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

October 2, 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: EA2025-1286, Electric distribution audit of SCE's Victorville 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 Victorville District from June 16, 2025 to June 20, 2025.

Your letter requested a response by October 2, 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: Audit Findings

Cc: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, 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 insuring that they are in good condition so as to conform with these rules.*

SCE's records indicated that from May 2024 through May 2025, SCE completed 12 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 22 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 2024 through May 2025, it had 12 annual grid patrols that were completed past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 22 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 2024 through May 2025, SCE completed 649 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 44 pending detailed 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 2024 through May 2025, it had 649 overhead detailed inspections that were completed past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 44 overhead detailed inspections that were pending completion past SCE 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 May 2024 through May 2025, SCE completed 76 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 11 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 2024 through May 2025, it had 76 underground inspections that were completed past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 11 pending underground inspections that were 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 2024 through May 2025, SCE completed 632 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 130 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-A or GO 95, Rule 31.1, SCE responds as follows. Based on SCE's records, from May 2024 through May 2025, SCE had 632 overhead work orders that were completed past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 130 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 May 2025, SCE completed 51 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 13 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 May 2025, SCE had 51 underground work orders that were completed past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, as of the date of the audit, SCE had 13 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 inspection portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	4071402E	Wood Pole	Pinon Hills
2	2360755E	Wood Pole	Pinon Hills
3	2360756E	Wood Pole	Pinon Hills
4	3005918E	Wood Pole	Pinon Hills
5	3005917E	Wood Pole	Pinon Hills
6	4800906E	Wood Pole	Pinon Hills
7	4976454E	Wood Pole	Pinon Hills
8	4769349E	Wood Pole	Pinon Hills
9	4308574E	Wood Pole	Pinon Hills
10	2250058E	Wood Pole	Pinon Hills
11	2377624E	Wood Pole	Pinon Hills
12	4800905E	Composite Pole	Pinon Hills
13	4896312E	Composite Pole	Pinon Hills
14	42235873E	Wood Pole	Phelan
15	4185237E	Wood Pole	Phelan
16	4963344E	Wood Pole	Phelan
17	4225412E	Wood Pole	Phelan
18	4697085E	Wood Pole	Phelan
19	4773356E	Wood Pole	Phelan
20	4697084E	Wood Pole	Phelan
21	4185236E	Wood Pole	Phelan
22	4697083E	Wood Pole	Phelan
23	4773355E	Wood Pole	Phelan
24	4697082E	Wood Pole	Phelan
25	4616029E	Wood Pole	Phelan
26	2122375E	Wood Pole	Phelan
27	2185430E	Wood Pole	Phelan
28	2185431E	Wood Pole	Phelan
29	1601624E	Wood Pole	Lucerne Valley
30	1552387E	Wood Pole	Lucerne Valley
31	21850-CIT	Wood Pole	Lucerne Valley
32	427186	Wood Pole	Lucerne Valley
33	1757109E	Wood Pole	Lucerne Valley
34	363274S	Wood Pole	Lucerne Valley
35	363275S	Wood Pole	Lucerne Valley
36	463221	Wood Pole	Lucerne Valley
37	21849-CIT	Wood Pole	Lucerne Valley
38	4020396E	Wood Pole	Lucerne Valley
39	63192	Wood Pole	Lucerne Valley
40	21848-CIT	Wood Pole	Lucerne Valley
41	20391CIT	Wood Pole	Lucerne Valley
42	427362S	Wood Pole	Lucerne Valley

43	4680472E	Wood Pole	Lucerne Valley
44	1785245E	Wood Pole	Apple Valley
45	1785244E	Wood Pole	Apple Valley
46	1785246E	Wood Pole	Apple Valley
47	1907190E	Wood Pole	Apple Valley
48	53491CTC	Wood Pole	Apple Valley
49	67501	Wood Pole	Apple Valley
50	67502S	Wood Pole	Apple Valley
51	67503S	Wood Pole	Apple Valley
52	67504S	Wood Pole	Apple Valley
53	67505S	Wood Pole	Apple Valley
54	67713S	Wood Pole	Apple Valley
55	67506S	Wood Pole	Apple Valley
56	67711	Wood Pole	Apple Valley
57	1785243E	Wood Pole	Apple Valley
58	4939438E	Wood Pole	Apple Valley
59	2360629E	Wood Pole	Apple Valley
60	63869S	Wood Pole	Apple Valley
61	4920744E	Wood Pole	Apple Valley
62	2252969E	Wood Pole	Apple Valley
63	1601037E	Wood Pole	Apple Valley
64	1601036E	Wood Pole	Apple Valley
65	1601035E	Wood Pole	Apple Valley
66	4962796E	Wood Pole	Apple Valley
67	1599791E	Wood Pole	Apple Valley
68	1601034E	Wood Pole	Apple Valley
69	265980	Wood Pole	Apple Valley
70	4893706E	Wood Pole	Apple Valley
71	2042972E	Wood Pole	Apple Valley
72	2042973E	Wood Pole	Apple Valley
73	1601033E	Wood Pole	Apple Valley
74	4071180E	Wood Pole	Apple Valley
75	4071181E	Wood Pole	Apple Valley
76	4920715E	Wood Pole	Apple Valley
77	26737	Wood Pole	Apple Valley
78	1601032E	Wood Pole	Apple Valley
79	Secondary Pole Adjacent to 1601032E	Wood Pole	Apple Valley
80	4893705E	Wood Pole	Apple Valley
81	Secondary Pole Adjacent to 4893705E	Wood Pole	Apple Valley
82	2360982E	Wood Pole	Apple Valley
83	1601031E	Wood Pole	Apple Valley
84	4893704E	Wood Pole	Apple Valley
85	P5610823	Padmount	Apple Valley
86	P5610821	Padmount	Apple Valley
87	P5403020	Padmount	Apple Valley
88	5541145	Vault	Apple Valley
89	5583256	SOE	Apple Valley

90	P5386750	Mini Padmount	Apple Valley
91	P5578445	Mini Padmount	Apple Valley
92	P5578447	Mini Padmount	Apple Valley
93	P5653996	Mini Padmount	Apple Valley
94	P5653995	Mini Padmount	Apple Valley

IV. Field Inspection Violations List

My staff observed the following violations during the field inspection 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 2360756E: due to an incomplete pole transfer, a third-party communications conductor (passing unattached) was touching the SCE pole
- Pole 4800905E: a third-party buddy pole, resulting from an incomplete pole transfer, was touching an SCE riser
- Pole 2185430E: due to an incomplete pole transfer, a third-party communications conductor (passing unattached) was touching the SCE pole
- Pole 1601624E: a third-party communications service drop was touching an SCE ground moulding and ground wire
- Pole 63869S: a third-party communications service drop was supported on an SCE service drop via a rope.

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 2360756E – Third Party notification for communication cable contacting SCE pole and incomplete transfer.* ***SCE Response:*** *Due on 09/14/2030.*
- *Pole 4800905E – Third Party notification buddy pole and incomplete transfer.* ***SCE Response:*** *Due on 09/14/2030.*
- *Pole 2185430E – Third Party notification for communication cable contacting SCE pole and incomplete transfer.* ***SCE Response:*** *Due on 09/14/2030.*
- *Pole 1601624E – Third Party Communication service drop contacting SCE guying.* ***SCE Response:*** *Due on 09/14/2030.*
- *Pole 63869S – Third Party Communication service drop was supported on an SCE service drop via a rope.* ***SCE Response:*** *Due on 09/14/2030.*

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.*

A pole mounted transformer on Pole 67503S was weeping oil on its casing.

SCE Response:
The above condition was recorded in SCE's Work Management System and was addressed in accordance with SCE's maintenance program.

- *Pole 67503S – Overhead Transformer weeping oil.* ***SCE Response:*** *Completed on 06/17/2025.*

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 service drop supported on Pole 2252969E was strained and abraded by a tree near.

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 2252969E – Strained SCE service drop due to vegetation, creating abrasion on triplex.* ***SCE Response:*** *Due on 09/15/2028.*

GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 19 requires the minimum radial clearance of "Guys and span wires passing conductors supported on the same poles" from "0 – 750 Volts (Including Service Drops) and Trolley Feeders" supported on the same pole to be 3 inches.

The SCE span guy wire supporting Pole 1785243E was contacting an SCE service drop supported on the same pole.

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 1785243E – SCE span guy wire contacting SCE service drop.* ***SCE Response:*** *Due on 08/06/2027.*

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:

- 363274S
- 21849-CIT
- 67501
- 67505S

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 363274S – 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 21849CIT– 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 67501S – 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 67505S – 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 on each of the following poles was missing or damaged:

- Pole 4185236E
- Pole 1601624E
- Pole 1907190E

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 4185236E – Ground Molding Damaged.* ***SCE Response:*** *Due on 02/09/2028.*
- *Pole 1601624E – Ground Molding Damaged.* ***SCE Response:*** *Due on 09/14/2030.*

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 1907190E – Ground Molding Damaged.* ***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 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 supporting Pole 2122375E was loose.

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 2122375E – Loose Down guy wire.* ***SCE Response:*** *Due on 09/16/2028.*

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.*

Padmounted structure No. P5386750 had a significant amount of oil within the enclosure underneath the Bay-O-Net Fuses. Additionally, the oil sight glass was completely empty.

SCE Response:

The above condition was recorded in SCE's Work Management System and was addressed in accordance with SCE's maintenance program.

- *Pole P53866750 – Pad mount transformer was leaking oil.* ***SCE Response:*** *Completed on 06/23/2025*