



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

January 22, 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

TA2023-1065  
Subject: Audit of Southern California Edison's North Coast Grid

Dear Mr. Daye:

Your letter, dated December 22, 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) transmission audit of North Coast Grid from June 20, 2023 to June 24, 2023.

Your letter requested a response by January 22, 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 Kjetsli, Program Manager, ESRB, SED, CPUC  
Majed Ibrahim, 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:

- SCE's Transmission Procedures
- Utility Statistics
- Patrol and Detailed Inspection Records
- Work Order Records
- Vegetation Management Records
- Infrared Testing Records
- Insulator Wash Records
- Third-party Notifications
- Foundation Resistance Testing Records

## II. Field Inspections

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

No.	Structure ID	Circuit	Structure Type	Location
1	M25/T5	Moorpark-Pardee Nos. 2 & 3	Lattice Tower	Santa Clarita
2	M0/T1	Pardee-Sylmar Nos. 1 & 2	Portal Tower	Santa Clarita
3	M25/T4	Moorpark-Pardee Nos. 1 & 4	Portal Tower	Santa Clarita
4	M1/T2	Pardee-Saugus Nos. 1 & 2	Portal Tower	Santa Clarita
5	M39/T3A	Pardee-Saugus Nos. 3 & 4	Portal Tower	Santa Clarita
6	4784517E	Saugus-Colossus-Lockhead-Pitchgen	Steel Pole	Santa Clarita
7	4476981E	Saugus-Lockheed-Haskell & Saugus-Haskell-Solemint	Steel Pole	Santa Clarita
8	M39/T3	Vincent-Santa Clara & Pardee-Santa Clara	Portal Tower	Santa Clarita
9	M0/T1A	Pardee-Sylmar Nos. 1 & 2	Portal Tower	Santa Clarita
10	M25/T4	Moorpark-Pardee Nos. 2 & 3	Portal Tower	Santa Clarita
11	M25/T3	Moorpark-Pardee Nos. 1 & 4	Portal Tower	Santa Clarita
12	M0/T6	Pardee-Saugus Nos. 1 & 2	Lattice Tower	Santa Clarita
13	M39/T5	Pardee-Saugus Nos. 3 & 4	Lattice Tower	Santa Clarita
14	4239763E	Saugus-Lockheed-Haskell & Saugus-Haskell-Solemint	Steel Pole	Santa Clarita
15	4784520E	Saugus-Colossus-Lockhead-Pitchgen	Steel Pole	Santa Clarita
16	M0/T4	Pardee-Saugus Nos. 1 & 2	Lattice Tower	Santa Clarita
17	M4/T2	Pardee-Saugus Nos. 3 & 4	Lattice Tower	Santa Clarita
18	PS3824	Saugus-Lockheed-Haskell & Saugus-Haskell-Solemint	Steel Pole	Santa Clarita
19	4784523E	Saugus-Lockheed-Colossus-Pitchgen	Steel Pole	Santa Clarita
20	M24/T8	Moorpark-Pardee Nos. 1 & 4	Portal Tower	Santa Clarita
21	M25/T1	Moorpark-Pardee Nos. 2 & 3	Portal Tower	Santa Clarita
22	M25/T1	Moorpark-Pardee Nos. 1 & 4	Portal Tower	Santa Clarita
23	M25/T2	Moorpark-Pardee Nos. 2 & 3	Portal Tower	Santa Clarita
24	M0/T2A	Pardee-Sylmar Nos. 1 & 2	Portal Tower	Santa Clarita
25	M9/T4	Pardee-Sylmar Nos. 1 & 2	Lattice Tower	Sylmar
26	M9/T5	Eagle Rock-Sylmar & Gould-Sylmar	Lattice Tower	Sylmar
27	6001657	Sauugus-Newhall Nos. 1 & 2	Vault	Santa Clarita
28	6001658	Sauugus-Newhall Nos. 1 & 2	Vault	Santa Clarita
29	6001659	Sauugus-Newhall Nos. 1 & 2	Vault	Santa Clarita
30	6001660	Sauugus-Newhall Nos. 1 & 2	Vault	Santa Clarita

31	6001661	Sauugus-Newhall Nos. 1 & 2	Vault	Santa Clarita
32	6001522	Newbury-Thousand Oaks	Vault	Newbury Park
33	6001521	Newbury-Thousand Oaks	Vault	Newbury Park
34	6000585	Malibu-Oakpark	Vault	Aguora Hills
35	6000584	Malibu-Oakpark	Vault	Aguora Hills
36	6000583	Malibu-Oakpark	Vault	Aguora Hills
37	1662459E	Malibu-Potrero & Moorpark-Crater-Malibu	Steel Pole	Aguora Hills
38	1662458E	Malibu-Potrero & Moorpark-Crater-Malibu	Wood Pole	Aguora Hills
39	3007720E	Malibu-Potrero & Moorpark-Crater-Malibu	Wood Pole	Aguora Hills
40	1662456E	Malibu-Potrero & Moorpark-Crater-Malibu	Steel Pole	Aguora Hills
41	1662455E	Malibu-Potrero & Moorpark-Crater-Malibu	Steel Pole	Aguora Hills
42	3007719E	Malibu-Potrero & Moorpark-Crater-Malibu	Steel Pole	Aguora Hills
43	3007718E	Malibu-Potrero & Moorpark-Crater-Malibu	Steel Pole	Aguora Hills
44	4762631E	Malibu-Potrero & Moorpark-Crater-Malibu	Steel Pole	Aguora Hills
45	3007716E	Malibu-Potrero & Moorpark-Crater-Malibu	Steel Pole	Aguora Hills
46	4424766E	Malibu-Potrero & Moorpark-Crater-Malibu	Steel Pole	Aguora Hills
47	1922713E	Malibu-Potrero & Moorpark-Crater-Malibu	Wood Pole	Aguora Hills
48	1922714E	Malibu-Potrero & Moorpark-Crater-Malibu	Steel Pole	Aguora Hills
49	1872093E	San Marcos-Vegas	Steel Pole	Santa Barbara
50	1872094E	San Marcos-Vegas	Wood Pole	Santa Barbara
51	1643307E	San Marcos-Vegas	Wood Pole	Santa Barbara
52	1643308E	San Marcos-Vegas	Wood Pole	Santa Barbara
53	1643309E	San Marcos-Vegas	Wood Pole	Santa Barbara
54	1643311E	San Marcos-Vegas	Wood Pole	Santa Barbara
55	1643312E	San Marcos-Vegas	Steel Pole	Santa Barbara
56	1643313E	San Marcos-Vegas	Steel Pole	Santa Barbara
57	1643315E	San Marcos-Vegas	Wood Pole	Santa Barbara
58	1643316E	San Marcos-Vegas	Wood Pole	Santa Barbara
59	1643317E	San Marcos-Vegas	Wood Pole	Santa Barbara
60	1643314E	San Marcos-Vegas	Wood Pole	Santa Barbara

61	4441959E	Goleta-Colegio-Isla Vista-Vegas	Steel Pole	Goleta
62	4441958E	Goleta-Colegio-Isla Vista-Vegas	Steel Pole	Goleta
63	4441957E	Goleta-Colegio-Isla Vista-Vegas	Steel Pole	Goleta
64	4441956E	Goleta-Colegio-Isla Vista-Vegas	Steel Pole	Goleta
65	4441955E	Goleta-Colegio-Isla Vista-Vegas	Steel Pole	Goleta
66	4441954E	Goleta-Colegio-Isla Vista-Vegas	Steel Pole	Goleta
67	4441953E	Goleta-Colegio-Isla Vista-Vegas	Steel Pole	Goleta
68	1025556E	Goleta-Colegio-Isla Vista-Vegas	Steel Pole	Goleta
69	1481909E	Goleta-Colegio-Isla Vista-Vegas	Wood Pole	Goleta
70	1675756E	Goleta-Colegio-Isla Vista-Vegas	Wood Pole	Goleta
71	4041821E	Carpinteria-Ortega-Santa Barbara	Wood Pole	Montecito
72	4434913E	Carpinteria-Ortega-Santa Barbara	Steel Pole	Montecito
73	2279202E	Carpinteria-Ortega-Santa Barbara	Wood Pole	Montecito
74	4534709E	Carpinteria-Ortega-Santa Barbara	Steel Pole	Montecito
75	2279203E	Carpinteria-Ortega-Santa Barbara	Wood Pole	Montecito
76	4434911E	Carpinteria-Ortega-Santa Barbara	Steel Pole	Montecito
77	4434910E	Carpinteria-Ortega-Santa Barbara	Steel Pole	Montecito
78	4434909E	Carpinteria-Ortega-Santa Barbara	Steel Pole	Montecito
79	1236201E	Carpinteria-Ortega-Santa Barbara	Wood Pole	Montecito
80	2339459E	Carpinteria-Ortega-Santa Barbara	Wood Pole	Montecito
81	4434906E	Carpinteria-Ortega-Santa Barbara	Steel Pole	Montecito
82	4534708E	Carpinteria-Ortega-Santa Barbara	Steel Pole	Montecito

83	4456731E	Carpinteria-Ortega-Santa Barbara	Steel Pole	Montecito
84	1236206E	Carpinteria-Ortega-Santa Barbara	Wood Pole	Montecito
85	1868647E	Carpinteria-Ortega-Santa Barbara	Wood Pole	Montecito
86	3007057E	Carpinteria-Ortega-Santa Barbara	Wood Pole	Montecito
87	2339461E	Carpinteria-Ortega-Santa Barbara	Wood Pole	Montecito
88	1943780E	Carpinteria-Ortega-Santa Barbara	Wood Pole	Montecito

### III. Field Inspection Violations List

My staff observed the following violations during the field inspection:

**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.*

**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.*

**GO 95, Rule 61.6 (A) Marking and Guarding, Marking**, states in part:

*All towers shall be equipped with signs designed to warn the public of the danger of climbing same. Additionally, such signs shall include a graphic depiction of the dangers of falling or electrocution associated with climbing the towers. Such signs shall be placed and arranged so that they may be read from the four corners of the tower. Such signs shall be neither less than 8 feet nor more than 20 feet above the ground except where the lowest horizontal member of the tower is more than 20 feet above the ground in which case the sign shall be not more than 30 feet above the ground.*

The safety signs posted on the M24/T8 Portal Tower of the Moorpark-Pardee circuit (FLOC No. 7017038), including both "High Voltage" and "No Climbing" signs, were observed to be faded beyond legibility.

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

*The condition listed above has been recorded in SCE's Work Management System and will be addressed in accordance with SCE's maintenance program and GO 95.*

- *Tower OH7017038 (M24/T8) - Safety signs posted were faded beyond legibility. SCE Response: Due on 1/6/2029.*

**GO 95, Rule 56.4, Clearances**, states in part:

*The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall not be less than as specified in Table 2, Case 19.*

Table 2, Column C, Case 19 requires guy wires and communications conductors supported on the same pole to maintain a radial clearance of three inches.

An SCE distribution span guy wire was observed to be in contact with a third-party communications conductor between Pole No. 1643307E and Pole No. 1643308E.

**SCE Response:**

*The condition listed above was previously recorded in SCE's Work Management System and was addressed in accordance with SCE's maintenance program and GO 95.*

- *Pole 1643307E – Span guy wire in contact with a third-party communications conductor between Pole No. 1643307E and Pole No. 1643308E. **SCE Response:** Completed on 8/17/2023.*