South Lake
6	P5486869	Padmounted Transformer	South Lake
7	P5486940	Padmounted Transformer	South Lake
8	P5309020	Padmounted Transformer	South Lake
9	P5604814	Padmounted Transformer	South Lake
10	B5180150	Underground Burd Transformer	Mountain Mesa
11	B5153242	Underground Splice Box	Mountain Mesa
12	5180170	Underground Burd Transformer	Mountain Mesa
13	5127349	Underground Burd Transformer	Mountain Mesa
14	PME5334609	Padmounted Switch	Mountain Mesa
15	P5309095	Padmounted Transformer	Mountain Mesa
16	P5309063	Padmounted Transformer	Lake Isabella
17	P5309064	Padmounted Transformer	Lake Isabella
18	P5309175	Padmounted Transformer	Lake Isabella
19	P5309190	Padmounted Transformer	Lake Isabella
20	5309189	Underground Burd Switch	Lake Isabella
21	5309196	Underground Burd Transformer	Lake Isabella
22	B5309197	Underground Burd Transformer	Lake Isabella
23	B5309200	Underground Burd Transformer	Lake Isabella
24	5309199	Underground Burd Transformer	Lake Isabella
25	5309198	Underground Burd Transformer	Lake Isabella
26	5309194	Padmounted Transformer	Lake Isabella
27	5309193	Padmounted Transformer	Lake Isabella
28	5127323	Padmounted Transformer	Lake Isabella

29	5127309	Padmounted Transformer	Lake Isabella
30	P5309176	Padmounted Transformer	Lake Isabella
31	PM5309177	Padmounted Transformer	Lake Isabella
32	P5309178	Padmounted Transformer	Lake Isabella
33	V5634038	Vault	Lake Isabella
34	P5015202	Padmounted Transformer	Kernville
35	1761345E	Utility Pole	Kernville
36	1761346E	Utility Pole	Kernville
37	4989650E	Utility Pole	Kernville
38	1761347E	Utility Pole	Kernville
39	818198E	Utility Pole	Kernville
40	2261295E	Utility Pole	Kernville
41	4559793E	Utility Pole	Kernville
42	818196E	Utility Pole	Kernville
43	818200E	Utility Pole	Kernville
44	27035CIT	Utility Pole	Kernville
45	1828383E	Utility Pole	Kernville
46	4875699E	Utility Pole	Kernville
47	4614818E	Utility Pole	Kernville
48	895749E	Utility Pole	Kernville
49	4875152E	Utility Pole	Kernville
50	895748E	Utility Pole	Kernville
51	4615288E	Utility Pole	Kernville
52	4722428E	Utility Pole	Kernville
53	895983E	Utility Pole	Kernville
54	895743E	Utility Pole	Kernville
55	895742E	Utility Pole	Kernville
56	895741E	Utility Pole	Kernville
57	895740E	Utility Pole	Kernville
58	895987E	Utility Pole	Kernville
59	895986E	Utility Pole	Kernville
60	957822E	Utility Pole	Kernville
61	2163347E	Utility Pole	Kernville
62	2063073E	Utility Pole	Kernville
63	2063074E	Utility Pole	Kernville
64	4722427E	Utility Pole	Kernville
65	4722426E	Utility Pole	Kernville
66	895663E	Utility Pole	Kernville
67	8995664E	Utility Pole	Kernville
68	895665E	Utility Pole	Kernville
69	895666E	Utility Pole	Kernville

70	895662E	Utility Pole	Kernville
71	895661E	Utility Pole	Kernville
72	1790007E	Utility Pole	Kernville
73	995336E	Utility Pole	Kernville
74	818187E	Utility Pole	Kernville
75	4389227E	Utility Pole	Kernville
76	1761332E	Utility Pole	Kernville
77	4389228E	Utility Pole	Kernville
78	818185E	Utility Pole	Kernville
79	818184E	Utility Pole	Kernville
80	818183E	Utility Pole	Kernville
81	818182E	Utility Pole	Kernville
82	818181E	Utility Pole	Kernville
83	818180E	Utility Pole	Kernville
84	818179E	Utility Pole	Kernville
85	934731E	Utility Pole	Kernville
86	818178E	Utility Pole	Kernville
87	4730064E	Utility Pole	Kernville
88	1170300E	Utility Pole	Kernville
89	2261215E	Utility Pole	Kernville
90	1235880E	Utility Pole	Kernville
91	818434E	Utility Pole	Kernville
92	2253739E	Utility Pole	Kernville
93	1997040E	Utility Pole	Kernville
94	4719049E	Utility Pole	Kernville
95	4559782E	Utility Pole	Kernville
96	4319967E	Utility Pole	Kernville
97	1799237E	Utility Pole	Kernville
98	1799225E	Utility Pole	Kernville
99	1799224E	Utility Pole	Kernville
100	4319834E	Utility Pole	Kernville
101	1828449E	Utility Pole	Kernville
102	818436E	Utility Pole	Kernville
103	1400958E	Utility Pole	Wofford Heights
104	1400957E	Utility Pole	Wofford Heights
105	1400959E	Utility Pole	Wofford Heights
106	4606619E	Utility Pole	Wofford Heights
107	1400814E	Utility Pole	Wofford Heights
108	1400980E	Utility Pole	Wofford Heights
109	4606618E	Utility Pole	Wofford Heights
110	4606617E	Utility Pole	Wofford Heights

111	2197714E	Utility Pole	Wofford Heights
112	2197713E	Utility Pole	Wofford Heights
113	2072104E	Utility Pole	Wofford Heights
114	4082501E	Utility Pole	Wofford Heights
115	4614713E	Utility Pole	Wofford Heights

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 SCE facilities on each of the following poles were not maintained for their intended use:

- 895741E – an SCE down guy wire was strained by vegetation.
- 2072104E – two SCE down guy anchors were completely buried (potentially leading to corrosion between the down guy anchor and the down guy wire).

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 895741E – Vegetation Strain on Down Guy.* ***SCE Response:*** *Due on 01/14/2025.*
- *Pole 2072104E – 2 Buried Anchors.* ***SCE Response:*** *Due on 01/14/2025.*

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 2261295E.

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 2261295E – Unauthorized Attachment.* ***SCE Response:*** *Due on 01/14/2025.*

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 not maintained taut:

- 4614818E
- 895743E
- 4722427E
- 818185E
- 4559782E

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 4614818E – Loose Down guy wire.* ***SCE Response:*** *Due on 07/15/2029.*
- *Pole 895743E – Loose Down guy wire.* ***SCE Response:*** *Due on 06/06/2025.*
- *Pole 4722427E – Loose Down guy wire.* ***SCE Response:*** *Due on 12/24/2024.*
- *Pole 818185E – Loose Down guy wire.* ***SCE Response:*** *Due on 07/15/2029.*
- *Pole 4559782E – Loose Down guy wire.* ***SCE Response:*** *Due on 07/15/2029.*

GO 95, Rule 37, Minimum Clearance of Wires above Railroads, Thoroughfares, Buildings, Etc. Table 1, Case D, Column 7, requires that secondary conductors maintain a minimum horizontal clearance of 3 feet from a building where such conductor is not attached therto.

On Pole 818187E, an SCE secondary supply conductor service drop was less than 3 feet from a walkable structure.

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 818187E – SCE Secondary Conductor Clearance Infraction.* ***SCE Response:*** *Due on 01/14/2025.*

GO 95, Rule 38, Minimum Clearance of Wires from other Wires, Table 2, Column D, Case 4 requires the minimum clearance between supply conductors of 0-750 volts from other supply conductors of 0-750 volts to be 24 inches.

On Pole 1235880E, an SCE secondary triplex service drop conductor was touching an SCE neutral 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 1235880E – SCE Service drop contacting SCE Neutral Conductor.* ***SCE Response:*** *Due on 01/14/2025.*

GO 95, Rule 37, Minimum Clearance of Wires above Railroads, Thoroughfares, Buildings, Etc. Table 1, Case 10, Column D, requires that secondary conductor service drop maintain a minimum radial centerline clearance of 3 ft. from a light post where such conductor is not part of the overhead line system.

On Pole 1170300E, an SCE secondary supply conductor service drop was touching a light post.

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 1170300E – SCE Secondary contacting light post.* ***SCE Response:*** *Due on 01/14/2025.*

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.*

The following SCE facilities were not maintained for their intended use:

- BURD 5127349 – SCE had a damaged underground BURD cover.
- PM 5309177 – vegetation was obstructing the door of the padmounted transformer

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.

- *Burd B5127349 – Damaged Grade Ring.* ***SCE Response:*** *Due on 08/31/2024.*
- *Padmount P5309177 – Vegetation Obstruction of Door.* ***SCE Response:*** *Due on 07/24/2024.*