#### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



July 1, 2016

EA2016-005

Melvin Stark Manager, Maintenance & Inspection Southern California Edison Company (SCE) 3 Innovation Way Pomona, CA 91786

Subject: Audit of SCE's Tehachapi District

Dear Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Richard Kyo of my staff conducted an audit of SCE's Tehachapi District from April 4, 2016 to April 8, 2016. 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 August 1, 2016, 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, please contact Richard Kyo at (213) 576-7081 or richard.kyo@cpuc.ca.gov.

Sincerely,

Fadi Daye, P.E.

Program and Project Supervisor

Electric Safety and Reliability Branch

Safety and Enforcement Division

California Public Utilities Commission

**Enclosures: CPUC Audit Findings** 

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC

#### **AUDIT FINDINGS**

#### I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- Intrusive test records.
- Diagnostic testing records for oil insulated equipment.

#### II. Records Review - Violations List

My staff observed the following violations during the records review portion of the audit:

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.

General Order 165, Section III-C, Standards for Inspection, states:

For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.

SCE's records indicated that from 2013 to 2016, three work orders were completed past their scheduled date of corrective action.

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# **III.Field Inspections**

My staff inspected the following facilities during the field inspection:

| Structure Number | Type of Structure | Location         |
|------------------|-------------------|------------------|
| 1184268E         | Pole              | Tehachapi        |
| 1184267E         | Pole              | Tehachapi        |
| 4180093E         | Pole              | Tehachapi        |
| 4277877E         | Pole              | Tehachapi        |
| 4180092E         | Pole              | Tehachapi        |
| 991992E          | Pole              | Tehachapi        |
| 991991E          | Pole              | Tehachapi        |
| 4388950E         | Pole              | Tehachapi        |
| 4388936E         | Pole              | Tehachapi        |
| 1184269E         | Pole              | Tehachapi        |
| 2038231E         | Pole              | Tehachapi        |
| 4410417E         | Pole              | Tehachapi        |
| 313975S          | Pole              | Tehachapi        |
| 313976E          | Pole              | Tehachapi        |
| 313977E          | Pole              | Tehachapi        |
| 313978E          | Pole              | Tehachapi        |
| 4671511E         | Pole              | Tehachapi        |
| 2370318E         | Pole              | Tehachapi        |
| 313980E          | Pole              | Tehachapi        |
| 4073266E         | Pole              | Tehachapi        |
| 4267035E         | Pole              | Stallion Springs |
| 4136843E         | Pole              | Stallion Springs |
| 4136842E         | Pole              | Stallion Springs |
| 4202766E         | Pole              | Stallion Springs |
| 2058850E         | Pole              | Stallion Springs |
| 2038833E         | Pole              | Stallion Springs |
| 2038647E         | Pole              | Stallion Springs |
| 2038648E         | Pole              | Stallion Springs |
| 20572T           | Pole              | Stallion Springs |
| 2038649E         | Pole              | Stallion Springs |
| 4136647E         | Pole              | Stallion Springs |
| 4136648E         | Pole              | Stallion Springs |
| 2164209E         | Pole              | Stallion Springs |
| 4420587E         | Pole              | Stallion Springs |
| 2164207E         | Pole              | Stallion Springs |
| 2164248E         | Pole              | Stallion Springs |
| 2003356E         | Pole              | Stallion Springs |
| 2003357E         | Pole              | Stallion Springs |
| 2338788E         | Pole              | Stallion Springs |

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| 4589171E | Pole                                  | Stallion Springs |
|----------|---------------------------------------|------------------|
| 2338789E | Pole                                  | Stallion Springs |
| 2226777E | Pole                                  | Stallion Springs |
| 2135119E | Pole                                  | Stallion Springs |
| 2135117E | Pole                                  | Stallion Springs |
| 2135118E | Pole                                  | Stallion Springs |
| 4333037E | Pole                                  | Stallion Springs |
| 2135121E | Pole                                  | Stallion Springs |
| 2227446E | Pole                                  | Stallion Springs |
| 4011587E | Pole                                  | Stallion Springs |
| 4011588E | Pole                                  | Stallion Springs |
| 4011589E | Pole                                  | Stallion Springs |
| 4011590E | Pole                                  | Stallion Springs |
| 313989E  | Pole                                  | Tehachapi        |
| 313990E  | Pole                                  | Tehachapi        |
| 313991E  | Pole                                  | Tehachapi        |
| 313992E  | Pole                                  | Tehachapi        |
| 313993E  | Pole                                  | Tehachapi        |
| 313994E  | Pole                                  | Tehachapi        |
| 9455T    | Pole                                  | Tehachapi        |
| 313996E  | Pole                                  | Tehachapi        |
| 313997E  | Pole                                  | Tehachapi        |
| 2089840E | Pole                                  | Tehachapi        |
| 2089847E | Pole                                  | Tehachapi        |
| 2089848E | Pole                                  | Tehachapi        |
| 2093501E | Pole                                  | Tehachapi        |
| 2093502E | Pole                                  | Tehachapi        |
| 2100727E | Pole                                  | Tehachapi        |
| 2093503E | Pole                                  | Tehachapi        |
| 4418104E | Pole                                  | Tehachapi        |
| 5152237  | BURD Switch                           | Tehachapi        |
| 5157556  | CST                                   | Tehachapi        |
| P5473315 | Padmount Transformer                  | Tehachapi        |
| P5557796 | Padmount Transformer                  | Tehachapi        |
| 5157493  | BURD Switch                           | Tehachapi        |
| P5564326 | Mini-Pad Transformer                  | Tehachapi        |
| P5564328 | Mini-Pad Transformer                  | Tehachapi        |
| 5158340  | Mini-Pad Transformer                  | Tehachapi        |
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## IV. Field Inspection – Undocumented Violations List

My staff observed the following violations during the field inspection. None of these violations were documented and/or addressed by SCE during its last inspections.

### GO 95, Rule 18-B, Notification of Safety Hazards, states in part:

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.

SCE did not notify other companies of safety hazards involving their facilities on the following poles:

- Pole 313977E (low communications cable clearance)
- Pole 2089840E (CIP trunk line touching ground)

## **GO 95, Rule 56.4-I,** states in part:

Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion—resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position.

Where such covering consists of wood moulding, rigid plastic moulding, or other suitable protective moulding, the distance between the attachment materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) shall not exceed 36 inches on either side of the moulding

The ground moulding on Pole number 2227446E was loose and not attached every 36 inches.

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# V. Field Inspection – Documented Violations List

My staff observed the following violations during the field inspection that were documented and/or addressed by SCE during its last inspections.

## GO 95, Rule 51.6-A, Marking and Guarding, 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"

The High Voltage sign on the following poles was either damaged or missing:

- Pole 1184268E
- Pole 1184267E
- Pole 4277877E
- Pole 991992E
- Pole 991991E
- Pole 4388950E
- Pole 1184269E
- Pole 2038231E
- Pole 2058850E
- Pole 2038647E
- Pole 2038649E
- Pole 4136647E
- Pole 2164209E
- Pole 2135119E
- Pole 2135117E
- Pole 2227446E
- Pole 2089840E
- Pole 2089847E
- Pole 2093501E
- Pole 2038469E

#### 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 on the following SCE poles was damaged:

- Pole 4180092E
- Pole 2038649E

- Pole 4136647E
- Pole 2135119E
- Pole 2135117E

# GO 95, Rule 56.4-I, states in part:

Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion—resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position.

Where such covering consists of wood moulding, rigid plastic moulding, or other suitable protective moulding, the distance between the attachment materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) shall not exceed 36 inches on either side of the moulding

The ground moulding on Pole number 2038648E was loose and not attached every 36 inches. Additionally, the conduit strap on Pole number 2038649E was loose.