Melvin Stark
Principal Manager
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October 3, 2025

Fadi Daye
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: EA2025-1216, Electric distribution audit of Southern California Edison's Redlands District

Mr. Daye:

Your letter, dated September 2, 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 Redlands District from June 23, 2025 to June 27, 2025.

Your letter requested a response by October 3, 2025. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

Sincerely,

Mel Stark
Principal Manager, EHSQ-T&D Compliance & Quality
2 Innovation Way
Pomona, CA 91768

Enclosures: SED Audit Findings and SCE's Responses

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, 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
- Pole Loading Calculation 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 May 2022 through April 2025, SCE completed 5031 overhead detailed inspections and 47 above ground patrol inspections past SCE's scheduled due date for completion. Additionally, as of the audit, SCE had 107 overhead detailed inspections and 20 above ground patrol inspections past due and had not yet been completed.

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 May 2022 through April 2025, it completed 5,031 overhead detailed inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from May 2022 through April 2025, it had 47 annual grid patrols that were completed past SCE's scheduled due date. Additionally, based on SCE's records as of the audit, SCE had 107 overhead detailed inspections and 20 annual grid patrol inspections that were past due and pending completion. 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 May 2022 through April 2025, SCE completed 1059 underground detailed inspections past SCE's scheduled due date for completion. Additionally, as of the audit, SCE had 38 underground detailed inspections past due and had not yet been completed.

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 May 2022 through April 2025, it had 1,059 underground inspections that have been completed after SCE's scheduled due date. Additionally, as of the date of the audit SCE had 38 underground inspections that are past due and pending completion. 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 May 2024 through April 2025, SCE completed 2086 overhead work orders past SCE's due date for corrective action. Additionally, as of the audit, SCE had 191 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 May 2024 through April 2025, SCE had 2,086 overhead work orders that were completed or pending completion past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, as of July 2024, SCE had 59 open 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 May 2024 through April 2025, SCE completed 694 underground work orders past SCE's due date for corrective action. Additionally, as of the audit, SCE had 67 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 May 2024 through April 2025, SCE had 694 underground work orders that were past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, SCE notes that as of June 27, 2025, SCE had 67 open 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 structures during the field inspection portion of the audit:

No.	Facility Identification	Facility Type	Location
1	4365647E	Pole	Redlands
2	157455E	Pole	Redlands
3	157454E	Pole	Redlands
4	4067310E	Pole	Redlands
5	4067311E	Pole	Redlands
6	4067312E	Pole	Redlands
7	157691E	Pole	Redlands
8	4920709E	Pole	Redlands
9	585665E	Pole	Redlands
10	1375353E	Pole	Redlands
11	1375352E	Pole	Redlands
12	1375351E	Pole	Redlands
13	400796E	Pole	Redlands
14	1071237E	Pole	Redlands
15	1071238E	Pole	Redlands
16	1071238E	Pole	Redlands
17	1071239E	Pole	Redlands
18	1071240E	Pole	Redlands
19	157673E	Pole	Redlands
20	1215142E	Pole	Redlands
21	727064E	Pole	Redlands
22	157457E	Pole	Redlands
23	4672784E	Pole	Loma Linda
24	2066883E	Pole	Loma Linda
25	76984S	Pole	Loma Linda
26	4810669E	Pole	Loma Linda
27	2254788E	Pole	Loma Linda
28	4893259E	Pole	Loma Linda
29	4016315E	Pole	Loma Linda
30	4859962E	Pole	Loma Linda
31	4857663E	Pole	Loma Linda
32	4859974E	Pole	Loma Linda
33	4854699E	Pole	Loma Linda
34	1610CWT	Pole	Loma Linda
35	22608CWT	Pole	Loma Linda
36	200357	Pole	Loma Linda
37	1971555E	Pole	Loma Linda

38	4052246E	Pole	Yucaipa
39	4052245E	Pole	Yucaipa
40	4052244E	Pole	Yucaipa
41	4907409E	Pole	Yucaipa
42	4964395E	Pole	Yucaipa
43	A1320450E	Pole	Yucaipa
44	4907746E	Pole	Yucaipa
45	4907437E	Pole	Yucaipa
46	246139E	Pole	Mentone
47	246138E	Pole	Mentone
48	246137E	Pole	Mentone
49	246136E	Pole	Mentone
50	246135E	Pole	Mentone
51	246134E	Pole	Mentone
52	246133E	Pole	Mentone
53	4805545E	Pole	Mentone
54	2152010E	Pole	Mentone
55	GT131787	Pole	Mentone
56	447734E	Pole	Mentone
57	4211078E	Pole	Mentone
58	4211027E	Pole	Mentone
59	560579E	Pole	Mentone
60	1561213E	Pole	Mentone
61	1764301E	Pole	Mentone
62	4202692E	Pole	Mentone
63	5001723E	Pole	Mentone
64	225078E	Pole	Mentone
65	4190417E	Pole	Mentone
66	1289299E	Pole	Mentone
67	1289300E	Pole	Mentone
68	4691585E	Pole	Mentone
69	2260578E	Pole	Mentone
70	2326566E	Pole	Mentone
71	698494E	Pole	Mentone
72	1733317E	Pole	Mentone
73	2342230E	Pole	Mentone
74	GT121674	Pole	Mentone
75	GT57951	Pole	Mentone
76	GT57950	Pole	Mentone
77	891859E	Pole	Mentone
78	4220755E	Pole	Highland
79	2210609E	Pole	Highland
80	4220754E	Pole	Highland

81	4293544E	Pole	Highland
82	1112572E	Pole	Highland
83	4311634E	Pole	Highland
84	4311635E	Pole	Highland
85	465096E	Pole	Highland
86	2099801E	Pole	Highland
87	4328578E	Pole	Highland
88	4366338E	Pole	Highland
89	813144H	Pole	Highland
90	2326346E	Pole	Highland
91	497255H	Pole	Highland
92	465099E	Pole	Highland
93	4485910E	Pole	Highland
94	2210650E	Pole	Highland
95	4115239E	Pole	Highland
96	965053E	Pole	Highland
97	965054E	Pole	Highland
98	965055E	Pole	Highland
99	157609E	Pole	Highland
100	684076E	Pole	Highland
101	639508E	Pole	Highland
102	514032E	Pole	Highland
103	4201936E	Pole	Highland
104	476189E	Pole	Highland
105	476190E	Pole	Highland
106	4106066E	Pole	Highland
107	476198E	Pole	Highland
108	2343238E	Pole	Highland
109	2343403E	Pole	Highland
110	1865334E	Pole	Highland
111	4253894E	Pole	Highland
112	4826844E	Pole	Highland
113	4241284E	Pole	Highland
114	2138185E	Pole	Highland
115	200620	Pole	San Bernardino
116	1768463E	Pole	San Bernardino
117	201427S	Pole	San Bernardino
118	4617521E	Pole	San Bernardino
119	5409037	BURD Transformer	Redlands
120	B5409036	BURD Transformer	Redlands
121	5370705	BURD Transformer	Redlands
122	3370701	BURD Switch	Redlands
123	5339538	BURD Transformer	Redlands

124	B5370702	Vault with Switch	Redlands
125	5388922	BURD Transformer	Highland
126	5308921	BURD Transformer	Highland
127	5308919	BURD Transformer	Highland
128	P5600327	Padmounted Transformer	Highland
129	P5600326	Padmounted Transformer	Highland
130	5600325	Primary Fuse Cabinet	Highland
131	5314981	Padmounted Transformer	Highland
132	P5647178	Padmounted Transformer	Highland
133	P5776818	Padmounted Transformer	Highland
134	P5432159	Padmounted Transformer	San Bernardino
135	P5415425	Padmounted Transformer	San Bernardino
136	P5409343	Padmounted Transformer	San Bernardino
137	P5530803	Padmounted Transformer	San Bernardino

IV. Field Inspection Violations List

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 each of the following poles was not taut:

- 1215142E
- 4220755E

A span guy wire between Pole Nos. 225078E and 4190417E was not taut.

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 1215142E – Down guy wire was not taut.* ***SCE Response:*** *Due on 09/30/2026.*
- *Pole 4220755E – Down guy wire was not taut.* ***SCE Response:*** *Due on 12/31/2027.*
- *Pole 225078E – Span guy wire was not taut.* ***SCE Response:*** *Due on 03/17/2026.*

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 overhead facilities needed maintenance:

- The upper section (above eight feet) of the ground moulding on Pole No. 1375351E was damaged.
- The visibility strips attached to Pole No. 891859E were damaged.

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 1375351E – Ground molding damaged above public level.* ***SCE Response:*** *Due on 09/14/2030.*
- *Pole 891859E – Visibility Strips are damaged.* ***SCE Response:*** *Due on 02/03/2029.*

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 communications conductors supported on the same pole to be three inches.

An SCE down guy wire attached to each of the following poles was in contact with a third-party communications conductors supported by the same pole:

- 157673E
- 4805545E
- 4211078E
- 560579E

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 157673E – SCE Down Guy radial clearance to Comm. equipment.* ***SCE Response:*** *Due on 09/30/2026.*
- *Pole 4805545E – SCE Down Guy radial clearance to Comm. equipment.* ***SCE Response:*** *Due on 03/16/2026.*
- *Pole 4211078E – SCE Down Guy radial clearance to Comm. equipment.* ***SCE Response:*** *Due on 03/16/2026.*
- *Pole 560579E – SCE Down Guy radial clearance to Comm. equipment.* ***SCE Response:*** *Due on 03/16/2026.*

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.*

"High Voltage" signs on each of the following poles were either missing or damaged:

- 157457E
- 2343238E

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

- *Pole 2343238E – 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.*

SCE Response:
One of the above conditions has been recorded in SCE's Work Management System and it will be addressed in accordance with SCE's maintenance program.

- *Pole 157457E – SCE Down Guy radial clearance to Comm. equipment.* ***SCE Response:*** *Due on 09/15/2030.*

GO 95, Rule 91.3, Stepping, Section 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 each of the following poles was located at a height of less than eight feet:

- 1071237E
- 497255H
- 965055E
- 684076E

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 1071237E – Lowest pole step less than 8 feet from ground.* ***SCE Response:*** *Due on 09/15/2030.*
- *Pole 497255H – Lowest pole step less than 8 feet from ground.* ***SCE Response:*** *Due on 09/15/2030.*
- *Pole 965055E – Lowest pole step less than 8 feet from ground.* ***SCE Response:*** *Due on 09/15/2030.*
- *Pole 684076E – Note: Correct structure number is 664076E, pole tag in field has been corrected. Lowest pole step less than 8 feet from ground.* ***SCE Response:*** *Due on 09/21/2030.*

GO 95, Rule 34, Foreign Attachments, states in part:

> *Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*

An unauthorized sign advertising a car care service was attached to Pole No. 1610CWT.

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 1610CWT – Unauthorized attachment (Advertising sign).* ***SCE Response:*** *Completed 06/23/2025 during audit.*

GO 95, Rule 56.4, Clearances, Section D, From Guys or Span Wires, Subsection (2), Passing and Attached to Same Pole, states:

> *The radial clearance between different guys, different span wires, or different guys and span wires, attached to the same pole shall not be less than 3 inches.*

Two SCE down guy wires attached to the same pole were in contact near Pole No. 157673E.

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 157673E – Two SCE down guy wires in contact on same pole.* ***SCE Response:*** *Due on 09/30/2026.*