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

September 6, 2024, EA2024-1275

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

Subject: Audit of Southern California Edison's Covina District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Sultan Tipu of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Covina District from July 29, 2024, to August 2, 2024. The audit included a review of SCE's inspection and maintenance records and a field inspection 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, you can contact Sultan Tipu at (213) 660-5524 or Sultan.Tipu@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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC
Sultan Tipu, Utilities Engineer, ESRB, SED, 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 Management 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 a condition as not to create a hazard.*

- SCE's records indicated that from June 2018 through May 2024, SCE completed 43 overhead detailed inspections and 4 patrol 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 of these rules.*

- SCE's records indicated that from June 2018 through May 2024, SCE completed 477 underground inspections and 47 patrol inspections 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 2018 to May 2024, SCE completed 8128 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 254 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 2018 to May 2024, SCE completed 92 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 36 open underground work orders that were past SCE's scheduled due date for corrective action.

III. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	810047E	Pole	San Dimas
2	1337212E	Pole	San Dimas
3	4578503E	Pole	San Dimas
4	G26688Y	Pole	San Dimas
5	810020E	Pole	San Dimas
6	8100007E	Pole	San Dimas
7	4463011E	Pole	San Dimas
8	1565540E	Pole	San Dimas
9	G14579Y	Pole	San Dimas
10	810006E	Pole	San Dimas
11	810005E	Pole	San Dimas
12	668276E	Pole	San Dimas
13	4503995E	Pole	San Dimas
14	668278E	Pole	San Dimas
15	2270736E	Pole	San Dimas
16	2270737E	Pole	San Dimas
17	2270738E	Pole	San Dimas
18	2270739E	Pole	San Dimas
19	2217792E	Pole	San Dimas
20	4463006E	Pole	San Dimas
21	14586YG	Pole	San Dimas
22	14587YG	Pole	San Dimas
23	14588YG	Pole	San Dimas
24	1617482E	Pole	San Dimas
25	4173514E	Pole	San Dimas
26	1617480E	Pole	San Dimas
27	1617483E	Pole	San Dimas
28	4337842E	Pole	La Verne
29	2271146E	Pole	La Verne
30	2335731E	Pole	La Verne
31	517449E	Pole	La Verne
32	2335730E	Pole	La Verne
33	161365E	Pole	La Verne
34	2335729E	Pole	La Verne
35	2335728E	Pole	La Verne
36	161364E	Pole	La Verne
37	742441E	Pole	La Verne
38	4503594E	Pole	La Verne
39	925651E	Pole	La Verne

40	925652E	Pole	La Verne
41	4501670E	Pole	La Verne
42	925654E	Pole	La Verne
43	925655E	Pole	La Verne
44	925656E	Pole	La Verne
45	925657E	Pole	La Verne
46	925658E	Pole	La Verne
47	925659E	Pole	La Verne
48	969340E	Pole	La Verne
49	969341E	Pole	La Verne
50	969342E	Pole	La Verne
51	213131E	Pole	La Verne
52	4634603E	Pole	La Verne
53	762586E	Pole	La Verne
54	762585E	Pole	La Verne
55	714574E	Pole	La Verne
56	682818E	Pole	La Verne
57	682817E	Pole	La Verne
58	4377463E	Pole	La Verne
59	4394273E	Pole	La Verne
60	682809E	Pole	La Verne
61	1740064E	Pole	Covina
62	1470354E	Pole	Covina
63	1740065E	Pole	Covina
64	1470354E	Pole	Covina
65	1470356E	Pole	Covina
66	1470357E	Pole	Covina
67	1470360E	Pole	Covina
68	1470361E	Pole	Covina
69	1470362E	Pole	Covina
70	1470363E	Pole	Covina
71	1343746E	Pole	Baldwin Park
72	1681477E	Pole	Baldwin Park
73	1462723E	Pole	Baldwin Park
74	1462722E	Pole	Baldwin Park
75	1462721E	Pole	Baldwin Park
76	1462719E	Pole	Baldwin Park
77	1558729E	Pole	Baldwin Park
78	4736139E	Pole	Baldwin Park
79	1558731E	Pole	Baldwin Park
80	1558732E	Pole	Baldwin Park
81	1558733E	Pole	Baldwin Park
82	1558734E	Pole	Baldwin Park
83	E10759Y	Pole	Baldwin Park
84	185527E	Pole	Baldwin Park

85	4539706E	Pole	Glendora
86	1111615E	Pole	Glendora
87	1111614E	Pole	Glendora
88	4539707E	Pole	Glendora
89	1111612E	Pole	Glendora
90	1111611E	Pole	Glendora
91	1111610E	Pole	Glendora
92	1111609E	Pole	Glendora
93	143445E	Pole	Glendora
94	4929698E	Pole	Glendora
95	515497E	Pole	Pomona
96	515498E	Pole	Pomona
97	762553E	Pole	Pomona
98	762554E	Pole	Pomona
99	762555E	Pole	Pomona
100	4372232E	Pole	Pomona
101	378968E	Pole	Claremont
102	2271227E	Pole	Claremont
103	776420E	Pole	Claremont
104	776419E	Pole	Claremont
105	776418E	Pole	Claremont
106	G24816Y	Pole	Diamond Bar
107	1886117E	Pole	Diamond Bar
108	4480238E	Pole	Diamond Bar
109	G24818Y	Pole	Diamond Bar
110	4480239E	Pole	Diamond Bar
111	4511225E	Pole	Diamond Bar
112	4930191E	Pole	Diamond Bar
113	788943H	Pole	Diamond Bar
114	4450565E	Pole	Diamond Bar
115	1740639E	Pole	City of Industry
116	1681977E	Pole	City of Industry
117	4022577E	Pole	City of Industry
118	4426071E	Pole	City of Industry
119	4426072E	Pole	City of Industry
120	4426073E	Pole	City of Industry
121	4126168E	Pole	Hacienda Hights
122	4425444E	Pole	Hacienda Hights
123	2180218E	Pole	Hacienda Hights
124	4446530E	Pole	Hacienda Hights
125	4756729E	Pole	Hacienda Hights
126	2180215E	Pole	Hacienda Hights
127	370585E	Pole	Hacienda Hights
128	1054056E	Pole	Hacienda Hights
129	370E	Pole	Hacienda Hights

130	4245376E	Pole	Hacienda Hights
131	P5179795 DF	Padmount	Covina
132	P5454599 DF	Padmount	Covina
133	P5454589 LF	Padmount	Covina
134	P5164635 DF	Padmount	Covina
135	V5164632	Vault	Covina
136	B5043939	Burd	Glendora
137	B5043937	Burd	Glendora
138	5043937-BS1183	Burd Switch	Glendora
139	5335502	Manhole	La Verne
140	5335512	Padmount	La Verne
141	P5335544 DF	Padmount	La Verne
142	P5335543 DF	Padmount	La Verne
143	5551312 DF	Padmount	Claremont
144	5551313 DF	Padmount	Claremont
145	5551314 DF	Padmount	Claremont
146	5551315 DF	Padmount	Claremont
147	P5551129 PME4147	Padmount Switch	Claremont
148	P5551131 DF	Padmount	Claremont
149	P5551132 DF	Padmount	Claremont
150	P5551133 DF	Padmount	Claremont

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 1343746E: a secondary crossarm was damaged.
- Pole G14588Y: the "eye" of the SCE down guy anchor was buried.

The ground moulding on each of the following poles was damaged:

- 1565540E
- 2270739E
- 161364E
- 1462723E
- 1462721E
- 185527E
- 1111612E
- 1111611E
- 4372232E

GO 95, Rule 34, Foreign Attachments, states in part:

> *Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight 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.*

- Pole 1740065E had a camera, not owned or authorized by SCE, attached to it.
- Pole 1558731E had a camera, not owned or authorized by SCE, and a light attached to it.
- Pole 2180218E had a camera, not owned or authorized by SCE, attached to it.

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).

An SCE secondary service drop conductor attached to the following pole was strained by vegetation:

- 4501670E

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 were either missing or damaged:

- 1337212E
- 810020E
- 810005E
- 2270737E
- 2270738E
- 2270739E
- 2217792E
- G14586Y
- 1617480E
- 4501670E
- 213131E
- 4394273E
- 1343746E
- 1462721E
- 1558731E
- 1558732E
- 1558733E
- 185527E
- 378968E
- 2271227E
- 2180281E
- 4446530E
- 370586E