**Melvin Stark**
Principal Manager
EHSQ-T&D Compliance & Quality

May 27, 2025

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

Subject: EA2024-1279, Electric distribution audit of SCE's Ridgecrest District

Dear Mr. Daye:

Your letter, dated April 24, 2025, requested that we advise you of actions taken by Southern California Edison Company (SCE) to address conditions identified during the Safety Enforcement Division's (SED's) distribution audit of SCE's Ridgecrest District from December 16, 2024 to December 20, 2024.

Your letter requested a response by May 26, 2025. Since SCE's offices were closed on that date due to the Memorial Day holiday, SCE is responding on May 27th. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Mel Stark
Principal Manager, EHSQ-T&D Compliance & Quality
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Enclosures: SED Audit Findings and SCE's Responses

Cc: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Safety and Enforcement Division, CPUC
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC
Jose Lastra, Utilities Engineer, 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 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 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.*

SCE's records indicated that from January 2022 to November 2024, SCE completed 4,633 detailed inspections and 76 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 295 pending detailed inspections and 285 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 January 2022 through November 2024, it had 4,633 overhead detailed inspections that were completed past SCE's scheduled due date and 295 overhead detailed inspections that were pending completion past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes from January 2022 through November 2024, it had 76 annual grid patrols that were completed past SCE's scheduled due date and 285 annual grid patrols that were 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, system issues 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 January 2022 to November 2024, SCE completed 50 underground 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 January 2022 through November 2024, it had 50 underground detailed inspections that were completed 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, system issues or environmental constraints, among other reasons.*

**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 …*

**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 January 2022 to November 2024, SCE completed 107

overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 64 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-B1 or GO 95, Rule 31.1, SCE responds as follows. Based on SCE's records, from January 2022 through November 2024, SCE had 107 overhead work orders that were completed past SCE's scheduled due date for corrective action. Additionally, from January 2022 through November 2024, it had 64 overhead work orders that were pending completion 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.*

**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 January 2022 to November 2024, SCE completed 26 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 22 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 January 2022 through November 2024, SCE had 26 underground work orders that were completed past SCE's scheduled due date for corrective action. Additionally, January 2022 through November 2024, it had 22 underground work orders that were pending completion 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 facilities during the field portion of the audit:

| No. | Structure ID. | Type of Structure | Location |
|---|---|---|---|
| 1 | 88999S | Wood Pole | Ridgecrest |
| 2 | 2172027E | Wood Pole | Ridgecrest |
| 3 | 4902246E | Wood Pole | Ridgecrest |
| 4 | 2025463E | Wood Pole | Ridgecrest |
| 5 | 2179502E | Wood Pole | Ridgecrest |
| 6 | 4177372E | Wood Pole | Ridgecrest |
| 7 | 2179981E | Wood Pole | Ridgecrest |
| 8 | 2179982E | Wood Pole | Ridgecrest |
| 9 | 4927707E | Wood Pole | Ridgecrest |
| 10 | 1646448E | Wood Pole | Ridgecrest |
| 11 | 4796273E | Wood Pole | Coso Junction |
| 12 | 4721051E | Wood Pole | Coso Junction |
| 13 | 4721057E | Wood Pole | Coso Junction |
| 14 | 4721056E | Wood Pole | Coso Junction |
| 15 | 4721055E | Wood Pole | Coso Junction |
| 16 | 4721054E | Wood Pole | Coso Junction |
| 17 | 4721053E | Wood Pole | Coso Junction |
| 18 | 4721052E | Wood Pole | Coso Junction |
| 19 | 4587967E | Wood Pole | Little Lake/Pearsonville |
| 20 | 1899839E | Wood Pole | Little Lake/Pearsonville |
| 21 | 1899840E | Wood Pole | Little Lake/Pearsonville |
| 22 | 1899841E | Wood Pole | Little Lake/Pearsonville |
| 23 | 4593900E | Wood Pole | Little Lake/Pearsonville |
| 24 | 1899843E | Wood Pole | Little Lake/Pearsonville |
| 25 | 1899844E | Wood Pole | Little Lake/Pearsonville |
| 26 | 1899845E | Wood Pole | Little Lake/Pearsonville |
| 27 | 1899846E | Wood Pole | Little Lake/Pearsonville |
| 28 | 1899847E | Wood Pole | Little Lake/Pearsonville |
| 29 | 1649847E | Wood Pole | Ridgecrest |
| 30 | 1646385E | Wood Pole | Ridgecrest |
| 31 | 4887885E | Wood Pole | Ridgecrest |
| 32 | 4924112E | Wood Pole | Ridgecrest |
| 33 | 4918384E | Wood Pole | Ridgecrest |
| 34 | 525718S | Wood Pole | Ridgecrest |
| 35 | 2172374E | Wood Pole | Ridgecrest |
| 36 | 4841950E | Wood Pole | Ridgecrest |
| 37 | 1649975E | Wood Pole | Ridgecrest |
| 38 | 1649976E | Wood Pole | Ridgecrest |
| 39 | 1649977E | Wood Pole | Ridgecrest |
| 40 | 1649979E | Wood Pole | Ridgecrest |
| 41 | 1649978E | Wood Pole | Ridgecrest |

| | | | |
|---|---|---|---|
| 42 | P5340267 | Padmount Transformer | Ridgecrest |
| 43 | 5183938 | SOE | Ridgecrest |
| 44 | P5183652 | Padmount Enclosure | Ridgecrest |
| 45 | P5376800 | Padmount Transformer | Ridgecrest |
| 46 | P5484277 | Padmount Transformer | Ridgecrest |
| 47 | 5376347 | Handhole | Ridgecrest |
| 48 | P5376348 | Padmount Transformer | Ridgecrest |
| 49 | P5376348 | Handhole | Ridgecrest |
| 50 | 5183807 | BURD | Ridgecrest |
| 51 | 5183682 | Manhole | Ridgecrest |
| 52 | P5653613 | Padmount Transformer | Ridgecrest |
| 53 | 5183683 | BURD | Ridgecrest |
| 54 | 5183683 | Handhole | Ridgecrest |
| 55 | 5183679 | BURD | Ridgecrest |
| 56 | 5183679 | Handhole | Ridgecrest |
| 57 | 1778575E | Wood Pole | California City |
| 58 | 1778576E | Wood Pole | California City |
| 59 | 2025268E | Wood Pole | California City |
| 60 | 2025267E | Wood Pole | California City |
| 61 | 1778571E | Wood Pole | California City |
| 62 | 1778574E | Wood Pole | California City |
| 63 | 4177346E | Wood Pole | California City |
| 64 | 1778570E | Wood Pole | California City |
| 65 | 1778569E | Wood Pole | California City |
| 66 | 1849175E | Wood Pole | California City |
| 67 | 1849176E | Wood Pole | California City |
| 68 | 1849178E | Wood Pole | California City |
| 69 | 1849179E | Wood Pole | California City |
| 70 | 1849177E | Wood Pole | California City |
| 71 | 1899723E | Wood Pole | California City |
| 72 | 1899724E | Wood Pole | California City |
| 73 | 1899725E | Wood Pole | California City |
| 74 | 1899726E | Wood Pole | California City |
| 75 | 1778577E | Wood Pole | California City |
| 76 | 2110163E | Wood Pole | Ridgecrest |
| 77 | 4739643E | Wood Pole | Ridgecrest |
| 78 | 4868138 | Wood Pole | Ridgecrest |
| 79 | A1533090BE | Wood Pole | Ridgecrest |
| 80 | 1744569E | Wood Pole | Ridgecrest |
| 81 | A1533089BE | Wood Pole | Ridgecrest |
| 82 | 1924286E | Wood Pole | Ridgecrest |
| 83 | 1998109E | Wood Pole | Ridgecrest |
| 84 | 4418305E | Wood Pole | Ridgecrest |
| 85 | 2055913E | Wood Pole | Ridgecrest |
| 86 | 2055914E | Wood Pole | Ridgecrest |
| 87 | 2110166E | Wood Pole | Ridgecrest |

| | | | |
|---|---|---|---|
| 88 | 2110165E | Wood Pole | Ridgecrest |
| 89 | 2110164E | Wood Pole | Ridgecrest |
| 90 | 2025184E | Wood Pole | Ridgecrest |
| 91 | 2025186E | Wood Pole | Ridgecrest |
| 92 | 4829972E | Wood Pole | Ridgecrest |
| 93 | 2025185E | Wood Pole | Ridgecrest |
| 94 | 2025183E | Wood Pole | Ridgecrest |

## IV. Field Inspection Violations List

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

**GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards,** states:

> *(3) 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 10 business days after the discovery.*

SCE did not notify the responsible third-party of the following safety hazards:

- Pole 2025463E: a third-party communications pedestal was completely uncovered, exposing the encased wiring
- Pole 2179981E: a third-party communications cable was hanging at the public level of the pole
- Pole 1849176E: multiple third-party communications conductors were hanging at the public level of the pole

***SCE Response:***
*One of the above conditions was previously recorded in SCE's Work Management System and it was addressed in accordance with SCE's maintenance program. The remaining two conditions have been recorded in SCE's Work Management System and they were addressed in accordance with SCE's maintenance program.*

- *Pole 2025463E – Third-party communications pedestal completely uncovered.* ***SCE Response:*** *SCE notified the impacted communication company to remediate the concern on 5/27/2025.*
- *Pole 2179981E – Low hanging third-party communications cable.* ***SCE Response:*** *SCE notified the impacted communication company to remediate the concern on 10/22/2023.*
- *Pole 1849176E – Multiple Low hanging third-party communications cable.* ***SCE Response:*** *SCE notified the impacted communication companies to remediate the concern on 5/27/2025.*

**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 SCE facilities required maintenance:

- Pole 4902246E: an SCE down guy wire was touching the V-brace of a third-party

communications crossarm (located on buddy pole), causing strain to the down guy wire
- Pole 2179502E: a bird guard was dislodged from the insulator and conductor
- Pole 1899847E: a brace of an SCE crossarm was detached and hanging.
- Pole 1649847E: a bird guard was dislodged from the insulator and conductor.
- Pole 4887885E: the SCE transformer had a large bird nest resting on it
- Pole 4918384E: the bird guard was dislodged from the insulator and conductor.
- Pole 1849177E: a bolt on the SCE pole mounted transformer bracket was loose.

***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 4902246E – Down guy wire contacting third-party communications V-brace.* ***SCE Response:*** *SCE notified the impacted communication company to remediate the concern on 6/20/2024.*
- *Pole 2179502E – Dislodged Bird Guard.* ***SCE Response:*** *Due on 5/26/2028.*
- *Pole 1899847E – Detached crossarm brace.* ***SCE Response:*** *Due on 10/29/2025.*
- *Pole 1649847E – Dislodged Bird Guard.* ***SCE Response:*** *Due on 5/26/2028.*
- *Pole 4887885E – Bird's Nest on transformer.* ***SCE Response:*** *Due on 11/28/2025.*
- *Pole 4918384E – Dislodged Bird Guard.* ***SCE Response:*** *Due on 5/26/2028.*
- *Pole 1849177E – Loose transformer hardware.* ***SCE Response:*** *Due on 11/28/2025.*

**GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19** requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be 3 inches.

The radial clearance between an SCE down guy wire and a third-party communications conductor on Pole 88999S was less than 3 inches.

***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 88999S –Clearance between down guy wire and a third-party communications conductor less than 3 inches.* ***SCE Response:*** *Due on 5/26/2028.*

**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:

- 2172027E
- 1778570E
- 1849176E
- 1849177E
- 1998109E
- 2110164E
- 2172374E
- 1778569E
- 1849178E
- 1899723E
- 4418305E
- 1649976E
- 4177346E
- 1849175E
- 1849179E
- 1899725E
- 2110166E

***SCE Response:***

*The above conditions were previously recorded in SCE's Work Management System, and they 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 2172027E – 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 1778570E – 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 1849176E – 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 1849177E – 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 1998109E – 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 2110164E – 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 2172374E – 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 1778569E – 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 1849178E – 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 1899723E – 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 4418305E – 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 1649976E – 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 4177346E – 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 1849175E – 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 1849179E – 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 1899725E – 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 2110166E – 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 moulding attached to each of the following poles was damaged:

- 2172027E
- 2179502E
- 2172374E
- 1849177E
- 2055913E
- 2110165E

***SCE Response:***

*The above conditions were previously recorded in SCE's Work Management System, and they 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 2172027E – Damaged/Missing 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.*
- *Pole 2179502E – Damaged/Missing Ground Moulding.* ***SCE Response:*** *Due on 08/07/2026.*
- *Pole 2172374E – Damaged/Missing 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.*
- *Pole 1849177E – Damaged/Missing 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.*
- *Pole 2055913E – Damaged/Missing 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.*
- *Pole 2110165E – Damaged/Missing Ground Moulding.* ***SCE Response:*** *Due on 10/28/2026.*

**GO 95, Rule 54.6-E.1, Vertical and Lateral Conductors, Risers, Encased from Ground Level to 8 Feet above the Ground**, states in part:

> *Risers from underground cables or other conductors shall be encased from the ground level to a level not less than 8 feet above the ground…*

An SCE riser supported on Pole 2172027E had a section that was not covered at ground level.

***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. Note: GO 95 did not require a due date for priority 3 (level 3) notifications created prior to 07/01/2019.*

- *Pole 2172027E – Damaged Riser.* ***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 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.*

The concrete foundation for Padmount transformer P5376800 had a large hole underneath it, allowing animals to enter (we also discovered a deceased rabbit inside).

***SCE Response:***
*The above condition was recorded in SCE's Work Management System at the time of the audit, and it was addressed in accordance with SCE's maintenance program.*

- *Padmount P5376800 – Exposed concrete foundation.* ***SCE Response:*** *Completed on 12/18/2024.*