

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 27, 2024

EA2024-1138

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

Subject: Audit of Southern California Edison's Kernville District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Kyle King of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Kernville District from June 10-14, 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). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than July 29, 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 Kyle King at (213) 222-3260 or Kyle.King@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "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, 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.

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.

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.

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.

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).

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.

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

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 thereto.

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

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.

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.

GO 95, 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.
- PM5309177 – vegetation was obstructing the door of the padmounted transformer