



Desiree Villalobos
Principal Manager
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October 19, 2026

Majed Ibrahim
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: EA2026-1491 Electric Distribution Audit of Southern California Edison's Montebello District

Mr. Ibrahim:

Your letter, dated September 18, 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 Montebello District from July 13, 2026 to July 17, 2026.

Your letter requested a response by October 19, 2026. Attached are the conditions identified in your letter, along with SCE's responses and corresponding actions.

Sincerely,

A handwritten signature in cursive script that reads "Desiree Villalobos".

Desiree Villalobos
Principal Manager, T&D Compliance
1 Innovation Way
Pomona, CA 91768

Enclosures: SED Audit Findings and SCE's Responses to Findings

Cc: Koko Tomassian, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Saimon Islam, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records
- Late Inspections
- Work Orders Created from Inspections
- Repair Work Orders
- 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 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 calendar year 2023 through June 24, 2026, SCE had 868 overhead detailed inspections and 18 above ground patrol inspections which had either been completed after SCE's scheduled due date or were past due and had not yet been completed as of June 24, 2026.

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 calendar year 2023 through June 24, 2026, it completed 1010 overhead detailed inspections past SCE's due date. Additionally, as of the date of the audit, SCE had 108 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 calendar year 2023 through June 24, 2026, SCE had 83 underground detailed inspections which had either been completed after SCE's scheduled due date or which were past due and had not yet been completed as of June 24, 2026.

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 calendar year 2023 through June 24, 2026 it had 78 underground inspections that were completed 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 1, 2023, through May 31, 2026, SCE completed 587 overhead work orders past SCE's due date for corrective action. Additionally, as of June 28, 2026, SCE had 241 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 June 1, 2023, through May 31, 2026, SCE had 587 overhead work orders that were completed past SCE's scheduled due date for corrective action. Additionally, as of the date of the audit, SCE had 241 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 various 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 1, 2023, through May 31, 2026, SCE completed 62 underground work orders past SCE's due date for corrective action. Additionally, as of June 28, 2026, SCE had 49 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 June 1, 2023, through May 31, 2026, SCE had 62 underground work orders that were past SCE's scheduled due date for corrective action. Additionally, as of the date of the audit, SCE had 49 open 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 various reasons, including but not limited to Permits, System Emergencies, and Customer Issues.

III. Field Inspections

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

No.	Facility ID No.	Facility Type	City	Coordinates
1	1455398E	Utility Pole	Monterey Park	34.0353277 , -118.1193843
2	777501E	Utility Pole	Monterey Park	34.0350477 , -118.1186888
3	4381036E	Utility Pole	Monterey Park	34.0351382 , -118.1189064
4	4356239E	Utility Pole	Monterey Park	34.0350475 , -118.1191014
5	777505E	Utility Pole	Monterey Park	34.0348108 , -118.1195238
6	777506E	Utility Pole	Monterey Park	34.0346722 , -118.1198643
7	4356350E	Utility Pole	Monterey Park	34.0345183 , -118.1202438
8	777509E	Utility Pole	Monterey Park	34.0343416 , -118.1205417
9	777508E	Utility Pole	Monterey Park	34.0343291 , -118.1205465
10	777511E	Utility Pole	Monterey Park	34.0341841 , -118.1210314
11	777510E	Utility Pole	Monterey Park	34.0341776 , -118.1209577
12	4356232E	Utility Pole	Monterey Park	34.0340815 , -118.1214067
13	4419689E	Utility Pole	Monterey Park	34.0341079 , -118.1213999
14	777515E	Utility Pole	Monterey Park	34.0340671 , -118.1219037
15	777514E	Utility Pole	Monterey Park	34.0340418 , -118.1218704
16	777516E	Utility Pole	Monterey Park	34.0340533 , -118.1222716
17	777517E	Utility Pole	Monterey Park	34.0340541 , -118.1227182
18	4430089E	Utility Pole	Monterey Park	34.0378303 , -118.1304626
19	808995E	Utility Pole	Monterey Park	34.0384317 , -118.130518
20	4563034E	Utility Pole	Monterey Park	34.0384366 , -118.1305497
21	808994E	Utility Pole	Monterey Park	34.0387194 , -118.1302749
22	4430088E	Utility Pole	Monterey Park	34.038969 , -118.1300325
23	808992E	Utility Pole	Monterey Park	34.0392109 , -118.1298666
24	808991E	Utility Pole	Monterey Park	34.039487 , -118.1298303
25	808990E	Utility Pole	Monterey Park	34.039813 , -118.1297923
26	808989E	Utility Pole	Monterey Park	34.0401476 , -118.1297667
27	808988E	Utility Pole	Monterey Park	34.0405003 , -118.1297807
28	808987E	Utility Pole	Monterey Park	34.0407851 , -118.1297894
29	4183896E	Utility Pole	Rosemead	34.078177 , -118.0804751
30	838752H	Utility Pole	Rosemead	34.0781512 , -118.0805877
31	1579505E	Utility Pole	Rosemead	34.0783655 , -118.0804933
32	4761312E	Streetlight Pole	Rosemead	34.0786105 , -118.0806161
33	966701E	Streetlight Pole	Rosemead	34.0786954 , -118.0801477
34	1579504E	Utility Pole	Rosemead	34.0787594 , -118.0805068
35	380730E	Utility Pole	Rosemead	34.0791343 , -118.0805145

36	4345287E	Utility Pole	Rosemead	34.0793046 , -118.0806313
37	1579503E	Utility Pole	Rosemead	34.0797132 , -118.080545
38	937526E	Utility Pole	Rosemead	34.0796566 , -118.080386
39	937527E	Utility Pole	Rosemead	34.0796695 , -118.0797727
40	937528E	Utility Pole	Rosemead	34.0796985 , -118.0791033
41	1237883E	Utility Pole	El Monte	34.0795107 , -118.0057998
42	1237884E	Utility Pole	El Monte	34.0793218 , -118.0053767
43	1684907E	Utility Pole	El Monte	34.0794878 , -118.0058632
44	1684908E	Utility Pole	El Monte	34.0797442 , -118.0056935
45	1684930E	Utility Pole	El Monte	34.0803863 , -118.0054232
46	1574000E	Utility Pole	El Monte	34.0803699 , -118.0053449
47	1658372E	Utility Pole	El Monte	34.0809093 , -118.005172
48	1658371E	Utility Pole	El Monte	34.0814454 , -118.0048929
49	1547338E	Utility Pole	El Monte	34.0818302 , -118.0047283
50	575682E	Utility Pole	El Monte	34.0819433 , -118.0044472
51	1547337E	Utility Pole	El Monte	34.0821624 , -118.0045755
52	1547336E	Utility Pole	El Monte	34.0823399 , -118.0046348
53	1026588H	Utility Pole	El Monte	34.0820859 , -118.0047709
54	4908205E	Utility Pole	El Monte	34.0804441 , -118.0055427
55	1684909E	Utility Pole	El Monte	34.079772 , -118.0060654
56	4412927E	Utility Pole	El Monte	34.0565438 , -118.0490761
57	2218733E	Utility Pole	El Monte	34.0565134 , -118.0490911
58	2218737E	Utility Pole	El Monte	34.0580961 , -118.0490927
59	2218738E	Utility Pole	El Monte	34.0579295 , -118.0491128
60	4568231E	Utility Pole	El Monte	34.0576857 , -118.0492118
61	2218736E	Utility Pole	El Monte	34.057445 , -118.0491988
62	2218734E	Utility Pole	El Monte	34.0571269 , -118.049214
63	4568232E	Utility Pole	El Monte	34.0567465 , -118.0491926
64	1262606E	Utility Pole	Whittier	33.987948 , -118.0414831
65	4739538E	Utility Pole	Whittier	33.987482 , -118.0415058
66	2275566E	Utility Pole	Whittier	33.9870624 , -118.041479
67	3000970E	Utility Pole	Whittier	33.9866742 , -118.0414292
68	954071E	Utility Pole	Whittier	33.9865353 , -118.0415036
69	3000870E	Utility Pole	Whittier	33.98627 , -118.0417899
70	953575E	Utility Pole	Whittier	33.9862224 , -118.0419903
71	4679167E	Utility Pole	Whittier	33.9862746 , -118.0422963
72	4614418E	Utility Pole	Whittier	33.9862619 , -118.042649
73	4739540E	Utility Pole	Whittier	33.9861593 , -118.0426611
74	1951165E	Utility Pole	Whittier	33.9858306 , -118.0426763

75	1865CT	Utility Pole	Whittier	33.9858814 , -118.0427404
76	1866CT	Utility Pole	Whittier	33.9858694 , -118.0432507
77	4724196E	Utility Pole	Whittier	33.9858606 , -118.0439706
78	1858177E	Utility Pole	Whittier	33.9858787 , -118.0443263
79	1868CT	Utility Pole	Whittier	33.985902 , -118.0444308
80	4771984E	Utility Pole	Whittier	33.985881 , -118.044945
81	1662CT	Utility Pole	Whittier	33.9858824 , -118.0454537
82	W11192Y	Utility Pole	Whittier	33.9858868 , -118.045743
83	1993814E	Utility Pole	Pico Rivera	34.0021921 , -118.0841859
84	4308190E	Utility Pole	Pico Rivera	34.0020967 , -118.084444
85	4345469E	Utility Pole	Pico Rivera	34.0022808 , -118.0849029
86	1043224E	Utility Pole	Pico Rivera	34.0024757 , -118.0852761
87	1778019E	Utility Pole	Pico Rivera	34.0025041 , -118.0843348
88	1778018E	Utility Pole	Pico Rivera	34.0030236 , -118.0842094
89	10434040E	Utility Pole	Pico Rivera	34.0034572 , -118.0842936
90	1778015E	Utility Pole	Pico Rivera	34.0035437 , -118.084609
91	5518754DF	Padmounted Transformer	Rosemead	34.0424628 , -118.0868761
92	P5003581	Padmounted Transformer	Rosemead	34.0412443 , -118.0840747
93	P5003580	Padmounted Transformer	Rosemead	34.0406223 , -118.0842586
94	P5003579	Padmounted Transformer	Rosemead	34.0400409 , -118.0850009
95	5147425	BURD Transformer	Rosemead	34.0393556 , -118.083214
96	B5147423	BURD Transformer	Rosemead	34.0388134 , -118.0840292
97	S5208307	Vault	Rosemead	34.0335621 , -118.076215
98	5205308	Vault	Rosemead	34.0328868 , -118.0783706
99	5008938	Vault	Monterey Park	34.0550949 , -118.1404482
100	5008937	Vault	Monterey Park	34.0554501 , -118.1412991
101	5208112	Padmounted Transformer	Alhambra	34.0855665 , -118.1402814
102	P5567758	Padmounted Switch	Alhambra	34.0819879 , -118.142258
103	V5631649	Vault	Alhambra	34.0819281 , -118.1422551
104	5631654	Vault	Alhambra	34.0816914 , -118.1425515
105	5568000	Vault	Alhambra	34.0816411 , -118.1426812

IV. Field Inspection Violations List

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.

Ground wires and their moldings had been vandalized on each of the following three poles:

- 1866CT
- 1868CT
- 1043224E

SCE Response:

The 3 above conditions have been recorded in SCE's Work Management System, and they will be addressed in accordance with SCE's maintenance program.

- *Pole 1866CT – Damaged SCE ground molding. **SCE Response:** Due on 01/04/2027.*
- *Pole 1868CT – Damaged SCE ground molding. **SCE Response:** Due on 01/04/2027.*
- *Pole 1043224E – Damaged SCE ground molding. **SCE Response:** Due on 01/28/2027.*

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.

"High Voltage" signs on each of the following thirteen poles were either missing or damaged:

- 777509E
- 4356232E
- 777517E
- 4430089E
- 808994E
- 808990E
- 1579505E
- 937526E
- 937527E
- 1658371E
- 1684909E
- 2218736E
- 1043224E

SCE Response:

Eight of the above conditions were previously recorded in SCE's Work Management System at the time of the audit, 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 777509E – 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 4430089E – 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 808994E – 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 937526E – 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 1658371E – 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 1687909E – 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 2218736E – 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 1043224E – 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.*
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The five remaining conditions have been recorded in SCE's Work Management System, and they will be addressed in accordance with SCE's maintenance program.

- *Pole 4356232E – Damaged/missing SCE high sign. **SCE Response:** Due on 09/09/2030.*

- Pole 777517E – Damaged/missing SCE high sign. **SCE Response:** Due on 06/24/2031.
- Pole 1579805E – Damaged/missing SCE high sign. **SCE Response:** Due on 05/29/2031.
- Pole 808990E – Damaged/missing SCE high sign. **SCE Response:** Due on 07/14/2031.
- Pole 937527E – Damaged/missing SCE high sign. **SCE Response:** Due on 06/10/2029.

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.

Pole No. 808994E supported an unauthorized “Cash for Junk Cars” sign.

Pole No. 3000970E supported several unauthorized ornaments which were nailed to it.

SCE Response:

The two above conditions have been recorded in SCE’s Work Management System, and they will be addressed in accordance with SCE’s maintenance program.

- Pole 808994E – Unauthorized attachment (Sign). **SCE Response:** Due on 07/14/2031.
- Pole 3000970E – Unauthorized attachment (Ornaments). **SCE Response:** Due on 07/15/2031.

General Order 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be three inches.

An SCE down guy and a third-party communications conductor, both supported by Pole No. 1574000E, passed with approximately one inch of radial clearance.

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 1547000E – SCE down guy and communication cable clearance issue. **SCE Response:** Due on 07/02/2029.

GO 95, Rule 91.3-C, Stepping, states in part:

Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step.

The lowest step on each of the following poles was located at a height of less than 8 feet:

- 4356350E
- 777509E
- 777517E

SCE Response:

The three above conditions have been recorded in SCE's Work Management System, and they will be addressed in accordance with SCE's maintenance program.

- Pole 4356350E – Pole step is below 8 feet. ***SCE Response:*** Completed on 09/23/2026.
- Pole 777509E – Pole step is below 8 feet. ***SCE Response:*** Completed on 09/23/2026.
- Pole 777517E – Pole step is below 8 feet. ***SCE Response:*** Completed on 09/23/2026.

GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment.

A padmounted transformer, Structure No. 5208112, lacked adequate unobstructed working space in front of its doors.

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.

- Padmount P5208112 – Obstruction in front of padmount doors restricting access. ***SCE Response:*** Due on 07/20/2029.