PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

August 13, 2024 EA2024-1136

Melvin Stark
Principal Manager, T&D Compliance Integration
Southern California Edison Company (SCE)
1 Innovation Way
Pomona, CA 91786

Subject: Electric distribution audit of SCE's Ventura District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Jose Lastra of my staff conducted an electric distribution audit of SCE's Ventura District from May 20-24, 2024. The audit included a review of SCE's records and field inspections of SCE's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). Included with this letter is a copy of the audit findings that itemize the violations discovered during the audit. Please advise me no later than September 13, 2024, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Jose Lastra (213) 507-1438 or jose.lastra@cpuc.ca.gov.

Sincerely,

Fadi Daye

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

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 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 July 1, 2020 to April 1, 2024, SCE completed 57 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 13 pending patrol inspections that were past SCE's scheduled due date.

SCE's records indicated that from July 1, 2020 to April 1, 2024, SCE completed 3,829 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 67 pending detailed inspections that were past SCE's scheduled due date.

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 July 1, 2020 to April 1, 2024, SCE completed 310 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 10 pending underground inspection that was past SCE's scheduled due date.

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 July 1, 2020 to April 1, 2024, SCE completed 1,336 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 837 open overhead work orders that were past SCE's scheduled due date for corrective action.

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 July 1, 2020 to April 1, 2024, SCE completed 289 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 455 open underground work orders that were past SCE's scheduled due date for corrective action.

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	2359251E	Wood Pole	Ventura
2	1748842E	Wood Pole	Ventura
3	1748841E	Wood Pole	Ventura
4	329119E	Wood Pole	Ventura
5	1748840E	Wood Pole	Ventura
6	1648950E	Wood Pole	Ventura
7	2168578E	Wood Pole	Ventura
8	1648949E	Wood Pole	Ventura
9	1648948E	Wood Pole	Ventura
10	1648947E	Wood Pole	Ventura
11	1648946E	Wood Pole	Ventura
12	1648945E	Wood Pole	Ventura
13	1877789E	Wood Pole	El Rio
14	679614E	Wood Pole	El Rio
15	679615E	Wood Pole	El Rio
16	1415427E	Wood Pole	El Rio
17	679617E	Wood Pole	El Rio
18	4743685E	Wood Pole	El Rio
19	1666305E	Wood Pole	El Rio
20	679618E	Wood Pole	El Rio
21	692095H	Wood Pole	Ojai/Mira Monte
22	692094H	Wood Pole	Ojai/Mira Monte
23	4868045E	Wood Pole	Ojai/Mira Monte
24	4868049E	Wood Pole	Ojai/Mira Monte
25	4868047E	Wood Pole	Ojai/Mira Monte
26	692090H	Wood Pole	Ojai/Mira Monte
27	692089H	Wood Pole	Ojai/Mira Monte
28	4868011E	Wood Pole	Ojai/Mira Monte
29	692087H	Wood Pole	Ojai/Mira Monte
30	692086H	Wood Pole	Ojai/Mira Monte
31	4946866E	Wood Pole	Ojai/Mira Monte
32	4630757E	Wood Pole	Ojai/Mira Monte
33	4630756E	Wood Pole	Ojai/Mira Monte
34	4806207E	Wood Pole	Ojai/Mira Monte
35	4876594E	Wood Pole	Ojai/Mira Monte
36	1863593E	Wood Pole	Ojai
37	X7811E	Wood Pole	Ojai
38	4990658E	Wood Pole	Ojai
39	1795603E	Wood Pole	Ojai
40	1781540E	Wood Pole	Ojai
41	1795604E	Wood Pole	Ojai
42	4576779E	Wood Pole	Ojai

43	4990824E	Wood Pole	Ojai
44	4576777E	Wood Pole	Ojai
45	1310914E	Wood Pole	Ojai
46	2114537E	Wood Pole	Ojai
47	4204338E	Wood Pole	Ojai
48	4732125E	Wood Pole	Ojai
49	4953233E	Wood Pole	Ojai
50	577181E	Wood Pole	Ojai
51	X6470E	Wood Pole	Meiners Oaks/Ojai
52	X5568E	Wood Pole	Meiners Oaks/Ojai
53	X6488E	Wood Pole	Meiners Oaks/Ojai
54	2334677E	Wood Pole	Meiners Oaks
55	4953229E	Wood Pole	Meiners Oaks
56	1882799E	Wood Pole	Meiners Oaks
57	577222E	Wood Pole	Meiners Oaks
58	4873379E	Wood Pole	Meiners Oaks
59	4744113E	Wood Pole	Meiners Oaks
60	4563175E	Wood Pole	Meiners Oaks
61	477057E	Wood Pole	Meiners Oaks
62	2334676E	Wood Pole	Meiners Oaks
63	4794281E	Wood Pole	Meiners Oaks
64	577219E	Wood Pole	Meiners Oaks
65	2358920E	Wood Pole	Meiners Oaks
66	PNN001	Wood Pole	Meiners Oaks
67	174100E	Wood Pole	Santa Paula
68	729370E	Wood Pole	Filmore
69	1561449E	Wood Pole	Filmore
70	1561448E	Wood Pole	Filmore
71	729365E	Wood Pole	Filmore
72	729366E	Wood Pole	Filmore
73	729367E	Wood Pole	Filmore
74	729280E	Wood Pole	Filmore
75	4648681E	Wood Pole	Filmore
76	729369E	Wood Pole	Filmore
77	1406006E	Wood Pole	Filmore
78	1406007E	Wood Pole	Filmore
79	1406008E	Wood Pole	Filmore
80	1406009E	Wood Pole	Filmore
81	4452275E	Wood Pole	Bardsdale
82	2264482E	Wood Pole	Bardsdale
83	729560E	Wood Pole	Bardsdale
84	729559E	Wood Pole	Bardsdale
85	4630693E	Wood Pole	Bardsdale
86	4659283E	Wood Pole	Bardsdale
87	121010E	Wood Pole	Bardsdale
88	121009E	Wood Pole	Bardsdale
89	121008E	Wood Pole	Bardsdale
90	4424288E	Wood Pole	Bardsdale
91	650640H	Wood Pole	Bardsdale

92	4424289E	Wood Pole	Bardsdale
93	121005E	Wood Pole	Bardsdale
94	1746357E	Wood Pole	Bardsdale
95	1746356E	Wood Pole	Bardsdale
96	V5197210	Vault	Ventura
97	P5411104	Padmounted Transformer	Ventura
98	B5035143	BURD	Ventura
99	5035142	BURD	Ventura
100	5035203	BURD	Ventura
101	S5182934	Subsurface Structure - Transformer and Switch	Ventura
102	P5727727	Vault	Santa Paula
103	P5727728	Padmounted Transformer	Santa Paula
104	P5465889	Padmounted Transformer	Filmore
105	P5465890	Padmounted Transformer	Filmore
106	P5465891	Padmounted Transformer	Filmore
107	5446609	Subsurface Structure - Transformer and Switch	Filmore

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 the following poles required maintenance:

- Pole 4204338E: there was soil erosion at the base of the pole, creating a hole that was approximately 3 feet deep
- Pole X6470E: the pole tag was damaged
- Pole 1561448E: the bird guard was dislodged from the insulator and conductor
- Pole 121008E: the bird guard was dislodged from the insulator and conductor
- Pole 1746356E: the bird guard was dislodged from the insulator and conductor
- Pole 1746357E: the SCE down guy anchor supporting the pole was corroded

The "eye" of the SCE down guy anchor attached to each of the following SCE poles was buried:

- 692094H
- 692086H
- 729370E
- 1561449E
- 1406006E

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.*

Unauthorized foreign attachments were observed on each of the following SCE poles:

- Pole 2168578E: unauthorized "Private Property. No Trespassing" sign was attached.
- Pole 1648946E: unauthorized "Private Property. No Trespassing" sign was attached.

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 was damaged:

- 1877789E
- 679614E
- 692090H
- 4868011E
- 4576779E
- 4732125E
- X6470E
- 2358920E
- 1561449E
- 1406006E
- 729559E
- 4424289E
- 121005E
- 1746356E

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:

- Pole X6470E
- Pole 2334677E

GO 95, Rule 54.8-C4: Clearances between Supply Service Drops and Other Conductors, From Communication Service Drops, states in part:

> *The radial clearance between supply service drop conductors and communication service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.*

SCE service drops on the following poles were touching a third-party communications service drop within 15 feet of the point of attachment to the home:

- Pole 1795604E
- Pole 477057E

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.*

On Pole 121005E, the lowest pole step was less than eight feet from the ground line.

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 padmounted transformer number P5465890 was leaking oil into the enclosure. Additionally, the padmount oil sight glass was empty.