



September 29, 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: EA2025-1262, Audit of Southern California Edison's Ventura District

Dear Mr. Daye:

Your letter, dated August 28, 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 Ventura District from June 9, 2025 to June 13, 2025.

Your letter requested a response by September 29, 2025. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

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, Electric Safety and Reliability Branch, CPUC Norvik Ohanian, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and Underground Detail Inspection Records
- Patrol Inspection Records
- SCE's Documented Inspection Program
- Repair Notifications
- Transformers, Switches and 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 insuring that they are in good condition so as to conform with these rules.

SCE's records indicated that from May 2020 through April 2025, SCE completed 115 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 14 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 May 2020 through April 2025, it had 115 annual grid patrols that were completed past SCE's scheduled due date and, as of the date of the audit, it had 14 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.

SCE's records indicated that from May 2020 through April 2025, SCE completed 3,999 detail inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 129

pending detail 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 May 2020 through April 2025, it had 3,999 overhead detailed inspections that were completed past SCE's scheduled due date and, as of the date of the audit, it had 129 overhead detailed inspections 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 of these rules.

SCE's records indicated that from May 2020 through April 2025, SCE completed 403 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 10 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, SCE notes that from May 2020 through April 2025, it had 403 underground detailed inspections that were completed past SCE's scheduled due date and, as of the date of the audit, it had 10 underground detailed inspections 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 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 2023 through April 2025, SCE completed 1,844 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 409 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 2023 through April 2025, SCE had 1,844 overhead work orders that were completed past SCE's scheduled due date for corrective action. Additionally, as of the date of the audit, it had 409 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 2023 through April 2025, SCE completed 230 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 289 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 2023 through April 2025, SCE had 230 underground work orders that were completed past SCE's scheduled due date for corrective action. Additionally, Mas of the date of the audit, it had 289 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 Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	1424440E	Pole	Ventura
2	1311349E	Pole	Ventura
3	1616337E	Pole	Ventura
4	1053375E	Pole	Ventura
5	1311701E	Pole	Ventura
6	1311702E	Pole	Ventura
7	1138792E	Pole	Ventura
8	1311703E	Pole	Ventura
9	360989E	Pole	Ventura
10	1604180E	Pole	Ventura
11	1311705E	Pole	Ventura
12	419416E	Pole	Ventura
13	4157949E	Pole	Ventura
14	4352537E	Pole	Ventura
15	1424785E	Pole	Ventura
16	942519E	Pole	Ventura
17	1424648E	Pole	Ventura
18	1424647E	Pole	Ventura
19	2085793E	Pole	Ventura
20	1424646E	Pole	Ventura
21	1424645E	Pole	Ventura
22	1424644E	Pole	Ventura
23	581051E	Pole	Ventura
24	1477706E	Pole	Ventura
25	716728H	Pole	Ventura
26	173140E	Pole	Ventura
27	716729Н	Pole	Ventura
28	526357H	Pole	Ventura
29	361875E	Pole	Ventura
30	516116H	Pole	Ventura
31	1796020E	Pole	Ventura
32	2359393E	Pole	Ventura
33	4913287E	Pole	Ventura
34	506118H	Pole	Ventura
35	573411E	Pole	Ventura
36	4863270E	Pole	Ventura
37	4970575E	Pole	Ventura
38	506120H	Pole	Ventura
39	2359387E	Pole	Ventura
40	1477302E	Pole	Ventura
41	4990883E	Pole	Ventura
42	4382825E	Pole	Ventura

43	526356Н	Pole	Ventura
44	573415H	Pole	Ventura
45	4730684E	Pole	Oxnard
46	1136581E	Pole	Oxnard
47	1136582E	Pole	Oxnard
48	1136583E	Pole	Oxnard
49	1136584E	Pole	Oxnard
50	1136585E	Pole	Oxnard
51	1136586E	Pole	Oxnard
52	1136587E	Pole	Oxnard
53	1136588E	Pole	Oxnard
54	1136589E	Pole	Oxnard
55	307997E	Pole	Oxnard
56	307998E	Pole	Oxnard
57	307999E	Pole	Oxnard
58	308000E	Pole	Oxnard
59	4262870E	Pole	Oxnard
60	1383527E 1383512E	Pole Pole	Oxnard
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63	1877720E	Pole	Oxnard
64	1383515E	Pole	Oxnard
65	1383516E	Pole	Oxnard
66	1383550E	Pole	Oxnard
67	1384200E	Pole	Oxnard
68	1384199E	Pole	Oxnard
69	1384198E	Pole	Oxnard
70	1540501E	Pole	Oxnard
71	1540502E	Pole	Oxnard
72	1540503E	Pole	Oxnard
73	1540504E	Pole	Oxnard
74	1539492E	Pole	Oxnard
75	1877748E	Pole	Oxnard
76	1539493E	Pole	Oxnard
77	2168728E	Pole	Oxnard
78	727932E	Pole	Camarillo
79	727931E	Pole	Camarillo
80	4428765E	Pole	Camarillo
81	1748604E	Pole	Camarillo
82	717199E	Pole	Camarillo
83	4492219E	Pole	Camarillo
84	717398E	Pole	Camarillo
85	717399E	Pole	Camarillo
86	1713263E	Pole	Camarillo
87	727933E	Pole	Camarillo
88	792922E	Pole	Camarillo
89	727934E	Pole	Camarillo

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135 1863595E Pole Ojai	134	1863593E	Pole	
	135	1863595E	Pole	
	136	4204961E	Pole	Ojai

137	4451246E	Pole	Ojai
138	4204960E	Pole	_
			Ojai
139	4204959E	Pole	Ojai
140	557560E	Pole	Ojai
141	1882620E	Pole	Ojai
142	2334800E	Pole	Ojai
143	1255684E	Pole	Ojai
144	2060650E	Pole	Ojai
145	2188626E	Pole	Ojai
146	1033349E	Pole	Ojai
147	1033348E	Pole	Ojai
148	1033451E	Pole	Ojai
149	2071439E	Pole	Ojai
150	4626032E	Pole	Ojai
151	174100E	Pole	Santa Paula
152	4262776E	Pole	Fillmore
153	4262777E	Pole	Fillmore
154	4262778E	Pole	Fillmore
155	4262779E	Pole	Fillmore
156	4262780E	Pole	Fillmore
157	4262781E	Pole	Fillmore
158	4262782E	Pole	Fillmore
159	985631E	Pole	Saticoy
160	537353E	Pole	Saticoy
161	537354E	Pole	Saticoy
162	538125E	Pole	Saticoy
163	4339923E	Pole	Saticoy
164	4339924E	Pole	Saticoy
165	537357E	Pole	Saticoy
166	1795852E	Pole	Saticoy
167	1795554E	Pole	Saticoy
168	89906E	Pole	Saticoy
169	537374E	Pole	Saticoy
170	633227H	Pole	
171	681778E	Pole	Sationy
	3001807E	Pole	Sationy
172 173	S5020676	Vault	Saticoy
			Ventura
174	P5632582	Pad-mounted Transformer	Ventura
175	B5197093	BURD	Ventura
176	5197096	BURD	Ventura
177	P5403885	Pad-mounted Transformer	Ventura
178	5525606	Vault	Ventura
179	P5492693	Pad-mounted Transformer	Port Hueneme
180	5501528	Pad-mounted Switch	Port Hueneme
181	P5401773	Pad-mounted Transformer	Oxnard
182	P5746096	Pad-mounted Transformer	Oxnard
183	P5413482	Pad-mounted Transformer	Oxnard

184	5353814	Pad-mounted Switch	Oxnard
185	P5766396	Pad-mounted Transformer	Camarillo
186	P5664187	Pad-mounted Gas Switch	Camarillo
187	P5664188	Pad-mounted Transformer	Camarillo

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection 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 each of the following poles required maintenance:

- Pole No. 4262870E The down guy anchor was buried.
- Pole No. 537354E The service drop weather-head and conduit were broken and not secured, causing the service drop conductor to contact the structure roof.
- Pole No. 1877720E An unidentified customer related cable was found in contact with the SCE service drop conductors at the weather-head connection point.
- Pole No. 1383550E An unidentified customer related cable was found in contact with the SCE service drop conductors at the weather-head connection point.

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 4262870E Buried Anchor. **SCE Response:** Due on 09/14/2030.
- Pole 537354E Service Drop Contacting Roof. SCE Response: Due 09/13/2028.
- Pole 1877720E Communication cable contacting service drop. **SCE Response:** Due on 09/13/2028.
- Pole 1383550E Communication cable contacting service drop. **SCE Response:** Due on 09/13/2028.

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.

Unauthorized foreign attachment was attached to each of the following SCE poles:

- Pole No. 1383513E business advertisement sign
- Pole No. 1383550E business advertisement sign

SCE Response:

One condition was previously recorded in SCE's Work Management System, 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 it will be addressed in accordance with SCE's maintenance program.

- Pole 1383513E Unauthorized Attachment. SCE Response: Due on 09/14/2030.
- Pole 1383550E Unauthorized Attachment. SCE Response: Due on 03/02/2028.

GO 95, Rule 35 – Vegetation Management, states in part:

When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).

The SCE conductor attached to each of the following poles was strained by vegetation:

- Pole No. X9913Y service drop
- Pole No. 1863595E service drop

SCE Response:

One condition was previously recorded in SCE's Work Management System, and it was addressed in accordance with SCE's maintenance program. The remaining condition has been recorded in SCE's Work Management System and it will be addressed in accordance with SCE's maintenance program.

- Pole X9913Y Service Drop strained by Vegetation. **SCE Response:** Completed on 07/08/2025.
- Pole 1863595E Service Drop strained by Vegetation. **SCE Response:** Due on 09/13/2028.

GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19, requires the minimum radial separation between "Communication Conductors (Including Open Wire, Cables and Service Drops)" from "Guys and span wires passing conductors supported on the same poles" to be 3 inches.

The SCE down guy wire attached to each of the following poles was in contact with a third-party communications conductor attached to the same pole:

- Pole No. 716728H
- Pole No. 1863595E

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 716728H Communications cable contacting down guy wire. **SCE Response:** Due on 09/13/2028.
- Pole 1863595E Communications cable contacting down guy wire. **SCE Response:** Due on 09/13/2028.

GO 95, Rule 51.6A - 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. Such signs shall be of weather and corrosion—resisting material, solid or with letters cut out therefrom and clearly legible.

The high voltage sign on each of the following poles was either missing or damaged:

- Pole No. 1311701E
- Pole No. 506116H
- Pole No. 1136581E
- Pole No. 1136582E
- Pole No. 1136588E
- Pole No. 1136589E
- Pole No. 1540501E
- Pole No. 4300223E
- Pole No. 1531669E
- Pole No. 1444597E
- Pole No. 4505375E
- Pole No. 537353E
- Pole No. 537354E
- Pole No. 4339923E
- Pole No. 537357E
- Pole No. 1795554E
- Pole No. 89906E
- Pole No. 537374E

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 1311701E – 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 506116H High Voltage Sign Damaged/Missing. SCE Response: Due on 03/03/2030.
- Pole 1136581E 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 1136582E 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 1136588E 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 1136589E 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 1540501E 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 4300223E 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 1531669E 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 1444597E 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 4505375E 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 537353E High Voltage Sign Damaged/Missing. SCE Response: Due on 06/12/2030.
- Pole 537354E 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 4339923E 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 537357E 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 1795554E 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 89906E 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 537374E 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 56.2 - Overhead Guys, Anchor Guys and Span Wire 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 SCE down guy wire supporting each of the following poles was loose and not taut:

- Pole No. 1311705E
- Pole No. 1648459E

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 1311705E Loose Down Guy Wire. **SCE Response:** Due on 09/14/2030.
- Pole 1648459E Loose Down Guv Wire. SCE Response: Due on 09/14/2030.