



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

March 12, 2026

Majed Ibrahim
Program & Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West 4th St., Ste. 500
Los Angeles, California 90013

SUBJECT: EA2025-1355, Electric distribution audit of Southern California Edison's Redlands District

Dear Mr. Ibrahim:

Your letter, dated February 12, 2026, 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 December 8, 2025, to December 12, 2025.

Your letter requested a response by March 12, 2026. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

A handwritten signature in black ink, appearing to read "Mel Stark".

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

Enclosures: SED Audit Findings and SCE's Responses

Cc: Leslie Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy, and Water
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Stacey Ocampo, Utilities Engineer, ESRB, SED, 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 September 2020 through September 2025, SCE completed 55 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 23 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 September 2020 through September 2025, it had 55 annual grid patrols that were completed past SCE's scheduled due date and, as of the date of the audit, it had 23 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 September 2020 through September 2025, SCE completed

8,683 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 69 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 September 2020 through September 2025, it had 8,683 overhead detailed inspections that were completed past SCE's scheduled due date and, as of the date of the audit, it had 69 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 September 2020 through September 2025, SCE completed 1,406 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 36 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 September 2020 through September 2025, it had 1,406 underground detailed inspections that were completed past SCE's scheduled due date and, as of the date of the audit, it had 36 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 September 2020 through September 2025, SCE completed 3,474 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 146 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 September 2020 through September 2025, SCE had 3,474 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 146 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 September 2020 through September 2025, SCE completed 1,088 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 50 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 September 2020 through September 2025, SCE had 1,088 underground work orders that were completed past SCE's scheduled due date for corrective action. Additionally, as of the date of the audit, it had 50 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:

No.	Structure ID	Type of Structure	Location	GPS Coordinates
1	4602165E	Pole	Beaumont	33.9339278, -116.9745124
2	1196453E	Pole	Beaumont	33.93350, -116.97452
3	1196452E	Pole	Beaumont	33.93323, -116.97464
4	4728944E	Pole	Beaumont	33.93296, -116.97454
5	1609166E	Pole	Beaumont	33.93253, -116.97458
6	823595E	Pole	Beaumont	33.93256, -116.97401
7	823596E	Pole	Beaumont	33.93258, -116.97346
8	823597E	Pole	Beaumont	33.93257, -116.97288
9	129453E	Pole	Beaumont	33.93255, -116.97238
10	2342235E	Pole	Beaumont	33.93273, -116.97202
11	823451E	Pole	Beaumont	33.93252, -116.97135
12	823452E	Pole	Beaumont	33.93245, -116.97087
13	1289584E	Pole	Beaumont	33.93251, -116.97059
14	1910659E	Pole	Beaumont	33.93253, -116.97039
15	823453E	Pole	Beaumont	33.93254, -116.96984
16	5356CWT	Pole	Yucaipa	34.00997, -117.05775
17	GT134715	Pole	Yucaipa	34.01036, -117.05778
18	4632873E	Pole	Yucaipa	34.01072, -117.05727
19	965192E	Pole	Yucaipa	34.01037, -117.05713
20	1214870E	Pole	Yucaipa	34.01037, -117.05671
21	1551790E	Pole	Yucaipa	34.01036, -117.05604
22	965189E	Pole	Yucaipa	34.01054, -117.05530
23	965188E	Pole	Yucaipa	34.01037, -117.05474
24	1613961E	Pole	Yucaipa	34.01039, -117.05402
25	1865290E	Pole	Yucaipa	34.01053, -117.05410
26	4704748E	Pole	Yucaipa	34.01113, -117.05404
27	GT140567	Pole	Yucaipa	34.01025, -117.05462
28	265424E	Pole	Yucaipa	34.01030, -117.05515
29	4511577E	Pole	Yucaipa	34.01025, -117.05585
30	GT134719	Pole	Yucaipa	34.01025, -117.05689
31	4998951E	Pole	Yucaipa	34.01024, -117.05727
32	943281E	Pole	Calimesa	33.99934, -117.05173
33	1214777E	Pole	Calimesa	33.99939, -117.05192
34	1182185E	Pole	Calimesa	33.99951, -117.05197
35	560403E	Pole	Calimesa	34.00024, -117.05184
36	4201877E	Pole	Calimesa	33.99951, -117.05097
37	4210932E	Pole	Calimesa	33.99956, -117.05042
38	1463140E	Pole	Calimesa	33.99945, -117.04970
39	1407291E	Pole	Calimesa	33.99948, -117.04919
40	1248041E	Pole	Calimesa	33.99950, -117.04859

41	1027078E	Pole	Calimesa	33.99951, -117.04798
42	4707626E	Pole	Calimesa	33.99949, -117.04742
43	4707627E	Pole	Calimesa	33.99954, -117.04749
44	4981911E	Pole	Calimesa	33.99989, -117.04749
45	4678654E	Pole	Calimesa	34.00031, -117.04743
46	1375422E	Pole	Calimesa	34.00025, -117.04739
47	288062E	Pole	Calimesa	34.00057, -117.04755
48	4787175E	Pole	Calimesa	34.00111, -117.04750
49	4819128E	Pole	Calimesa	34.00108, -117.04779
50	4819127E	Pole	Calimesa	34.00068, -117.04769
51	157455E	Pole	Redlands	34.04848, -117.17901
52	157454E	Pole	Redlands	34.04825, -117.17877
53	4067310E	Pole	Redlands	34.04796, -117.17863
54	4087311E	Pole	Redlands	34.04764, -117.17832
55	4087312E	Pole	Redlands	34.04744, -117.17814
56	157691E	Pole	Redlands	34.04697, -117.17783
57	4920709E	Pole	Redlands	34.04722, -117.17721
58	585665E	Pole	Redlands	34.04731, -117.17742
59	1375353E	Pole	Redlands	34.04781, -117.17756
60	1375352E	Pole	Redlands	34.04802, -117.17780
61	1375351E	Pole	Redlands	34.04821, -117.17803
62	400796E	Pole	Redlands	34.04854, -117.17824
63	4512224E	Pole	Redlands	34.04838, -117.17860
64	4662676E	Pole	Redlands	34.04790, -117.17947
65	10828CWT	Pole	Redlands	34.04776, -117.17969
66	10992CWT	Pole	Redlands	34.04783, -117.17992
67	198705E	Pole	Redlands	34.04814, -117.18009
68	823446E	Pole	Redlands	34.04847, -117.18042
69	10827CWT	Pole	Redlands	34.04878, -117.18063
70	727063E	Pole	Redlands	34.04865, -117.18080
71	315496E	Pole	Mentone	34.07387, -117.13101
72	315491E	Pole	Mentone	34.07367, -117.13088
73	1164695E	Pole	Mentone	34.07320, -117.13095
74	315493E	Pole	Mentone	34.07291, -117.13108
75	1164696E	Pole	Mentone	34.07246, -117.13102
76	315495E	Pole	Mentone	34.07282, -117.13065
77	315490E	Pole	Mentone	34.07158, -117.13111
78	1164697E	Pole	Mentone	34.07116, -117.13107
79	4943038E	Pole	Mentone	34.07059, -117.13109
80	4823830E	Pole	Mentone	34.07051, -117.13119
81	4072276E	Pole	Mentone	34.07013, -117.13102
82	4072277E	Pole	Mentone	34.07009, -117.13042
83	225162E	Pole	Mentone	34.07035, -117.12977
84	4072278E	Pole	Mentone	34.07013, -117.12963
85	4201763E	Pole	Highland	34.13277, -117.19684

86	4201762E	Pole	Highland	34.13240, -117.19751
87	4201761E	Pole	Highland	34.13220, -117.19836
88	4785395E	Pole	Highland	34.13220, -117.19895
89	4365553E	Pole	Highland	34.13225, -117.19981
90	4227551E	Pole	Highland	34.13215, -117.19958
91	4227552E	Pole	Highland	34.13208, -117.20020
92	2157923E	Pole	Highland	34.13207, -117.20066
93	2157924E	Pole	Highland	34.13206, -117.20113
94	4365552E	Pole	Highland	34.13206, -117.20180
95	394586E	Pole	Highland	34.13209, -117.20189
96	4479980E	Pole	Highland	34.13211, -117.20274
97	394584E	Pole	Highland	34.13208, -117.20328
98	394583E	Pole	Highland	34.13212, -117.20370
99	394582E	Pole	Highland	34.13212, -117.20427
100	2782556E	Pole	Highland	34.13209, -117.20493
101	943540E	Pole	Yucaipa	34.05638, -117.02568
102	2293427E	Pole	Oak Glen	34.04845, -116.94978
103	1551304E	Pole	San Bernardino	34.14100, -117.27938
104	256929E	Pole	San Bernardino	34.12716, -117.29008
105	P5376041	Pad-mounted Transformer	Highland	34.11772, -117.16900
106	P5376044	Pad-mounted Transformer	Highland	34.11797, -117.16990
107	P5376043	Pad-mounted Transformer	Highland	34.11834, -117.16914
108	P5376037	Pad-mounted Switch	Highland	34.11737, -117.16757
109	P5376038	Pad-mounted Transformer	Highland	34.11797, -117.16771
110	P5327584	BURD Transformer	Highland	34.11660, -117.16916
111	5327583	BURD Transformer	Highland	34.11661, -117.6786
112	5308323	Vault	Highland	34.11711, -117.17065
113	50114820	BURD Transformer	Highland	34.12779, -117.21648
114	5443136	Vault	Highland	34.12110, -117.22223
115	5539229	Pad-mounted Transformer	Highland	34.12064, -117.22192
116	P5539228	Pad-mounted Transformer	Highland	34.11977, -117.22209

IV. Field Inspection Violations List

My staff observed the following violations during the field inspections 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:

- The visibility strip attached to Pole No. 4201877E was damaged.
- The visibility strip attached to Pole No. 4943038E was 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 4201877E - Damaged visibility strips. SCE Response: Due on 3/7/2031.*
- *Pole 4943038E - Damaged visibility strips. SCE Response: Due on 3/7/2031.*

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 attached to Pole No. 4227551E was strained by vegetation.

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 4227551E – Secondary service drop strained by vegetation. SCE Response: Due on 3/7/2029.*

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. 4602165E
- Pole No. 1196453E
- Pole No. 823452E
- Pole No. 157455E
- Pole No. 157454E
- Pole No. 4365552E
- Pole No. 823446E
- Pole No. 727063E
- Pole No. 4072276E
- Pole No. 394586E
- Pole No. 394582E
- Pole No. 4072278E

SCE Response:

Six 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. The remaining six conditions have been 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 4602165E – 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 1196453E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/7/2031.*
- *Pole 823452E – 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 157455E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/7/2031.*
- *Pole 157454E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/7/2031.*
- *Pole 4365552E – 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 823446E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 11/30/2026.*
- *Pole 727063E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/7/2031.*
- *Pole 4072276E – 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 394586E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 3/7/2031.*
- *Pole 394582E – 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 4072278E – 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 Pole No. 1865290E was loose and not taut.

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 1865290E – Loose down guy. **SCE Response:** Due on 3/7/2029.*

GO 95, Rule 54.6-B, Vertical and Lateral Conductors, 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 Pole No. 1375351E was damaged.

SCE Response:

The above condition 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.

- *Pole 1375351E – Damaged ground moulding. **SCE Response:** Due on 9/14/2030.*

GO 95, Rule 54.7-A, Climbing Space, states in part:

Climbing space shall be maintained from the ground level. Climbing space, measured from center line of pole, shall be provided on one side or in one quadrant of all poles or structures....

The climbing space on each of the following poles was obstructed by vegetation:

- Pole No. 585665E
- Pole No. 4365553E

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 585665E – Climbing space obstructed by vegetation. **SCE Response:** Due on 3/7/2029.
- Pole 4365553E – Climbing space obstructed by vegetation. **SCE Response:** Due on 3/7/2029.

GO 95, Rule 56.9, Guy Marker (Guy Guard), states:

A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.

The guy guard for down guy wire attached to Pole No. 4210932E was missing.

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 4210932E – Loose down guy. **SCE Response:** Due on 3/7/2031.

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 Pole No. 1375422E was in contact with third-party communications conductors supported by 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 1375422E – Down guy wire in contact with third-party communications cable. **SCE Response:** Due on 3/7/2029.

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 “Speed Limit” sign was attached to Pole No. 4201762E.

SCE Response:

The above condition 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.

- Pole 4201762E – Unauthorized attachment. **SCE Response:** Due on 10/8/2030.

GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment.

SCE's facilities on each of the following underground structures required maintenance:

- Pad-mounted transformer P5539228 lid was corroded.
- The pad located under Pad-mounted transformer P5539228 was damaged.

SCE Response:

The above conditions were recorded in SCE's Work Management System during the audit, and they will be addressed in accordance with SCE's maintenance program.

- *Pad-mounted transformer P5539228 – Damaged lid. SCE Response: Due on 12/31/2027.*
- *Pad-mounted transformer P5539228 – Damaged pad. SCE Response: Due on 9/22/2026.*