

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 6, 2024

EA2023-1105

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 Menifee District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch (ESRB) 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) Menifee District from December 4, 2023 to December 8, 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 March 6, 2024, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations. Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

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

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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, Electric Safety and Reliability Branch, CPUC
Stacey Ocampo, 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 October 2018 through October 2023, SCE completed 44 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 27 pending patrol inspections that were past SCE's scheduled due date.
- SCE's records indicated that from October 2018 through October 2023, SCE completed 5293 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 207 pending 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 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 October 2018 through October 2023, SCE completed 887 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 72 pending underground inspections that were past SCE's scheduled due date.

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 October 2018 through October 2023, SCE completed 1440 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 1141 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 October 2018 through October 2023, SCE completed 152 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 295 open underground work orders that were past SCE's scheduled due date for corrective action.

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	4227982E	Pole	Hemet
2	3000216E	Pole	Hemet
3	4627685E	Pole	Hemet
4	1935482E	Pole	Hemet
5	1935483E	Pole	Hemet
6	1954699E	Pole	Hemet
7	1996751E	Pole	Hemet
8	1996752E	Pole	Hemet
9	1954700E	Pole	Hemet
10	2160696E	Pole	Hemet
11	1935658E	Pole	Hemet
12	4299352E	Pole	Hemet
13	4299351E	Pole	Hemet
14	4113256E	Pole	Hemet
15	4207186E	Pole	Hemet
16	220373	Pole	Hemet
17	4308784E	Pole	Hemet
18	220374	Pole	Hemet
19	2160694E	Pole	Hemet
20	1622408E	Pole	Hemet
21	1622409E	Pole	Hemet
22	220376S	Pole	Hemet
23	221142S	Pole	Hemet
24	221143S	Pole	Hemet
25	1857432E	Pole	Hemet
26	2308785E	Pole	Hemet
27	2308786E	Pole	Hemet
28	1857433E	Pole	Hemet
29	2328018E	Pole	Hemet
30	2328019E	Pole	Hemet
31	2248182E	Pole	Winchester
32	2248183E	Pole	Winchester
33	2248181E	Pole	Winchester
34	2248180E	Pole	Winchester
35	2248179E	Pole	Winchester
36	4230018E	Pole	Winchester
37	2133978E	Pole	Winchester
38	2133979E	Pole	Winchester
39	2134037E	Pole	Winchester
40	2134246E	Pole	Winchester

41	1971048E	Pole	Homeland
42	1964439E	Pole	Homeland
43	4955797E	Pole	Homeland
44	270457S	Pole	Homeland
45	64741S	Pole	Homeland
46	33949CWT	Pole	Homeland
47	4066426E	Pole	Homeland
48	270458S	Pole	Homeland
49	311884S	Pole	Homeland
50	270459S	Pole	Homeland
51	216723S	Pole	Homeland
52	312360S	Pole	Homeland
53	216724S	Pole	Homeland
54	4523849E	Pole	Homeland
55	216725S	Pole	Homeland
56	2075695E	Pole	Homeland
57	4524440E	Pole	Canyon Lake
58	4524439E	Pole	Canyon Lake
59	2014041E	Pole	Canyon Lake
60	2014040E	Pole	Canyon Lake
61	2112546E	Pole	Canyon Lake
62	2293625E	Pole	Canyon Lake
63	2293626E	Pole	Canyon Lake
64	2302088E	Pole	Canyon Lake
65	4524463E	Pole	Canyon Lake
66	4323917E	Pole	Canyon Lake
67	2302087E	Pole	Canyon Lake
68	3000071E	Pole	Winchester
69	1954420E	Pole	San Jacinto
70	1588078E	Pole	San Jacinto
71	317379S	Pole	San Jacinto
72	2160643E	Pole	San Jacinto
73	1588070E	Pole	San Jacinto
74	2178022E	Pole	San Jacinto
75	4968751E	Pole	San Jacinto
76	4698752E	Pole	San Jacinto
77	1954419E	Pole	San Jacinto
78	4818217E	Pole	Perris
79	315245S	Pole	Perris
80	2150289E	Pole	Perris
81	2150290E	Pole	Perris
82	4725743E	Pole	Perris
83	5135591	BURD	Hemet
84	5135590	BURD	Hemet
85	P5135592	Pad-mounted Transformer	Hemet
86	P5013394	Pad-mounted Transformer	Hemet

87	P5507194	Pad-mounted Transformer	Hemet
88	5302664	BURD Switch	Moreno Valley
89	P5389444	Pad-mounted Transformer	Moreno Valley
90	5535679	Vault	Perris
91	V5754510	Vault	Perris
92	5343955	BURD	Perris
93	5321258	BURD	Menifee

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.

SCE's facilities on the following poles required maintenance:

- 4113256E - The "eye" of the SCE down guy anchor was buried.
- 220373 - The "eye" of the SCE down guy anchor was buried.

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 4227982E had an unauthorized floodlight attached to it.

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:

- 1857432E
- 2134037E
- 4323917E
- 2293626E