PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

July 18, 2025 EA2024-1277

Melvin Stark
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Southern California Edison Company (SCE)
1 Innovation Way
Pomona, CA 91786

Subject: Electric Distribution Audit of SCE's Blythe District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Jose Lastra of my staff conducted an electric distribution audit of SCE's Blythe District on April 21-25, 2025. The audit included a review of SCE's records and field inspections of SCE's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). Included with this letter is a copy of the audit findings that itemize the violations discovered during the audit. Please advise me no later than August 18, 2025, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Jose Lastra (213) 507-1438 or jose.lastra@cpuc.ca.gov.

Sincerely,

Fadi Daye

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Derek Fong, Senior Utilities Engineer, ESRB, SED, 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 ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

SCE's records indicated that from March 2021 through September 2024, SCE completed 7 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 4 pending patrol inspections that were past SCE's scheduled due date.

SCE's records indicated that from March 2021 through September 2024, SCE completed 1,182 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 100 pending detailed inspections that were past SCE's scheduled due date.

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 March 2021 through September 2024, SCE completed 7 underground inspections past SCE's scheduled due date.

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 March 2021 through September 2024, SCE completed 30 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 62 open overhead work orders that were past SCE's scheduled due date for corrective action.

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 March 2021 through September 2024, SCE completed 2 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 8 open underground work orders that were past SCE's scheduled due date for corrective action.

III. Field Inspections

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

No.	Structure ID.	Type of Structure	Location
1	4459491E	Wood Pole	Blythe
2	1904069E	Wood Pole	Blythe
3	1904070E	Wood Pole	Blythe
4	4800256E	Wood Pole	Blythe
5	1904072E	Wood Pole	Blythe
6	1903969E	Wood Pole	Blythe
7	1903968E	Wood Pole	Blythe
8	1841135E	Wood Pole	Blythe
9	4912950E	Wood Pole	Blythe
10	1903967E	Wood Pole	Blythe
11	1903966E	Wood Pole	Blythe
12	4320143E	Wood Pole	Blythe
13	4526071E	Wood Pole	Blythe
14	1903964E	Wood Pole	Blythe
15	1903963E	Wood Pole	Blythe
16	4459475E	Wood Pole	Blythe
17	4844500E	Wood Pole	Havasu Landing
18	4409589E	Wood Pole	Havasu Landing
19	4409589E	Wood Pole	Havasu Landing
20	4409588E	Wood Pole	Havasu Landing
21	1280385E	Wood Pole	Havasu Landing
22	4713073E	Wood Pole	Havasu Landing
23	1280386E	Wood Pole	Havasu Landing
24	4628839E	Wood Pole	Havasu Landing
25	1280229E	Wood Pole	Havasu Landing
26	4800713E	Wood Pole	Havasu Landing
27	1280388E	Wood Pole	Havasu Landing
28	2267777E	Wood Pole	Havasu Landing
29	2326403	Wood Pole	Havasu Landing
30	2350527E	Wood Pole	Havasu Landing
31	2326402E	Wood Pole	Havasu Landing
32	2326401E	Wood Pole	Havasu Landing
33	1511610E	Wood Pole	Havasu Landing
34	1758064E	Wood Pole	Havasu Landing
35	2310798E	Wood Pole	Havasu Landing
36	1280393E	Wood Pole	Havasu Landing
37	1280392E	Wood Pole	Havasu Landing
38	1969635E	Wood Pole	Havasu Landing
39	1969637E	Wood Pole	Havasu Landing
40	1280395E	Wood Pole	Havasu Landing

41	4816471E	Wood Pole	Havasu Landing
42	4816470E	Wood Pole	Havasu Landing
43	4556376E	Wood Pole	Vidal
44	2310913E	Wood Pole	Vidal
45	4320713E	Wood Pole	Vidal
46	2310914E	Wood Pole	Vidal
47	2311864E	Wood Pole	Vidal
48	2310915E	Wood Pole	Vidal
49	2310916E	Wood Pole	Vidal
50	2310917E	Wood Pole	Vidal
51	4749086E	Wood Pole	Vidal
52	2311870E	Wood Pole	Vidal
53	2310918E	Wood Pole	Vidal
54	2310919E	Wood Pole	Vidal
55	4199677E	Wood Pole	Vidal
56	2310921E	Wood Pole	Vidal
57	2310922E	Wood Pole	Vidal
58	V5584621	Vault	Blythe
59	V5584619	Vault	Blythe
60	V5500613	Vault	Blythe
61	V5584614	Vault	Blythe
62	V5584613	Vault	Blythe
63	PME0235	PME	Blythe
64	P5581635	Padmount	Blythe
65	P5419213	Padmount	Blythe
66	P5650200	Padmount	Blythe
67	P5376179	Padmount	Blythe
68	P5419338	Padmount	Blythe
69	P5419337	Padmount	Blythe
70	P5419336	Padmount	Blythe
71	P5495662	Padmount	Blythe
72	4794204E	Wood Pole	Blythe
73	5021006E	Wood Pole	Blythe
74	5021005E	Wood Pole	Blythe
75	5021004E	Wood Pole	Blythe
76	5021003E	Wood Pole	Blythe
77	4794215E	Wood Pole	Blythe
78	4794214E	Wood Pole	Blythe
79	5021002E	Wood Pole	Blythe
80	5021001E	Wood Pole	Blythe
81	4794213E	Wood Pole	Blythe
82	4794212E	Wood Pole	Blythe
83	4794211E	Wood Pole	Blythe
84	4794210E	Wood Pole	Blythe
85	4794209E	Wood Pole	Blythe

86	4794228E	Wood Pole	Blythe
87	4794208E	Wood Pole	Blythe
88	4794207E	Wood Pole	Blythe
89	4794206E	Wood Pole	Blythe
90	4794205E	Wood Pole	Blythe

IV. Field Inspection Violations List

My staff observed the following violations during the field inspections portion of the audit.

GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:

> *(3) 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 10 business days after the discovery.*

SCE did not notify the responsible third-party of the following safety hazards:

- Pole 1904072E: a third party down guy anchor was abandoned in proximity to the pole
- Pole 1969637E: a third party communication conductor was cut and wrapped around the pole

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 the following poles required maintenance:

- Pole 1903969E: the SCE down guy wire was strained by a buddy pole
- Pole 2310914E: the primary crossarm had a longitudinal crack, reaching the bolt of a pin insulator
- Pole 2311870E: the visibility strips on the pole were damaged
- Pole 1903964E: a riser strap attached to the conduit riser on was damaged.

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:

- 4459491E
- 4320143E

- 4800256E
- 1903969E
- 4320143E
- 2310919E
- 2310921E
- 4794214E

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 attached to each the following poles was damaged:

- 4526071E
- 2326402E
- 2310914E
- 2310916E
- 2310918E
- 2310921E
- 4794214E

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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 down guy wire supporting each of the following poles was not maintained taut:

- Pole 1903967E
- Pole 1903964E
- Pole 1903963E

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.*

The following underground facilities required maintenance:

- Padmount P5419338 – The entire padmount housing was shifted approximately 6 inches, causing misalignment of the fuse cap casing

- Padmount P5419336 – The entire padmount housing was shifted approximately 4 inches, causing misalignment of the fuse cap casing. Also, the pressure relief valve had leaked oil into the padmount enclosure.

GO 128, Rule 34.3-B, Guarding Live Parts, states in part:

> *Pad-mounted equipment that contains exposed live parts shall be installed to resist the passing of a wire the equivalent of a bare number 18 AWG from the outside between the pad and the housing of the equipment, into the compartment which contains live parts when it is closed.*

The padmounted structure P5419338 had a space between the pad and equipment that would allow an 18 AWG wire to pass into the compartment containing live parts when it is closed.