



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

January 16, 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

EA2023-1062
Subject: Audit of Southern California Edison's Santa Monica District

Dear Mr. Daye:

Your letter, dated December 14, 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 Santa Monica District from June 5, 2023 to June 9, 2023.

Your letter requested a response by January 15, 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, 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
Mily Vaidya, 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 Clearances Records

II. Records Review – Violations List

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

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.

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 ...

SCE's records indicated that from January 2021 through April 2023, SCE completed 25 patrol inspections past SCE's scheduled due date. SCE's records indicated that from January 2021 through April 2023, SCE completed 716 detailed inspections past SCE's scheduled due date.

SCE Response:

Without admitting that SCE violated GO 95, Rule 31.2 or GO 95, Rule 18-B1, SCE responds as follows. Based on SCE's records, SCE notes that from January 2021 through April 2023, it completed 24 patrol inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from January 2021 through April 2023, it completed 326 overhead detailed inspections past SCE's scheduled due date. While SCE strives to complete inspections as close as possible to assigned dates, there are many factors that can affect the completion of scheduled inspections, such as storms, customer requests, resource constraints, access constraints, permitting or environmental constraints, among other reasons.

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 these rules.

SCE's records indicated that from January 2021 through April 2023, SCE completed 101 underground inspections past SCE's scheduled due date.

SCE Response:

Without admitting that SCE violated GO 165, Section III-B or GO 128, Rule 17.2, SCE responds as follows. Based on SCE's records, SCE notes that from January 2021 through April 2023, it completed 41 underground detailed inspections past SCE's scheduled due date. While SCE strives to complete inspections as close as possible to assigned dates, there are many factors that can affect the completion of scheduled inspections, such as storms, customer requests, resource constraints, access constraints, permitting or environmental constraints, among other reasons.

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	967052E	Wood Pole	Santa Monica
2	487297E	Wood Pole	Santa Monica
3	4929221E	Wood Pole	Santa Monica
4	4101259E	Wood Pole	Santa Monica
5	1664215E	Wood Pole	Santa Monica
6	4429306E	Wood Pole	Santa Monica
7	1980218E	Wood Pole	Santa Monica
8	796119E	Wood Pole	Santa Monica
9	796133E	Wood Pole	Santa Monica
10	796134E	Wood Pole	Santa Monica
11	1517998E	Wood Pole	Santa Monica
12	1517999E	Wood Pole	Santa Monica
13	1517964E	Wood Pole	Santa Monica
14	2241355E	Wood Pole	Santa Monica
15	1517979E	Wood Pole	Santa Monica
16	24578Y	Wood Pole	Santa Monica
17	24595Y	Wood Pole	Santa Monica
18	24579Y	Wood Pole	Santa Monica
19	24580Y	Wood Pole	Santa Monica
20	24584Y	Wood Pole	Santa Monica
21	24585Y	Wood Pole	Santa Monica
22	170795E	Wood Pole	Santa Monica
23	29372Y	Wood Pole	Santa Monica
24	24586Y	Wood Pole	Santa Monica
25	225555E	Wood Pole	Santa Monica
26	1236404E	Wood Pole	Santa Monica
27	4685661E	Wood Pole	Santa Monica
28	1236406E	Wood Pole	Santa Monica
29	1236407E	Wood Pole	Santa Monica
30	1236408E	Wood Pole	Santa Monica
31	1236409E	Wood Pole	Santa Monica
32	295398E	Wood Pole	Santa Monica
33	295397E	Wood Pole	Santa Monica
34	4747848E	Wood Pole	Santa Monica
35	4457194E	Wood Pole	Santa Monica
36	4387349E	Wood Pole	Santa Monica
37	4367255E	Wood Pole	Santa Monica
38	4367256E	Wood Pole	Santa Monica
39	188221E	Wood Pole	Santa Monica

40	57415Y	Wood Pole	Santa Monica
41	188348E	Wood Pole	Santa Monica
42	188349E	Wood Pole	Santa Monica
43	805436E	Wood Pole	Beverly Hills
44	2060010E	Wood Pole	Beverly Hills
45	618177E	Wood Pole	Beverly Hills
46	2255387E	Wood Pole	Beverly Hills
47	2371699E	Wood Pole	Beverly Hills
48	446989E	Wood Pole	Beverly Hills
49	4403050E	Wood Pole	Beverly Hills
50	4470526E	Wood Pole	Beverly Hills
51	4315867E	Wood Pole	Beverly Hills
52	4315868E	Wood Pole	Beverly Hills
53	4315869E	Wood Pole	Beverly Hills
54	225378E	Wood Pole	Beverly Hills
55	136736E	Wood Pole	Beverly Hills
56	734543H	Wood Pole	Beverly Hills
57	4389177E	Wood Pole	Beverly Hills
58	4433465E	Wood Pole	Beverly Hills
59	4856379E	Wood Pole	Beverly Hills
60	4856363E	Wood Pole	Beverly Hills
61	136610E	Wood Pole	Beverly Hills
62	136609E	Wood Pole	Beverly Hills
63	136608E	Wood Pole	Beverly Hills
64	136607E	Wood Pole	Beverly Hills
65	2255410E	Wood Pole	Beverly Hills
66	4883138E	Wood Pole	Beverly Hills
67	4387488E	Wood Pole	Beverly Hills
68	136603E	Wood Pole	Beverly Hills
69	2370901E	Wood Pole	Beverly Hills
70	4315475E	Wood Pole	Beverly Hills
71	4951322E	Wood Pole	Beverly Hills
72	929564E	Wood Pole	Beverly Hills
73	929563E	Wood Pole	Beverly Hills
74	929562E	Wood Pole	Beverly Hills
75	929561E	Wood Pole	Beverly Hills
76	929560E	Wood Pole	Beverly Hills
77	929559E	Wood Pole	Beverly Hills
78	929558E	Wood Pole	Beverly Hills
79	2370938E	Wood Pole	Beverly Hills
80	2317582E	Wood Pole	Beverly Hills
81	835393E	Wood Pole	Beverly Hills
82	4467768E	Wood Pole	Beverly Hills
83	4467155E	Wood Pole	Beverly Hills
84	4470535E	Wood Pole	Beverly Hills

85	559658E	Wood Pole	Beverly Hills
86	4467154E	Wood Pole	Beverly Hills
87	4467088E	Wood Pole	Culver City
88	1508747E	Wood Pole	Culver City
89	885479E	Wood Pole	Culver City
90	1629433E	Wood Pole	Culver City
91	4462959E	Wood Pole	Culver City
92	5304478	Manhole	Santa Monica
93	5039920	Manhole	Santa Monica
94	5039141	Manhole	Santa Monica
95	5040987	Manhole	Santa Monica
96	P5715713	Pad	Santa Monica
97	5646843	BURD	Culver City
98	5040924	BURD	Culver City
99	5040926	BURD	Culver City
100	5040927	BURD	Culver City

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 796133E – the visibility strip was damaged.
- Pole 2371699E – SCE's riser conduit was damaged.
- Pole 188348E – A "buddy pole" was not yet removed and left approximately a foot away from the pole.
- Pole 2255387E – A "buddy pole" was not yet removed and left approximately a foot away from the pole.
- Pole 2371699E – A "buddy pole" was not yet removed and left approximately a foot away from the pole.

SCE Response:

The above conditions have been recorded in SCE's Work Management System and will be addressed, or have already been addressed, in accordance with SCE's maintenance program.

- Pole 796133E – Damaged visibility strip. **SCE Response:** Completed on 1/3/2024 .
- Pole 2371699E – Damaged SCE riser conduit. **SCE Response:** Completed on 1/3/2024.
- Pole 188348E – "Buddy pole" not yet removed. **SCE Response:** Due on 01/02/2029.
- Pole 2255387E – "Buddy pole" not yet removed. **SCE Response:** Due on 01/02/2029.
- Pole 2371699E – "Buddy pole" not yet removed. **SCE Response:** Due on 01/02/2029.

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.

An SCE abandoned service drop was still attached to Pole No. 796134E.

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 796134E – Abandoned service drop. **SCE Response:** Due on 1/3/2025.

GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 10,

Column C requires the vertical separation between a secondary conductor and communication conductor supported on the same pole to be not less than 48 inches.

A SCE secondary service drop was in contact with a communication service drop on pole 4387488E.

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 4387488E – Secondary service drop in contact with communications service drop. **SCE Response:** Due on 01/02/2029.*

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 damaged:

- 487297E
- 1517998E
- 805436E
- 2060010E
- 446989E
- 225378E
- 4462959E

SCE Response:

Four of 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. The remaining three conditions have been recorded in SCE's Work Management System and 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 487297E – High Voltage Sign Damaged/Missing. **SCE Response:** SCE field personnel confirmed the correct Pole ID for this location is 1487297E. The condition is due on 01/01/2029.*
- *Pole 1517998E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 8/11/2024.*
- *Pole 805436E – High Voltage Sign Damaged/Missing. **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.

- *Pole 2060010E – High Voltage Sign Damaged/Missing. **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.*
- *Pole 446989E – High Voltage Sign Damaged/Missing. **SCE Response:** SCE field personnel confirmed the correct Pole ID for this location is 4466989E. The condition is due on 1/8/2029.*
- *Pole 225378E – High Voltage Sign Damaged/Missing. **SCE Response:** SCE field personnel confirmed the correct Pole ID for this location is 2255378E. 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.*
- *Pole 4462959E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 7/14/2026.*

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 attached to each of the following poles was damaged:

- 487297E
- 1517999E
- 225378E
- 929562E
- 929560E
- 929558E

SCE Response:

Three of 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. The remaining three conditions have been recorded in SCE’s Work Management System and 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 487297E – Damaged ground moulding. **SCE Response:** SCE field personnel confirmed the correct Pole ID for this location is 1487297E. The condition was completed on 1/3/2024.*
- *Pole 1517999E – Damaged ground moulding. **SCE Response:** Completed on 1/3/2024.*
- *Pole 225378E – Damaged ground moulding. **SCE Response:** SCE field personnel confirmed the correct Pole ID for this location is 2255378E. 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.*

- Pole 929562E – Damaged ground moulding. **SCE Response:** Due on 7/2/2024.
- Pole 929560E – Damaged ground moulding. **SCE Response:** Due on 03/28/2028.
- Pole 929558E – Damaged ground moulding. **SCE Response:** Due on 3/28/2028.

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 .

The down guy wire on each of the following poles was not taut:

- 1236407E
- 835393E

SCE Response:

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

- Pole 1236407E – Loose down guy wire. **SCE Response:** Due on 11/21/2028.
- Pole 835393E – Loose down guy wire. **SCE Response:** Due on 4/16/2025.