



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

May 13, 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

TA2024-1124  
SUBJECT: Transmission Audit of SCE's San Joaquin Transmission Grid

Dear Mr. Daye:

Your letter, dated April 12, 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) transmission audit of SCE's San Joaquin Transmission Grid from March 4, 2024 to March 8, 2024.

Your letter requested a response by May 13, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

A handwritten signature in black ink, appearing to read "Mel Stark", with a long horizontal flourish extending to the right.

Mel Stark  
Principal Manager, EHSQ-T&D Compliance & Quality  
1 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  
Calvin Choi, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

## AUDIT FINDINGS

### I. Records Review

During the audit, my staff reviewed the following records:

- Patrol & Detailed Inspection Records
- Repair Notifications
- Vegetation Management Records
- Third Party Notifications
- Infrared Testing Records
- Intrusive Test Records
- Structural Load Calculations
- Foundation Resistance Test Records

### II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

**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 2019 to 2023, SCE had 1352 overhead repair notifications that were completed or pending completion 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, SCE notes that from 2019 to 2023, it had 1,352 overhead repair notifications that were completed or pending completion past SCE's scheduled due date. Work orders may be pending or completed past their due dates for valid reasons per General Order 95, Rule 18, including but not limited to Permits, System Emergencies, and Customer Issues.*

### III. Field Inspection

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

No.	Structure ID.	Type of Structure
1	Rector/Springville #1 M167- T3	Tower
2	Big Creek 4/Springville M60-T2	Tower
3	Big Creek 4/Springville M60-H1X	Tower
4	Big Creek 3/Springville M168-T1	Tower
5	4140998E	Pole
6	1666508E	Pole
7	633815E	Pole
8	2299611E	Pole
9	2299612E	Pole
10	2299613E	Pole
11	2299614E	Pole
12	Big Creek 3/Rector #1 M62-T3	Tower
13	Rector/Springville M9-T3	Tower
14	Big Creek 3/Rector #1 M62-T2	Tower
15	Rector/Springville M9-T4	Tower
16	Big Creek 3/Rector #1 M62-T1	Tower
17	Rector/Springville M10-T1	Tower
18	Rector/Springville M10-T5	Tower
19	Big Creek 3/Rector #1 M61-T3	Tower
20	Big Creek 3/Rector #1 M61-T1	Tower
21	Big Creek 1/Rector M61-T1	Tower
22	Big Creek 3/Rector #1 M60-T8	Tower
23	Big Creek 1/Rector M60-T8	Tower
24	4012594E	Pole
25	4451306E	Pole
26	Rector/Vestal #2 M73-T4	Tower
27	Rector/Vestal #1 M73-T4	Tower
28	Rector/Vestal #2 M73-T5	Tower
29	Rector/Vestal #1 M73-T5	Tower
30	Rector/Vestal #2 M73-T6	Tower
31	Rector/Vestal #1 M73-T6	Tower
32	Rector/Springville M147-T2	Tower
33	Big Creek 4/Springville M80-T4	Tower
34	Rector/Springville M147-T3	Tower
35	Big Creek 4/Springville M80-T3	Tower
36	4683635E	Pole
37	4685867E	Pole
38	4685866E	Pole
39	1554967E	Pole
40	1554968E	Pole

41	1554969E	Pole
42	1554970E	Pole
43	1554971E	Pole
44	1554972E	Pole
45	1554973E	Pole
46	1554974E	Pole
47	4685758E	Pole
48	1554976E	Pole
49	804580E	Pole
50	804579E	Pole
51	2299339E	Pole
52	2299346E	Pole
53	804576E	Pole
54	2299340E	Pole
55	804574E	Pole
56	2299347E	Pole
57	Rector/Vestal #1 M75-T2	Tower
58	Rector/Vestal #2 M75-T2	Tower
59	2299341E	Pole
60	804571E	Pole
61	804570E	Pole
62	804569E	Pole
63	Rector/Vestal #1 M75-T1	Tower
64	Rector/Vestal #2 M75-T1	Tower
65	Rector/Vestal #1 M75-T3	Tower
66	Rector/Vestal #2 M75-T3	Tower
67	V6001397	Vault
68	V6001396	Vault
69	V22030	Vault

#### IV. Field Inspection – Violations List

We observed the following violations during the field inspections portion of the audit:

**GO 95, Rule 51.6-A, Marking and Guarding, High Voltage Marking**, 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. 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 poles were damaged:

- 4140998E
- 2299347E
- 2299341E

#### ***SCE Response:***

*The conditions listed above have been recorded in SCE’s Work Management System and they will be addressed in accordance with SCE’s maintenance program and GO 95.*

- *Pole 4140998E – Damaged/Missing High Voltage Signs. SCE Response: Due on 3/10/2029.*
- *Pole 2299347E - Damaged/Missing High Voltage Signs. SCE Response: Due on 4/17/2029.*
- *Pole 2299341E - Damaged/Missing High Voltage Signs. SCE Response: Due on 4/17/2029.*

**GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wire**, 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 loose:

- 633815E
- 1554976E

#### ***SCE Response:***

*The conditions listed above have been recorded in SCE’s Work Management System and they will be addressed in accordance with SCE’s maintenance program and GO 95.*

- *Pole 633815E – Loose Down Guy Wire. SCE Response: Due on 3/10/2029.*
- *Pole 1554976E - Loose Down Guy Wire. SCE Response: Due on 3/10/2029.*

**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 following facilities required maintenance:

- Big Creek 4/Springville M60-T2 – the tower had a bent member.
- Big Creek 1/Rector M60-T8 – the tower had a bent member.
- Rector/Vestal #1 M73-T6 – the tower had a bent member.

***SCE Response:***

*The conditions listed above have been recorded in SCE’s Work Management System and they will be addressed in accordance with SCE’s maintenance program and GO 95.*

- *Tower 7014831 Big Creek 4/Springville (M60-T2) – Bent Steel Member. SCE Response: Due on 4/18/2025.*
- *Tower 7021992 Big Creek 1/Rector (M60-T8) – Bent Steel Member. SCE Response: Due on 4/19/2025.*
- *Tower 7023420 Rector/Vestal #1 (M73-T6) – Bent Steel Member. SCE Response: Due on 3/11/2025.*

**GO 95, Rule 61.6-A, Towers, Marking and Guarding, Marking**, states in part:

*All towers shall be equipped with signs designed to warn the public of the danger of climbing same. Additionally, such signs shall include a graphic depiction of the dangers of falling or electrocution associated with climbing the towers. Such signs shall be placed and arranged so that they may be read from the four corners of the tower.*

“No climbing” signs on the following towers were missing or not visible from all corners of the towers:

- Big Creek 4/Springville M60-T2
- Rector/Vestal #2 M73-T4

***SCE Response:***

*The conditions listed above have been recorded in SCE’s Work Management System and they will be addressed in accordance with SCE’s maintenance program and GO 95.*

- *Tower 7014831 Big Creek 4/Springville (M60-T2) – The “No climbing” signs could not be read from all four corners of the tower. SCE Response: Due on 4/17/2029.*
- *Tower 7023681 Rector/Vestal #1 (M73-T6) – The “No climbing” signs could not be read from all four corners of the tower. SCE Response: Due on 3/10/2029.*