

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 27, 2021

EA2021-894

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 Santa Monica District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Kyle King and Stacey Ocampo of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Santa Monica District from April 5, 2021 to April 9, 2021. 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 June 28, 2021, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Kyle King at (213)-222-3260 or [Kyle.King@cpuc.ca.gov](mailto: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  
Kyle King, Utilities Engineer, ESRB, SED, CPUC  
Stacey Ocampo, Utilities Engineer, ESRB, SED, CPUC

## AUDIT FINDINGS

### I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- Intrusive test records
- 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:

**General Order (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 2015 to 2020, SCE completed 12 work orders past their due date for corrective actions.

**GO 165, Standard III-B, Distribution Facilities, Standards for Inspections**, states in part:

*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 2015 to 2020, SCE completed 1765 overhead detailed inspections past their scheduled due date.

**GO 165, Standard III-B, Distribution Facilities, Standards for Inspections**, states in part:

*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 in part:

*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 2015 to 2020, SCE completed 450 underground detailed inspections past their scheduled due date.

**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 2015 to 2020, SCE completed 9 work orders past their due date for corrective actions.

### III. Field Inspections

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

	<b>Structure No.</b>	<b>Structure Type</b>	<b>Location</b>
1	2370958E	Utility Pole	Beverly Hills
2	2371582E	Utility Pole	Beverly Hills
3	835393E	Utility Pole	Beverly Hills
4	4467768E	Utility Pole	Beverly Hills
5	4467155E	Utility Pole	Beverly Hills
6	4470535E	Utility Pole	Beverly Hills
7	559658E	Utility Pole	Beverly Hills
8	4467154E	Utility Pole	Beverly Hills
9	4314673E	Utility Pole	Beverly Hills
10	4314672E	Utility Pole	Beverly Hills
11	4467153E	Utility Pole	Beverly Hills
12	813978E	Utility Pole	Beverly Hills
13	4929215E	Utility Pole	Beverly Hills
14	4467488E	Utility Pole	Beverly Hills
15	1979964E	Utility Pole	Beverly Hills
16	893185E	Utility Pole	Beverly Hills
17	4467352E	Utility Pole	Beverly Hills
18	957968E	Utility Pole	Beverly Hills
19	957967E	Utility Pole	Beverly Hills
20	957966E	Utility Pole	Beverly Hills
21	957965E	Utility Pole	Beverly Hills
22	187241E	Utility Pole	Beverly Hills
23	957963E	Utility Pole	Beverly Hills
24	957964E	Utility Pole	Beverly Hills
25	542520H	Utility Pole	Beverly Hills
26	957962E	Utility Pole	Beverly Hills
27	957961E	Utility Pole	Beverly Hills
28	957960E	Utility Pole	Beverly Hills
29	2059746E	Utility Pole	Beverly Hills
30	957959E	Utility Pole	Beverly Hills
31	847247E	Utility Pole	Beverly Hills
32	957957E	Utility Pole	Beverly Hills
33	957955E	Utility Pole	Beverly Hills
34	957954E	Utility Pole	Beverly Hills
35	957953E	Utility Pole	Beverly Hills
36	957952E	Utility Pole	Beverly Hills

	<b>Structure No.</b>	<b>Structure Type</b>	<b>Location</b>
37	2032997E	Utility Pole	Beverly Hills
38	428222E	Utility Pole	Beverly Hills
39	1059970E	Utility Pole	Beverly Hills
40	4583545E	Utility Pole	Beverly Hills
41	1059968E	Utility Pole	West Hollywood
42	4820544E	Utility Pole	West Hollywood
43	2033039E	Utility Pole	West Hollywood
44	2060040E	Utility Pole	West Hollywood
45	1487176E	Utility Pole	West Hollywood
46	4243810E	Utility Pole	West Hollywood
47	4298136E	Utility Pole	West Hollywood
48	4453566E	Utility Pole	West Hollywood
49	4834590E	Utility Pole	West Hollywood
50	1168984E	Utility Pole	West Hollywood
51	4443164E	Utility Pole	West Hollywood
52	4314604E	Utility Pole	West Hollywood
53	1467379E	Utility Pole	West Hollywood
54	4314670E	Utility Pole	West Hollywood
55	4315831E	Utility Pole	West Hollywood
56	2241255E	Utility Pole	West Hollywood
57	1826973E	Utility Pole	West Hollywood
58	2241254E	Utility Pole	West Hollywood
59	2371571E	Utility Pole	West Hollywood
60	4816439E	Utility Pole	West Hollywood
61	2371655E	Utility Pole	West Hollywood
62	44535678	Utility Pole	West Hollywood
63	1308625E	Utility Pole	West Hollywood
64	1169401E	Utility Pole	West Hollywood
65	2371658E	Utility Pole	West Hollywood
66	2059916E	Utility Pole	West Hollywood
67	4842508E	Utility Pole	West Hollywood
68	958206E	Utility Pole	West Hollywood
69	4502020E	Utility Pole	Culver City
70	4558341E	Utility Pole	Culver City
71	788501E	Utility Pole	Culver City
72	59257E	Utility Pole	Culver City
73	1596738E	Utility Pole	Culver City
74	59707E	Utility Pole	Culver City
75	59708E	Utility Pole	Culver City
76	59709E	Utility Pole	Culver City

	<b>Structure No.</b>	<b>Structure Type</b>	<b>Location</b>
77	825275E	Utility Pole	Culver City
78	59503E	Utility Pole	Culver City
79	1017460E	Utility Pole	Culver City
80	1017461E	Utility Pole	Culver City
81	1308686E	Utility Pole	Culver City
82	4502004E	Utility Pole	Culver City
83	1308785E	Utility Pole	Culver City
84	876626E	Utility Pole	Culver City
85	4315497E	Utility Pole	Culver City
86	855424E	Utility Pole	Culver City
87	1169004E	Utility Pole	Culver City
88	893373E	Utility Pole	Culver City
89	671520E	Utility Pole	Culver City
90	4315480E	Utility Pole	Culver City
91	4386942E	Utility Pole	Culver City
92	4315481E	Utility Pole	Culver City
93	4315482E	Utility Pole	Culver City
94	876845E	Utility Pole	Culver City
95	876843E	Utility Pole	Culver City
96	4314652E	Utility Pole	Culver City
97	2032741E	Utility Pole	Culver City
98	517036H	Utility Pole	Culver City
99	4284149E	Utility Pole	Culver City
100	4504437E	Utility Pole	Culver City
101	517037H	Utility Pole	Culver City
102	25325Y	Utility Pole	Culver City
103	4743072E	Utility Pole	Culver City
104	4462957E	Utility Pole	Culver City
105	4462956E	Utility Pole	Culver City
106	4086865E	Utility Pole	Culver City
107	1759584E	Utility Pole	Culver City
108	929694E	Utility Pole	Culver City
109	4462955E	Utility Pole	Culver City
110	4432391E	Utility Pole	Culver City
111	4389059E	Utility Pole	Marina Del Rey
112	401007M	Utility Pole	Marina Del Rey
113	401006M	Utility Pole	Marina Del Rey
114	401005M	Utility Pole	Marina Del Rey
115	351153M	Utility Pole	Marina Del Rey
116	401374M	Utility Pole	Marina Del Rey

	<b>Structure No.</b>	<b>Structure Type</b>	<b>Location</b>
117	401152M	Utility Pole	Marina Del Rey
118	1261153E	Utility Pole	Santa Monica
119	1638928E	Utility Pole	Santa Monica
120	1464084E	Utility Pole	Santa Monica
121	958246E	Utility Pole	Santa Monica
122	1464083E	Utility Pole	Santa Monica
123	1487258E	Utility Pole	Santa Monica
124	4423272E	Utility Pole	Santa Monica
125	4611361E	Utility Pole	Santa Monica
126	1377989E	Utility Pole	Santa Monica
127	50783E	Utility Pole	Beverly Hills
128	2255646E	Utility Pole	Beverly Hills
129	P5304380	Pad-Mount Transformer	Santa Monica
130	X5440629	Splice Box	Santa Monica
131	X5038632	Splice Box	Santa Monica
132	P5465666	Pad-Mount Transformer	Santa Monica
133	P5037495	Pad-Mount Transformer	Santa Monica
134	V5040602	Vault	Santa Monica
135	X5039610	Splice Box	Santa Monica
136	V5459041	Vault	Santa Monica
137	P5304447	Pad-Mount Transformer	Santa Monica
138	V5440939	Vault	Santa Monica
139	P5440754	Pad-Mount Transformer	Santa Monica
140	P5386228	Pad-Mount Transformer	Santa Monica
141	P5440753	Pad-Mount Transformer	Santa Monica
142	P5440752	Pad-Mount Transformer	Santa Monica
143	P5440751	Pad-Mount Transformer	Santa Monica
144	P5386231	Pad-Mount Transformer	Santa Monica
145	5485268	BURD Transformer	Culver City
146	5485266	BURD Transformer	Culver City
147	5482567	BURD Transformer	Culver City
148	5485270	BURD Transformer	Culver City
149	5440577	Vault	Culver City
150	P5194062	Pad-Mount Transformer	Culver City
151	5661613	Pad-Mount Switch	Culver City
152	P5661614	Capacitor Bank	Culver City
153	P5661615	Pad-Mount Transformer	Culver City
154	1638919E	Vegetation	Santa Monica

	<b>Structure No.</b>	<b>Structure Type</b>	<b>Location</b>
155	1464089E	Vegetation	Santa Monica
156	136633E	Vegetation	Beverly Hills

#### IV. Field Inspection - Violations List

**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 poles were either missing or damaged:

- 2060040E
- 4314604E
- 4816439E
- 59708E
- 59709E
- 825275E
- 4315480E
- 4386942E
- 876845E
- 876843E
- 4284149E
- 4462957E
- 929694E
- 4432391E

**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.*

A pole step attached to SCE Pole 4314604E was damaged.

The visibility strip attached to each of the following SCE poles was damaged.

- 4929215E
- 401006M
- 401007M

A conduit attached to SCE Pole 1979964E was damaged.

The span guy wire on each of the following SCE poles supported was damaged:

- 957959E
- 4298136E

The down guy wire attached to SCE Pole 4558341E was strained by vegetation.

A crossarm on each of the following SCE poles was damaged:

- 59708E
- 876843E

The insulator on a crossarm on SCE Pole 825275E was “a sunken insulator.”

The conduit attached to SCE Pole 957962E was damaged.

**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 attached to each of the following SCE poles was loose:

- 2371582E
- 835393E
- 4470535E
- 559658E
- 1059970E

**GO 95, Rule 38, Minimum Clearance of Wires from other Wires, Table 2, Case No. 18, Column D**, states in part:

*Guys passing conductors supported on other poles, or guys approximately parallel to conductors supported on the same poles must have least 11.5 inches radial separation for conductors that are between 0 – 750 Volts.*

An SCE secondary conductor on SCE Pole 876626E was touching a span guy wire.

**GO 95, Rule 31.6, Abandoned Lines**, states in part:

*Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.*

The following SCE poles were abandoned:

- 957961E
- 957959E
- 4443164E

**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 on each of the following poles was damaged:

- 4315482E
- 957952E
- 2032741E
- 4314604E
- 2032741E
- 2060040E
- 2370958E
- 59708E
- 957960E
- 1308785E
- 957962E

**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 advertising signs were attached to each of the following SCE poles:

- 957967E
- 542520H
- 4462957E
- 401007M