

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 13, 2022

EA2022-967

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 Foothill District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Kyle King and Joceline Pereira of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Foothill District from March 21, 2022 to March 25, 2022. The audit included a review of SCE's inspection and maintenance 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 13, 2022, 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  
Joceline Pereira, 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
- Patrol records
- Completed and pending corrective action work orders
- Pole loading calculations.
- Safety hazard notifications.
- Intrusive test records
- SCE's documented inspection program
- Tree Trimming Management Records

### II. Records Review – Violations List

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

**Pre-2018 version of GO 95, Rule 18A: Resolution of Safety Hazards and General Order 95 Nonconformances**, states in part:

*Each company (including utilities and CIPs) is responsible for taking appropriate corrective action to remedy safety hazards and GO 95 nonconformances posed by its facilities.*

**Current GO 95 Rule 18A: 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 2017 to 2021, SCE completed 5 overhead work orders past SCE's required 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 2017 to 2021, SCE completed 5066 overhead detailed inspections past SCE's 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 2017 to 2021, SCE completed 8 underground work orders past SCE's required 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 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 2017 to 2021, SCE completed 861 underground detailed inspections past SCE's scheduled due date.

### 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	919195E	Utility Pole	Fontana
2	919190E	Utility Pole	Fontana
3	919189E	Utility Pole	Fontana
4	919188E	Utility Pole	Fontana
5	4088511E	Utility Pole	Fontana
6	4102391E	Utility Pole	Fontana
7	1389170E	Utility Pole	Fontana
8	1211033	Utility Pole	Fontana
9	1211032E	Utility Pole	Fontana
10	2332168E	Utility Pole	Fontana
11	872549E	Utility Pole	Fontana
12	909198E	Utility Pole	Fontana
13	4196163E	Utility Pole	Fontana
14	4149440E	Utility Pole	Fontana
15	4004544E	Utility Pole	Fontana
16	4310729E	Utility Pole	Fontana
17	1448400E	Utility Pole	Fontana
18	4132898E	Utility Pole	Fontana
19	4149441E	Utility Pole	Fontana
20	1265414E	Utility Pole	Lytle Creek
21	1265413E	Utility Pole	Lytle Creek
22	1265412E	Utility Pole	Lytle Creek
23	1511791E	Utility Pole	Lytle Creek
24	4680451E	Utility Pole	Lytle Creek
25	1265416E	Utility Pole	Lytle Creek
26	1265418E	Utility Pole	Lytle Creek
27	1329213E	Utility Pole	Lytle Creek
28	1329212E	Utility Pole	Lytle Creek
29	1346543E	Utility Pole	Lytle Creek
30	13465544E	Utility Pole	Lytle Creek
31	1346545E	Utility Pole	Lytle Creek
32	1329214E	Utility Pole	Lytle Creek
33	1329215E	Utility Pole	Lytle Creek
34	1296206E	Utility Pole	Lytle Creek
35	1296205E	Utility Pole	Lytle Creek
36	1296204E	Utility Pole	Lytle Creek

	<b>Structure No.</b>	<b>Structure Type</b>	<b>Location</b>
37	1448368E	Utility Pole	Lytle Creek
38	1448369E	Utility Pole	Lytle Creek
39	4495355E	Utility Pole	Lytle Creek
40	1421053E	Utility Pole	Lytle Creek
41	4967652E	Utility Pole	Lytle Creek
42	4678877E	Utility Pole	Lytle Creek
43	919187E	Utility Pole	Lytle Creek
44	F18074Y	Utility Pole	Devore
45	1569497E	Utility Pole	Devore
46	4876157E	Utility Pole	Devore
47	4917306E	Utility Pole	Devore
48	4920668E	Utility Pole	Devore
49	4917304E	Utility Pole	Devore
50	4917305E	Utility Pole	Devore
51	1672794E	Utility Pole	Devore
52	1672792E	Utility Pole	Devore
53	4949625E	Utility Pole	Devore
54	4949620E	Utility Pole	Devore
55	4949619E	Utility Pole	Devore
56	2202358E	Utility Pole	Devore
57	4949618E	Utility Pole	Devore
58	4464023E	Utility Pole	Devore
59	4949617E	Utility Pole	Devore
60	4949616E	Utility Pole	Devore
61	1811433E	Utility Pole	Devore
62	4949602E	Utility Pole	Devore
63	4949603E	Utility Pole	Devore
64	2285742E	Utility Pole	Devore
65	1734281E	Utility Pole	Cajon
66	1734280E	Utility Pole	Cajon
67	1734279E	Utility Pole	Cajon
68	1734278E	Utility Pole	Cajon
69	2310081E	Utility Pole	Cajon
70	4858168E	Utility Pole	Cajon
71	2310082E	Utility Pole	Cajon
72	2310083E	Utility Pole	Cajon
73	4876184E	Utility Pole	Cajon
74	2310084E	Utility Pole	Cajon
75	2310085E	Utility Pole	Cajon
76	4858169E	Utility Pole	Cajon

	<b>Structure No.</b>	<b>Structure Type</b>	<b>Location</b>
77	2310086E	Utility Pole	Cajon
78	1734282E	Utility Pole	Cajon
79	2237354E	Utility Pole	Rancho Cucamonga
80	2237355E	Utility Pole	Rancho Cucamonga
81	2237356E	Utility Pole	Rancho Cucamonga
82	2237357E	Utility Pole	Rancho Cucamonga
83	4885940E	Utility Pole	Rancho Cucamonga
84	2263149E	Utility Pole	Rancho Cucamonga
85	2263150E	Utility Pole	Rancho Cucamonga
86	2152970E	Utility Pole	Rancho Cucamonga
87	4042896E	Utility Pole	Rancho Cucamonga
88	4042897E	Utility Pole	Rancho Cucamonga
89	4042898E	Utility Pole	Rancho Cucamonga
90	4042899E	Utility Pole	Rancho Cucamonga
91	4103215E	Utility Pole	Rancho Cucamonga
92	2152968E	Utility Pole	Rancho Cucamonga
93	4506850E	Utility Pole	Rancho Cucamonga
94	2152966E	Utility Pole	Rancho Cucamonga
95	2152965E	Utility Pole	Rancho Cucamonga
96	2152964E	Utility Pole	Rancho Cucamonga
97	4623795E	Utility Pole	Rancho Cucamonga
98	2152962E	Utility Pole	Rancho Cucamonga
99	2152961E	Utility Pole	Rancho Cucamonga
100	P5551642	Pad-Mount Transformer	Fontana
101	P5551644	Pad-Mount Transformer	Fontana
102	P5551646	Pad-Mount Transformer	Fontana
103	P5551645	Pad-Mount Transformer	Fontana
104	P5551647	Pad-Mount Transformer	Fontana
105	P5551650	Pad-Mount Transformer	Fontana
106	P5485616	Pad-Mount Transformer	Jurupa Valley
107	P5474839	Pad-Mount Transformer	Jurupa Valley
108	P5445973	Pad-Mount Transformer	Jurupa Valley
109	P5001194	Pad-Mount Switch	Jurupa Valley
110	P5001193	Pad-Mount Switch	Jurupa Valley
111	321087E	Utility Pole	Fontana
112	2137633E	Utility Pole	Fontana
113	1346295E	Utility Pole	Fontana
114	2203191E	Utility Pole	Bloomington
115	4445136E	Utility Pole	Fontana
116	1931775E	Utility Pole	Fontana

	<b>Structure No.</b>	<b>Structure Type</b>	<b>Location</b>
117	4590481E	Utility Pole	Fontana
118	1115635E	Utility Pole	Fontana
119	4338238E	Utility Pole	Fontana
120	2176650E	Utility Pole	Fontana
121	2107900E	Utility Pole	Rancho Cucamonga
122	1602058	Utility Pole	Rancho Cucamonga
123	1733935E	Utility Pole	Rancho Cucamonga
124	1733936E	Utility Pole	Rancho Cucamonga
125	1733937E	Utility Pole	Rancho Cucamonga
126	1733938E	Utility Pole	Rancho Cucamonga
127	2087545E	Utility Pole	Rancho Cucamonga
128	1733940E	Utility Pole	Rancho Cucamonga
129	2087544E	Utility Pole	Rancho Cucamonga
130	4132585E	Utility Pole	Rancho Cucamonga
131	2262733E	Utility Pole	Rancho Cucamonga
132	1733944E	Utility Pole	Rancho Cucamonga
133	1733862E	Utility Pole	Rancho Cucamonga
134	1673250E	Utility Pole	Rancho Cucamonga
135	4239577E	Utility Pole	Rancho Cucamonga
136	4887684E	Utility Pole	Rancho Cucamonga
137	H16519Y	Utility Pole	Rancho Cucamonga
138	4887683E	Utility Pole	Rancho Cucamonga
139	4385952E	Utility Pole	Rancho Cucamonga
140	H16517Y	Utility Pole	Rancho Cucamonga
141	2202750E	Vegetation	Lytle Creek
142	4233999E	Vegetation	Lytle Creek

#### **IV. Field Inspection - Violations List**

My staff observed the following violations during the field inspection portion of the audit:

**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:

- 1265414E
- 1346543E
- H16517Y

**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 facilities attached to the following poles were not maintained for their intended use:

- Pole 1265412E - A high visibility strip was damaged and not fully attached to the pole.
- Pole 4858169E – An SCE pole was damaged.
- Pole H16517Y – An SCE riser attached to the pole was damaged.

**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:

- 4102391E
- 2332168E

**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 attachments were attached to each of the following SCE poles:

- 1211032E
- 1265416E
- 1346545E
- 2202358E
- 2107900E
- 4887684E

**GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 19, Column C** requires the minimum radial separation between a down guy wire and a communications conductor supported on the same pole to be 3 inches.

The guy wire attached to Pole number 2285742E was contacting a third-party communications conductor.

**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.*

The following SCE facilities were not maintained for their intended use:

- Padmount transformer P5551644 was leaking fluid.
- Padmount transformers P5551647 and P5551650 had vegetation that was obstructing the working space.