



Melvin Stark
Principal Manager
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August 25, 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

EA2025-1284

Subject: Audit of Southern California Edison's Ontario District

Dear Mr. Daye:

Your letter, dated July 23rd, 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 Ontario District from April 1, 2025 to April 4, 2025.

Your letter requested a response by August 25, 2025. 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", with a long horizontal flourish extending to the right.

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

Enclosures: CPUC 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 calendar year 2022 through calendar year 2024, SCE had 3348 overhead detailed inspections and 93 above ground patrol inspections which had either been completed after SCE's scheduled due date, or were past due and had not yet been completed at the time of the audit.

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 calendar year 2022 through calendar year 2024, it completed 3,348 overhead detailed inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from calendar year 2022 through calendar year 2024, it had 93 annual grid patrols that were completed or 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 calendar year 2022 through calendar year 2024, SCE had 637 underground detailed inspections which had either been completed after SCE's scheduled due date, or were past due and had not yet been completed at the time of the audit.

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 calendar year 2022 through calendar year 2024, it had 637 underground inspections which had either been completed after SCE's scheduled due date or were past due and had not yet been completed at the time of the audit. 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 March 2022 through February 2025, SCE completed 551

overhead work orders past SCE's due date for corrective action. Additionally, as of the audit, SCE had 443 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 March 2022 through February 2025, SCE had 551 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 2025, SCE had 443 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 March 2022 through February 2025, SCE completed 256 underground work orders past SCE's due date for corrective action. Additionally, as of the audit, SCE had 700 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 March 2022 through February 2025, SCE had 256 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 July 31, 2025, SCE had 700 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	4606946E	Pole	Norco
2	1240467E	Pole	Norco
3	634721H	Pole	Norco
4	4810992E	Pole	Norco
5	4852591E	Pole	Norco
6	4852590E	Pole	Norco
7	4852589E	Pole	Norco
8	4972158E	Pole	Norco
9	4810991E	Pole	Norco
10	4852588E	Pole	Norco
11	4854005E	Pole	Norco
12	4860506E	Pole	Norco
13	4123833E	Pole	Norco
14	4854004E	Pole	Norco
15	304121E	Pole	Norco
16	1670200E	Pole	Norco
17	863400E	Pole	Ontario
18	4867051E	Pole	Ontario
19	1463885E	Pole	Ontario
20	5004089E	Pole	Ontario
21	5004088E	Pole	Ontario
22	5004087E	Pole	Ontario
23	5004086E	Pole	Ontario
24	4584744E	Pole	Ontario
25	1668970E	Pole	Ontario
26	1668968E	Pole	Ontario
27	1668971E	Pole	Ontario
28	4328872E	Pole	Ontario
29	H30563Y	Pole	Ontario
30	4868799E	Pole	Ontario
31	4817905E	Pole	Ontario
32	411478E	Pole	Chino
33	2269595E	Pole	Chino
34	4111479E	Pole	Chino
35	4111480E	Pole	Chino
36	4111481E	Pole	Chino
37	4111482E	Pole	Chino
38	3306322	Pole	Chino

39	4111483E	Pole	Chino
40	4817652E	Pole	Chino
41	4111477E	Pole	Chino
42	4111476E	Pole	Chino
43	4111475E	Pole	Chino
44	4116710E	Pole	Chino
45	411474E	Pole	Chino
46	4116711E	Pole	Chino
47	4117218E	Pole	Chino
48	4111473E	Pole	Chino
49	4111472E	Pole	Chino
50	4907559E	Pole	Chino
51	4328790E	Pole	Ontario
52	4328789E	Pole	Ontario
53	4328789E	Pole	Ontario
54	4328788E	Pole	Ontario
55	4665053E	Pole	Ontario
56	1911225E	Pole	Ontario
57	358409E	Pole	Ontario
58	358408E	Pole	Ontario
59	358407E	Pole	Ontario
60	358406E	Pole	Ontario
61	358405E	Pole	Ontario
62	1957316E	Pole	Ontario
63	1891720E	Pole	Ontario
64	1580604E	Pole	Ontario
65	331813E	Pole	Ontario
66	1580603E	Pole	Ontario
67	2173916E	Pole	Ontario
68	H30578Y	Pole	Ontario
69	H30577Y	Pole	Ontario
70	GT71529	Pole	Montclair
71	4561336E	Pole	Montclair
72	4239450E	Pole	Montclair
73	2263146E	Pole	Montclair
74	1886745E	Pole	Montclair
75	1886643E	Pole	Montclair
76	1863397E	Pole	Montclair
77	2237020E	Pole	Montclair
78	4021050E	Pole	Montclair
79	4240154E	Pole	Montclair
80	4191142E	Pole	Montclair
81	393941E	Pole	Montclair

82	4325706E	Pole	Montclair
83	4325707E	Pole	Montclair
84	4325708E	Pole	Montclair
85	4239576E	Pole	Montclair
86	1309539E	Pole	Upland
87	1309536E	Pole	Upland
88	1309535E	Pole	Upland
89	1309534E	Pole	Upland
90	1309533E	Pole	Upland
91	1309532E	Pole	Upland
92	1309531E	Pole	Upland
93	1309530E	Pole	Upland
94	1309529E	Pole	Upland
95	2127516E	Pole	Upland
96	1125303E	Pole	Upland
97	2326091E	Pole	Upland
98	1998480E	Pole	Upland
99	1354570E	Pole	Upland
100	P5452541	Padmounted Transformer	Corona
101	5300552	Vault with J-Bars	Corona
102	P5300551	BURD Transformer	Corona
103	P5710369	Padmounted Transformer	Corona
104	P5710368	Gas Switch	Corona
105	P5710365	RAR Switch	Corona
106	P5710363	Padmounted Transformer	Corona
107	P5710372	Gas Switch	Corona
108	S5170242	Vault with Gas Switch and Transformer	Corona
109	B5337344	BURD Switch	Corona
110	V5337906	Vault with Gas Switch and Transformer	Corona
111	P5457608	Padmounted Transformer	Ontario
112	P5457607	Padmounted Transformer	Ontario
113	P5457606	Padmounted Transformer	Ontario
114	P5636814	Padmounted Switch	Ontario
115	P5636815	Padmounted Transformer	Ontario
116	P5457605	Padmounted Transformer	Ontario
117	B5047144	BURD Transformer	Montclair
118	B5047143	BURD Transformer	Montclair
119	B5047142	BURD Switch	Montclair
120	5047153	BURD Transformer	Montclair
121	B5047154	BURD Switch	Montclair

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 .

A down guy wire attached to each of the following poles was not taut:

- 4810992E
- 1911225E
- 1580604E

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 4810992E – Down guy wire was not taut. **SCE Response:** Due on 03/31/2030.*
- *Pole 1911225E – Down guy wire was not taut. **SCE Response:** Due on 08/25/2030.*
- *Pole 1580604E – Down guy wire was not taut. **SCE Response:** Due on 08/31/2030.*

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 were in need of maintenance:

- The ground moulding and guy guard on Pole No. 1668968E were damaged.
- The bird guard on Pole No. 4532448E had fallen out of place.
- The ground wire on Pole No. 4191142E had been cut.
- The visibility strips on Pole No. 1891720E 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 1668968E – Damaged ground molding and guy guard. **SCE Response:** Due on 08/16/2029.*
- *Pole 4532448E – Avian protection dislodged/fallen off. **SCE Response:** Due on 03/31/2030.*
- *Pole 4191142E – Ground wire has been cut. **SCE Response:** Due on 04/02/2027.*
- *Pole 1891720E – Damaged visibility strips. **SCE Response:** Due on 07/22/2029.*

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 on each of the following poles was in contact with third-party communications conductors supported by the same pole:

- 4810992E
- 4325706E
- 1309537E

SCE Response:

Two of 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 4810992E – SCE down guy contacting communication equipment. **SCE Response:** Due on 10/02/2027.*
- *Pole 1309537E – SCE down guy contacting communication equipment. **SCE Response:** Due on 08/25/2030.*

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

- *Pole 4325706E– SCE down guy contacting communication equipment. **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 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:

- 4810992E
- 4852588E
- 1670200E
- 1668968E
- H30568Y
- 358408E
- 358407E

- 358406E
- 1580603E
- 1863397E
- 4191142E
- 4325706E
- 4325707E
- 4325708E
- 1309535E
- 1309534E
- 1309530E

SCE Response:

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

- *Pole 4852588E– 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 1670200E– 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 1668968E– 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 H30568Y– 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 358408E– 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 358407E– 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 1580603E– 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 1863397E– 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 4191142E– 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 4325706E– 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 4325707E– 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 4325708E– 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 1309535E– 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.

Three of 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 1309530E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 08/03/2030.
- Pole 1309534E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 08/03/2030.
- Pole 4810992E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 10/02/2029.

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:

- 4123833E
- 1670200E
- 331813E
- 4561336E

SCE Response:

All of 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 4123833E – Pole step is to low. **SCE Response:** Due on 08/13/2030.
- Pole 1670200E – Pole step is to low. **SCE Response:** Due on 08/03/2030.
- Pole 331813E – Pole step is to low. **SCE Response:** Due on 08/03/2030.
- Pole 4561336E – Pole step is to low. **SCE Response:** Due on 08/03/2030.

GO 95, Rule 58.5, Street Lighting Equipment, Section (B)(3)(b), Conductors Not Supported by Messengers, states:

All parts of street light drop wires, street lamps, and their supporting fixtures (including rods, braces and guys) shall not be less than 1 foot radially from all unprotected conductors not supported on messengers (including lead wires and taps) except the lead wires supplying the street lamps within 24 inches of their points of entrance to the street lighting equipment.

An SCE secondary triplex service drop was in contact with a street light attached to Pole No. 1580603E.

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 1580603E – SCE secondary triplex contacting with street light mast. **SCE Response:** Due on 04/02/2027.

GO 95, Rule 59.4, Grounding, Section C, Transformers, states in part:

On common neutral systems with transformers installed on a branch circuit without a common neutral loop return, each transformer shall be so located that there will be one or more grounds of a combined resistance not greater than 3.5 ohms.

A transformer installation located on a grid section of a common neutral system requires no independent ground provided there is a ground connection, having a resistance not in excess of 3.5 ohms, to the common neutral conductor either at the transformer pole or at an adjacent pole.

An SCE transformer installed on Pole No. 358409E was not grounded at that pole or any adjacent pole.

SCE Response:

SCE notes that the correct structure number is 358405E. 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 358405E – O.H. Transformer has missing/damaged ground. **SCE Response:** Due on 08/03/2030.*