



Melvin Stark
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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

EA2023-1051

Subject: Distribution Audit of Southern California Edison's Compton 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 Compton District from September 11, 2023, to September 15, 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: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Eric Ujiye, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- Intrusive test records
- SCE's documented inspection program.

II. Records Review – Violations List

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

GO 165, Section III-B, 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 from 2018 to 2023, SCE completed or have pending 16,350 overhead detailed inspections and 5 annual grid patrols 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 2018 through 2023, it completed 16,351 overhead detailed inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from 2018 through 2023, it completed 5 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.

GO 165, Section III-B, 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 of these rules.

SCE's records indicated that from 2018 to 2023, SCE completed or have pending 507 underground detailed 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 2018 through 2023, it completed 507 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, 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 ...

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 2018 to 2023, SCE completed or have pending 21 Priority 1 and 1381 Priority 2 overhead work orders past SCE's due date for corrective action.

SCE Response:

Without admitting that SCE violated GO 95, Rule 18-B1 or GO 95, Rule 31.1, SCE responds as follows. Based on SCE's records, from 2018 to 2023, SCE completed 21 Priority 1 and 1381 Priority 2 overhead work orders 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, System Issues, 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 2018 to 2023, SCE completed or have pending 17 Priority 1 and 483 Priority 2 underground work orders 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 2018 to 2023, SCE completed 17 Priority 1 and 483 Priority 2 underground work orders 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 facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	1307033E	Pole	East Gardena
2	1307032E	Pole	East Gardena
3	1307031E	Pole	East Gardena
4	1307030E	Pole	East Gardena
5	1328588E	Pole	East Gardena
6	1233933E	Pole	East Gardena
7	1233934E	Pole	East Gardena
8	1233935E	Pole	East Gardena
9	997669E	Pole	East Gardena
10	4353518E	Pole	East Gardena
11	1356252E	Pole	East Gardena
12	1356251E	Pole	East Gardena
13	1416251E	Pole	Carson
14	697423H	Pole	Carson
15	1207121E	Pole	Carson
16	2296525E	Pole	Carson
17	1207125E	Pole	Carson
18	1207126E	Pole	Carson
19	1207127E	Pole	Carson
20	1207128E	Pole	Carson
21	4558050E	Pole	Carson
22	1207134E	Pole	Carson
23	1207139E	Pole	Carson
24	1207041E	Pole	Carson
25	1211266E	Pole	Carson
26	1206930E	Pole	Carson
27	4400852E	Pole	Carson
28	980307E	Pole	Carson
29	1206928E	Pole	Carson
30	1108587E	Pole	Carson
31	1065737E	Pole	Carson
32	841679E	Pole	Carson
33	2318077E	Pole	Bellflower
34	80888E	Pole	Bellflower
35	2304047E	Pole	Bellflower
36	913870E	Pole	Bellflower
37	1835437E	Pole	Bellflower
38	4455344E	Pole	Bellflower
39	1179858E	Pole	Bellflower
40	1578292E	Pole	Bellflower

41	4158740E	Pole	Bellflower
42	GT137117	Pole	Bellflower
43	4158741E	Pole	Bellflower
44	1283930E	Pole	Bellflower
45	1538700E	Pole	Bellflower
46	GT134315	Pole	Bellflower
47	4158742E	Pole	Bellflower
48	1356448E	Pole	Paramount
49	1179768E	Pole	Paramount
50	4759644E	Pole	Paramount
51	1179767E	Pole	Paramount
52	4407942E	Pole	Paramount
53	1179765E	Pole	Paramount
54	4242987E	Pole	Paramount
55	1577709E	Pole	Paramount
56	1116393E	Pole	Paramount
57	1179107E	Pole	Paramount
58	1381971E	Pole	Paramount
59	1356032E	Pole	Paramount
60	4600365E	Pole	Paramount
61	1179106E	Pole	Paramount
62	1443338E	Pole	Paramount
63	1658980E	Pole	Bell Gardens
64	1658991E	Pole	Bell Gardens
65	969796E	Pole	Bell Gardens
66	M15383Y	Pole	Bell Gardens
67	M8102Y	Pole	Bell Gardens
68	1404566E	Pole	Bell Gardens
69	1658982E	Pole	Bell Gardens
70	1013011E	Pole	Bell Gardens
71	969795E	Pole	Bell Gardens
72	1101726E	Pole	Bell Gardens
73	1658981E	Pole	Bell Gardens
74	5001089E	Pole	Bell Gardens
75	1658985E	Pole	Bell Gardens
76	1676253E	Pole	Montebello
77	1392495E	Pole	Montebello
78	1392496E	Pole	Montebello
79	1408241E	Pole	Montebello
80	616483H	Pole	Montebello
81	616482H	Pole	Montebello
82	1591225E	Pole	Montebello
83	1168249E	Pole	Montebello
84	M5123965	Vault	Commerce
85	V5052822	Vault	Southgate

86	5021793	Vault	Southgate
87	5021790	Vault	Southgate
88	P5308020	Pad	Southgate
89	5152900	Vault	Southgate
90	P5442126	Pad	Southgate
91	5152897	Vault	Southgate
92	V5022404	Vault	Paramount
93	P5306939	Pad	Paramount
94	P5346214	Pad	Paramount
95	P5346212	Pad	Paramount
96	5207756	Vault	Paramount
97	4432597E	Pole	Bell Gardens
98	4432598E	Pole	Bell Gardens
99	4666317E	Pole	Bell Gardens
100	4520196E	Pole	Bell Gardens
101	4812500E	Pole	Bell Gardens
102	779020E	Pole	Bell Gardens
103	1439330E	Pole	Bell Gardens
104	779021E	Pole	Bell Gardens
105	779022E	Pole	Bell Gardens
106	779023E	Pole	Bell Gardens
107	2296411E	Pole	Bell Gardens
108	779025E	Pole	Bell Gardens
109	779026E	Pole	Bell Gardens
110	4989937E	Pole	Bell Gardens
111	4139754E	Pole	Bell Gardens

IV. Field Inspection Violations List

My staff observed the following violations during the field inspections portion of the audit.

GO 95, Rule 18.A(3), Resolution of Potential Violation of General Order 95 and Safety Hazards, states in part:

If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

SCE did not notify a third party entity of the following safety hazards:

- Pole 616482H: A third party communications span guy wire was detached from one end and lying on a communications conductor.
- Pole 779020E: A third party communications pan guy wire was detached from one end and lying against the pole.

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 condition has 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 616482H – Detached third party communications span 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.*
- *Pole 779020E – Detached third party communications span guy wire. **SCE Response:** Completed on 10/21/2023.*

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 facilities required maintenance:

- Pole 2296525E: the second step from the bottom of the pole was bent.
- Pole 1835437E: three primary down guy wires were causing a communication messenger guy wire to deflect at midspan.
- Pole 1116393E: the bottom pole step was damaged bent.
- Pole 1168249E: part of a primary double crossarm showed termite damage.

- Pole 2296411E: the visibility strips supported on the pole were partially separated from the pole.

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 four 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 2296525E – Damaged pole step. **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 1835437E – Communication messenger guy wire deflecting at midspan. **SCE Response:** *Due on 12/31/2026.*
- Pole 1116393E – Damaged pole step. **SCE Response:** *SCE field personnel confirmed the correct Pole ID for this location is 116393E. The condition is due on 12/31/2028.*
- Pole 1168249E – Damaged crossarm. **SCE Response:** *Due on 12/31/2026.*
- Pole 2296411E – Damaged visibility strips. **SCE Response:** *SCE field personnel visited the site on 1/2/2024 and confirmed that the visibility strips are not damaged or missing. No further action is required.*

GO 95, Rule 37, Table 1, Case 6, Column B requires the minimal vertical clearance of a Supply Service Drop of 0-750 Volts above a walkable surface on buildings, whether attached or not attached, to be 8 feet.

An SCE service drop serving 5515 Gotham Street, Bell Gardens and supported on Pole M15383Y had a vertical clearance of less than 8 feet above a walkable surface, at approximately 2 feet above the roof of 5521 1/2 Gotham Street of Bell Gardens.

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 M15383Y – Service drop with a vertical clearance of less than 8 feet. **SCE Response:** *Due on 12/31/2028.*

GO 95, Rule 51.6-A, 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 attached to each of the following poles were either damaged or missing.

- Pole 2296525E: the “HIGH VOLTAGE” sign was missing.
- Pole 1207125E: both the “HIGH” and “VOLTAGE” signs attached to the primary crossarm were illegible.
- Pole 1116393E: the “HIGH VOLTAGE” sign was missing.
- Pole 779020E: the “HIGH VOLTAGE” sign was missing.
- Pole 2296411E: the “HIGH VOLTAGE” sign was missing.

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 condition has 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 2296525E – 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 1207125E – 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 1116393E – High Voltage Sign Damaged/Missing. **SCE Response:** SCE field personnel confirmed the correct Pole ID for this location is 116393E. 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 779020E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 1/2/2029.*
- *Pole 2296411E – 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.*

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 molding on each of the following poles was either missing or damaged:

- Pole 1392496E: a 6-foot section of ground moulding was missing (at approximately 12 feet above the ground).
- Pole 1408241E: a damaged section of ground moulding was separating from the surface of the pole (at approximately 8 feet above the ground); additionally, a 6-foot section of ground molding was missing (at approximately 12 feet above the ground).

SCE Response:

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

- *Pole 1392496E – Ground Moulding Damaged/Missing. SCE Response: Due on 1/2/2029.*
- *Pole 1408241E – Ground Moulding Damaged/Missing. SCE Response: Due on 1/2/2027.*

GO 95, Rule 91.3-B, Stepping, 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.

The lowest pole step supported on Pole 1207126E was attached at approximately 7 feet above the ground.

SCE Response:

SCE field personnel visited the site on 1/2/2024 and confirmed that the lowest pole step supported on Pole 1207126E is attached at approximately 9 feet above the ground. No further action is required.