



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

March 9, 2026

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

**Subject:** EA2025-1425 Electric distribution Audit of Southern California Edison's Antelope Valley District

Mr. Ibrahim:

Your letter, dated February 9, 2026, 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 Antelope Valley District from October 27, 2025 to October 31, 2025.

Your letter requested a response by March 9, 2026. 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 and SCE's response to the Antelope Valley audit findings report.

Cc: Leslie Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy, and Water  
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC  
Jose Lastra, Utilities Engineer, ESRB, SED, CPUC

## Audit Findings

### I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Pole load calculations
- Intrusive test records
- Safety hazard notifications
- SCE's documented inspection program.
- Vegetation 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 2024 through September 2025, SCE completed 111 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 306 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 2024 through September 2025, it completed 111 annual grid patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 306 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 2024 through September 2025, SCE completed 804 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 661 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 June 2024 through September 2025, it completed 804 overhead detailed inspections past SCE's due date. Additionally, as of the date of the audit, SCE had 661 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 these rules.*

SCE's records indicated that from June 2024 through September 2025, SCE completed 133 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 17 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 2024 through September 2025, it had 113 underground inspections that were completed past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 17 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 2024 through September 2025, SCE completed 1,209 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 421 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, SCE notes that from June 2024 through September 2025, it had 1,209 overhead work orders that were completed past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 421 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 2024 through September 2025, SCE completed 86 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 191 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, SCE notes that from June 2024 through September 2025, it had 86 underground work*

*orders that were completed past SCE's scheduled due date for corrective action. Additionally, as of the date of the audit, SCE had 191 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 Inspections

My staff inspected the following facilities during the field inspection portion of the audit:

No.	Structure ID	Type of Structure	Location	Coordinates
1	800307E	Wood Pole	Quartz Hill	34.642128, -118.168856
2	K10769Y	Wood Pole	Quartz Hill	34.642172, -118.168856
3	800308E	Wood Pole	Quartz Hill	34.642625, -118.169778
4	878814E	Wood Pole	Quartz Hill	34.642639, -118.169783
5	1162528E	Wood Pole	Quartz Hill	34.642294, -118.170272
6	800309E	Wood Pole	Quartz Hill	34.642375, -118.170167
7	593246H	Wood Pole	Quartz Hill	34.641756, -118.171022
8	800310E	Wood Pole	Quartz Hill	34.641756, -118.171022
9	800311E	Wood Pole	Quartz Hill	34.642186, -118.171514
10	593247H	Wood Pole	Quartz Hill	34.642231, -118.171308
11	800312E	Wood Pole	Quartz Hill	34.642153, -118.172053
12	1014086E	Wood Pole	Quartz Hill	34.641275, -118.172931
13	2337987E	Wood Pole	Quartz Hill	34.642067, -118.172653
14	800313E	Wood Pole	Quartz Hill	34.642219, -118.173194
15	K10770Y	Wood Pole	Quartz Hill	34.642272, -118.173567
16	800314E	Wood Pole	Quartz Hill	34.642111, -118.174117
17	2208351E	Wood Pole	Quartz Hill	34.642353, -118.174331
18	800315E	Wood Pole	Quartz Hill	34.641992, -118.174761
19	K10771Y	Wood Pole	Quartz Hill	34.641853, -118.177742
20	4592027E	Wood Pole	Quartz Hill	34.642158, -118.177089
21	800318E	Wood Pole	Quartz Hill	34.641811, -118.176250
22	1122266E	Wood Pole	Quartz Hill	34.642419, -118.175619
23	800317E	Wood Pole	Quartz Hill	34.642419, -118.175619
24	593191H	Wood Pole	Quartz Hill	34.642078, -118.175997
25	800316E	Wood Pole	Quartz Hill	34.642419, -118.175619
26	800315E	Wood Pole	Quartz Hill	34.641858, -118.174833
27	2176086E	Wood Pole	Quartz Hill	34.641925, -118.174861
28	955711E	Wood Pole	Quartz Hill	34.623303, -118.161050
29	1937703E	Wood Pole	Quartz Hill	34.623461, -118.160906
30	2199767E	Wood Pole	Leona Valley	34.618586, -118.281650
31	4767009E	Wood Pole	Leona Valley	34.618758, -118.282681
32	2199766E	Wood Pole	Leona Valley	34.618747, -118.282642
33	4872370E	Wood Pole	Leona Valley	34.618050, -118.281667
34	2199759E	Wood Pole	Leona Valley	34.617836, -118.282786
35	2199765E	Wood Pole	Leona Valley	34.619156, -118.283353
36	2199764E	Wood Pole	Leona Valley	34.619044, -118.284447
37	2109318E	Wood Pole	Leona Valley	34.619275, -118.284997
38	1162784E	Wood Pole	Leona Valley	34.619222, -118.285817
39	800243E	Wood Pole	Leona Valley	34.619453, -118.286708
40	800242E	Wood Pole	Leona Valley	34.619572, -118.286944
41	1450725E	Wood Pole	Leona Valley	34.619300, -118.287747
42	4630950E	Wood Pole	Leona Valley	34.619575, -118.287086

43	1021869E	Wood Pole	Leona Valley	34.619581, -118.293133
44	1021873E	Wood Pole	Leona Valley	34.620939, -118.296842
45	1897236E	Wood Pole	Leona Valley	34.620606, -118.295989
46	2337545E	Wood Pole	Leona Valley	34.620583, -118.295750
47	4145120E	Wood Pole	Leona Valley	34.620208, -118.295175
48	4248199E	Wood Pole	Leona Valley	34.620256, -118.294964
49	4248335E	Wood Pole	Leona Valley	34.620208, -118.295031
50	4188136E	Wood Pole	Leona Valley	34.620075, -118.294589
51	4855089E	Wood Pole	Leona Valley	34.619922, -118.294044
52	2305749E	Wood Pole	Leona Valley	34.620003, -118.294469
53	4590665E	Wood Pole	Lake Elizabeth	34.659394, -118.391819
54	2294011E	Wood Pole	Lake Elizabeth	34.659222, -118.391811
55	4552803E	Wood Pole	Lake Elizabeth	34.658572, -118.392003
56	1295880E	Wood Pole	Lake Elizabeth	34.658572, -118.392003
57	4628647E	Wood Pole	Lake Elizabeth	34.658083, -118.391869
58	1295882E	Wood Pole	Lake Elizabeth	34.658658, -118.391867
59	4628644E	Wood Pole	Lake Elizabeth	34.658294, -118.391783
60	4694514E	Wood Pole	Lake Elizabeth	34.658122, -118.391742
61	1699094E	Wood Pole	Lake Elizabeth	34.657086, -118.390989
62	4117866E	Wood Pole	Lake Elizabeth	34.656578, -118.390531
63	4117865E	Wood Pole	Lake Elizabeth	34.656578, -118.390531
64	4117767E	Wood Pole	Lake Elizabeth	34.656453, -118.390111
65	4147439E	Wood Pole	Lake Elizabeth	34.656203, -118.389511
66	477776E	Wood Pole	Lake Elizabeth	34.656114, -118.389428
67	4147440E	Wood Pole	Lake Elizabeth	34.656017, -118.389047
68	4595389E	Wood Pole	Littlerock	34.525922, -118.010753
69	4145770E	Wood Pole	Littlerock	34.526692, -118.011264
70	778513E	Wood Pole	Littlerock	34.513592, -117.975006
71	778512E	Wood Pole	Littlerock	34.513833, -117.975275
72	778511E	Wood Pole	Littlerock	34.513914, -117.976358
73	778510E	Wood Pole	Littlerock	34.513853, -117.977281
74	778509E	Wood Pole	Littlerock	34.513831, -117.976114
75	4604451E	Wood Pole	Littlerock	34.513836, -117.976675
76	4749144E	Wood Pole	Littlerock	34.513828, -117.977203
77	778507E	Wood Pole	Littlerock	34.513825, -117.977611
78	4749145E	Wood Pole	Littlerock	34.513839, -117.978000
79	778506E	Wood Pole	Littlerock	34.513819, -117.980853
80	1310390E	Wood Pole	Littlerock	34.513822, -117.978903
81	1310389E	Wood Pole	Littlerock	34.521183, -117.982192
82	2227090E	Composite Pole	Palmdale	34.548667, -118.136208
83	1048976E	Wood Pole	Palmdale	34.549364, -118.136822
84	4778412E	Wood Pole	Palmdale	34.549150, -118.136869
85	4958419E	Wood Pole	Palmdale	34.549778, -118.137417
86	4631925E	Wood Pole	Palmdale	34.549378, -118.137767
87	2111025E	Wood Pole	Palmdale	34.549500, -118.137911
88	1897768E	Wood Pole	Palmdale	34.549831, -118.138544
89	1048971E	Wood Pole	Palmdale	34.549442, -118.140189
90	1048970E	Composite Pole	Palmdale	34.549403, -118.141181
91	1048969E	Wood Pole	Palmdale	34.549461, -118.142092

92	1586794E	Wood Pole	Palmdale	34.549422, -118.142475
93	1048968E	Wood Pole	Palmdale	34.549472, -118.142903
94	P5564234	Mini Pad	Quartz Hill/Lancaster	34.651067, -118.202678
95	P5564235	Mini Pad	Quartz Hill/Lancaster	34.651486, -118.202831
96	P5444917	Mini Pad	Quartz Hill/Lancaster	34.651269, -118.203111
97	P5444916	Mini Pad	Quartz Hill/Lancaster	34.652469, -118.203594
98	P5515257	Pad Transformer	Palmdale	34.629142, -118.219611
99	P5515258	Pad Transformer	Palmdale	34.629289, -118.219778
100	P5517062	Pad Capacitor Bank	Palmdale	34.629908, -118.219317
101	P5517103	Pad Transformer	Palmdale	34.629969, -118.219583
102	P5453337	Pad Transformer	Palmdale	34.628619, -118.219411
103	5484585	Vault	Palmdale	34.618464, -118.199622
104	P5484586	Mini Pad	Palmdale	34.618447, -118.200158
105	5499998	Vault	Palmdale	34.619064, -118.204703
106	5555784	Load Break Fuse Can	Palmdale	34.619606, -118.205342

#### 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 593191H: (1) an SCE crossarm had a lateral crack at the insulator pin, along with a longitudinal crack forming; (2) the SCE crossarm exhibited signs of torsion on both ends.
- Pole 778513E: the bird guard was dislodged from the insulator and flipped below the conductor.
- Pole 1310390E: the pole has a longitudinal crack propagating from the primary crossarm throughbolt to the v-brace throughbolt.

#### ***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 800317E – 800317E is the correct structure number, damaged cross arm. **SCE Response:** Due on 10/30/2026*
- *Pole 778513E – Damaged dislodged bird guard. **SCE Response:** Due on 10/23/2028.*
- *Pole 1310390E – Damaged cross arm. **SCE Response:** Due on 03/22/2029.*

**GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 8** requires the minimum vertical clearance between supply conductors “0 – 750 Volts (Including Service Drops) and Trolley Feeders” on separate crossarms or other supports at different levels from “Communication Conductors and Service Drops” supported on the same pole to be 48 inches.

An SCE secondary conductor supported on Pole 593247H had less than 48 inches of vertical clearance, at midspan, from 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 it will be addressed in accordance with SCE's maintenance program.*

- *Pole 593247H – Secondary conductor has less than 48 inches of vertical clearance to communication conductor. **SCE Response:** Due on 03/08/2031*

**GO 95, Rule 49.2-C, Crossarms, Strength,** states in part:

*Crossarms shall be securely supported by bracing, where necessary, to withstand unbalanced vertical loads and to prevent tipping of any arm sufficiently to decrease clearances below the values specified in Section III. Such bracing shall be securely attached to poles and crossarms*

The bracing on each of the following SCE poles was damaged:

- Pole 800308E: The v-brace supporting the primary crossarm was damaged and missing a metal brace on one side.
- Pole 800311E: The v-brace supporting the primary crossarm was damaged and the metal brace on one side was left hanging.

***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 800308E – Flat brace not attached correctly (Hanging). **SCE Response:** Due on 10/29/2026.*
- *Pole 800311E – Flat brace not attached correctly (Hanging). **SCE Response:** Due on 10/30/2026.*

**GO 95, Rule 51.6, 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. A pair of signs may be stacked to a height of no more than 12 inches. 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 SCE poles were damaged:

- 800307E
- 800314E
- K10769Y

***SCE Response:***

*Two of 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 800307E – 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 800314E – 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:***

*One of the above conditions has been recorded in SCE’s Work Management System and it will be addressed in accordance with SCE’s maintenance program.*

- *Pole K10769Y – Flat brace not attached correctly (Hanging). **SCE Response:** Due on 10/26/2030.*

**GO 95, Rule 54.6-B, 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 on each of the following poles was missing or damaged:

- Pole K10769Y
- Pole K10770Y
- Pole 800315E

***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 K10769Y – Damaged or missing ground molding. **SCE Response:** Due on 10/26/2030.*
- *Pole K10770Y – Damaged or missing ground molding. **SCE Response:** Due on 12/01/2028.*
- *Pole 800315E – Damaged or missing ground molding. **SCE Response:** Due on 12/01/2028.*