STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 16, 2021 EA2021-905

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 Thousand Oaks District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Richard Le, Joceline Pereira, and Mily Vaidya of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Thousand Oaks District from June 28, 2021 to July 2, 2021. The audit included a review of SCE's inspection and maintenance records and a field inspection 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 October 18, 2021, 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, you can contact Richard Le at (213) 999 – 9053 or Richard.Le@cpuc.ca.gov .

Sincerely,

Fadi Daye

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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
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Joceline Pereira, Utilities Engineer, ESRB, SED, CPUC
Mily Vaidya, Utilities Engineer, ESRB, SED, 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 Management 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 April 2016 through April 2021, SCE completed 224 overhead detailed inspections 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 April 2016 through April 2021, SCE completed 783 underground inspections 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 April 2016 to April 2021, SCE completed 1,024 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 648 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 April 2016 to April 2021, SCE completed 256 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 470 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:

No.	Structure ID.	Type of Structure	Location
1	1415129E	Pole	Moorpark
2	1415128E	Pole	Moorpark
3	1415127E	Pole	Moorpark
4	1415126E	Pole	Moorpark
5	1344567E	Pole	Moorpark
6	1344568E	Pole	Moorpark
7	679534E	Pole	Moorpark
8	4572636E	Pole	Moorpark
9	3005437E	Pole	Moorpark
10	5349292	BURD transformer	Moorpark
11	X5582863	BURD Switch	Moorpark
12	5381527	Pad-mounted transformer	Moorpark
13	1311837E	Pole	Simi Valley
14	1311836E	Pole	Simi Valley
15	946387E	Pole	Simi Valley
16	4467636E	Pole	Simi Valley
17	946385E	Pole	Simi Valley
18	1449636E	Pole	Simi Valley
19	4467637E	Pole	Simi Valley
20	946382E	Pole	Simi Valley
21	3005205E	Pole	Simi Valley
22	5024473	Pad-mounted transformer	Simi Valley
23	5566078	Pad-mounted switch	Simi Valley
24	5526377	Vault	Simi Valley
25	5025643	Pad-mounted transformer	Simi Valley
26	5025642	Pad-mounted transformer	Simi Valley
27	5477678	Pad-mounted transformer	Simi Valley
28	728405E	Pole/Vegetation	Simi Valley
29	4843475E	Pole	Agoura Hills
30	4843471E	Pole	Agoura Hills
31	4712908E	Pole	Agoura Hills
32	4831536E	Pole	Agoura Hills
33	4628387E	Pole	Thousand Oaks
34	1879260E	Pole	Thousand Oaks
35	4544259E	Pole	Thousand Oaks
36	4557075E	Pole	Thousand Oaks
37	4108741E	Pole	Thousand Oaks
38	4108740E	Pole	Thousand Oaks
39	1514579E	Pole	Thousand Oaks
40	1514580E	Pole	Thousand Oaks
41	1514582E	Pole	Thousand Oaks
42	1514581E	Pole	Thousand Oaks
43	4264018E	Pole	Thousand Oaks

44	4963975E	Pole	Thousand Oaks
45	4046940E	Pole	Thousand Oaks
46	1293236E	Pole/Vegetation	Thousand Oaks
47	1293237E	Pole/Vegetation	Thousand Oaks
48	1293250E	Pole/Vegetation	Thousand Oaks
49	5635876	Pad-mounted transformer	Thousand Oaks
50	5430560	Pad-mounted transformer	Thousand Oaks
51	5189646	Pad-mounted transformer	Thousand Oaks
52	P5189650	Pad-mounted transformer	Thousand Oaks
53	P51889647	Pad-mounted transformer	Thousand Oaks
54	1539328E	Pole	Santa Rosa Valley
55	1539329E	Pole	Santa Rosa Valley
56	2064296E	Pole	Santa Rosa Valley
57	4835981E	Pole	Santa Rosa Valley
58	X12068Y	Pole	Santa Rosa Valley
59	4382713E	Pole	Santa Rosa Valley
60	4047172E	Pole	Santa Rosa Valley
61	2241509E	Pole	Santa Rosa Valley
62	376665E	Pole	Santa Rosa Valley
63	4047163E	Pole	Santa Rosa Valley
64	1443865E	Pole	Santa Rosa Valley
65	1539104E	Pole	Santa Rosa Valley
66	1539105E	Pole	Santa Rosa Valley
67	4215711E	Pole	Santa Rosa Valley
68	4125350E	Pole	Malibu
69	799663E	Pole	Malibu
70	799664E	Pole	Malibu
71	4572679E	Pole	Malibu
72	4197878E	Pole	Malibu
73	799666E	Pole	Malibu
74	1638829E	Pole	Malibu
75	799667E	Pole	Malibu
76	783286E	Pole	Malibu
77	783287E	Pole	Malibu
78	783288E	Pole	Malibu
79	880761E	Pole	Malibu
80	4860449E	Pole	Malibu
81	2055065E	Pole	Malibu
82	893371E	Pole	Malibu
83	4704019E	Pole/Vegetation	Malibu
84	783009E	Pole/Vegetation	Malibu
85	770646E	Pole	Topanga
86	4521475E	Pole	Topanga
87	4669895E	Pole	Topanga
88	1112376E	Pole	Topanga
89	17557Y	Pole	Topanga
90	855474E	Pole	Topanga
91	855473E	Pole	Topanga
92	1638458E	Pole	Topanga

93	4744026E	Pole	Topanga
94	1868119E	Pole	Calabasas
95	2144978E	Pole	Calabasas
96	1639316E	Pole	Calabasas
97	4861137E	Pole	Calabasas
98	3002683E	Pole	Calabasas
99	4744954E	Pole	Calabasas
100	4607256E	Pole	Calabasas
101	4607257E	Pole	Calabasas
102	4574541E	Pole	Calabasas
103	4592082E	Pole	Calabasas
104	1143402E	Pole	Calabasas
105	1143403E	Pole	Calabasas
106	1845273E	Pole	Calabasas
107	4125687E	Pole	Calabasas
108	4574515E	Pole	Hidden Hills
109	4262978E	Pole	Hidden Hills
110	885353E	Pole	Hidden Hills
111	4856954E	Pole	Hidden Hills
112	4660526E	Pole	Hidden Hills
113	P5465874	Pad-mounted transformer	Newbury Park
114	5310253	Pad-mounted transformer	Newbury Park

IV. Field Inspection – Violations List

GO 95, Rule 18.B, Reporting and Resolution of Safety Hazards Discovered by Utilities, Notifications 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 report the third-party safety hazards on the following poles:

- 4843471E – third-party communications facilities need to complete pole transfer.
- 4963975E – third-party communications facilities need to complete pole transfer.
- 799664E – third-party abandoned service drop hanging off pole.

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.*

The guy anchor attached to each of the following SCE poles was buried in the ground:

- 1639316E
- 4574515E

The ground moulding on the following pole was damaged:

- 1344568E

GO 95, Rule 31.6, Abandoned Lines, states in part:

> *Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.*

- The guy anchor attached to Pole 4574515E was abandoned and not removed.

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.

- An unauthorized "children playing" sign was attached to pole 17557Y.

GO 95, Rule 35, Vegetation Management, Table 1, Case 14, Column E requires the radial clearance of bare line supply conductors, with a voltage between 750 to 22,500 volts, from vegetation in Extreme and Very High Fire Threat Zones in Southern California to be not less than 48 inches.

- The radial clearance between vegetation and a primary conductor on pole 4572679E, located in an Extreme High Fire Threat Zone, was approximately 2-3 feet.

GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 19, Column C requires the radial separation between span wires and communications conductors supported on the same pole to be not less than 3 inches.

- An SCE span wire attached to pole 679534E was in contact with a communication conductor.

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:

- 4108740E
- 783288E
- 1443865E

GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, Use, states in part:

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 .

The down guy wire attached on each of the following SCE poles was loose and not taut:

- 1415128E
- 1514581E
- 4574541E

The span wire attached on the following SCE pole was loose and not taut:

- 1514582E

GO 95, Rule 56.9, Guy Marker (Guy Guard), states in part:

> *A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.*

- The SCE guy wire attached to pole 4382713E did not have a guy guard.

GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:

> *The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.*

- The lowest pole step on pole 4047172E was located at a height of less than eight feet.