



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

September 15, 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

EA2025-1362

SUBJECT: Audit of Southern California Edison's Santa Barbara District

Dear Mr. Daye:

Your letter, dated August 14th, 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 Santa Barbara District from July 28, 2025 to August 1, 2025.

Your letter requested a response by September 15, 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
2 Innovation Way
Pomona, CA 91768

Enclosures: Audit Findings

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 June 2020 through May 2025, SCE completed 46 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 30 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 June 2020 through May 2025, it completed 46 annual grid patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 30 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 June 2020 through May 2025, SCE completed 4,066 detail inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 28 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 June 2020 through May 2025, it completed 4,066 overhead detailed inspections past SCE's due date. Additionally, as of the date of the audit, SCE had 28 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 June 2020 through May 2025, SCE completed 175 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 3 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 June 2020 through May 2025, it had 175 underground inspections that were completed past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 3 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 June 2023 through May 2025, SCE completed 1,336 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 1,005 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 June 2023 through May 2025, SCE had 1,336 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 1,005 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 June 2023 through May 2025, SCE completed 65 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 288 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 June 2023 through May 2025, SCE had 65 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 288 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	4805466E	Pole	Goleta
2	1524463E	Pole	Goleta
3	4371170E	Pole	Goleta
4	2296239E	Pole	Goleta
5	1082272E	Pole	Goleta
6	4883234E	Pole	Goleta
7	1915268E	Pole	Goleta
8	4365384E	Pole	Goleta
9	4199173E	Pole	Goleta
10	4263130E	Pole	Goleta
11	4451590E	Pole	Goleta
12	1453410E	Pole	Goleta
13	4574175E	Pole	Goleta
14	4721176E	Pole	Goleta
15	218955E	Pole	Goleta
16	1675558E	Pole	Goleta
17	406683E	Pole	Goleta
18	4735023E	Pole	Goleta
19	4365383E	Pole	Goleta
20	4300215E	Pole	Goleta
21	1947146E	Pole	Goleta
22	1947147E	Pole	Goleta
23	4754761E	Pole	Goleta
24	2023919E	Pole	Goleta
25	2023920E	Pole	Goleta
26	4375731E	Pole	Goleta
27	1915304E	Pole	Goleta
28	1524379E	Pole	Goleta
29	1608634E	Pole	Goleta
30	4943571E	Pole	Carpinteria
31	1372555E	Pole	Carpinteria
32	1608417E	Pole	Carpinteria
33	1828838E	Pole	Carpinteria
34	4880258E	Pole	Carpinteria
35	2024053E	Pole	Carpinteria
36	2024054E	Pole	Carpinteria
37	2024056E	Pole	Carpinteria
38	1664583E	Pole	Carpinteria
39	1345370E	Pole	Carpinteria
40	1081995E	Pole	Carpinteria
41	2024057E	Pole	Carpinteria
42	1345368E	Pole	Carpinteria

43	1345367E	Pole	Carpinteria
44	1345366E	Pole	Carpinteria
45	1345365E	Pole	Carpinteria
46	208056E	Pole	Carpinteria
47	GT133633	Pole	Toro Canyon
48	1868638E	Pole	Toro Canyon
49	1828945E	Pole	Toro Canyon
50	1828946E	Pole	Toro Canyon
51	949523E	Pole	Toro Canyon
52	4669735E	Pole	Toro Canyon
53	403672E	Pole	Toro Canyon
54	403671E	Pole	Toro Canyon
55	1829041E	Pole	Toro Canyon
56	1675687E	Pole	Toro Canyon
57	1829040E	Pole	Toro Canyon
58	1286976E	Pole	Toro Canyon
59	1256083E	Pole	Toro Canyon
60	1256084E	Pole	Toro Canyon
61	1828743E	Pole	Summerland
62	1287165E	Pole	Summerland
63	1217653E	Pole	Summerland
64	1217654E	Pole	Summerland
65	1217655E	Pole	Summerland
66	1081883E	Pole	Summerland
67	807554E	Pole	Summerland
68	4041874E	Pole	Summerland
69	2338729E	Pole	Summerland
70	4340210E	Pole	Montecito
71	1189344E	Pole	Montecito
72	1189343E	Pole	Montecito
73	2178546E	Pole	Montecito
74	4892903E	Pole	Montecito
75	1664670E	Pole	Montecito
76	4428853E	Pole	Montecito
77	513229E	Pole	Montecito
78	4417134E	Pole	Montecito
79	4892469E	Pole	Montecito
80	4992502E	Pole	Santa Barbara
81	4874718E	Pole	Santa Barbara
82	S28400Y	Pole	Santa Barbara
83	S29301Y	Pole	Santa Barbara
84	1675247E	Pole	Santa Barbara
85	1345930E	Pole	Santa Barbara
86	1345931E	Pole	Santa Barbara
87	1345932E	Pole	Santa Barbara
88	1345933E	Pole	Santa Barbara
89	1345934E	Pole	Santa Barbara

90	2143959E	Pole	Santa Barbara
91	1523332E	Pole	Goleta
92	1523333E	Pole	Goleta
93	1523334E	Pole	Goleta
94	1523341E	Pole	Goleta
95	1523335E	Pole	Goleta
96	1524313E	Pole	Goleta
97	1523337E	Pole	Goleta
98	1675056E	Pole	Goleta
99	1523339E	Pole	Goleta
100	1523340E	Pole	Goleta
101	1524689E	Pole	Goleta
102	1524690E	Pole	Goleta
103	1482292E	Pole	Goleta Valley
104	4589257E	Pole	Goleta Valley
105	1482293E	Pole	Goleta Valley
106	1482294E	Pole	Goleta Valley
107	4041968E	Pole	Goleta
108	1996229E	Pole	Goleta
109	4130559E	Pole	Goleta
110	1413089E	Pole	Goleta
111	4914014E	Pole	Goleta
112	1413090E	Pole	Goleta
113	1413091E	Pole	Goleta
114	4672148E	Pole	Goleta
115	4830342E	Pole	Goleta
116	4339715E	Pole	Goleta
117	1372739E	Pole	Goleta
118	4550544E	Pole	Goleta
119	GT23858	Pole	Goleta
120	GT23859	Pole	Goleta
121	GT23860	Pole	Goleta
122	2367222E	Pole	Goleta
123	1865099E	Pole	Goleta
124	1865098E	Pole	Goleta
125	1188652E	Pole	Isla Vista
126	1524253E	Pole	Isla Vista
127	1188651E	Pole	Isla Vista
128	S18634Y	Pole	Isla Vista
129	1216878E	Pole	Isla Vista
130	1345783E	Pole	Isla Vista
131	1188580E	Pole	Isla Vista
132	S18337Y	Pole	Isla Vista
133	1216918E	Pole	Isla Vista
134	S18338Y	Pole	Isla Vista
135	1216877E	Pole	Isla Vista
136	4843671E	Pole	Isla Vista

137	S20138Y	Pole	Isla Vista
138	579082E	Pole	Isla Vista
139	1216924E	Pole	Isla Vista
140	1216925E	Pole	Isla Vista
141	1345339E	Pole	Isla Vista
142	S18925Y	Pole	Isla Vista
143	4920973E	Pole	Isla Vista
144	1133219E	Pole	Isla Vista
145	1216879E	Pole	Isla Vista
146	903237E	Pole	Isla Vista
147	1188952E	Pole	Isla Vista
148	903236E	Pole	Isla Vista
149	1345787E	Pole	Isla Vista
150	1217299E	Pole	Isla Vista
151	1217300E	Pole	Isla Vista
152	4563265E	Pole	Isla Vista
153	4460150E	Pole	Santa Barbara
154	1345291	Pole	Santa Barbara
155	218862E	Pole	Santa Barbara
156	2073819E	Pole	Santa Barbara
157	4579016E	Pole	Santa Barbara
158	2108937E	Pole	Santa Barbara
159	2108938E	Pole	Santa Barbara
160	2108939E	Pole	Santa Barbara
161	2073876E	Pole	Santa Barbara
162	207107E	Pole	Santa Barbara
163	1882592E	Pole	Santa Barbara
164	1324237E	Pole	Santa Barbara
165	1324238E	Pole	Santa Barbara
166	2244719E	Pole	Santa Barbara
167	1324234E	Pole	Santa Barbara
168	760872E	Pole	Santa Barbara
169	1324233E	Pole	Santa Barbara
170	P5031408	Pad-mounted Transformer	Goleta
171	B5032295	BURD Switch	Goleta
172	P5032243	Pad-mounted Transformer	Goleta
173	V5619031	Vault	Goleta
174	P5619030	Pad-mounted Gas Switch	Goleta
175	P5619029	Pad-mounted Transformer	Goleta
176	P5567814	Pad-mounted Equipment	Goleta
177	P5567815	Pad-mounted Transformer	Goleta
178	P5594413	Pad-mounted Transformer	Santa Barbara
179	P5637600	Pad-mounted Transformer	Santa Barbara
180	X5637601	Vault	Santa Barbara
181	V5031519	Gas Switch	Santa Barbara
182	P5031304	Pad-mounted Transformer	Santa Barbara
183	5030639	Pad-mounted Transformer	Montecito

184	5032223	BURD	Montecito
185	P5413501	Pad-mounted Transformer	Summerland
186	P5496413	Pad-mounted Equipment	Summerland

IV. Field Inspection – Violations List

We 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:

- 1523339E – The down guy anchor was buried.
- 4199173E – The down guy was severed and was no longer anchored to the ground.

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 1523339E – Buried anchor. ***SCE Response:*** Due on 02/03/2028.
- Pole 4199173E – Down guy was cut and not attached to anchor. ***SCE Response:*** Due on 09/10/2028.

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:

- 4365383E – light fixture
- 2108939E – “PRIVATE PROPERTY” sign

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 4365383E – Unauthorized attachment, light fixture. ***SCE Response:*** Due on 09/03/2028.
- Pole 2108939E – Unauthorized attachment Private property sign. ***SCE Response:*** Due on 09/03/2028.

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 8, requires the minimum vertical separation between “0 – 750 Volts Conductors (Including Service Drops)” from “Communication Conductors and Service Drops” supported on the same pole to be 48 inches.

The SCE service drop attached to pole 4992502E was in contact with a third-party communications conductor supported on the same pole.

SCE Response:

The above condition has been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.

- *Pole 4992502E – SCE service drop is contacting communication cable. **SCE Response:** Due on 09/09/2028.*

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 pole 4199173E was damaged.

SCE Response:

The above condition has been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.

- *Pole 4199173E – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 09/09/2030.*

GO 95, Rule 54.8 - Service Drops, 0-750 Volts, Table 10, requires the minimum vertical clearance of insulated service drops of 0-750 volts above the roof of the building being served to be 0.5 inches.

The SCE service drop attached to pole 1324233E was contacting the roof of the house being served.

SCE Response:

The above condition has been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program.

- *Pole 1324233E – SCE service drop contacting building. **SCE Response:** Due on 07/30/2026.*

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:

- 1372555E
- 2338729E
- 1413090E

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 1372555E – SCE down guy not taut. **SCE Response:** Due on 12/08/2025.*
- *Pole 2338729E – SCE down guy not taut. **SCE Response:** Due on 09/09/2026.*
- *Pole 1413090E – SCE down guy not taut. **SCE Response:** Due on 09/03/2028.*