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



October 31, 2023

EA2023-1088

Melvin Stark Principle Manager, T&D Compliance Integration Southern California Edison Company 1 Innovation Way Pomona, CA 91786

Subject: Audit of Southern California Edison's Ontario District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Stacey Ocampo and Sultan Tipu of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Ontario District from August 21, 2023, to August 25, 2023. 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). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than December 1, 2023, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Stacey Ocampo at (213) 266-4712 or <u>Stacey.Ocampo@cpuc.ca.gov</u>.

Sincerely,

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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: Lee Palmer, Director, Safety and Enforcement Division, CPUC Nika Kjensli, Program Manager, ESRB, SED, CPUC Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC Stacey Ocampo, Utilities Engineer, ESRB, SED, CPUC Sultan Tipu, 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
- Vegetation Management Records
- Pole Loading Calculation Records

I. 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 June 2018 through June 2023, SCE completed 108 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 3 pending patrol inspections that were past SCE's scheduled due date.
- SCE's records indicated that from June 2018 through June 2023, SCE completed 6715 overhead detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 640 pending overhead 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

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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 June 2018 through June 2023, SCE completed 1237 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 166 pending underground inspections that were past SCE's scheduled due date.

GO 95, Rule 18-A: Resolution of Safety Hazards and General Order 95 Nonconformances, states in part:

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

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 2018 through June 2023, SCE completed 294 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 426 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 June 2018 through June 2023, SCE completed 233 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 776 open underground work orders that were past SCE's scheduled due date for corrective action.

III. Field Inspections

	Structure No.	Structure Type	Location
1	4328933E	Utility Pole	Ontario
2	4328934E	Utility Pole	Ontario
3	4328935E	Utility Pole	Ontario
4	4328936E	Utility Pole	Ontario
5	4328937E	Utility Pole	Ontario
6	1829760E	Utility Pole	Ontario
7	4593226E	Utility Pole	Ontario
8	4328938E	Utility Pole	Ontario
9	1891985E	Utility Pole	Ontario
10	4328939E	Utility Pole	Ontario
11	1205770E	Utility Pole	Ontario
12	H30571Y	Utility Pole	Ontario
13	H8003Y	Utility Pole	Ontario
14	H30570Y	Utility Pole	Ontario
15	4042938E	Utility Pole	Ontario
16	4338771E	Utility Pole	Ontario
17	1064673E	Utility Pole	Ontario
18	H30568Y	Utility Pole	Ontario
19	4779695E	Utility Pole	Ontario
20	1199687E	Utility Pole	Chino
21	1199686E	Utility Pole	Chino
22	4310845E	Utility Pole	Chino
23	1199685E	Utility Pole	Chino
24	4787160E	Utility Pole	Chino
25	4310843E	Utility Pole	Chino
26	519866E	Utility Pole	Chino
27	1310611E	Utility Pole	Chino
28	1310610E	Utility Pole	Chino
29	G24975Y	Utility Pole	Chino
30	1310609E	Utility Pole	Chino
31	1310608E	Utility Pole	Chino
32	G15188Y	Utility Pole	Chino
33	G15189Y	Utility Pole	Chino
34	G15190Y	Utility Pole	Chino
35	G15191Y	Utility Pole	Chino
36	G14778Y	Utility Pole	Montclair
37	742197E	Utility Pole	Montclair

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

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38	1683121E	Utility Pole	Montclair
39	1780662E	Utility Pole	Montclair
40	714726E	Utility Pole	Montclair
41	714727E	Utility Pole	Montclair
42	1683665E	Utility Pole	Montclair
43	1862267E	Utility Pole	Montclair
44	1683664E	Utility Pole	Montclair
45	4929729E	Utility Pole	Montclair
46	4707849E	Utility Pole	Montclair
47	2132668E	Utility Pole	Montclair
48	668633E	Utility Pole	Montclair
49	322288E	Utility Pole	Montclair
50	GT60397E	Utility Pole	Montclair
51	G14772Y	Utility Pole	Montclair
52	322290E	Utility Pole	Montclair
53	GT60398E	Utility Pole	Montclair
54	4562703E	Utility Pole	Montclair
55	4909056E	Utility Pole	Montclair
56	4933397E	Utility Pole	Montclair
57	4694941E	Utility Pole	Montclair
58	4593268E	Utility Pole	Montclair
59	1236938E	Utility Pole	Montclair
60	P5397074	Pad-mounted Switch	Rancho Cucamonga
61	P5601427	Pad-mounted Transformer	Rancho Cucamonga
62	V5704748	Vault	Rancho Cucamonga
63	B5196697	BURD Switch	Chino
64	P5196694	Pad-mounted Transformer	Chino
65	P5347970	Junction Box	Chino
66	M5140583	Manhole	Corona
67	P5193525	Pad-mounted Transformer	Corona
68	V5140584	Vault	Corona
69	P5140586	Pad-mounted Transformer	Corona
70	V5140585	Vault	Corona
71	4562617E	Utility Pole	San Antonio Heights
72	2103135E	Utility Pole	San Antonio Heights
73	2103130E	Utility Pole	San Antonio Heights
74	2103133E	Utility Pole	San Antonio Heights
75	544809E	Utility Pole	San Antonio Heights
76	544808E	Utility Pole	San Antonio Heights
77	544807E	Utility Pole	San Antonio Heights
78	544806E	Utility Pole	San Antonio Heights

79	1137757E	Utility Pole	San Antonio Heights
80	4148745E	Utility Pole	Mount Baldy
81	1922017E	Utility Pole	Mount Baldy
82	4562616E	Utility Pole	Mount Baldy
83	2165721E	Utility Pole	Mount Baldy
84	4817260E	Utility Pole	Mount Baldy
85	4882249E	Utility Pole	Mount Baldy
86	4817862E	Utility Pole	Mount Baldy
87	H6719Y	Utility Pole	Mount Baldy
88	544943E	Utility Pole	Mount Baldy
89	1445130E	Utility Pole	Mount Baldy
90	1445131E	Utility Pole	Mount Baldy
91	2108463E	Utility Pole	Mount Baldy
92	4820176E	Utility Pole	Mount Baldy
93	1445133E	Utility Pole	Mount Baldy
94	788329E	Utility Pole	Upland
95	1615366E	Utility Pole	Upland
96	4819729E	Utility Pole	Upland
97	4819728E	Utility Pole	Upland
98	H5976Y	Utility Pole	Upland
99	H5977Y	Utility Pole	Upland
100	1615365E	Utility Pole	Upland
101	H5979Y	Utility Pole	Upland
102	4132204E	Utility Pole	Upland
103	1829724E	Utility Pole	Upland
104	1829723E	Utility Pole	Upland
105	748797E	Utility Pole	Upland
106	4386383E	Utility Pole	Rancho Cucamonga

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.

SCE's facilities on the following poles required maintenance:

- Pole 742197E: an insulator attached to the secondary crossarm was sunken.
- Pole 1205770E: the "eye" of the SCE down guy anchor was buried.
- Pole 1615366E: the "eye" of the SCE down guy anchor was buried.

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:

- 4328933E
- 4328934E
- 4328935E
- 4328936E
- 4328937E

- H30568Y
- 1199685E
- 4310843E
- 519866E

- G15190Y
- G15191Y
- G14772Y
- 322290E

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 attached to Pole 1064673E was damaged.

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 attached to Pole 2132668E was loose and not taut.

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 Pole 1829760E was located at a height of less than eight feet.

GO 128, Rule 32.7, Covers, states in part:

Manholes, handholes, and subsurface equipment enclosures while not being worked in, shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them and arrangements shall be such that a tool or appliance shall be required for their opening and cover removal.

The pull box lid for pad-mounted transformer P5140586 was missing bolts and not properly secured.