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

September 13, 2021 EA2021-907

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 San Jacinto-Menifee District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Calvin Choi and Joceline Pereira of my staff conducted an electric distribution audit of Southern California Edison's (SCE) San Jacinto-Menifee District from July 12, 2021 to July 16, 2021. 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 October 13, 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 Calvin Choi at (213) 266-4730 or Calvin.Choi@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

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Calvin Choi, Utilities Engineer, ESRB, SED, 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.
- Safety hazard notifications.
- Pole loading calculations records.
- Intrusive testing records.
- Vegetation management records.
- SCE's documented inspection program.

II. Records Review – Violations List

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

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 2016 to 2020, SCE failed to complete 4,686 overhead detailed inspections by SCE's inspection dates.

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 2016 to 2020, SCE failed to complete 915 underground detailed inspections by SCE's inspection dates.

GO 95, Rule 18, 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 2016 to 2021, SCE completed 1,375 work orders past their 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 2016 to 2021, SCE completed 352 underground notifications past SCE's scheduled due date for corrective action.

III. Field Inspections

My staff inspected the following facilities during the field inspection:

No.	Structure ID	Type of Structure	Location
1	4293939E	Pole	Winchester
2	4294403E	Pole	Winchester
3	4294404E	Pole	Winchester
4	4294405E	Pole	Winchester
5	4294406E	Pole	Winchester
6	4294407E	Pole	Winchester
7	4294408E	Pole	Winchester
8	4294409E	Pole	Winchester
9	4294410E	Pole	Winchester
10	4294411E	Pole	Winchester
11	4294412E	Pole	Winchester
12	220750S	Pole	Hemet
13	4149991E	Pole	Hemet
14	220614E	Pole	Hemet
15	20699S	Pole	Hemet
16	20700S	Pole	Hemet
17	4491843E	Pole	Hemet
18	20702S	Pole	Hemet
19	220613S	Pole	Hemet
20	220612S	Pole	Hemet
21	4439389E	Pole	Hemet
22	4828352E	Pole	Hemet
23	4828253E	Pole	Hemet
24	4866709E	Pole	Idyllwild
25	4540790E	Pole	Idyllwild
26	4866708E	Pole	Idyllwild
27	4866707E	Pole	Idyllwild
28	4866706E	Pole	Idyllwild
29	1775708E	Pole	Idyllwild
30	4002911E	Pole	Idyllwild
31	2033683E	Pole	Idyllwild
32	4002910E	Pole	Idyllwild
33	4005203E	Pole	Idyllwild
34	4005204E	Pole	Idyllwild
35	4655114E	Pole	Idyllwild
36	1588232E	Pole	Idyllwild
37	4569495E	Pole	Idyllwild
38	4569455E	Pole	Idyllwild
39	4841274E	Pole	Idyllwild
40	2672590E	Pole	Idyllwild

41	2248319E	Pole	Idyllwild
42	4607517E	Pole	Idyllwild
43	1588229E	Pole	Idyllwild
44	4164817E	Pole	Idyllwild
45	4164818E	Pole	Idyllwild
46	4164819E	Pole	Idyllwild
47	4908906E	Pole	Idyllwild
48	4855337E	Pole	Idyllwild
49	4855334E	Pole	Idyllwild
50	42072589E	Pole	Idyllwild
51	4720942E	Pole	Mead Valley
52	4513700E	Pole	Mead Valley
53	4831604E	Pole	Mead Valley
54	236956E	Pole	Mead Valley
55	316827S	Pole	Mead Valley
56	250153GT	Pole	Mead Valley
57	316826S	Pole	Mead Valley
58	28109CWT	Pole	Mead Valley
59	2150289E	Pole	Mead Valley
60	2150290E	Pole	Mead Valley
61	4060741E	Pole	Mead Valley
62	4060742E	Pole	Mead Valley
63	2150291E	Pole	Mead Valley
64	2150292E	Pole	Mead Valley
65	2277427E	Pole	Mead Valley
66	2277426E	Pole	Mead Valley
67	2270500E	Pole	Mead Valley
68	1623610E	Pole	Moreno Valley
69	74334S	Pole	Moreno Valley
70	4442017E	Pole	Moreno Valley
71	4366801E	Pole	Moreno Valley
72	74331S	Pole	Moreno Valley
73	311580S	Pole	Moreno Valley
74	1964178E	Pole	Moreno Valley
75	2013964E	Pole	Moreno Valley
76	1964172E	Pole	Moreno Valley
77	4591007E	Pole	Moreno Valley
78	1964164E	Pole	Moreno Valley
79	4799641E	Pole	Woodcrest
80	4709162E	Pole	Woodcrest
81	2270431E	Pole	Woodcrest
82	4709161E	Pole	Woodcrest
83	4827735E	Pole	Woodcrest
84	4944055E	Pole	Woodcrest
85	4473085E	Pole	Woodcrest

86	2150717E	Pole	Woodcrest
87	105564H	Pole	Woodcrest
88	209694S	Pole	Lake Matthews
89	209695S	Pole	Lake Matthews
90	1971421E	Pole	Lake Matthews
91	4058827E	Pole	Lake Matthews
92	209697S	Pole	Lake Matthews
93	4720197E	Pole	Lake Matthews
94	215897S	Pole	Perris
95	215896S	Pole	Perris
96	1964535E	Pole	Perris
97	1964534E	Pole	Perris
98	1964533E	Pole	Perris
99	16717E	Pole	Perris
100	4726458E	Pole	Perris
101	2307074E	Pole	Perris
102	2307075E	Pole	Perris
103	4819427E	Pole	Perris
104	4819426E	Pole	Perris
105	2309844E	Pole	Perris
106	GT4345	Pole	Perris
107	4781304E	Pole	Perris
108	4781303E	Pole	Perris
109	4781305E	Pole	Perris
110	2173580E	Pole	Perris
111	2362044E	Pole	Nuevo
112	2362043E	Pole	Nuevo
113	2362042E	Pole	Nuevo
114	2362041E	Pole	Nuevo
115	2362040E	Pole	Nuevo
116	3000772E	Pole	Nuevo
117	4857816E	Pole	Nuevo
118	4857819E	Pole	Nuevo
119	77095S	Pole	Nuevo
120	4162747E	Pole	San Jacinto
121	4162746E	Pole	San Jacinto
122	4054685E	Pole	San Jacinto
123	4162745E	Pole	San Jacinto
124	4162744E	Pole	San Jacinto
125	4162743E	Pole	San Jacinto
126	4054682E	Pole	San Jacinto
127	4054681E	Pole	San Jacinto
128	4162742E	Pole	San Jacinto
129	4162741E	Pole	San Jacinto
130	1990975E	Pole	Homeland

131	GT104368	Pole	Homeland
132	1990976E	Pole	Homeland
133	GT104369	Pole	Homeland
134	1990977E	Pole	Homeland
135	2547781E	Pole	Homeland
136	4507481E	Pole	Homeland
137	GT104370	Pole	Homeland
138	1990979E	Pole	Homeland
139	5301933	BURD Transformer	Moreno Valley
140	5301934	BURD Transformer	Moreno Valley
141	5311965	Vault	Moreno Valley
142	5320920	BURD Transformer	Moreno Valley
143	5311967	BURD Switch	Moreno Valley
144	5419366	Pad-mounted Transformer	Moreno Valley
145	P5550696	Pad-mounted Transformer	Moreno Valley
146	P5550695	Splice Box	Moreno Valley
147	5388466	Pad-mounted Transformer	Moreno Valley
148	P5653915	Pad-mounted Transformer	Perris
149	5653916	Splice Box	Perris
150	5653918	Pad-mounted Transformer	Perris
151	P5653962	Pad-mounted Transformer	Perris
152	V5629013	Vault	Perris
153	P5629022	Pad-mounted Transformer	Perris
154	P5629620	Pad-mounted Switch	Perris
155	P5626822	Pad-mounted Switch	Perris

IV. Field Inspection - Violations List

My staff observed the following violations during the field inspections portion of the audit:

GO 95, Rule 51.6-A, 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 attached to each of the following SCE poles were damaged and/or missing:

- 4294406E
- 4294407E
- 220614E
- 20699S
- 20700S
- 220613S
- 220612S
- 2150291E
- 2150292E
- 4366801E
- 311580S
- 4473085E
- 2150717E
- 105564H
- 2309844E
- 2362043E
- 4162746E
- 4162742E
- 1990975E

GO 95, Rule 56.2, Uses (Guy Wires), 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.*

SCE down guy wire attached to pole No. 4857816E was not taut.

GO 95, Rule 84.6-B, Ground Wires, states in part:

> *Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet.*

The ground moulding attached to each of the following poles was damaged and/or missing:

- 4491843E
- 220613S
- 220612S
- 4569495E
- 316826S
- 2150289E

- 1623610E
- 2150717E
- 2309844E
- 2362040E
- 1990979E

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 "eye" of the down guy anchor attached to each of the following poles was buried:

- 4866708E
- 316827S

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 fence was attached to Pole No. 1964534E and 1964533E.

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.*

- Vault 5311965 was missing a ladder to safely enter the vault.
- Padmounted transformer 5388466 had a small oil leak and an area of significant rust on the enclosure.