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

October 7, 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

Subject: EA2024-1140, Electric distribution audit of SCE's Shaver Lake District

Dear Mr. Daye:

Your letter, dated September 6, 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 Shaver Lake District from June 24, 2024 to June 28, 2024.

Your letter requested a response by October 7, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Mel Stark
Principal Manager, EHSQ-T&D Compliance & Quality
3 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
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 ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

SCE's records indicated that from June 1, 2021 to May 1, 2024, SCE completed 24 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 14 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 1, 2021 through May 1, 2024, it had 24 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 14 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 1, 2021 to May 1, 2024, SCE completed 96 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 42 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 1, 2021 through May 1, 2024, it had 96 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 42 overhead detailed 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.

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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 1, 2021 to May 1, 2024, SCE completed 21 underground 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 June 1, 2021 to May 1, 2024, it had 21 underground detailed inspections that were completed 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-B1, Maintenance Programs, states in part:

> *Companies shall undertake corrective actions within the time periods stated for*

each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate …

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 1, 2021 to May 1, 2024, SCE completed 122 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 198 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 1, 2021 to May 1, 2024, SCE had 122 overhead work orders that were completed past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 198 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 1, 2021 to May 1, 2024, SCE completed 3 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 1 open underground work order that was 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 1, 2021 to May 1, 2024, SCE had 3 underground work orders that were completed past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 1 underground work order that was 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 portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	1650316E	Wood Pole	Shaver Lake
2	1650317E	Wood Pole	Shaver Lake
3	1650318E	Wood Pole	Shaver Lake
4	4322583E	Wood Pole	Shaver Lake
5	4972929E	Wood Pole	Shaver Lake
6	4916311E	Wood Pole	Shaver Lake
7	4916312E	Wood Pole	Shaver Lake
8	4972928E	Wood Pole	Shaver Lake
9	4487026E	Wood Pole	Shaver Lake
10	4704864E	Wood Pole	Shaver Lake
11	4260802E	Wood Pole	Shaver Lake
12	4696007E	Wood Pole	Shaver Lake
13	4322491E	Wood Pole	Shaver Lake
14	585622E	Wood Pole	Shaver Lake
15	1287625E	Wood Pole	Shaver Lake
16	4956893E	Wood Pole	Shaver Lake
17	1031020E	Wood Pole	Lakeshore
18	1031021E	Wood Pole	Lakeshore
19	1031022E	Wood Pole	Lakeshore
20	1031023E	Wood Pole	Lakeshore
21	1031024E	Wood Pole	Lakeshore
22	1031025E	Wood Pole	Lakeshore
23	1031026E	Wood Pole	Lakeshore
24	1031027E	Wood Pole	Lakeshore
25	4493043E	Wood Pole	Huntington Lake
26	1432550E	Wood Pole	Huntington Lake
27	4493042E	Wood Pole	Huntington Lake
28	591399E	Wood Pole	Huntington Lake
29	4260865E	Wood Pole	Huntington Lake
30	582304E	Wood Pole	Huntington Lake
31	4914438E	Wood Pole	Huntington Lake
32	582302E	Wood Pole	Huntington Lake
33	4907779E	Wood Pole	Huntington Lake
34	4907775E	Wood Pole	Huntington Lake
35	582301E	Wood Pole	Huntington Lake
36	1030954E	Wood Pole	Huntington Lake
37	1030953E	Wood Pole	Huntington Lake
38	1030955E	Wood Pole	Huntington Lake
39	1030956E	Wood Pole	Huntington Lake
40	1030957E	Wood Pole	Huntington Lake

41	1030958E	Wood Pole	Huntington Lake
42	1030960E	Wood Pole	Huntington Lake
43	1030959E	Wood Pole	Huntington Lake
44	2305098E	Wood Pole	Big Creek
45	3007676E	Wood Pole	Big Creek
46	4448264E	Wood Pole	Big Creek
47	3007929E	Wood Pole	Big Creek
48	1842956E	Wood Pole	Big Creek
49	4490572E	Wood Pole	Big Creek
50	3007855E	Wood Pole	Big Creek
51	1842958E	Wood Pole	Big Creek
52	3007968E	Wood Pole	Big Creek
53	4505739E	Wood Pole	Big Creek
54	558908E	Wood Pole	Big Creek
55	4907769E	Wood Pole	Big Creek
56	1842959E	Wood Pole	Big Creek
57	582504E	Wood Pole	Big Creek
58	2367138E	Wood Pole	Big Creek
59	1842903E	Wood Pole	Big Creek
60	1842953E	Wood Pole	Big Creek
61	1648214E	Wood Pole	Shaver Lake
62	1648215E	Wood Pole	Shaver Lake
63	2081131E	Wood Pole	Shaver Lake
64	4694309E	Wood Pole	Shaver Lake
65	4696049E	Wood Pole	Shaver Lake
66	1948421E	Wood Pole	Shaver Lake
67	4322618E	Wood Pole	Shaver Lake
68	4590009E	Wood Pole	Shaver Lake
69	2000852E	Wood Pole	Shaver Lake
70	4590050E	Wood Pole	Shaver Lake
71	2253101E	Wood Pole	Shaver Lake
72	1948410E	Wood Pole	Shaver Lake
73	2081146E	Wood Pole	Shaver Lake
74	4322507E	Wood Pole	Shaver Lake
75	1948407E	Wood Pole	Shaver Lake
76	4977054E	Wood Pole	Shaver Lake
77	1948406E	Wood Pole	Shaver Lake
78	4590018E	Wood Pole	Shaver Lake
79	1948418E	Wood Pole	Shaver Lake
80	1948419E	Wood Pole	Shaver Lake
81	870562E	Wood Pole	Shaver Lake
82	2197618E	Wood Pole	Shaver Lake
83	1757595E	Wood Pole	Shaver Lake
84	703307E	Wood Pole	Shaver Lake
85	4956759E	Wood Pole	Shaver Lake

86	4956760E	Wood Pole	Shaver Lake
87	4956755E	Wood Pole	Shaver Lake
88	4956754E	Wood Pole	Shaver Lake
89	753821E	Wood Pole	Shaver Lake
90	870577E	Wood Pole	Shaver Lake
91	4956756E	Wood Pole	Shaver Lake
92	4956757E	Wood Pole	Shaver Lake
93	4210169E	Wood Pole	Shaver Lake
94	2253081E	Wood Pole	Shaver Lake
95	1012320E	Wood Pole	Shaver Lake
96	4971776E	Wood Pole	Shaver Lake
97	1012319E	Wood Pole	Shaver Lake
98	1467947E	Wood Pole	Shaver Lake
99	870564E	Wood Pole	Shaver Lake
100	2367113E	Wood Pole	Shaver Lake
101	1872567E	Wood Pole	Shaver Lake
102	S5147327	Burd Switch	Shaver Lake
103	5153440	Subsurface Structure with Burd Switch	Shaver Lake
104	P5403186	Padmount Transformer	Shaver Lake
105	5429531	Handhole	Shaver Lake
106	P5429507	Padmounted Transformer	Huntington Lake
107	P5017501	Padmounted Transformer	Huntington Lake
108	P5403198	Padmounted Transformer	Huntington Lake
109	63134 Regatta Vista Ln, Big Creek CA	Handhole	Huntington Lake
110	P5350657	Padmounted Transformer	Huntington Lake

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 down guy marker attached to the down guy on Pole 4696049E was damaged and not securely attached.

SCE Response:
The above condition was previously recorded in SCE's Work Management System and it will be addressed in accordance with SCE's maintenance program.

- *Pole 4696049E – Damaged Guy Marker.* ***SCE Response:*** *Due on 10/25/2024.*

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 extension cord and camera (not owned or authorized by SCE) were attached to Pole 4322491E.

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 4322491E – Unauthorized Attachment.* ***SCE Response:*** *Due on 03/31/2025.*

GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guy 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 703307E 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 703307E – Radial clearance between down guy wire and third-party communications conductor less than 3 inches.* ***SCE Response:*** *Due on 03/31/2025.*

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.*

The high voltage signs on each of the following SCE poles were damaged:

- 1842956E
- 582504E
- 2367138E
- 4696049E
- 1948421E
- 4322618E
- 4590050E
- 870562E
- 2367113E

SCE Response:

Three 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 six conditions have been recorded in SCE's Work Management System 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 1842956E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 09/29/2029.*
- *Pole 4696049E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 10/25/2028.*
- *Pole 4590050E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 09/30/2029.*
- *Pole 582504E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 09/30/2029.*
- *Pole 1948421E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 09/30/2029.*
- *Pole 870562E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 09/30/2029.*
- *Pole 2367138E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 10/23/2028.*
- *Pole 4322618E – 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 2367113E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 09/30/2029.*

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.*

An SCE down guy wire supporting each of the following poles was not taut:

- Pole 1031021E
- Pole 4505739E

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 1031021E – Down guy wire was not taut.* ***SCE Response:*** *Due on 09/30/2029.*
- *Pole 4505739E – Down guy wire was not taut.* ***SCE Response:*** *Due on 09/30/2029.*

GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:

> *The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.*

The lowest pole step on Pole 3007676E was located at a height of less than eight feet.

SCE Response:

The above condition has been recorded in SCE's Work Management System and it was addressed in accordance with SCE's maintenance program.

- *Pole 3007676E – Low Pole Step.* ***SCE Response:*** *Completed on 10/1/2024.*

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 BURD Switch S5147327 had a corroded rack supporting a J hook and conductors.

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.

- *Subsurface Structure S5147327 – Corroded cable rack.* ***SCE Response:*** *Due on 09/01/2026.*