



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

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", 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: 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.*