



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

January 16, 2024

Fadi Daye, P.E.  
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

EA2023-1097

SUBJECT: Audit of Southern California Edison's Fullerton District

Dear Mr. Daye:

Your letter, dated December 14, 2023, requested that we advise you of actions taken by Southern California Edison Company (SCE) to address conditions identified during the Safety and Enforcement Division's (SED's) distribution audit of Fullerton District from October 16, 2023 to October 20, 2023.

Your letter requested a response by January 15, 2024. 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".

Mel Stark  
Principal Manager, OE-T&D Compliance & Quality  
1 Innovation Way  
Pomona, CA 91768

Enclosure: SED Audit Findings and SCE's Responses

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC  
Stacey Ocampo, Utilities Engineer, Electric Safety and Reliability Branch, CPUC  
Jose Lastra, Utilities Engineer, Electric Safety and Reliability Branch, 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 August 2018 through August 2023, SCE completed 2 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 5 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 August 2018 through August 2023, it completed 2 annual grid patrols past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from August 2018 through August 2023, it had 5 pending patrol inspections 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 or environmental constraints, among other reasons.*

- SCE's records indicated that from August 2018 through August 2023, SCE completed 10,191 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 779 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 August 2018 through August 2023, it completed 10,191 overhead detailed inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from August 2018 through August 2023, it had 779 pending overhead detailed inspections 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 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 August 2018 through August 2023, SCE completed 385 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 29 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 August 2018 through August 2023, it completed 385 underground inspections past SCE's scheduled due date. Additionally, based on SCE's records, SCE notes that from August 2018 through August 2023, it had 29 pending underground inspections 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 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 August 2018 through August 2023, SCE completed 206 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 183 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 August 2018 through August 2023, SCE completed 206 overhead work orders that were completed or pending completion past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that from August 2018 through August 2023, it had 183 open overhead work orders past SCE's scheduled due date. Work orders may be pending or completed past their due dates for valid reasons per General Order 95, Rule 18, 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 August 2018 through August 2023, SCE completed 209 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 146 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 August 2018 through August 2023, SCE completed 209 underground work orders past SCE's due date for corrective action. Additionally, based on SCE's records, SCE notes that from August 2018 through August 2023, it had 146 open underground work orders 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 Inspection

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

No.	Structure ID	Type of Structure	Location
1	1655106E	Wood Pole	La Habra Heights
2	4088246E	Wood Pole	La Habra Heights
3	4792042E	Wood Pole	La Habra Heights
4	661937E	Wood Pole	La Habra Heights
5	1390682E	Wood Pole	La Habra Heights
6	661938E	Wood Pole	La Habra Heights
7	W9916Y	Wood Pole	La Habra Heights
8	4611781E	Wood Pole	La Habra Heights
9	4769967E	Wood Pole	La Habra Heights
10	718045E	Wood Pole	La Habra Heights
11	4007367E	Wood Pole	La Habra Heights
12	1914698E	Wood Pole	La Habra Heights
13	W9919Y	Wood Pole	La Habra Heights
14	2062059E	Wood Pole	La Habra Heights
15	1530473E	Wood Pole	La Habra Heights
16	4374335E	Wood Pole	Whittier
17	4374332E	Wood Pole	Whittier
18	4462645E	Wood Pole	Whittier
19	663631E	Wood Pole	Whittier
20	2365351E	Wood Pole	Whittier
21	4232248E	Wood Pole	Whittier
22	675242E	Wood Pole	Whittier
23	4385607E	Wood Pole	Whittier
24	783963E	Wood Pole	Whittier
25	4374331E	Wood Pole	Whittier
26	4551418E	Wood Pole	Whittier
27	2274435E	Wood Pole	Whittier
28	4374184E	Wood Pole	Whittier
29	4707808E	Wood Pole	Whittier
30	W13599Y	Wood Pole	Whittier
31	4811937E	Wood Pole	Whittier
32	4791687E	Wood Pole	La Habra Heights
33	551450E	Wood Pole	La Habra Heights
34	W10755Y	Wood Pole	La Habra Heights
35	562751E	Wood Pole	La Habra Heights
36	W10756Y	Wood Pole	La Habra Heights
37	562752E	Wood Pole	La Habra Heights
38	W1075Y	Wood Pole	La Habra Heights
39	4374522E	Wood Pole	La Habra Heights
40	W10758Y	Wood Pole	La Habra Heights
41	562754E	Wood Pole	La Habra Heights

42	1973658E	Wood Pole	La Habra Heights
43	1043778E	Wood Pole	Brea
44	274618E	Wood Pole	Brea
45	274617E	Wood Pole	Brea
46	274616E	Wood Pole	Brea
47	1077232E	Wood Pole	Brea
48	274615E	Wood Pole	Brea
49	1162944E	Wood Pole	Brea
50	1124431E	Wood Pole	Brea
51	1162945E	Wood Pole	Brea
52	641610H	Wood Pole	Brea
53	1162943E	Wood Pole	Brea
54	1162942E	Wood Pole	Brea
55	1162941E	Wood Pole	Brea
56	1162940E	Wood Pole	Brea
57	4551096E	Wood Pole	Brea
58	1617033E	Wood Pole	Brea
59	4016652E	Wood Pole	Brea
60	4426854E	Wood Pole	Yorba Linda
61	4602801E	Wood Pole	Yorba Linda
62	4703358E	Wood Pole	Yorba Linda
63	4426853E	Wood Pole	Yorba Linda
64	4851777E	Wood Pole	Yorba Linda
65	4853852E	Wood Pole	Yorba Linda
66	1498034E	Wood Pole	Yorba Linda
67	4919219E	Wood Pole	Yorba Linda
68	1272286E	Wood Pole	Yorba Linda
69	1272287E	Wood Pole	Yorba Linda
70	4705197E	Wood Pole	Yorba Linda
71	1314214E	Wood Pole	Fullerton
72	1272622E	Wood Pole	Fullerton
73	972610E	Wood Pole	Fullerton
74	1129219E	Wood Pole	Fullerton
75	677358E	Wood Pole	Fullerton
76	4908705E	Wood Pole	Fullerton
77	744869H	Wood Pole	Fullerton
78	4458440E	Wood Pole	Fullerton
79	677356E	Wood Pole	Fullerton
80	1272252E	Wood Pole	Fullerton
81	1272251E	Wood Pole	Fullerton
82	1291615E	Wood Pole	Fullerton
83	1291614E	Wood Pole	Fullerton
84	1543175E	Wood Pole	Fullerton
85	484620H	Wood Pole	Fullerton
86	1762343E	Wood Pole	Fullerton
87	1543174E	Wood Pole	Fullerton

88	1719898E	Wood Pole	Fullerton
89	1683550E	Wood Pole	Fullerton
90	1272264E	Wood Pole	Fullerton
91	P5399446	Pad-mounted Transformer	Whittier
92	P5487247	Pad-mounted Transformer	Whittier
93	P5439178	Pad-mounted Transformer	La Habra
94	P5703091	Pad-mounted Transformer	La Habra
95	P5146290	Pad-mounted Transformer	La Habra
96	V5318745	Vault	La Habra
97	B5147035	BURD Transformer	La Habra
98	S5177823	Subsurface Structure	Fullerton

#### IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections 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.*

An insulator attached to the secondary crossarm on Pole 1314214E was sunken.

#### ***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 1314214E – Sunken insulator on secondary crossarm. **SCE Response:** Due on 01/01/2029.*

The “eye” of the SCE down guy anchor attached to each of the following SCE poles was buried:

- 1530473E
- 4374522E
- 1162945E
- 4919219E

#### ***SCE Response:***

*Two 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. The remaining two conditions have been recorded in SCE's Work Management System and they will be addressed in accordance with SCE's maintenance program.*

- *Pole 1530473E – Buried down guy anchor. **SCE Response:** Due on 06/30/2024.*
- *Pole 4374522E – Buried down guy anchor. **SCE Response:** Due on 7/13/2028.*
- *Pole 1162945E – Buried down guy anchor. **SCE Response:** Due on 01/01/2027.*
- *Pole 4919219E – Buried down guy anchor. **SCE Response:** Due on 7/20/2026.*

**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.*

Unauthorized foreign attachments were observed on each of the following SCE poles:

- Pole W9916Y had an unauthorized “No Stopping Any Time” sign attached to it.



- Pole 4611781E had an unauthorized “No Stopping Any Time” sign attached to it.
- Pole 4769967E had an unauthorized “No Stopping Any Time” sign attached to it.
- Pole 718045E had an unauthorized “No Stopping Any Time” sign attached to it.

**SCE Response:**

*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.*

- *Pole W9916Y – Unauthorized attachment. **SCE Response:** Due on 5/16/2027.*
- *Pole 4611781E – Unauthorized attachment. **SCE Response:** Due on 7/20/2028.*
- *Pole 4769967E – Unauthorized attachment. **SCE Response:** Due on 7/20/2028.*
- *Pole 718045E – Unauthorized attachment. **SCE Response:** Due on 5/16/2027.*

**GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 10, Column C** requires the vertical separation between a secondary conductor and communication conductor supported on the same pole to be not less than 48 inches.

- An SCE secondary service drop was in contact with a communication service drop on pole 4385607E.
- An SCE secondary service drop was in contact with a communication service drop on pole 783963E.

**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 4385607E – Secondary service drop in contact with a communication service drop. **SCE Response:** Due on 01/01/2029.*
- *Pole 783963E – Secondary service drop in contact with a communication service drop. **SCE Response:** Due on 01/01/2029.*

**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).*

An SCE secondary service drop conductor attached to each of the following poles was strained by vegetation:

- 4462645E
- 4232248E

***SCE Response:***

*One of the above conditions was previously recorded in SCE's Work Management System at the time of the audit, and it will be addressed in accordance with SCE's maintenance program. The remaining condition has been recorded in SCE's Work Management System and it will be addressed in accordance with SCE's maintenance program.*

- *Pole 4462645E – Secondary service drop conductor strained by vegetation. SCE Response: Due on 01/01/2025.*
- *Pole 4232248E – Secondary service drop conductor strained by vegetation. SCE Response: Due on 8/29/2028.*

**GO 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 3 inches.

The radial clearance between an SCE down guy wire and a third-party communications conductor on Pole 4551096E was less than 3 inches.

***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 4551096E – Radial clearance between an SCE down guy wire and a third-party communications conductor is less than 3 inches. SCE Response: Due on 01/01/2029.*

**GO 95, Rule 44.1, Installation and Reconstruction**, states in part:

*Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.*

The pole loading calculations supplied by SCE for the following poles contained incorrect information:

- 1314214E – The pole loading data did not include a span guy which was present at the time of the field inspection.
- 1129219E – The pole loading data did not include a down guy which was present at the time of the field inspection.

***SCE Response:***

*The above conditions have been corrected by SCE's district planning personnel. Updated pole loading calculations for Pole 1314214E and Pole 1129219E were updated on 01/12/2024.*

**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 Pole 4919219E is missing on the bottom section of the pole, exposing the ground wire.

**SCE Response:**

*The above condition was previously recorded in SCE’s Work Management System at the time of the audit, and it will be addressed in accordance with SCE’s maintenance program.*

- *Pole 4919219E – Ground moulding Damaged/Missing. **SCE Response:** Due on 10/31/2024.*

**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 either missing or damaged:

- W9916Y
- W1075Y
- W10758
- 1077232E
- 1272286E
- 677358E
- 484620H

**SCE Response:**

*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 W9916Y – 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 W1075Y – 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 W10758 – High Voltage Sign Damaged/Missing. **SCE Response:** Due on 7/13/2028.*
- *Pole 1077232E – 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 1272286E – 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 677358E – 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 484620H – 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.*

**GO 95, Rule 54.8, Table 10** requires the minimum vertical clearance of insulated service drops of 0-750 volts above the roof of the house being served to be 0.5 inches.

A service drop attached to Pole 4385607E was touching the roof of the home it was servicing.

***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 4385607E – Service drop was touching the roof of the home. **SCE Response:** Due on 01/01/2029.*

**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 span guy wire attached to Pole 4811937E was loose and not taut.
- The down guy wire attached to Pole 1973658E was loose and not taut.
- The down guy wire attached to Pole 4703358E was loose and not taut.

***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 4811937E – Loose span guy wire. **SCE Response:** Due on 01/01/2029.*
- *Pole 1973658E – Loose down guy wire. **SCE Response:** Due on 01/01/2029.*
- *Pole 4703358E – Loose down guy wire. **SCE Response:** Due on 01/01/2029.*

**GO 95, Rule 56.9 Guy Marker (Guy Guard), states in part:**

*A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.*

The outer most down guy wire attached to pole 4705197E did not have a guy marker.

***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 4705197E – Missing down guy marker. **SCE Response:** Due on 01/01/2029.*

**GO 95, Rule 54.7, Climbing Space, states in part:**

*Climbing space shall be maintained from the ground level. Climbing space, measured from center line of pole, shall be provided on one side or in one quadrant of all poles or structures....*

The climbing space on each of the following poles was obstructed by vegetation:

- 4374335E
- W13599Y
- 4703358E
- 4426853E

***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 4374335E – Climbing space obstructed by vegetation. **SCE Response:** Due on 01/01/2025.*
- *Pole W13599Y – Climbing space obstructed by vegetation. **SCE Response:** Due on 01/01/2027.*
- *Pole 4703358E – Climbing space obstructed by vegetation. **SCE Response:** SCE field personnel visited the site on 1/2/2024 and confirmed that the condition no longer exists. No further action is required.*
- *Pole 4426853E – Climbing space obstructed by vegetation. **SCE Response:** SCE field personnel visited the site on 1/2/2024 and confirmed that the condition no longer exists. No further action is required.*

**GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:**

*The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.*

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

- 4426854E
- 4853852E
- 1272286E
- 1291614E

***SCE Response:***

*One of the above conditions was previously recorded in SCE's Work Management System at the time of the audit, and it will be addressed in accordance with SCE's maintenance program. The remaining three conditions have been recorded in SCE's Work Management System and they will be addressed in accordance with SCE's maintenance program.*

- *Pole 4426854E – Lowest pole step located at a height of less than eight feet. **SCE Response:** Due on 01/01/2029.*
- *Pole 4853852E – Lowest pole step located at a height of less than eight feet. **SCE Response:** Due on 10/29/2028.*
- *Pole 1272286E – Lowest pole step located at a height of less than eight feet. **SCE Response:** Due on 01/01/2029.*
- *Pole 1291614E – Lowest pole step located at a height of less than eight feet. **SCE Response:** Due on 01/01/2029.*