Melvin Stark
Principal Manager
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September 29, 2023

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

EA2023-1082
Subject: Audit of Southern California Edison's Valencia District

Dear Mr. Daye:

Your letter, dated August 29, 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 Valencia District from July 31, 2023 to August 4, 2023.

Your letter requested a response by September 29, 2023. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Mel Stark
Principal Manager, OE-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, ESRB, SED, CPUC
Kyle King, 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. Records Review – Violations List

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

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 95, Rule 31.2, Inspection of Lines, states in part:

> *Lines shall be inspected frequently and thoroughly for the purpose of insuring that they are in good condition so as to conform with these rules.*

SCE's records indicated that from 2020 through 2022, SCE had 40 annual grid patrol inspections and 689 overhead detailed inspections were completed or pending completion past SCE's scheduled due date.

SCE Response:

Without admitting that SCE violated GO 165, Section III-B or GO 95, Rule 31.2, SCE responds as follows. Based on SCE's records, from 2020 through 2022, SCE completed 40 annual grid patrol inspections past SCE's scheduled due date. Additionally, based on SCE's records, as of the date of the audit, SCE had 689 overhead detailed inspections that were completed or pending completion 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 2020 through 2022, SCE had 338 underground detailed inspections were completed or pending completion 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, from 2020 to 2022, SCE completed 338 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.

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 2020 to 2022, SCE had 1091 overhead notifications 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 2020 to 2022, SCE completed 1,384 overhead notifications past SCE's due date for corrective action. 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.

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 2020 through 2022, SCE had 113 underground notifications were completed or pending completion past SCE's scheduled due date for corrective action.

SCE Response:
Without admitting that SCE violated GO 128, Rule 17.1, SCE responds as follows. Based on SCE's records, SCE notes that from 2020 to 2022, SCE completed 482 underground notifications past SCE's due date for corrective action. Work orders may be pending or completed past their due dates for valid reasons, including but not limited to Permits, System Emergencies, and Customer Issues.

III. Field Inspections

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

	Structure No.	Structure Type	Location
1	1997473E	Utility Pole	Santa Clarita
2	4081315E	Utility Pole	Santa Clarita
3	4081317E	Utility Pole	Santa Clarita
4	4081319E	Utility Pole	Santa Clarita
5	4081321E	Utility Pole	Santa Clarita
6	4081313E	Utility Pole	Santa Clarita
7	4081312E	Utility Pole	Santa Clarita
8	4081311E	Utility Pole	Santa Clarita
9	4081309E	Utility Pole	Santa Clarita
10	4081307E	Utility Pole	Santa Clarita
11	4081305E	Utility Pole	Santa Clarita
12	4081303E	Utility Pole	Santa Clarita
13	4081301E	Utility Pole	Santa Clarita
14	1611835E	Utility Pole	Santa Clarita
15	1611834E	Utility Pole	Santa Clarita
16	1611833E	Utility Pole	Santa Clarita
17	1611832E	Utility Pole	Santa Clarita
18	1611831E	Utility Pole	Santa Clarita
19	1611836E	Utility Pole	Santa Clarita
20	1611837E	Utility Pole	Santa Clarita
21	4434921E	Utility Pole	Santa Clarita
22	1611839E	Utility Pole	Santa Clarita
23	1611840E	Utility Pole	Santa Clarita
24	1611841E	Utility Pole	Santa Clarita
25	1611842E	Utility Pole	Santa Clarita
26	4193612E	Utility Pole	Santa Clarita
27	4452273E	Utility Pole	Santa Clarita
28	1611845E	Utility Pole	Santa Clarita
29	4434829E	Utility Pole	Santa Clarita
30	2139779E	Utility Pole	Santa Clarita
31	4539427E	Utility Pole	Santa Clarita
32	4244987E	Utility Pole	Santa Clarita
33	P5502153	Padmounted Transformer	Castaic
34	P5637509	Padmounted Transformer	Castaic
35	P5637536	Padmounted Switch	Castaic
36	P5637535	Padmounted Switch	Castaic
37	P5706420	Padmounted Capacitor	Castaic

38	P5706419	Padmounted Switch	Castaic
39	S5637508	Padmounted Splice	Castaic
40	P5708348	Padmounted Gas Switch	Castaic
41	P5708349	Padmounted Switch	Castaic
42	P5471594	Padmounted Switch	Castaic
43	P5637946	Padmounted Transformer	Castaic
44	P5471592	Padmounted Transformer	Castaic
45	P5471591	Padmounted Switch	Castaic
46	P5637493	Padmounted Transformer	Castaic
47	P5138945	Padmounted Transformer	Santa Clarita
48	P5138943	Padmounted Transformer	Santa Clarita
49	P5138938	Padmounted Transformer	Santa Clarita
50	P5138859	Padmounted Subsurface Enclosure	Santa Clarita
51	P5138858	Padmounted Subsurface Enclosure	Santa Clarita
52	P5138950	Padmounted Transformer	Santa Clarita
53	P5138949	Padmounted Transformer	Santa Clarita
54	P5138952	Padmounted Transformer	Santa Clarita
55	P5138953	Padmounted Transformer	Santa Clarita
56	P5138951	Padmounted Transformer	Santa Clarita
57	P5620436	Padmounted Transformer	Santa Clarita
58	P5620435	Padmounted Switch	Santa Clarita
59	P5620438	Padmounted Transformer	Santa Clarita
60	P5138459	Padmounted Transformer	Santa Clarita
61	P5326096	Padmounted Transformer	Santa Clarita
62	P5035458	Padmounted Transformer	Santa Clarita
63	P5035457	Padmounted Transformer	Santa Clarita
64	P5035459	Padmounted Transformer	Santa Clarita
65	P5325939	Padmounted Transformer	Santa Clarita
66	P5499404	Padmounted Transformer	Santa Clarita
67	P5509704	Padmounted Transformer	Santa Clarita
68	949073E	Utility Pole	Val Verde
69	4104654E	Utility Pole	Val Verde
70	4041104E	Utility Pole	Val Verde
71	4041103E	Utility Pole	Val Verde
72	4041105E	Utility Pole	Val Verde
73	4041106E	Utility Pole	Val Verde
74	1865899E	Utility Pole	Val Verde
75	797384E	Utility Pole	Val Verde
76	1912701E	Utility Pole	Val Verde
77	1912703E	Utility Pole	Val Verde
78	4179715E	Utility Pole	Val Verde

79	4179716E	Utility Pole	Val Verde
80	689348E	Utility Pole	Val Verde
81	689346E	Utility Pole	Val Verde
82	689347E	Utility Pole	Val Verde
83	4179676E	Utility Pole	Val Verde
84	4179677E	Utility Pole	Val Verde
85	3008987E	Utility Pole	Val Verde
86	4215885E	Utility Pole	Val Verde
87	4179489E	Utility Pole	Val Verde
88	2101208E	Utility Pole	Val Verde
89	610652E	Utility Pole	Val Verde
90	4248928E	Utility Pole	Val Verde
91	4142489E	Utility Pole	Val Verde
92	4154883E	Utility Pole	Val Verde
93	1912759E	Utility Pole	Val Verde
94	4248947E	Utility Pole	Val Verde
95	2266059E	Utility Pole	Val Verde
96	1912763E	Utility Pole	Val Verde
97	1912764E	Utility Pole	Val Verde
98	4790686E	Utility Pole	Val Verde
99	4010750E	Utility Pole	Val Verde
100	4539103E	Utility Pole	Castaic
101	4539104E	Utility Pole	Castaic
102	4539105E	Utility Pole	Castaic
103	4539106E	Utility Pole	Castaic
104	4093441E	Utility Pole	Castaic
105	4306173E	Utility Pole	Castaic
106	1871232E	Utility Pole	Castaic
107	1871234E	Utility Pole	Castaic
108	4093439E	Utility Pole	Castaic
109	4093437E	Utility Pole	Castaic
110	1871233E	Utility Pole	Castaic
111	4539107E	Utility Pole	Castaic
112	4093435E	Utility Pole	Castaic
113	4456809E	Utility Pole	Castaic
114	4093433E	Utility Pole	Castaic
115	4093434E	Utility Pole	Castaic
116	4868648E	Utility Pole	Hasley Canyon
117	4155247E	Utility Pole	Hasley Canyon
118	1982588E	Utility Pole	Piru
119	4278529E	Utility Pole	Piru

IV. Field Inspection Violations List

My staff observed the following violations during the field inspections 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:

- 4081321E
- 1611834E
- 1611833E
- 1611840E
- 4244987E
- 1871232E

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 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 4081321E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 9/12/2026.*
- *Pole 1611834E – 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 1611833E – 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 1611840E – 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 4244987E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 5/16/2027.*

- *Pole 1871232E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 9/2/2024.*

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.*

An unauthorized sign was attached to each of the following poles:

- 4081321E
- 4081303E

SCE Response:
The above conditions were recorded in SCE's Work Management System and addressed in accordance with SCE's maintenance program.

- *Pole 4081321E – Unauthorized sign attached.* ***SCE Response:*** *Completed on 9/12/2023.*
- *Pole 4081303E – Unauthorized sign attached.* ***SCE Response:*** *Completed on 9/12/2023.*

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 Pole number 1611839E was damaged.

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.

- *Pole 1611839E – Damaged ground molding.* ***SCE Response:*** *Due on 4/7/2027.*