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

September 2, 2025 EA2025-1286

Melvin Stark
Principal Manager, T&D Compliance Integration
Southern California Edison Company (SCE)
1 Innovation Way
Pomona, CA 91786

Subject: Electric distribution audit of SCE's Victorville 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 Victorville District from June 16-20, 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 October 2, 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: Leslie 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 insuring that they are in good condition so as to conform with these rules.*

SCE's records indicated that from May 2024 through May 2025, SCE completed 12 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 22 pending patrol inspections that were past SCE's scheduled due date.

SCE's records indicated that from May 2024 through May 2025, SCE completed 649 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 44 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 these rules.*

SCE's records indicated that from May 2024 through May 2025, SCE completed 76 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 11 pending underground inspections that were 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 May 2024 through May 2025, SCE completed 632 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 130 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 May 2024 through May 2025, SCE completed 51 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 13 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 inspection portion of the audit:

| No. | Structure ID. | Type of Structure | Location |
|---|---|---|---|
| 1 | 4071402E | Wood Pole | Pinon Hills |
| 2 | 2360755E | Wood Pole | Pinon Hills |
| 3 | 2360756E | Wood Pole | Pinon Hills |
| 4 | 3005918E | Wood Pole | Pinon Hills |
| 5 | 3005917E | Wood Pole | Pinon Hills |
| 6 | 4800906E | Wood Pole | Pinon Hills |
| 7 | 4976454E | Wood Pole | Pinon Hills |
| 8 | 4769349E | Wood Pole | Pinon Hills |
| 9 | 4308574E | Wood Pole | Pinon Hills |
| 10 | 2250058E | Wood Pole | Pinon Hills |
| 11 | 2377624E | Wood Pole | Pinon Hills |
| 12 | 4800905E | Composite Pole | Pinon Hills |
| 13 | 4896312E | Composite Pole | Pinon Hills |
| 14 | 42235873E | Wood Pole | Phelan |
| 15 | 4185237E | Wood Pole | Phelan |
| 16 | 4963344E | Wood Pole | Phelan |
| 17 | 4225412E | Wood Pole | Phelan |
| 18 | 4697085E | Wood Pole | Phelan |
| 19 | 4773356E | Wood Pole | Phelan |
| 20 | 4697084E | Wood Pole | Phelan |
| 21 | 4185236E | Wood Pole | Phelan |
| 22 | 4697083E | Wood Pole | Phelan |
| 23 | 4773355E | Wood Pole | Phelan |
| 24 | 4697082E | Wood Pole | Phelan |
| 25 | 4616029E | Wood Pole | Phelan |
| 26 | 2122375E | Wood Pole | Phelan |
| 27 | 2185430E | Wood Pole | Phelan |
| 28 | 2185431E | Wood Pole | Phelan |
| 29 | 1601624E | Wood Pole | Lucerne Valley |
| 30 | 1552387E | Wood Pole | Lucerne Valley |
| 31 | 21850-CIT | Wood Pole | Lucerne Valley |
| 32 | 427186 | Wood Pole | Lucerne Valley |
| 33 | 1757109E | Wood Pole | Lucerne Valley |
| 34 | 363274S | Wood Pole | Lucerne Valley |
| 35 | 363275S | Wood Pole | Lucerne Valley |
| 36 | 463221 | Wood Pole | Lucerne Valley |
| 37 | 21849-CIT | Wood Pole | Lucerne Valley |
| 38 | 4020396E | Wood Pole | Lucerne Valley |
| 39 | 63192 | Wood Pole | Lucerne Valley |
| 40 | 21848-CIT | Wood Pole | Lucerne Valley |
| 41 | 20391CIT | Wood Pole | Lucerne Valley |
| 42 | 427362S | Wood Pole | Lucerne Valley |

| | | | |
|---|---|---|---|
| 43 | 4680472E | Wood Pole | Lucerne Valley |
| 44 | 1785245E | Wood Pole | Apple Valley |
| 45 | 1785244E | Wood Pole | Apple Valley |
| 46 | 1785246E | Wood Pole | Apple Valley |
| 47 | 1907190E | Wood Pole | Apple Valley |
| 48 | 53491CTC | Wood Pole | Apple Valley |
| 49 | 67501 | Wood Pole | Apple Valley |
| 50 | 67502S | Wood Pole | Apple Valley |
| 51 | 67503S | Wood Pole | Apple Valley |
| 52 | 67504S | Wood Pole | Apple Valley |
| 53 | 67505S | Wood Pole | Apple Valley |
| 54 | 67713S | Wood Pole | Apple Valley |
| 55 | 67506S | Wood Pole | Apple Valley |
| 56 | 67711 | Wood Pole | Apple Valley |
| 57 | 1785243E | Wood Pole | Apple Valley |
| 58 | 4939438E | Wood Pole | Apple Valley |
| 59 | 2360629E | Wood Pole | Apple Valley |
| 60 | 63869S | Wood Pole | Apple Valley |
| 61 | 4920744E | Wood Pole | Apple Valley |
| 62 | 2252969E | Wood Pole | Apple Valley |
| 63 | 1601037E | Wood Pole | Apple Valley |
| 64 | 1601036E | Wood Pole | Apple Valley |
| 65 | 1601035E | Wood Pole | Apple Valley |
| 66 | 4962796E | Wood Pole | Apple Valley |
| 67 | 1599791E | Wood Pole | Apple Valley |
| 68 | 1601034E | Wood Pole | Apple Valley |
| 69 | 265980 | Wood Pole | Apple Valley |
| 70 | 4893706E | Wood Pole | Apple Valley |
| 71 | 2042972E | Wood Pole | Apple Valley |
| 72 | 2042973E | Wood Pole | Apple Valley |
| 73 | 1601033E | Wood Pole | Apple Valley |
| 74 | 4071180E | Wood Pole | Apple Valley |
| 75 | 4071181E | Wood Pole | Apple Valley |
| 76 | 4920715E | Wood Pole | Apple Valley |
| 77 | 26737 | Wood Pole | Apple Valley |
| 78 | 1601032E | Wood Pole | Apple Valley |
| 79 | Secondary Pole Adjacent to 1601032E | Wood Pole | Apple Valley |
| 80 | 4893705E | Wood Pole | Apple Valley |
| 81 | Secondary Pole Adjacent to 4893705E | Wood Pole | Apple Valley |
| 82 | 2360982E | Wood Pole | Apple Valley |
| 83 | 1601031E | Wood Pole | Apple Valley |
| 84 | 4893704E | Wood Pole | Apple Valley |
| 85 | P5610823 | Padmount | Apple Valley |
| 86 | P5610821 | Padmount | Apple Valley |
| 87 | P5403020 | Padmount | Apple Valley |
| 88 | 5541145 | Vault | Apple Valley |
| 89 | 5583256 | SOE | Apple Valley |

| | | | |
|---|---|---|---|
| 90 | P5386750 | Mini Padmount | Apple Valley |
| 91 | P5578445 | Mini Padmount | Apple Valley |
| 92 | P5578447 | Mini Padmount | Apple Valley |
| 93 | P5653996 | Mini Padmount | Apple Valley |
| 94 | P5653995 | Mini Padmount | Apple Valley |

## IV. Field Inspection Violations List

My staff observed the following violations during the field inspection 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 2360756E: due to an incomplete pole transfer, a third-party communications conductor (passing unattached) was touching the SCE pole
- Pole 4800905E: a third-party buddy pole, resulting from an incomplete pole transfer, was touching an SCE riser
- Pole 2185430E: due to an incomplete pole transfer, a third-party communications conductor (passing unattached) was touching the SCE pole
- Pole 1601624E: a third-party communications service drop was touching an SCE ground moulding and ground wire
- Pole 63869S: a third-party communications service drop was supported on an SCE service drop via a rope.

**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 pole mounted transformer on Pole 67503S was weeping oil on its casing.

**GO 95, Rule 35, Vegetation Management,** states in part:

> *When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).*

The SCE service drop supported on Pole 2252969E was strained and abraded by a tree near.

**GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 19** requires the minimum radial clearance of "Guys and span wires passing conductors supported on the same poles" from "0 – 750 Volts (Including Service Drops) and Trolley Feeders" supported on the same pole to be 3 inches.

The SCE span guy wire supporting Pole 1785243E was contacting an SCE service drop supported on the same pole.

**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:

- 363274S
- 21849-CIT
- 67501
- 67505S

**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 4185236E
- Pole 1601624E
- Pole 1907190E

**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 Pole 2122375E was loose.

**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.*

Padmounted structure No. P5386750 had a significant amount of oil within the enclosure underneath the Bay-O-Net Fuses. Additionally, the oil sight glass was completely empty.