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

November 7, 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

SUBJECT: EA2025-1376, Audit of SCE's Covina District

Dear 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 Covina District from August 4, 2025 to August 8, 2025.

Your letter requested a response by November 7, 2025. Attached are the conditions mentioned in your letter, and our responses and corresponding actions.

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

Enclosures: SED Audit Findings and SCE's Responses

Cc: Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Majed Ibrahim, Senior Utilities Engineer Supervisor, ESRB, 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:

- Patrol & Detailed Inspection records
- Repair Notifications
- 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 2024 to June 2025, SCE completed 2 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 19 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 2024 through June 2025, it had 2 annual grid patrols that were completed past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 19 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 2024 to June 2025, SCE completed 315 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 69

pending detailed 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 2024 through June 2025, it had 315 overhead detailed inspections that were completed past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that 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 August 2024 to June 2025, SCE completed 149 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 12 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 2024 through June 2025, it had 149 underground detailed inspections that were completed past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 12 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 August 2024 to June 2025, SCE completed 292 overhead work orders past SCE's due date for corrective action. Also, as of the date of the audit, SCE had 39 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 2024 through June 2025, SCE had 292 overhead work orders that were completed past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 39 overhead work orders that were pending completion past SCE's scheduled due date. 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 2024 to June 2025, SCE completed 80 underground work orders past SCE's due date for corrective action. Also, as of the date of the audit, SCE had 18 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 2024 through June 2025, SCE had 80 underground work orders that were completed past SCE's scheduled due date for corrective action. Additionally, based on SCE's records, SCE notes that as of the date of the audit, it had 18 underground work orders that were pending completion past SCE's scheduled due date. 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	G14403Y	Pole	San Dimas
2	229567E	Pole	San Dimas
3	229566E	Pole	San Dimas
4	4820016E	Pole	San Dimas
5	G23482Y	Pole	San Dimas
6	4819172E	Pole	San Dimas
7	4635079R	Pole	San Dimas
8	319655E	Pole	San Dimas
9	319656E	Pole	San Dimas
10	985941E	Pole	Sam Dimas
11	1470535E	Pole	San Dimas
12	319658E	Pole	San Dimas
13	E16734Y	Pole	Glendora
14	96598E	Pole	Glendora
15	1207775E	Pole	Glendora
16	1207807E	Pole	Glendora
17	1207767E	Pole	Glendora
18	4848283E	Pole	Citrus
19	4848282E	Pole	Citrus
20	4848281E	Pole	Citrus
21	4848280E	Pole	Citrus
22	4848279E	Pole	Citrus
23	1009239E	Pole	Covina
24	1009240E	Pole	Covina
25	1009241E	Pole	Covina
26	1009242E	Pole	Covina
27	1029839E	Pole	Covina
28	4593747E	Pole	Covina
29	1740664E	Pole	Covina
30	1029830E	Pole	Covina
31	1029823E	Pole	Covina
32	1029822E	Pole	Covina
33	1029817E	Pole	Covina
34	1029816E	Pole	Covina
35	1029815E	Pole	Covina
36	1165693E	Pole	Baldwin Park

37	1186348E	Pole	Baldwin Park
38	836163E	Pole	Baldwin Park
39	836162E	Pole	Baldwin Park
40	836161E	Pole	Baldwin Park
41	836160E	Pole	Baldwin Park
42	836159E	Pole	Baldwin Park
43	836158E	Pole	Baldwin Park
44	1820431E	Pole	Diamond Bar
45	1476102E	Pole	Diamond Bar
46	2217794E	Pole	Diamond Bar
47	1476103E	Pole	Diamond Bar
48	981906E	Pole	Diamond Bar
49	1863113E	Pole	Diamond Bar
50	981905E	Pole	Diamond Bar
51	4272719E	Pole	Diamond Bar
52	4280407E	Pole	Diamond Bar
53	GT8946	Pole	Diamond Bar
54	981903E	Pole	Diamond Bar
55	1451606E	Pole	Diamond Bar
56	981902E	Pole	Diamond Bar
57	1451605E	Pole	Diamond Bar
58	4016831E	Pole	Diamond Bar
59	4016830E	Pole	Diamond Bar
60	4016829E	Pole	Diamond Bar
61	4016828E	Pole	Diamond Bar
62	4321052E	Pole	Hacienda Heights
63	4860538E	Pole	Hacienda Heights
64	4815217E	Pole	Hacienda Heights
65	4376899E	Pole	Hacienda Heights
66	863076E	Pole	Hacienda Heights
67	270340E	Pole	Hacienda Heights
68	270341E	Pole	Hacienda Heights
69	4082374E	Pole	Baldwin Park
70	4431491E	Pole	Baldwin Park
71	89006E	Pole	Baldwin Park
72	4808294E	Pole	Baldwin Park
73	4808295E	Pole	Baldwin Park
74	740903E	Pole	Baldwin Park
75	740904E	Pole	Baldwin Park
76	740905E	Pole	Baldwin Park
77	740906E	Pole	Baldwin Park

78	185600E	Pole	Baldwin Park
79	4826051E	Pole	San Dimas
80	4852218E	Pole	San Dimas
81	4855674E	Pole	San Dimas
82	1888619E	Pole	San Dimas
83	1626918E	Pole	San Dimas
84	1888432E	Pole	San Dimas
85	1565578E	Pole	San Dimas
86	1565577E	Pole	San Dimas
87	4531093E	Pole	San Dimas
88	1565180E	Pole	San Dimas
89	1888480E	Pole	San Dimas
90	1888478E	Pole	San Dimas
91	1888479E	Pole	San Dimas
92	1682960E	Pole	Claremont
93	4941921E	Pole	Claremont
94	1683543E	Pole	Claremont
95	802637E	Pole	Claremont
96	2316866E	Pole	Claremont
97	776423E	Pole	Claremont
98	4665713E	Pole	Claremont
99	265708E	Pole	Claremont
100	G19266Y	Pole	Claremont
101	47573E	Pole	Claremont
102	4621225E	Pole	Claremont
103	4425765E	Pole	Claremont
104	471100E	Pole	Claremont
105	471099E	Pole	Claremont
106	4372208E	Pole	Claremont
107	4401255E	Pole	Claremont
108	411498E	Pole	Claremont
109	1682579E	Pole	La Verne
110	48983E	Pole	La Verne
111	48984E	Pole	La Verne
112	48985E	Pole	La Verne
113	4502361E	Pole	La Verne
114	517866E	Pole	La Verne
115	427425E	Pole	La Verne
116	517865E	Pole	La Verne
117	1598486E	Pole	La Verne

118	4377461E	Pole	La Verne
119	518234E	Pole	Pomona
120	462691E	Pole	Pomona
121	453901E	Pole	Pomona
122	448050E	Pole	Pomona
123	2214000E	Pole	Pomona
124	G22724Y	Pole	Pomona
125	1598470E	Pole	Pomona
126	1598469E	Pole	Pomona
127	1598468E	Pole	Pomona
128	1395664E	Pole	Pomona
129	1395671E	Pole	Pomona
130	G23588Y	Pole	Pomona
131	4862583E	Pole	Pomona
132	P5450546	Padmount	Glendora
133	P5427813	Padmount	Glendora
134	P5179779	Padmount	Glendora
135	P5179778	Padmount	Glendora
136	V5055875	Vault	Glendora
137	P5182001	Padmount	Pomona
138	P5527037	Padmount	Pomona
139	V5049269	Vault	Pomona
140	P5049152	Padmount	Diamond Bar
141	P5049134	Padmount	Diamond Bar
142	P5049133	Padmount	Diamond Bar
143	P5181542	Padmount	Diamond Bar
144	P5181544	Padmount	Diamond Bar
145	V5007072	Vault	Diamond Bar
146	G14403Y	Pole	San Dimas

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection portion of the audit:

GO 95, Rule 51.6-A, Marking and Guarding, High Voltage Marking, 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 signs on each of the following poles were damaged:

- Pole No. 319655E
- Pole No. 1165693E
- Pole No. 319656E
- Pole No. 2217794E
- Pole No. 319658E
- Pole No. 4280407E
- Pole No. 1451606E
- Pole No. 776423E
- Pole No. 4401255E
- Pole No. 411498E
- Pole No. 517866E
- Pole No. 4377461E
- Pole No. 462691E
- Pole No. 2214000E
- Pole No. 1598470E
- Pole No. 1598468E

SCE Response:

The above conditions were previously 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 319655E – 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 1165693E – 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 319656E – 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 2217794E – 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 319658E – 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 4280407E – High Voltage Sign Damaged/Missing.* ***SCE Response:*** *Due on 8/24/2028*
- *Pole 1451606E – 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 776423E – 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 4401255E – 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 411498E – 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 517866E – 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 4377461E – 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 462691E – 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 2214000E – 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 1598470E – 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 1598468E – 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, 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:

- Pole No. GT8946
- Pole No. 4272719E

SCE Response:
The above conditions were previously recorded in SCE's Work Management System, and they will be addressed in accordance with SCE's maintenance program.

- *Pole GT8946 – Loose Down Guy.* ***SCE Response:*** *Due on 8/24/2028.*
- *Pole 4272719E – Loose Down Guy.* ***SCE Response:*** *Due on 8/04/2030.*

The SCE secondary down guy wire supporting each of the following poles was loose:

- Pole No. 1186348E
- Pole No. 1598470E

SCE Response:
The above conditions were previously 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 1186348E – Loose Down Guy.* ***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 1598470E – Loose Down Guy.* ***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 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 each of the following poles was damaged:

- Pole No. 319656E
- Pole No. 1029839E
- Pole No. E16734Y
- Pole No. 1598468E

SCE Response:
The above conditions were previously 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 319656E – Damaged/Missing Ground Moulding.* ***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 1029839E – Damaged/Missing Ground Moulding.* ***SCE Response:*** *Due on 9/14/2027.*
- *Pole E16734Y – Damaged/Missing Ground Moulding.* ***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 1598468E – Damaged/Missing Ground Moulding.* ***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 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.

The following facilities required maintenance:

- Pole No. 4852218E: the ground moulding attached to the pole was damaged.
- Pole No. 1598486E: the riser conduit attached to the pole was damaged.

SCE Response:
One of the above conditions was previously recorded in SCE's Work Management System, and it will be addressed in accordance with SCE's maintenance program. The remaining condition has been recorded in SCE's Work Management System, and it will be addressed in accordance with SCE's maintenance program.

- *Pole 4852218E – Damaged/Missing Ground Moulding.* ***SCE Response:*** *Due on 10/25/2030.*

- *Pole 1598486E – Damaged Riser.* ***SCE Response:*** *Due on 7/07/2028.*

A hole in the footing of each of the following poles:

- Pole No. 1863113E
- Pole No. 1451606E

SCE Response:
The above conditions were previously recorded in SCE's Work Management System, and they were addressed in accordance with SCE's maintenance program.

- *Pole 1863113E – Erosion at the base of the pole.* ***SCE Response:*** *Completed on 10/28/2025.*
- *Pole 1451606E – Erosion at the base of the pole.* ***SCE Response:*** *Completed on 11/05/2025.*

The visibility strip attached to each of the following poles was damaged:

- Pole No. 1009239E
- Pole No. 4502361E
- Pole No. G23588Y

SCE Response:
One of the above conditions was previously recorded in SCE's Work Management System, and it will be addressed in accordance with SCE's maintenance program. The remaining two conditions have been recorded in SCE's Work Management System, and they will be addressed in accordance with SCE's maintenance program.

- *Pole 1009239E – Damaged Visibility Strips.* ***SCE Response:*** *Due on 10/25/2030.*
- *Pole 4502361E – Damaged Visibility Strips.* ***SCE Response:*** *Due on 10/25/2030.*
- *Pole G23588Y – Damaged Visibility Strips.* ***SCE Response:*** *Due on 01/19/2028.*