



Melvin Stark
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November 7, 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: EA2025-1363, Electric distribution audit of Southern California Edison's Thousand Oaks District

Mr. Daye:

Your letter, dated October 7, 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 Thousand Oaks District from August 18, 2025 to August 22, 2025.

Your letter requested a response by November 7, 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, 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 August 2023 through July 2025, SCE completed 66 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 157 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 August 2023 through July 2025, it completed 66 annual grid patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 157 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 August 2023 through July 2025, SCE completed 112 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 9 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 August 2023 through July 2025, it completed 112 overhead detailed inspections past SCE's due date. Additionally, as of the date of the audit, SCE had 9 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 August 2023 through July 2025, SCE completed 249 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 46 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 August 2023 through July 2025, it had 249 underground inspections that were completed past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 46 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 August 2023 through July 2025, SCE completed 3,667 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 507 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 August 2023 through July 2025, SCE had 3,667 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 507 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 August 2023 through July 2025, SCE completed 813 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 136 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 August 2023 through July 2025, SCE had 813 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 135 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	376402E	Pole	Thousand Oaks
2	4537330E	Pole	Thousand Oaks
3	1443890E	Pole	Thousand Oaks
4	3006954E	Pole	Thousand Oaks
5	1137001E	Pole	Thousand Oaks
6	4124745E	Pole	Thousand Oaks
7	4705250E	Pole	Thousand Oaks
8	3004794E	Pole	Thousand Oaks
9	4743910E	Pole	Thousand Oaks
10	1603356E	Pole	Thousand Oaks
11	1603357E	Pole	Thousand Oaks
12	4619298E	Pole	Thousand Oaks
13	1976437E	Pole	Thousand Oaks
14	4108750E	Pole	Thousand Oaks
15	4108749E	Pole	Thousand Oaks
16	577840E	Pole	Thousand Oaks
17	4743909E	Pole	Thousand Oaks
18	3005350E	Pole	Thousand Oaks
19	4315271E	Pole	Thousand Oaks
20	4705249E	Pole	Thousand Oaks
21	658174E	Pole	Thousand Oaks
22	1332641E	Pole	Thousand Oaks
23	4705248E	Pole	Thousand Oaks
24	4315272E	Pole	Thousand Oaks
25	4920664E	Pole	Agoura Hills
26	636189E	Pole	Agoura Hills
27	2013220E	Pole	Agoura Hills
28	4278976E	Pole	Agoura Hills
29	1085925E	Pole	Agoura Hills
30	2024471E	Pole	Agoura Hills
31	4278975E	Pole	Agoura Hills
32	2012700E	Pole	Agoura Hills
33	4251437E	Pole	Agoura Hills
34	1517906E	Pole	Agoura Hills
35	4198509E	Pole	Agoura Hills
36	2114132E	Pole	Agoura Hills
37	1976610E	Pole	Agoura Hills
38	1940645E	Pole	Agoura Hills
39	3006563E	Pole	Agoura Hills
40	1976611E	Pole	Agoura Hills
41	1998293E	Pole	Agoura Hills
42	2240286E	Pole	Agoura Hills

43	1308529E	Pole	Malibu
44	1308530E	Pole	Malibu
45	1308527E	Pole	Malibu
46	4093861E	Pole	Malibu
47	4951217E	Pole	Malibu
48	4759799E	Pole	Malibu
49	1451357E	Pole	Malibu
50	4124911E	Pole	Malibu
51	1451356E	Pole	Malibu
52	1451355E	Pole	Malibu
53	1451353E	Pole	Malibu
54	4457715E	Pole	Malibu
55	4759800E	Pole	Malibu
56	1451359E	Pole	Malibu
57	733307E	Pole	Malibu
58	1513749E	Pole	Malibu
59	733305E	Pole	Malibu
60	733304E	Pole	Malibu
61	GT116140	Pole	Malibu
62	4197881E	Pole	Malibu
63	1467269E	Pole	Malibu
64	733302E	Pole	Malibu
65	733301E	Pole	Malibu
66	2197085E	Pole	Malibu
67	1308461E	Pole	Malibu
68	733335E	Pole	Malibu
69	4863178E	Pole	Malibu
70	4389287E	Pole	Calabasas
71	4389286E	Pole	Calabasas
72	4389285E	Pole	Calabasas
73	4389284E	Pole	Calabasas
74	4389283E	Pole	Calabasas
75	4389279E	Pole	Calabasas
76	4426013E	Pole	Calabasas
77	4831165E	Pole	Calabasas
78	4125725E	Pole	Calabasas
79	1753500E	Pole	Calabasas
80	4592272E	Pole	Hidden Hills
81	4868005E	Pole	Hidden Hills
82	899867E	Pole	Hidden Hills
83	1024617H	Pole	Hidden Hills
84	899868E	Pole	Hidden Hills
85	1024616H	Pole	Hidden Hills
86	899869E	Pole	Hidden Hills
87	4249486E	Pole	Hidden Hills
88	4251311E	Pole	Hidden Hills
89	4216269E	Pole	Hidden Hills

90	4754676E	Pole	Hidden Hills
91	1621155E	Pole	Newbury Park
92	1621200E	Pole	Newbury Park
93	4874619E	Pole	Newbury Park
94	1621156E	Pole	Newbury Park
95	4551748E	Pole	Newbury Park
96	2012692E	Pole	Newbury Park
97	4944312E	Pole	Newbury Park
98	4923433E	Pole	Newbury Park
99	4919022E	Pole	Newbury Park
100	4919001E	Pole	Newbury Park
101	T3980Y	Pole	Newbury Park
102	2137106E	Pole	Newbury Park
103	3005518E	Pole	Newbury Park
104	4557799E	Pole	Newbury Park
105	4576846E	Pole	Newbury Park
106	4198750E	Pole	Newbury Park
107	4197807E	Pole	Newbury Park
108	4424046E	Pole	Newbury Park
109	2145083E	Pole	Thousand Oaks
110	4216674E	Pole	Thousand Oaks
111	4705240E	Pole	Thousand Oaks
112	4705241E	Pole	Thousand Oaks
113	4705242E	Pole	Thousand Oaks
114	4879545E	Pole	Thousand Oaks
115	4705243E	Pole	Thousand Oaks
116	4705244E	Pole	Thousand Oaks
117	4521966E	Pole	Thousand Oaks
118	4705245E	Pole	Thousand Oaks
119	376417E	Pole	Thousand Oaks
120	5469959	Pad-mounted Transformer	Thousand Oaks
121	P5430550	Pad-mounted Equipment	Thousand Oaks
122	S5189388	Vault	Thousand Oaks
123	B5043146	BURD	Thousand Oaks
124	5043147	BURD	Thousand Oaks
125	B5190701	BURD	Thousand Oaks
126	5190703	BURD Switch	Thousand Oaks
127	5190702	BURD	Thousand Oaks
128	5575979	Vault	Moorpark
129	B5338692	BURD Switch	Moorpark
130	P5521512	Pad-mounted Transformer	Simi Valley
131	P5521513	Pad-mounted Transformer	Simi Valley

IV. Field Inspection – Violations List

We observed the following violations during the field inspection portion of the audit:

GO 95, Rule 18.A3 - Resolution of Potential Violation of General Order 95 and Safety Hazards, states in part:

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 ten (10) business days after the discovery.

SCE did not notify the third-party entity of a safety hazard of facilities on the pole 3005350E, where a third-party communications cross-arm was broken and was hanging from the 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 3005350E – Third party notification, communication cross arm is broken. SCE Response: SCE sent correspondence to all attached third party communication companies on 08/26/2025 eight days after it was discovered during audit inspection on 08/18/2025.*

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 service drop weather-head and conduit attached to pole No. 1603357E was not properly secured and was hanging from the building.

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 1603357E – SCE service drop weather head and conduit not properly secured. SCE Response: Due on 02/19/2026.*

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:

- Pole No. 1085925E – “PRIVATE PROPERTY” sign
- Pole No. 3005518E – “DEAD END ROAD” sign and traffic safety mirror

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 1085925E – Unauthorized attachment, “Private Property Sign”. SCE Response: Due on 02/20/2026.*
- *Pole 3005518E – Unauthorized attachment, “Dead End Road Sign”. SCE Response: Due on 08/20/2030.*

GO 95, Rule 44.1 - Installation and Reconstruction, states in part:

Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term “planned” applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.

The pole loading calculations supplied by SCE for pole No. 733307E included a primary down guy wire supported at 37 feet high, which was missing at the time of the field inspection.

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 733307E – Pole load did not match field conditions, primary down guy missing in field.*

SCE Response: Revised pole load with existing conditions was sent to CPUC Auditor on October 10, 2025.

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 N. T3980Y 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 T3980Y – High Voltage Sign Damaged/Missing. SCE Response: Due on 08/20/2030.*

GO 95, Rule 54.6B - 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 wire attached to the surface of pole No. 1137001E was not completely covered by protective covering.

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 1137001E – Damaged / missing ground molding. SCE Response: Due on 08/19/2030.*

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. 4691298E
- Pole No. 1998293E
- Pole No. 899869E
- Pole No. 4944312E

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 4691298E – SCE down guy not taut. **SCE Response:** Due on 08/20/2028.*
- *Pole 1998293E – SCE down guy not taut. **SCE Response:** Due on 08/20/2028.*
- *Pole 899869E – SCE down guy not taut. **SCE Response:** Due on 08/20/2028.*
- *Pole 49944312E – SCE down guy not taut. **SCE Response:** Due on 08/20/2028.*