BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Commission Order Instituting Investigation Into the Rates, Charges, Service and Practices of Pacific Gas and Electric Company.

Commission Order Instituting Rulemaking to Develop Standards for Electric System Reliability and Safety Pursuant to D96-09-073. I.95-02-015 (Filed February 22, 1995)

R.96-11-004 (Filed November 8, 1996)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL REPORT OF 2019 DISTRIBUTION INSPECTIONS SUBMITTED PURSUANT TO GENERAL ORDER NO. 165

CLAIRE E. TORCHIA KRIS G. VYAS

Attorneys for SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-6613
E-mail: kris.vyas@sce.com

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SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL REPORT OF 2019 DISTRIBUTION INSPECTIONS SUBMITTED PURSUANT TO GENERAL ORDER NO. 165 TABLE OF CONTENTS

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Pursuant to General Order No. 165 ("GO 165") and Decision No. ("D.") 97-03-070 issued by the California Public Utilities Commission (the "Commission"), Southern California Edison Company ("SCE") respectfully submits its Annual Report of distribution inspections completed in 2019 ("Report"). SCE submits this Report in accordance with D.12-01-032, issued in Rulemaking ("R.") 08-11-005. That decision amended the GO 165 reporting requirements effective January 12, 2012.

The data in this Report is based on information retrieved from SCE's Work Management System ("WMS") at a particular juncture. SCE's overhead and underground electric distribution system is large and dynamic. Equipment quantities, system configurations, and system conditions are continually changing as a result of many factors, including but not limited to:

(1) customer-related issues or constraints; (2) weather and environmental conditions; (3) the addition and/or removal of equipment to accommodate new customer connections and load growth; (4) requests from customers, cities, and governmental agencies to relocate facilities;

(5) the sale and/or acquisition of existing distribution systems; and (6) the retirement and

replacement of aging plant. In addition, minor errors may occur in the entry of data into WMS. For example, a large amount of data is entered into WMS by linemen, troublemen, and other field personnel that work on our electrical system. Although these field personnel receive training on the field tools (such as laptop computers), virtually none of these individuals are experts or specialists in data entry. Moreover, due in part to the fact that, over the many decades that SCE has served its customers, SCE has inherited certain grid assets from other utilities, SCE may occasionally discover an asset that was not mapped into SCE's records, and thus may not have full information regarding the asset.

Additionally, we are continuing to migrate to new software platforms for the field tools (laptop computers and tablets) used by field personnel to record and transmit inspection and maintenance information into WMS. Those changes affected how data was created, utilized, and managed.

As a result of the above factors, the data in the WMS changes on a daily basis as new entries and corrections are made, and as assets are entered or removed from the system.

Accordingly, a query to the WMS performed in the future will retrieve data that contains minor deviations from the data presented in the table below.

I.

SUMMARY OF SCE'S DISTRIBUTION INSPECTIONS

DURING CALENDAR YEAR 2019

Type of Inspection (1)	Due (2)	Outstanding (3)	COMPLETED
Patrols by Grid	17,403	0	17, 403
Streetlight Patrols by	498,292	21	498,271
Equipment			
Overhead Detailed by Grid	2,858	0	2,858
Underground Detailed by	163,194	2	163, 192
Equipment			
Wood Pole Intrusive by Pole	556	11	545

Notes on the Summary Table:

Column Number 1: Each inspection type is defined by the basis for actually reporting "units" of the inspection. Patrols and overhead detailed inspections account for each grid inspected, where a grid is a defined geographical area averaging about three quarters of a square mile. Streetlight patrols and underground detailed inspections account for each equipment and structure inspected. Intrusive pole inspections account for each individual pole inspected.

Column Number 2: This column reports total inspections due in the reporting period, and does not include outstanding inspections from prior years. Inspection records for years prior to 2019 are documented in SCE's previous annual GO 165 reports, on file with the Commission.

Column Number 3: This column reports total required inspections that were not completed in the reporting period. It does not include outstanding inspections from prior years. That information is documented in SCE's previous annual GO 165 reports, as submitted to the Commission.

Column Number 4: This column reports all completed inspections for the reporting period for each program.

<u>DETAILS OF SCE'S DISTRIBUTION INSPECTIONS DURING CALENDAR YEAR</u> <u>2019</u>

SCE includes below a narrative summary of the required GO 165 annual inspection performance data.

A. Patrols

1. Grid Patrols (Urban and Rural)

As defined in GO 165, a patrol is a simple visual inspection of applicable utility equipment and structures. A patrol is designed to identify obvious structural problems and hazards. GO 165 requires annual patrols of applicable utility equipment and structures in urban areas and all high fire hazard areas, and biennial patrols in non-high fire rural areas. In 2019, SCE completed patrols on all 17,403 urban and rural grids, which comprised 100% of its grids due for patrol type inspections.

2. Streetlight Patrols (Urban and Rural)

GO 165 requires annual patrols of all urban streetlights, and biennial patrols of all rural streetlights. In 2019, SCE patrolled 498,292 streetlights. There was an outstanding count of 21 streetlights that were not inspected due to various system issues, such as not having the complete set of data that is needed for the system to generate an inspection date for the asset. The 21 outstanding streetlight inspections will be conducted in 2020.

B. Detailed Inspections

Per the GO 165 requirements for specific types of equipment, SCE performs more extensive inspections when conducting detailed inspections on overhead and underground assets.

1. Overhead Detailed Inspections

SCE completed 100% of the 2,858 grid inspections that were due. As noted in the Inspection Summary Table, there were no outstanding overhead detailed grid inspections in 2019.1

2. Underground and Pad-Mounted Equipment Detailed Inspections

SCE completed 163,192 underground and pad-mounted equipment detailed inspections which comprised 99.99% of its underground and pad-mounted equipment due for inspections. As reflected in the Inspection Summary Table, there was an outstanding balance of 2 underground detailed inspections in 2019. These inspections were held up as a result of third-party constraints such as access or obstruction issues.

3. Wood Pole Inspections (Intrusive and Visual)

In 2019, SCE was able to continue the grid-based inspection program that it commenced in 2009. Under this program, we align our wood pole inspection cycles so that all poles located within the same grid share the same cycle. In other words, we perform intrusive inspections on all poles within a grid, not just those poles that happened to be due for intrusive inspection. As a result, in any given year the number of poles actually inspected will exceed the number of poles due to be inspected in the year.

A total of 556 wood poles were due for intrusive wood pole inspection in 2019. As a result of its grid-based inspection program, SCE completed many more inspections in 2019 than were due pursuant to GO 165 requirements: more than 100,000 actual intrusive inspections (boring-type inspections) and more than 22,950 visual inspections. A visual inspection includes sounding the pole using a tool such as a hammer and visually examining the pole rather than boring into the pole using a drill. Of the 556 inspections that were due in 2019, there were 11 outstanding wood pole

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As indicated in the Summary Table above, SCE performs these overhead detailed inspections on a grid basis. SCE completed over 2,800 grids in 2019. Within those grids, a limited number of poles had certain third-party constraints such as access or obstruction issues, and are marked for follow-up.

inspections; these inspections were held up as a result of third-party constraints such as access or obstruction issues.

Respectfully submitted,

CLAIRE E. TORCHIA KRIS G. VYAS

/s/ Kris G. Vyas

By: Kris G. Vyas

Attorneys for SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770 Telephone: (626) 302-6613

E-mail: kris.vyas@sce.com

July 1, 2020

VERIFICATION

I am the Managing Director for Compliance, Vegetation & Operational Services for Southern California Edison Company, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of July, 2020, at Pomona, California.

/s/ Christine Fanous

Christine Fanous Managing Director, Compliance, Vegetation and Operational Services, Transmission & Distribution SOUTHERN CALIFORNIA EDISON COMPANY

> 1 Innovation Way Pomona, California 91768