

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 24, 2012

Robert F. LeMoine
Manager, Maintenance & Inspection
Southern California Edison
3 Innovation Way
Pomona, CA 91768

EA2012-020

SUBJECT: Electric Audit of SCE's Ontario District

Dear Mr. LeMoine:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Koko Tomassian and Richard Kyo of my staff conducted an Electric Audit of Southern California Edison's (SCE) Ontario District from July 16, 2012 to July 20, 2012. The audit included a review of SCE's records and field inspections of SCE's facilities.

During the audit, my staff found that SCE did not document all General Order (GO) 95 violations at the time of its inspections. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than September 28, 2012, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations.

If you have any questions, you can contact Koko Tomassian at (213) 576-7099 or koko.tomassian@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Stepanian", with a long horizontal flourish extending to the right.

Raffy Stepanian, P.E.
Program Manager
Electric Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary

CC: Raymond Fugere, Program and Project Supervisor, CPUC

AUDIT SUMMARY

Company: SCE – Ontario District
Electric Audit Date: July 16 to July 20, 2012

1.	Location:	Ontario District
	Date of CPUC Inspection:	07/16/12
Explanation of Violation(s):		
<p><u>Late Work Orders</u></p> <p>GO 165, Section IV, Standards for Inspection, Record-keeping, and Reporting, States:</p> <p style="text-align: center;"><i>“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.”</i></p> <p>During the audit, my staff identified 759 work orders, from 2009 to 2012, that were completed late.</p> <p><u>Inspection & Maintenance Program Deficiencies</u></p> <p>SCE’s Distribution Inspection & Maintenance Program (DIMP) does not require inspectors to identify and document all GO 95 and GO 128 violations, as required.</p>		

2.	Location:	Pole No.: 656114H
	Previous SCE Visit Details:	April 18, 2012 – Overhead (OH) Detailed Inspection
	Date of CPUC Inspection:	July 16, 2012
Explanation of Violation(s):		
<u>Third Party Safety Hazard – Broken Lashing Wire</u>		
GO 95, Rule 18-B, Notification of Safety Hazards, States:		
<i>“If a company, while performing inspections of its facilities, discovers a safety hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.”</i>		
The pole supported a broken CIP lashing wire. SCE did not notify the CIP of this safety hazard when it last visited the pole.		

3.	Location:	Pole No.: 656111H
	Previous SCE Visit Details:	April 18, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 16, 2012
Explanation of Violation(s):		
<u>Broken “Riser Strap”</u>		
GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:		
<i>“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.”</i>		
The pole had a broken and unsecured “riser strap.” This violation was not documented when SCE last visited the pole.		

4.	Location:	Pole No.: 656109H
	Previous SCE Visit Details:	April 18, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 16, 2012
Explanation of Violation(s):		
<p data-bbox="191 562 1446 632"><u>Insufficient Radial Clearance between Electric and Communication Infrastructure Provider (CIP) Service Drops</u></p> <p data-bbox="191 674 1333 705">GO 95, Rule 18-A1c, Resolution of Safety Hazards and GO 95 Nonconformances, states:</p> <p data-bbox="321 747 1463 894"><i>“Where a communications company’s or an electric utility’ actions result in GO nonconformances for another entity, that entity’s remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.”</i></p> <p data-bbox="191 936 1406 968">GO 95, Rule 54.8-C4, Clearances between Supply Service Drops and Other Conductors, states:</p> <p data-bbox="285 1010 1471 1188"><i>“The radial clearance between supply service drop conductors and communication 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.”</i></p> <p data-bbox="191 1230 1479 1331">The pole supported electric and communication service drops which had less than 24 inches of radial clearance beyond 15 feet from the point of attachment. This violation was not documented when SCE last visited the pole, and SCE did not notify the CIP of this GO nonconformance.</p>		

5.	Location:	Pole No.: 656108H
	Previous SCE Visit Details:	April 18, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 16, 2012
Explanation of Violation(s):		
<p><u>Insufficient Radial Clearance between Electric and CIP Service Drops</u></p> <p>GO 95, Rule 18-A1c, Resolution of Safety Hazards and GO 95 Nonconformances, states:</p> <p><i>“Where a communications company’s or an electric utility’ actions result in GO nonconformances for another entity, that entity’s remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.”</i></p> <p>GO 95, Rule 54.8-C4, Clearances between Supply Service Drops and Other Conductors, states:</p> <p><i>“The radial clearance between supply service drop conductors and communication 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.”</i></p> <p>The pole supported electric and communication service drops which had less than 24 inches of radial clearance beyond 15 feet from the point of attachment. This violation was not documented when SCE last visited the pole, and SCE did not notify the CIP of this GO nonconformance.</p>		

6.	Location:	Pole No.: 4239376E
	Previous SCE Visit Details:	April 18, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 16, 2012
Explanation of Violation(s):		
<p><u>Insufficient Radial Clearance between Electric and CIP Service Drops</u></p> <p>GO 95, Rule 18-A1c, Resolution of Safety Hazards and GO 95 Nonconformances, states:</p> <p><i>“Where a communications company’s or an electric utility’ actions result in GO nonconformances for another entity, that entity’s remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.”</i></p> <p>GO 95, Rule 54.8-C4, Clearances between Supply Service Drops and Other Conductors, states:</p> <p><i>“The radial clearance between supply service drop conductors and communication 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.”</i></p> <p>The pole supported electric and communication service drops which had less than 24 inches of radial clearance beyond 15 feet from the point of attachment. This violation was not documented when SCE last visited the pole, and SCE did not notify the CIP of this GO nonconformance.</p>		

7.	Location:	Pole No.: 4450244E
	Previous SCE Visit Details:	April 19, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 16, 2012
Explanation of Violation(s):		
<p data-bbox="188 564 1146 596"><u>Insufficient Radial Clearance between Electric and CIP Service Drops</u></p> <p data-bbox="188 638 1333 669">GO 95, Rule 18-A1c, Resolution of Safety Hazards and GO 95 Nonconformances, states:</p> <p data-bbox="323 711 1466 856"><i>“Where a communications company’s or an electric utility’ actions result in GO nonconformances for another entity, that entity’s remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.”</i></p> <p data-bbox="188 898 1409 930">GO 95, Rule 54.8-C4, Clearances between Supply Service Drops and Other Conductors, states:</p> <p data-bbox="282 972 1474 1150"><i>“The radial clearance between supply service drop conductors and communication 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.”</i></p> <p data-bbox="188 1192 1482 1295">The pole supported electric and communication service drops which had less than 24 inches of radial clearance beyond 15 feet from the point of attachment. This violation was not documented when SCE last visited the pole, and SCE did not notify the CIP of this GO nonconformance.</p>		

8.	Location:	Pole No.: 4526812E
	Previous SCE Visit Details:	April 6, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 17, 2012
Explanation of Violation(s):		
<p data-bbox="188 564 415 596"><u>Loose Guy Wire</u></p> <p data-bbox="188 638 1211 669">GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, states in part:</p> <p data-bbox="326 711 1479 783"><i>“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.”</i></p> <p data-bbox="188 825 1446 856">The pole had a slack guy wire. This violation was not documented when SCE last visited the pole.</p>		

9.	Location:	Pole No.: 4512602E
	Previous SCE Visit Details:	April 6, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 17, 2012
Explanation of Violation(s):		
<p><u>Insufficient Clearance between Power Down Guy and Communications Cable</u></p> <p>GO 95, Rule 18-A1c, Resolution of Safety Hazards and GO 95 Nonconformances, states:</p> <p><i>“Where a communications company’s or an electric utility’ actions result in GO nonconformances for another entity, that entity’s remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.”</i></p> <p>GO 95, Table 2, Case 19C requires:</p> <p><i>“Guys and span wires passing conductors supported on the same poles” to have a minimum clearance of 3 inches from “Communication conductors (including open wire, cables and service drops.”</i></p> <p>The pole had an SCE guy wire touching a communication cable. This violation was not documented when SCE last visited the pole, and SCE did not notify the CIP of this GO nonconformance.</p>		

10.	Location:	Pole No.: 514028H
	Previous SCE Visit Details:	April 6, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 17, 2012
Explanation of Violation(s):		
<p data-bbox="204 564 1162 596"><u>Insufficient Radial Clearance between Electric and CIP Service Drops</u></p> <p data-bbox="204 638 1349 669">GO 95, Rule 18-A1c, Resolution of Safety Hazards and GO 95 Nonconformances, states:</p> <p data-bbox="337 711 1479 852"><i>“Where a communications company’s or an electric utility’ actions result in GO nonconformances for another entity, that entity’s remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.”</i></p> <p data-bbox="204 894 1422 926">GO 95, Rule 54.8-C4, Clearances between Supply Service Drops and Other Conductors, states:</p> <p data-bbox="302 968 1471 1146"><i>“The radial clearance between supply service drop conductors and communication 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.”</i></p> <p data-bbox="204 1188 1438 1289">The pole supported electric and communication service drops which had less than 24 inches of radial clearance beyond 15 feet from the point of attachment. This violation was not documented when SCE last visited the pole, and SCE did not notify the CIP of this GO nonconformance.</p>		

11.	Location:	Pole No.: 368987E
	Previous SCE Visit Details:	April 9, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 17, 2012
Explanation of Violation(s):		
<p data-bbox="204 562 1162 596"><u>Insufficient Radial Clearance between Electric and CIP Service Drops</u></p> <p data-bbox="204 638 1349 672">GO 95, Rule 18-A1c, Resolution of Safety Hazards and GO 95 Nonconformances, states:</p> <p data-bbox="337 711 1479 856"><i>“Where a communications company’s or an electric utility’ actions result in GO nonconformances for another entity, that entity’s remedial action will be to transmit a single documented notice of identified nonconformances to the communications company or electric utility for compliance.”</i></p> <p data-bbox="204 896 1422 930">GO 95, Rule 54.8-C4, Clearances between Supply Service Drops and Other Conductors, states:</p> <p data-bbox="298 970 1474 1150"><i>“The radial clearance between supply service drop conductors and communication 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.”</i></p> <p data-bbox="204 1190 1443 1297">The pole supported electric and communication service drops which had less than 24 inches of radial clearance beyond 15 feet from the point of attachment. This violation was not documented when SCE last visited the pole, and SCE did not notify the CIP of this GO nonconformance.</p> <p data-bbox="204 1337 570 1371"><u>Missing High Voltage Sign</u></p> <p data-bbox="204 1411 958 1444">GO 95, Rule 56.1-A, High Voltage Marking, states in part:</p> <p data-bbox="298 1484 1422 1556"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p> <p data-bbox="204 1596 1430 1665">The High Voltage sign on the crossarm was damaged. This violation was not documented when SCE last visited the pole.</p>		

12.	Location:	Pole No.: 4607642E
	Previous SCE Visit Details:	N/A – Pole set within last 5 years, not yet detail inspected
	Date of CPUC Inspection:	July 17, 2012
Explanation of Violation(s):		
<p data-bbox="203 562 571 596"><u>Missing High Voltage Sign</u></p> <p data-bbox="203 636 959 669">GO 95, Rule 56.1-A, High Voltage Marking, states in part:</p> <p data-bbox="300 709 1422 779"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i></p> <p data-bbox="203 821 1430 890">The High Voltage sign on the crossarm was damaged. This violation was not documented when SCE last visited the pole.</p> <p data-bbox="203 932 659 966"><u>Bent Pole Step, Sunken Insulator</u></p> <p data-bbox="203 1005 1125 1039">Go 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="300 1079 1435 1186"><i>“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.”</i></p> <p data-bbox="203 1228 1477 1329">The pole contained a pole step which was bent and no longer usable. The pole also had an insulator which was sitting on the crossarm. These violations were not documented when SCE last visited the pole.</p>		

13.	Location:	Pole No.: 207816S
	Previous SCE Visit Details:	April 4, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 17, 2012
Explanation of Violation(s):		
<u>Missing High Voltage Sign</u>		
GO 95, Rule 56.1-A, High Voltage Marking, states in part: <i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.”</i>		
The High Voltage sign on the crossarm was damaged. This violation was not documented when SCE last visited the pole.		

14.	Location:	Pole No.: 586115H
	Previous SCE Visit Details:	April 3, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 17, 2012
Explanation of Violation(s):		
<u>Third Party Safety Hazard – Broken Lashing Wires</u>		
GO 95, Rule 18-B, Notification of Safety Hazards, States: <i>“If a company, while performing inspections of its facilities, discovers a safety hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.”</i>		
The pole supported broken CIP lashing wires on two spans. SCE did not notify the CIP of this safety hazard when it last visited the pole.		

15.	Location:	Pole No.: 6787S
	Previous SCE Visit Details:	April 4, 2012 – OH Detailed Inspection
	Date of CPUC Inspection:	July 17, 2012
Explanation of Violation(s):		
<p data-bbox="204 562 902 596"><u>Third Party Safety Hazard – Broken Lashing Wire</u></p> <p data-bbox="204 636 946 669">GO 95, Rule 18-B, Notification of Safety Hazards, States:</p> <p data-bbox="337 709 1474 856"><i>“If a company, while performing inspections of its facilities, discovers a safety hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.”</i></p> <p data-bbox="204 896 1474 963">The pole supported broken CIP lashing wire. SCE did not notify the CIP of this safety hazard when it last visited the pole.</p>		