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

September 6, 2024 EA2024-1257

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 Santa Barbara District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Norvik Ohanian of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Santa Barbara District from August 12, 2024 to August 16, 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 October 7, 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, please contact Norvik Ohanian at (213) 660-5528 or Norvik.Ohanian@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: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Norvik Ohanian, 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 Detail Inspection Records
- Patrol Inspection Records
- SCE's Documented Inspection Program
- Repair Notifications
- Transformers, Switches and Intrusive Testing Records
- Third Party Notifications
- 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 June 2019 through June 2024, SCE completed 42 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 9 pending patrol inspections that were past SCE's scheduled due date.

SCE's records indicated that from June 2019 through June 2024, SCE completed 4,521 detail inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 91 pending detail 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 of these rules.*

SCE's records indicated that from June 2019 through June 2024, SCE completed 202 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 10 pending underground inspections that were 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 June 2019 through June 2024, SCE completed 2,057 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 693 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 June 2019 through June 2024, SCE completed 284 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 309 open underground work orders that were past SCE's scheduled due date for corrective action.

III. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	903909E	Pole	Goleta
2	S28405Y	Pole	Goleta
3	1524744E	Pole	Goleta
4	4722563E	Pole	Goleta
5	4692367E	Pole	Goleta
6	1372789E	Pole	Goleta
7	1453481E	Pole	Goleta
8	1372788E	Pole	Goleta
9	1324424E	Pole	Goleta
10	1482270E	Pole	Goleta
11	1324423E	Pole	Goleta
12	1324422E	Pole	Goleta
13	1324415E	Pole	Goleta
14	1882489E	Pole	Goleta
15	4217026E	Pole	Goleta
16	1523056E	Pole	Goleta
17	1015249E	Pole	Goleta
18	1523057E	Pole	Goleta
19	1882488E	Pole	Goleta
20	GT23876	Pole	Goleta
21	949686E	Pole	Gaviota
22	4419433E	Pole	Gaviota
23	949675E	Pole	Gaviota
24	4414812E	Pole	Gaviota
25	4416715E	Pole	Gaviota
26	1340843E	Pole	Capitan
27	1340844E	Pole	Capitan
28	1340845E	Pole	Capitan
29	1345551E	Pole	Capitan
30	1340846E	Pole	Capitan
31	1340847E	Pole	Capitan
32	4505102E	Pole	Capitan
33	4724019E	Pole	Capitan
34	1340850E	Pole	Capitan
35	1920699E	Pole	Goleta
36	1340818E	Pole	Goleta
37	1340819E	Pole	Goleta
38	1340820E	Pole	Goleta
39	1340821E	Pole	Goleta
40	4375713E	Pole	Goleta
41	4743364E	Pole	Goleta
42	4791868E	Pole	Isla Vista
43	1345769E	Pole	Isla Vista
44	4855358E	Pole	Isla Vista

45	1188579E	Pole	Isla Vista
46	1188582E	Pole	Isla Vista
47	4419378E	Pole	Isla Vista
48	1413487E	Pole	Isla Vista
49	4857939E	Pole	Isla Vista
50	1413486E	Pole	Isla Vista
51	1524540E	Pole	Isla Vista
52	1453461E	Pole	Isla Vista
53	1453462E	Pole	Isla Vista
54	1523388E	Pole	Isla Vista
55	1345770E	Pole	Isla Vista
56	1413603E	Pole	Isla Vista
57	1664854E	Pole	Isla Vista
58	1413604E	Pole	Isla Vista
59	1524260E	Pole	Isla Vista
60	1345779E	Pole	Isla Vista
61	1188887E	Pole	Isla Vista
62	1324820E	Pole	Isla Vista
63	1345780E	Pole	Isla Vista
64	4855355E	Pole	Isla Vista
65	1256053E	Pole	Isla Vista
66	1256052E	Pole	Isla Vista
67	1413481E	Pole	Isla Vista
68	1608392E	Pole	Isla Vista
69	1675650E	Pole	Isla Vista
70	1608779E	Pole	Isla Vista
71	1413483E	Pole	Isla Vista
72	1675345E	Pole	Isla Vista
73	469534E	Pole	Isla Vista
74	4591566E	Pole	Isla Vista
75	1828979E	Pole	Isla Vista
76	469532E	Pole	Isla Vista
77	469531E	Pole	Isla Vista
78	4127178E	Pole	Isla Vista
79	4032263E	Pole	Summerland
80	4608014E	Pole	Summerland
81	4758428E	Pole	Summerland
82	206375E	Pole	Summerland
83	S19848Y	Pole	Summerland
84	644502E	Pole	Summerland
85	4428776E	Pole	Summerland
86	1524580E	Pole	Summerland
87	644505E	Pole	Summerland
88	GT128732	Pole	Summerland
89	903064E	Pole	Summerland
90	108360E	Pole	Summerland
91	1324206E	Pole	Carpinteria
92	1598987E	Pole	Carpinteria

93	GT133638	Pole	Carpinteria
94	219469E	Pole	Carpinteria
95	4127242E	Pole	Carpinteria
96	219471E	Pole	Carpinteria
97	4127243E	Pole	Carpinteria
98	4452848E	Pole	Carpinteria
99	1675628E	Pole	Carpinteria
100	4604093E	Pole	Carpinteria
101	4890271E	Pole	Toro Canyon
102	4370320E	Pole	Toro Canyon
103	1665471E	Pole	Toro Canyon
104	1665472E	Pole	Toro Canyon
105	1216868E	Pole	Montecito
106	4041978E	Pole	Montecito
107	4371167E	Pole	Montecito
108	4371157E	Pole	Montecito
109	4371158E	Pole	Montecito
110	4347928E	Pole	Montecito
111	4547888E	Pole	Montecito
112	4547887E	Pole	Montecito
113	4365398E	Pole	Montecito
114	1675754E	Pole	Montecito
115	219253E	Pole	Montecito
116	4458106E	Pole	Montecito
117	4371164E	Pole	Montecito
118	219256E	Pole	Montecito
119	S10594Y	Pole	Santa Barbara
120	4253775E	Pole	Santa Barbara
121	4261827E	Pole	Santa Barbara
122	4253776E	Pole	Santa Barbara
123	4253777E	Pole	Santa Barbara
124	4253778E	Pole	Santa Barbara
125	4253779E	Pole	Santa Barbara
126	GT123105	Pole	Santa Barbara
127	GT123106	Pole	Santa Barbara
128	4041281E	Pole	Santa Barbara
129	4796668E	Pole	Santa Barbara
130	4261828E	Pole	Santa Barbara
131	4753026E	Pole	Santa Barbara
132	P5657775	Pad-mounted Switch	Goleta
133	P5704277	Pad-mounted Transformer	Goleta
134	V5030318	Gas Switch Vault	Goleta
135	P5648607	Pad-mounted Gas Switch	Goleta
136	B5032295	BURD Switch	Goleta
137	P5647703	Pad-mounted Transformer	Santa Barbara
138	B5032968	BURD Switch	Santa Barbara
139	5314525	BURD Switch	Santa Barbara
140	S5033231	BURD Switch & Transformer	Santa Barbara

141	P5030265	Pad-mounted Transformer	Santa Barbara
142	P5413628	Pad-mounted Transformer	Montecito
143	P5648442	Pad-mounted Transformer	Montecito
144	S5648419	BURD Switch	Montecito
145	P5318053	Pad-mounted Transformer	Montecito
146	B5312968	BURD Switch	Montecito

IV. Field Inspection – Violations List

We observed the following violations during the field inspections:

GO 95, Rule 18.A3 - Resolution of Potential Violation of General Order 95 and Safety Hazards, states in part:

> *If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.*

SCE did not notify the third-party entity of a safety hazard of facilities on the following poles:

- Pole GT23876 – a third-party entity meter box and panel ground conductor was disconnected from ground rod.
- Pole 4604093E – a third-party communications down guy wire was detached from the ground and was hanging from the pole.

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 wire attached to pole 219253E was strained by a tree branch, resulting deflection of approximately 1 foot.

GO 95, Rule 35 - Vegetation Management, states in part:

> *When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).*

The SCE secondary conductor attached to pole 1524580E was strained by vegetation.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19, requires the minimum radial separation between communication conductors and guys supported on the same poles to be 3 inches.

The SCE down guy wire attached to pole 206375E was in contact with a third-party communications conductor.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 8, requires the minimum vertical separation between secondary and communication conductors supported on the same pole to be 48 inches.

The SCE service drop attached to pole 903909E was in contact with a third-party communications service drop.

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 sign on each of the following poles was either missing or damaged:

- S28405Y
- 1882489E
- 1413487E
- 4253777E

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

- GT23876
- 4419433E
- 1675628E
- 1216868E