

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 18, 2019

Mel Stark
Principle Manager, T&D Compliance & Quality
Southern California Edison
1 Innovation Way
Pomona, CA 91768

Subject: Supplemental SCE's Santa Barbara District Distribution Audit Report

Mr. Stark,

ESRB staff conducted an audit of SCE's Santa Barbara District on July 15 – 19, 2019 and sent SCE an audit report on August 13, 2019. On September 13, 2019, SCE replied to ESRB's audit report with a letter disputing the violations listed below and indicated that grid patrol work order 40327852 was completed in a timely manner on March 2019, and underground detail inspection work order number 901447874, for equipment numbered 203011691 and 2016837458, was also completed in a timely manner on December 2014 and November 2017, respectfully.

Please note that some of the dates included in our original audit report emailed to you on August 13, 2019, were incorrect.

Page 1 of the audit findings listed the following violations:

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.

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.

GO 165, Standard III-B, Distribution Facilities, Standards for Inspections, states in part:

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.

“SCE’s records indicated that from 2014 to 2018, SCE completed 1 annual grid patrol inspection past its scheduled due date. SCE annual grid patrol workorder number 40327852 was scheduled to be completed by March 2019 but was not completed until August 2019.”

Please note that the dates included in our findings related to workorder number 40327852 are incorrect. Our findings should have read as follows:

*“SCE’s records indicated that from 2014 to 2018, SCE completed 1 annual grid patrol past its scheduled due date. SCE annual grid patrol workorder number 40327852 was scheduled to be completed by March **2018** but was not completed until August **2018**”*

Page 2 of the audit findings listed the following violations:

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.

GO 128, Rule 17.2, Inspection, states in part:

Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance so as to conform with these rules.

GO 165, Standard III-B, Distribution Facilities, Standards for Inspections, states in part:

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.

“SCE’s records indicated that from 2014 to 2018, SCE completed 2 underground detailed inspections past their scheduled due date. SCE underground detailed inspection workorder number 901447874, for equipment numbered 203011691 and 206837458 was scheduled to be completed by May 2019 but was not completed until December 2019.”

Please note that the dates included in our findings related to workorder number 901447874 are incorrect. Our findings should have read as follows:

*“SCE’s records indicated that from 2014 to 2018, SCE completed 2 underground detailed inspections past their scheduled due date. SCE underground detailed inspection workorder number 901447874, for equipment numbered 203011691 and 206837458 was scheduled to be completed by May **2014** but was not completed until December **2014**.”*

Please advise us no later than November 1, 2019, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent the above violations.

If you have any questions concerning this correction, please contact Howard Huie at (213) 620-6503 or howard.huie@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye". The signature is written in a cursive, flowing style.

Fadi Daye, P.E.
Project and Program Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC
Lee Palmer, Deputy Director, Office of Utility Safety, SED, CPUC
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC
Howard Huie, Utilities Engineer, ESRB, CPUC