



Melvin Stark
Principal Manager
OE-T&D Compliance & Quality

January 19, 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

EA2023-1053
Subject: Audit of Southern California Edison's Saddleback District

Dear Mr. Daye:

Your letter, dated December 19, 2023, requested that we advise you of actions taken by Southern California Edison Company (SCE) to address conditions identified during the Safety and Enforcement Division's (SED's) distribution audit of Saddleback District from April 10, 2023 to April 14, 2023.

Your letter requested a response by January 19, 2024. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mel Stark".

Mel Stark
Principal Manager, OE-T&D Compliance & Quality
1 Innovation Way
Pomona, CA 91768

Enclosure: SED Audit Findings and SCE's Responses

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records.
- Late Inspections
- Work Orders Created from Inspections
- Repair Work Orders
- Intrusive Testing Records
- Third Party Notifications
- Vegetation Management Records
- Pole Loading Calculation Records

II. Field Inspections

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

No.	Facility Identification	Facility Type	Location
1	X8481E	Pole	Trabuco Canyon
2	8501E	Pole	Trabuco Canyon
3	4926573E	Pole	Trabuco Canyon
4	2258191E	Pole	Trabuco Canyon
5	4023896E	Pole	Trabuco Canyon
6	4023895E	Pole	Trabuco Canyon
7	2251283E	Pole	Trabuco Canyon
8	2257299E	Pole	Trabuco Canyon
9	4511274E	Pole	Trabuco Canyon
10	4974081E	Pole	Trabuco Canyon
11	4252350E	Pole	Trabuco Canyon
12	2030764E	Pole	Trabuco Canyon
13	4639878E	Pole	Trabuco Canyon
14	4639879E	Pole	Trabuco Canyon
15	1680965E	Pole	Trabuco Canyon
16	1680966E	Pole	Trabuco Canyon
17	1680964E	Pole	Trabuco Canyon
18	1680963E	Pole	Trabuco Canyon
19	1680962E	Pole	Trabuco Canyon
20	4252111E	Pole	Trabuco Canyon
21	417262E	Pole	Trabuco Canyon
22	4252111E	Pole	Trabuco Canyon
23	417262E	Pole	Trabuco Canyon
24	4723020E	Pole	Trabuco Canyon
25	4909793E	Pole	Trabuco Canyon
26	4859110E	Pole	Trabuco Canyon
27	PTC00024	Pole	Trabuco Canyon
28	1811062E	Pole	Modjeska Canyon
29	1811063E	Pole	Modjeska Canyon
30	1811065E	Pole	Modjeska Canyon
31	1811066E	Pole	Modjeska Canyon
32	1811067E	Pole	Modjeska Canyon
33	2257291E	Pole	Laguna Beach
34	4756856E	Pole	Laguna Beach
35	2076Y	Pole	Laguna Beach
36	2257292E	Pole	Laguna Beach

37	1220770E	Pole	Laguna Beach
38	4756857E	Pole	Laguna Beach
39	1220772E	Pole	Laguna Beach
40	4756858E	Pole	Laguna Beach
41	2257188E	Pole	Laguna Beach
42	412473E	Pole	Laguna Beach
43	GT7540	Pole	Laguna Beach
44	4615837E	Pole	Laguna Beach
45	370122E	Pole	Laguna Beach
46	4617118E	Pole	Laguna Beach
47	D2529Y	Pole	Laguna Beach
48	D2626Y	Pole	Laguna Beach
49	X10216E	Pole	Laguna Beach
50	4000551E	Pole	Laguna Beach
51	4000552E	Pole	Laguna Beach
52	4000553E	Pole	Laguna Beach
53	4584872E	Pole	Laguna Beach
54	4584871E	Pole	Laguna Beach
55	2075Y	Pole	Laguna Beach
56	2258913E	Pole	Laguna Beach
57	D2077Y	Pole	Laguna Beach
58	2258803E	Pole	Laguna Beach
59	4489176E	Pole	Laguna Beach
60	4489198E	Pole	Laguna Beach
61	X10466E	Pole	Laguna Beach
62	X10464E	Pole	Laguna Beach
63	X10463E	Pole	Laguna Beach
64	X10217E	Pole	Laguna Beach
65	4096449E	Pole	Laguna Beach
66	1642196E	Pole	Lake Forest
67	1679055E	Pole	Lake Forest
68	1642194E	Pole	Lake Forest
69	1642985E	Pole	Lake Forest
70	1679056E	Pole	Lake Forest
71	1362457E	Pole	Lake Forest
72	1642190E	Pole	Lake Forest
73	1679057E	Pole	Lake Forest
74	1642975E	Pole	Lake Forest
75	1642992E	Pole	Lake Forest
76	1642976E	Pole	Lake Forest
77	4502457E	Pole	Lake Forest
78	4393252E	Pole	Silverado Canyon
79	631876E	Pole	Silverado Canyon

80	1253312E	Pole	Silverado Canyon
81	4251936E	Pole	Silverado Canyon
82	1253310E	Pole	Silverado Canyon
83	432529E	Pole	Silverado Canyon
84	4838746E	Pole	Silverado Canyon
85	2318744E	Pole	Silverado Canyon
86	432527E	Pole	Silverado Canyon
87	4504719E	Pole	Silverado Canyon
88	1718250E	Pole	Silverado Canyon
89	4869764E	Pole	Silverado Canyon
90	1874500E	Pole	Silverado Canyon
91	1874463E	Pole	Silverado Canyon
92	1837267E	Pole	Silverado Canyon
93	2257947E	Pole	Silverado Canyon
94	B5124286	BURD Transformer	Irvine
95	P5532799	Padmounted Transformer	Irvine
96	P5440308	Padmounted Transformer	Irvine
97	P5532629	Padmounted Capacitor Bank	Irvine
98	P5203949	Primary Metering Switch	Irvine
99	M5204356	Vault	Irvine
100	P5393935	Padmounted Transformer	Irvine
101	P5402184	Padmounted Transformer	Irvine
102	V5350263	Vault with Switch and Transformer	Irvine
103	5304876	BURD Transformer	Irvine
104	5327646	BURD Transformer	Irvine
105	5330640	BURD Transformer	Irvine
106	5327630	BURD Transformer	Irvine
107	P5414744	Padmounted Switch	Aliso Viejo
108	P5414748	Padmounted Switch	Aliso Viejo
109	P5494687	Padmounted Transformer	Aliso Viejo
110	P5494688	Padmounted Transformer	Aliso Viejo
111	P5494689	Padmounted Transformer	Aliso Viejo

III. Field Inspection Violations List

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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 .

A down guy wire attached to Pole No. 1220772E was not taut.

SCE Response:

The above condition was previously recorded in SCE's Work Management System and it will be addressed in accordance with SCE's maintenance program. Note: GO 95 did not require a due date for priority 3 (level 3) notifications created prior to 07/01/2019.

- *Pole 1220772E – Loose Down Guy Wire. **SCE Response:** The condition of this priority level 3 was entered in SCE's Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*

GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:

The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.

The lowest pole step on Pole No. 1642985E was located at a height of less than eight feet.

SCE Response:

The above condition has been recorded in SCE's Work Management System and it will be addressed in accordance with SCE's maintenance program.

- *Pole 1642985E – Lowest pole step located at a height of less than eight feet. **SCE Response:** Due on 12/26/2028.*

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 foreign attachments were observed on the following poles:

- Pole No. 8501E had an unauthorized “Private Property” sign attached to it.
- Pole No. 2030764E had an unauthorized address sign attached to it.
- Pole No. 631876E had an unauthorized sign attached to it reading, “Slow down, this is a neighborhood not a racetrack.”
- Pole No. 1253310E had an unauthorized convex mirror attached to it.
- Pole No. 432527E had also supported an unauthorized mirror.

SCE Response:

The above conditions were previously recorded in SCE’s Work Management System at the time of the audit. One has been addressed in accordance with SCE’s maintenance program and four will be addressed in accordance with SCE’s maintenance program.

- Pole 8501E – Unauthorized attachment. **SCE Response:** Completed on 12/28/2023.
- Pole 2030764E – Unauthorized attachment. **SCE Response:** Due on 5/27/2028.
- Pole 631876E – Unauthorized attachment. **SCE Response:** Due on 5/25/2028.
- Pole 1253310E – Unauthorized attachment. **SCE Response:** Due on 5/25/2028.
- Pole 432527E – Unauthorized attachment. **SCE Response:** Due on 5/25/2028.

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 overhead facilities needed maintenance:

- The visibility strips on Pole No. 1811065E were damaged.
- The visibility strips on Pole No. X10466E were damaged.
- The “High Voltage” band on Pole No. 1642975E was partially detached from the pole.

SCE Response:

The above conditions have been recorded in SCE’s Work Management System. Two have been addressed in accordance with SCE’s maintenance program and one will be addressed in accordance with SCE’s maintenance program.

- Pole 1811065E – Damaged visibility strips. **SCE Response:** Completed on 12/28/2023.
- Pole X10466E – Damaged visibility strips. **SCE Response:** Completed on 12/28/2023.
- Pole 1642975E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 12/26/2028.

General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be three inches.

SCE down guy wire on each of the following poles was in contact with third-party communications conductors:

- 1220772E
- D2626Y

SCE Response:

The above conditions were previously recorded in SCE's Work Management System at the time of the audit, and they will be addressed in accordance with SCE's maintenance program.

- *Pole 1220772E – Down guy wire in contact with a third-party communications conductor. **SCE Response:** Due on 12/28/2024.*
- *Pole D2626Y – Down guy wire in contact with a third-party communications conductor. **SCE Response:** Due on 12/28/2026.*

GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment.

Corrosion was observed on the housing of Padmounted Structure No. P5532629.

SCE Response:

The above condition was previously recorded in SCE's Work Management System and was addressed in accordance with SCE's maintenance program.

- *Pad mounted Structure No. P5532629 – Corroded housing. **SCE Response:** Completed on 10/6/2023.*