



**Melvin Stark**  
Principal Manager  
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December 1, 2025

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

Subject: EA2025-1356, Electric distribution audit of Southern California Edison's Menifee District

Mr. Daye:

Your letter, dated October 31, 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 Menifee District from September 15, 2025 to September 19, 2025.

Your letter requested a response by December 1, 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".

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, Deputy Executive Director, Safety Enforcement, Safety Policy, and Water, CPUC  
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC  
Majed Ibrahim, Senior Utilities Engineer, Electric Safety and Reliability Branch, CPUC  
Stacey Ocampo, Utilities Engineer, Electric Safety and Reliability Branch, CPUC  
SM Arafat Kamal, 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 July 2020 through July 2025, SCE completed 54 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 28 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 July 2020 through July 2025, it completed 54 annual grid patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 28 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 July 2020 through July 2025, SCE completed 3,745 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 116 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 July 2020 through July 2025, it completed 3,745 overhead detailed inspections past SCE's due date. Additionally, as of the date of the audit, SCE had 116 pending overhead detailed 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 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 July 2020 through July 2025, SCE completed 1206 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 80 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 July 2020 through July 2025, it had 1,206 underground inspections that were completed past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 80 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 July 2020 through July 2025, SCE completed 3,461 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 598 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 July 2020 through July 2025, SCE had 3,461 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 598 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 July 2020 through July 2025, SCE completed 246 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 225 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 July 2020 through July 2025, SCE had 246 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 225 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	2182447E	Pole	Menifee
2	2169983E	Pole	Menifee
3	2182041E	Pole	Menifee
4	4872682E	Pole	Menifee
5	4872681E	Pole	Menifee
6	2135803E	Pole	Menifee
7	2135802E	Pole	Menifee
8	2135801E	Pole	Menifee
9	4233662E	Pole	Menifee
10	4233663E	Pole	Menifee
11	4233664E	Pole	Menifee
12	1820515E	Pole	Menifee
13	2289153E	Pole	Menifee
14	2289152E	Pole	Menifee
15	2289151E	Pole	Menifee
16	2295038E	Pole	Menifee
17	2315266E	Pole	Menifee
18	3000313E	Pole	Menifee
19	4529916E	Pole	Menifee
20	4706790E	Pole	Menifee
21	5005815E	Pole	Winchester
22	4606518E	Pole	Winchester
23	4606517E	Pole	Winchester
24	4606516E	Pole	Winchester
25	4606515E	Pole	Winchester
26	4606514E	Pole	Winchester
27	1553596E	Pole	Winchester
28	4583273E	Pole	Winchester
29	4500577E	Pole	Winchester
30	4500583E	Pole	Winchester
31	2289556E	Pole	Winchester
32	4056052E	Pole	Winchester
33	2072377E	Pole	Winchester
34	4974464E	Pole	Winchester
35	2033632E	Pole	Winchester
36	2302035E	Pole	Winchester
37	4302036E	Pole	Winchester
38	2105472E	Pole	Winchester
39	2105473E	Pole	Winchester
40	1895461E	Pole	Winchester
41	4447256E	Pole	Winchester
42	1919788E	Pole	Mead Valley

43	4872194E	Pole	Mead Valley
44	4872195E	Pole	Mead Valley
45	1623065E	Pole	Mead Valley
46	4710064E	Pole	Mead Valley
47	4385728E	Pole	Mead Valley
48	315094S	Pole	Mead Valley
49	4818212E	Pole	Mead Valley
50	4872193E	Pole	Mead Valley
51	2352248E	Pole	Mead Valley
52	4591003E	Pole	Mead Valley
53	4908390E	Pole	Mead Valley
54	4728521E	Pole	Mead Valley
55	4951685E	Pole	Mead Valley
56	4060658E	Pole	Perris
57	4871210E	Pole	Perris
58	4454974E	Pole	Perris
59	2346999E	Pole	Perris
60	2346978E	Pole	Perris
61	1930486E	Pole	Perris
62	1971373E	Pole	Perris
63	4060657E	Pole	Perris
64	1919690E	Pole	Perris
65	1919691E	Pole	Perris
66	4969931E	Pole	Nuevo
67	4920980E	Pole	Nuevo
68	4969901E	Pole	Nuevo
69	4720537E	Pole	Nuevo
70	4949375E	Pole	Nuevo
71	213204E	Pole	Nuevo
72	4949357E	Pole	Nuevo
73	2075549E	Pole	Nuevo
74	2227801E	Pole	Nuevo
75	4909693E	Pole	Nuevo
76	2090512E	Pole	Nuevo
77	4718452E	Pole	Nuevo
78	2090937E	Pole	Nuevo
79	4002439E	Pole	Nuevo
80	4002440E	Pole	Nuevo
81	4977975E	Pole	Nuevo
82	4151628E	Pole	Nuevo
83	4063180E	Pole	Nuevo
84	4063182E	Pole	Nuevo
85	4061963E	Pole	Nuevo
86	4112572E	Pole	Nuevo
87	4681303E	Pole	Nuevo
88	4632131E	Pole	Nuevo
89	2207086E	Pole	Nuevo

90	2207087E	Pole	Nuevo
91	4718451E	Pole	Nuevo
92	4150828E	Pole	Nuevo
93	4150829E	Pole	Nuevo
94	2065227E	Pole	Nuevo
95	4507146E	Pole	Nuevo
96	P5507009	Pad-mounted Capacitor Bank	Menifee
97	5360215	BURD Transformer	Menifee
98	5360214	Surface Operating Equipment	Menifee
99	5360216	BURD Transformer	Menifee
100	5360217	BURD Transformer	Menifee
101	5508480	Vault	Menifee
102	P5731777	Pad-mounted Transformer	Menifee
103	P5460064	Pad-mounted Switch	Menifee
104	P5510613	Pad-mounted Transformer	Menifee
105	P5521996	Pad-mounted Transformer	Menifee
106	P5590813	Pad-mounted Transformer	Perris
107	P5590815	Pad-mounted Transformer	Perris
108	P5590822	Pad-mounted Transformer	Perris
109	P5590824	Pad-mounted Transformer	Perris
110	P5590821	Pad-mounted Transformer	Perris
111	4725017E	Pole	Moreno Valley
112	4869683E	Pole	Moreno Valley
113	214202S	Pole	Moreno Valley
114	1991109E	Pole	Moreno Valley
115	1991110E	Pole	Moreno Valley
116	15022S	Pole	Moreno Valley
117	4165949E	Pole	Moreno Valley
118	2343912E	Pole	Moreno Valley
119	4532849E	Pole	Moreno Valley
120	4779880E	Pole	Moreno Valley
121	4847151E	Pole	Moreno Valley
122	2014512E	Pole	Moreno Valley
123	1553716E	Pole	Moreno Valley
124	1553717E	Pole	Moreno Valley
125	4527983E	Pole	Moreno Valley
126	4523929E	Pole	Moreno Valley
127	4523928E	Pole	Moreno Valley
128	214112S	Pole	Moreno Valley
129	4490656E	Pole	Moreno Valley
130	2178036E	Pole	Moreno Valley
131	1623037E	Pole	Moreno Valley
132	1797201E	Pole	Moreno Valley
133	4058949E	Pole	Moreno Valley
134	4427262E	Pole	Moreno Valley
135	264695S	Pole	Moreno Valley
136	1594467E	Pole	Moreno Valley

137	264692S	Pole	Moreno Valley
138	27868CWT	Pole	Moreno Valley
139	264693S	Pole	Moreno Valley
140	264694S	Pole	Moreno Valley
141	264874S	Pole	Moreno Valley
142	4527992E	Pole	Moreno Valley
143	1750862E	Pole	Moreno Valley
144	2135827E	Pole	Moreno Valley
145	1990877E	Pole	Moreno Valley
146	1759699E	Pole	Moreno Valley

#### 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. 1919788E – the down guy anchor supporting the pole was buried.
- Pole No. 15022S – the down guy anchor supporting the pole was buried.
- Pole No. 4872681E – the uni-strut bracket was not properly attached to the pole.

##### **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 1919788E – Buried anchor. SCE Response: Due on 09/03/2028.*
- *Pole 15022S – Buried anchor. SCE Response: Due on 04/29/2028.*
- *Pole 4872681E – Unistrut on riser was not fastened. SCE Response: Due on 11/27/2026.*

##### **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. 4165949E 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 4165949E – SCE service drop has vegetation strain. SCE Response: Due on 05/29/2026.*

##### **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. 2289153E
- Pole No. 2295038E
- Pole No. 2315266E
- Pole No. 4112572E
- Pole No. 4532849E
- Pole No. 1759699E

**SCE Response:**

*Four 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 2315266E – 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 4532849E – 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 1759699E – 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 2295038E – High Voltage Sign Damaged/Missing. SCE Response: The condition of this priority level 3 was entered in SCE's Work Management System before 7/1/2019 and has not changed since; SCE will assign a corrective action date with a new priority level, consistent with GO 95, if the condition changes.*

**SCE Response:**

*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 2289153E – High Voltage Sign Damaged/Missing. SCE Response: Due on 09/16/2030.*
- *Pole 4112752E – Pole tag was updated with the correct number. High Voltage Sign Damaged/Missing. SCE Response: Due on 01/19/2029.*

**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. 2295038E
- Pole No. 4977975E

**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 2295038E – SCE down guy not taut. **SCE Response:** Due on 09/25/2026.
- Pole 4977975E – SCE down guy not taut. **SCE Response:** Due on 09/17/2026.

**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. 2182041E was damaged.

**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 2182041E – Damaged / missing ground molding. **SCE Response:** Due on 11/16/2030.

**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 Pole No. 2075549E was obstructed 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 2075549E – Climbing space restriction. **SCE Response:** Due on 09/17/2026.

**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 anchor guy attached to Pole No. 4523929E 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 4523929E – Missing / Damaged guy guard. **SCE Response:** Completed 11/17/2025.

**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 P5590822 had an oil leak and was corroded.
- The required working space on Pad-mounted transformer P5590815 was obstructed by a block wall and a rose bush and could not be opened.

***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 P5590822 – Transformer is leaking and has corrosion. **SCE Response:** Completed on 09/20/2025*
- *Pole P5590815 – Workspace around padmount transformer area is restricted due to block wall. **SCE Response:** This is an existing condition and customer has been notified to remove block wall near the front of the padmount transformer. If an emergency occurs, SCE will be forced to break down the block wall to open the padmount transformer.*