

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 14, 2023

EA2023-1062

Melvin Stark
Principle Manager, T&D Compliance Integration
Southern California Edison Company
1 Innovation Way
Pomona, CA 91786

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

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Mily Vaidya and Jose Lastra of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Santa Monica District from June 5, 2023 to June 9, 2023. The audit included a review of SCE's inspection and maintenance records and a field inspection of SCE's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than January 15, 2024, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Mily Vaidya at (213)-999-8528 or Mily.Vaidya@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, 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.

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.

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.

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.

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.

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

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

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