STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION
VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

ARNOLD SCHWARZENEGGER, *Governor*

June 11, 2010

EA2010-18

Melvin Stark
Manager, Maintenance & Inspection
Southern California Edison
2885 W. Foothill Blvd.
Rialto, CA 92376

SUBJECT: Electric Audit of SCE's Foothill District

Dear Mr. Stark:

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission, I conducted a General Order (GO) 95, 128 and 165 Inspection of Southern California Edison (SCE) Foothill District from April 12 – 16, 2010. The audit included a review of SCE's records and field inspections of those SCE facilities in the district that had been recently inspected by SCE staff.

During the audit, I identified violations of GO 95, 128, and 165. A copy of the inspection summary itemizing the violations is enclosed. Please advise me no later than July 14, 2010, by electronic or hard copy, of all corrective measures taken or will be taken by SCE regarding the violations and the date they were or will be corrected.

If you have any questions, please contact me at (213) 576-6850.

Sincerely,

Derek Fong
Utilities Engineer
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary

Cc: Robert Conway, General Supervisor 3 Field Operations

AUDIT SUMMARY

Company: SCE – Foothill District
G.O. 95 & 128 Audit
Date: April 12 – 16, 2010

The following violations were observed:

1. **GO 95, Rule 54.8C(4): Above or below Supply Service Drops**
"The radial clearance between communication service drop conductors and supply service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches".

   Each of the following poles had a supply service drop with less than a 1 foot radial clearance from a communication service drop within 15 feet of the point of attachment.

   1) Pole 1859458E – the supply service drop was found touching a communication service drop. This was not documented by SCE when they inspected the pole on 02/26/2010.
   2) Pole 261131S – the supply service drop was found touching a communication service drop. This was not documented by SCE when they inspected the pole on 03/10/2010.
   3) Pole 4597348E – the supply service drop was found touching a communication service drop. This was not documented by SCE when they inspected the pole on 03/10/2010.
   4) Pole 5272S – this was not documented by SCE when they inspected the pole on 02/27/2010.
   5) Pole 4442418E – this was not documented by SCE when they inspected the pole on 02/26/2010.
   6) Pole 639507H – this was not documented by SCE when they inspected the pole on 02/26/2010.
   7) Pole 261710S – this was not documented by SCE when they inspected the pole on 03/11/2010.
   8) Pole 261653S – this was not documented by SCE when they inspected the pole on 03/10/2010.
   9) Pole 4698483E – this was not documented by SCE when they inspected the pole on 03/10/2010.

Each of the following poles had a supply service drop with less than a 2 foot radial clearance from a communication service drop over 15 feet from the point of attachment.

1) Pole 5399S – this was not documented by SCE when they inspected the pole on 02/18/2010.
2) Pole 261119S – this was not documented by SCE when they inspected the pole on 03/10/2010.
3) Pole 261654S – this was not documented by SCE when they inspected the pole on 03/10/2010. The clearance was measured at 1 foot.
4) Pole 261130S – this was not documented by SCE when they inspected the pole on 03/10/2010.
5) Pole 202760S – the supply service drop was found touching a communication service drop. This was not documented by SCE when they inspected the pole on 03/11/2010.

2. **GO 95, Rule 54.8B(2)(b): Supply line over Vehicle-accessible Areas**
"Over private driveways or lanes or other private property areas accessible to vehicles on premise used for residential purposes only, service drops shall have a vertical clearance not less than 12 feet".

1) Pole 261126S was found to have a supply service drop with less than a 12 ft vertical clearance over a vehicle accessible area. The clearance was measured and found to be 10 ft 9 inches. This was not documented by SCE when they inspected the pole on 03/10/2010.

3. **GO 95, Rule 54.6B: Ground Wires**
"... That portion of the ground wire attached to 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)."

1) Pole 205391S was found to have damaged ground moulding. This was not documented by SCE when they inspected the pole on 02/18/2010.
2) Pole 1859812E was found to have damaged ground moulding. This was not documented by SCE when they inspected the pole on 02/26/2010.
3) Pole 2254704E was found to have damaged ground moulding. This was not documented by SCE when they inspected the pole on 04/25/2009.

4. **GO 95, Rule 35: Tree Trimming**
"Where overhead wires pass through trees, safety and reliability of service demand that tree trimming be done in order that the wires may clear branches and foliage by a reasonable distance..."

1) Pole 261133S was found to have a supply service drop that was being strained by a tree. This was not documented by SCE when they inspected the pole on 03/10/2010.

5. **GO 95, Rule 38: Minimum Clearances of Wires from other Wires**
"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2…"

Table 2, Case 19 states that the distance between "guys and span wires" and communication conductors or supply service drops supported on the same poles is 3 inches.

Each of the following poles had an SCE guy wire with less than a 3 inch radial separation from a communication conductor.

1) Pole 4628419E – the guy wire was found touching a communication conductor. This was not documented by SCE when they inspected the pole on 02/26/2010.
2) Pole 639502H – the guy wire was found touching a communication conductor. This was not documented by SCE when they inspected the pole on 02/26/2010.
3) Pole 261129S – this was not documented by SCE when they inspected the pole on 03/10/2010.

6. **GO 95, Rule 54.8B, Table 10: Minimum Allowable Clearance of Service Drops of 0 – 750 Volts from Buildings**
"[Vertical clearances above] all portions of buildings including metallic or non-metallic cornice, decorative appendage, eaves, roof or parapet wall of the building served: minimum clearance of 0.5 inches."

1) Pole 4597348E had a service drop lying on the roof of a residence. This was not documented by SCE when they inspected the pole on 03/10/2010.

7. **GO 95, Rule 51.6A: High Voltage Marking**
"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 inches in height with letters not less than 3 inches in height. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible".

1) Pole 205390S had a "HIGH" sign missing. This was not documented by SCE when they inspected the pole on 02/18/2010.
2) Pole 261127S had a damaged "HIGH" sign. This was not documented by SCE when they inspected the pole on 03/10/2010.

8. **GO 95, Rule 31.1: Design, Construction and Maintenance**
"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".

   1) Pole 205391S had a bent pole step. This was not documented by SCE when they inspected the pole on 02/18/2010.
   2) Pole 261704S had a turned pole step. This was not documented by SCE when they inspected the pole on 03/11/2010.
   3) Pole 261140S had a damaged riser coupler. This was not documented by SCE when they inspected the pole on 03/11/2010.

9. **GO 128, Rule 17.1: Design, Construction, and Maintenance**
"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".

   1) 5478102 – this padmount enclosure had dead vegetation inside. This was not documented by SCE when they inspected the padmount on 03/11/2010.
   2) 5400111 – this Buried Underground Residential Distribution (BURD) had a cracked enclosure. This was not documented by SCE when they inspected the BURD on 03/12/2010.

10. **GO 128, Rule 34.3B: Guarding Live Parts (Supply only)**
"Compartments and enclosures which will, during normal operation, contain exposed live parts shall be designed and installed to prevent a person from passing a wire or other conducting material into such compartment from the outside when it is closed."

   1) 5451239 – this padmount was in such a condition that a person could pass a wire or other conducting material into the compartment from the outside when closed. This was not documented by SCE when they inspected the padmount on 03/12/2010. This violation was repaired during the audit.

11. **GO 128, Rule 34.3A: Strength (Supply only)**
"The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons".

   1) 5451240 – the enclosure was bolted down to the pad on one side only. This was not documented by SCE when they inspected the padmount on 03/12/2010.

12. **GO 165, Section IV – Standards for Inspection, Record-keeping, and Reporting, states:**
"For all inspections, within a reasonable period, company records shall specify the circuit, area, or equipment inspected, the name of the inspector, the date of the inspection, and any problems identified during each inspection, as well as the scheduled date of corrective action."

During the audit, I identified 1838 work orders, from 2007 to 2010, that were completed late.

CONCERNS AND RECOMMENDATIONS

SCE's records should show the current due date for all work orders. During the audit, I found work orders that had been reassessed since the initial problem date. That reassessment generated a new work order due date that was not stated in SCE's records.