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

December 1, 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

EA2023-1088
Subject: Audit of Southern California Edison's Ontario District

Dear Mr. Daye:

Your letter, dated October 31, 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 Ontario District from August 21, 2023, to August 25, 2023.

Your letter requested a response by December 1, 2023. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Sincerely,

Mel Stark
Principal Manager, 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
Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC
Stacey Ocampo, Utilities Engineer, ESRB, SED, CPUC
Sultan Tipu, 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

I. 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 June 2018 through June 2023, SCE completed 108 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 3 pending patrol inspections that were 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, SCE notes that from June 2018 through June 2023, it completed 108 patrol inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 3 pending annual grid patrols 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.

- SCE's records indicated that from June 2018 through June 2023, SCE completed 6715 overhead detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 640 pending overhead detailed inspections that were 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, SCE notes that from June 2018 through June 2023, it completed 6,715 overhead detailed inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 640 pending 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 June 2018 through June 2023, SCE completed 1237 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 166 pending underground inspections that were 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 June 2018 to June 2023, SCE completed 1,237 underground inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 166 pending underground 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 June 2018 through June 2023, SCE completed 294 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 426 open overhead work orders that were 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, from June 2018 to June 2023, SCE completed 294 overhead work orders past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 426 open overhead work orders past SCE's scheduled 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 June 2018 through June 2023, SCE completed 233 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 776 open underground work orders that were 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, from June 2018 to June 2023, SCE completed 233 underground work orders past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 776 open underground work orders past SCE's scheduled 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	4328933E	Utility Pole	Ontario
2	4328934E	Utility Pole	Ontario
3	4328935E	Utility Pole	Ontario
4	4328936E	Utility Pole	Ontario
5	4328937E	Utility Pole	Ontario
6	1829760E	Utility Pole	Ontario
7	4593226E	Utility Pole	Ontario
8	4328938E	Utility Pole	Ontario
9	1891985E	Utility Pole	Ontario
10	4328939E	Utility Pole	Ontario
11	1205770E	Utility Pole	Ontario
12	H30571Y	Utility Pole	Ontario
13	H8003Y	Utility Pole	Ontario
14	H30570Y	Utility Pole	Ontario
15	4042938E	Utility Pole	Ontario
16	4338771E	Utility Pole	Ontario
17	1064673E	Utility Pole	Ontario
18	H30568Y	Utility Pole	Ontario
19	4779695E	Utility Pole	Ontario
20	1199687E	Utility Pole	Chino
21	1199686E	Utility Pole	Chino
22	4310845E	Utility Pole	Chino
23	1199685E	Utility Pole	Chino
24	4787160E	Utility Pole	Chino
25	4310843E	Utility Pole	Chino
26	519866E	Utility Pole	Chino
27	1310611E	Utility Pole	Chino
28	1310610E	Utility Pole	Chino
29	G24975Y	Utility Pole	Chino
30	1310609E	Utility Pole	Chino
31	1310608E	Utility Pole	Chino
32	G15188Y	Utility Pole	Chino
33	G15189Y	Utility Pole	Chino
34	G15190Y	Utility Pole	Chino
35	G15191Y	Utility Pole	Chino
36	G14778Y	Utility Pole	Montclair
37	742197E	Utility Pole	Montclair

38	1683121E	Utility Pole	Montclair
39	1780662E	Utility Pole	Montclair
40	714726E	Utility Pole	Montclair
41	714727E	Utility Pole	Montclair
42	1683665E	Utility Pole	Montclair
43	1862267E	Utility Pole	Montclair
44	1683664E	Utility Pole	Montclair
45	4929729E	Utility Pole	Montclair
46	4707849E	Utility Pole	Montclair
47	2132668E	Utility Pole	Montclair
48	668633E	Utility Pole	Montclair
49	322288E	Utility Pole	Montclair
50	GT60397E	Utility Pole	Montclair
51	G14772Y	Utility Pole	Montclair
52	322290E	Utility Pole	Montclair
53	GT60398E	Utility Pole	Montclair
54	4562703E	Utility Pole	Montclair
55	4909056E	Utility Pole	Montclair
56	4933397E	Utility Pole	Montclair
57	4694941E	Utility Pole	Montclair
58	4593268E	Utility Pole	Montclair
59	1236938E	Utility Pole	Montclair
60	P5397074	Pad-mounted Switch	Rancho Cucamonga
61	P5601427	Pad-mounted Transformer	Rancho Cucamonga
62	V5704748	Vault	Rancho Cucamonga
63	B5196697	BURD Switch	Chino
64	P5196694	Pad-mounted Transformer	Chino
65	P5347970	Junction Box	Chino
66	M5140583	Manhole	Corona
67	P5193525	Pad-mounted Transformer	Corona
68	V5140584	Vault	Corona
69	P5140586	Pad-mounted Transformer	Corona
70	V5140585	Vault	Corona
71	4562617E	Utility Pole	San Antonio Heights
72	2103135E	Utility Pole	San Antonio Heights
73	2103130E	Utility Pole	San Antonio Heights
74	2103133E	Utility Pole	San Antonio Heights
75	544809E	Utility Pole	San Antonio Heights
76	544808E	Utility Pole	San Antonio Heights
77	544807E	Utility Pole	San Antonio Heights
78	544806E	Utility Pole	San Antonio Heights

79	1137757E	Utility Pole	San Antonio Heights
80	4148745E	Utility Pole	Mount Baldy
81	1922017E	Utility Pole	Mount Baldy
82	4562616E	Utility Pole	Mount Baldy
83	2165721E	Utility Pole	Mount Baldy
84	4817260E	Utility Pole	Mount Baldy
85	4882249E	Utility Pole	Mount Baldy
86	4817862E	Utility Pole	Mount Baldy
87	H6719Y	Utility Pole	Mount Baldy
88	544943E	Utility Pole	Mount Baldy
89	1445130E	Utility Pole	Mount Baldy
90	1445131E	Utility Pole	Mount Baldy
91	2108463E	Utility Pole	Mount Baldy
92	4820176E	Utility Pole	Mount Baldy
93	1445133E	Utility Pole	Mount Baldy
94	788329E	Utility Pole	Upland
95	1615366E	Utility Pole	Upland
96	4819729E	Utility Pole	Upland
97	4819728E	Utility Pole	Upland
98	H5976Y	Utility Pole	Upland
99	H5977Y	Utility Pole	Upland
100	1615365E	Utility Pole	Upland
101	H5979Y	Utility Pole	Upland
102	4132204E	Utility Pole	Upland
103	1829724E	Utility Pole	Upland
104	1829723E	Utility Pole	Upland
105	748797E	Utility Pole	Upland
106	4386383E	Utility Pole	Rancho Cucamonga

IV. Field Inspection – Violations List

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 742197E: an insulator attached to the secondary crossarm was sunken.
- Pole 1205770E: the "eye" of the SCE down guy anchor was buried.
- Pole 1615366E: the "eye" of the SCE down guy anchor was buried.

SCE Response:
One of the above conditions was previously recorded in SCE's Work Management System at the time of the audit, and it will be addressed in accordance with SCE's maintenance program. The remaining two conditions have been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.

- *Pole 742197E – Insulator attached to the secondary crossarm was sunken.* ***SCE Response:*** *Due on 04/30/2024.*
- *Pole 1205770E – Buried anchor.* ***SCE Response:*** *Due on 04/30/2024.*
- *Pole 1615366E – Buried anchor.* ***SCE Response:*** *Due on 12/4/2026.*

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 either missing or damaged:

- 4328933E
- 4328934E
- 4328935E
- 4328936E
- 4328937E
- H30568Y
- 1199685E
- 4310843E
- 519866E
- G15190Y
- G15191Y
- G14772Y
- 322290E

SCE Response:
Eleven 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 two 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 4328933E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 8/22/2028.*
- *Pole 4328934E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 4/13/2028.*
- *Pole 4328935E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 8/22/2028.*
- *Pole 4328936E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 11/25/2028.*
- *Pole 4328937E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *SCE field personnel visited the site on 11/27/2023 and confirmed that the high voltage signs are not damaged or missing. No further action is required..*
- *Pole H30568Y – 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 1199685E – 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 4310843E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 8/22/2028.*
- *Pole 519866E – 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 G15190Y – 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 G15191Y – 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 G14772Y – 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 322290E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 9/8/2026.*

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 Pole 1064673E was damaged.

SCE Response:
The above condition was previously recorded in SCE's Work Management System at the time of the audit, 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 1064673E – Damaged ground moulding.* ***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 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 attached to Pole 2132668E was loose and 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 2132668E – Loose down guy wire.* ***SCE Response:*** *Due on 04/30/2024.*

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 1829760E 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 1829760E – Low pole step.* ***SCE Response:*** *Due on 8/22/2028.*

GO 128, Rule 32.7, Covers, states in part:

> *Manholes, handholes, and subsurface equipment enclosures while not being worked in, shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them and arrangements shall be such that a tool or appliance shall be required for their opening and cover removal.*

The pull box lid for pad-mounted transformer P5140586 was missing bolts and not properly secured.

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.

- *Pad-mount Transformer P5140586 – Missing bolts.* ***SCE Response:*** *Due on 8/30/2025.*