



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

January 22, 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

EA2023-1084
Subject: Audit of Southern California Edison's Facilities on Catalina Island

Dear Mr. Daye:

Your letter, dated December 22, 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 Catalina Island District from August 7, 2023 to August 8, 2023.

Your letter requested a response by January 22, 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", with a long horizontal flourish extending to the right.

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
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	X10141E	Pole	Avalon
2	2365067E	Pole	Avalon
3	1492837E	Pole	Avalon
4	1492838E	Pole	Avalon
5	1492839E	Pole	Avalon
6	1492840E	Pole	Avalon
7	4753257E	Pole	Avalon
8	1492833E	Pole	Avalon
9	4753256E	Pole	Avalon
10	2167593E	Pole	Avalon
11	1491785E	Pole	Avalon
12	2365060E	Pole	Avalon
13	2365061E	Pole	Avalon
14	2365062E	Pole	Avalon
15	2365063E	Pole	Avalon
16	2365064E	Pole	Avalon
17	2365065E	Pole	Avalon
18	2365066E	Pole	Avalon
19	2167664E	Pole	Avalon
20	2381630E	Pole	Avalon
21	2381629E	Pole	Avalon
22	2381633E	Pole	Avalon
23	2381631E	Pole	Avalon
24	4152825E	Pole	Avalon
25	X10144E	Pole	Avalon
26	2167575E	Pole	Avalon
27	1491709E	Pole	Avalon
28	2167576E	Pole	Avalon
29	1492459E	Pole	Avalon
30	1492376E	Pole	Avalon
31	1492336E	Pole	Avalon
32	2244225E	Pole	Avalon
33	1492550E	Pole	Avalon
34	1492399E	Pole	Avalon
35	1492846E	Pole	Avalon
36	X8634E	Pole	Avalon
37	1492847E	Pole	Avalon

38	1492848E	Pole	Avalon
39	1492849E	Pole	Avalon
40	X10113E	Pole	Avalon
41	X8648E	Pole	Avalon
42	1492514E	Pole	Avalon
43	1492512E	Pole	Avalon
44	1492513E	Pole	Avalon
45	4806552E	Pole	Avalon
46	X8614E	Pole	Avalon
47	X8613E	Pole	Avalon
48	X8618E	Pole	Avalon
49	4733684E/4733683E	H-frame	Haypress Reservoir
50	2381735E/2381736E	H-frame	Haypress Reservoir
51	2381733E/2381734E	H-frame	Haypress Reservoir
52	4733681E/4733682E	H-frame	Haypress Reservoir
53	V5062584	Vault with Switch	Avalon
54	V5062543	Vault with Switch	Avalon
55	V5062558	Vault with Switch	Avalon
56	P5468779	Padmounted Transformer	Avalon
57	P5636778	Padmounted Transformer	Avalon
58	S5712286	Vault with Switch	Avalon
59	P5649962	Padmounted Transformer	Avalon
60	V5062541	Vault with Switch	Avalon
61	P5060671	Padmounted Transformer	Avalon
62	2276323E	Pole	Avalon
63	1492823E	Pole	Avalon

III. Field Inspection Violations List

My staff observed the following violations during the field inspection:

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. 2365060E was not taut.

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 2365060E – Loose down guy wire. SCE Response: Due on 01/01/2029.*

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. 1491709E 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 1491709E – Low Pole Step. SCE Response: Due on 01/01/2029.*