STATE OF CALIFORNIA Gavin Newsom, *Governor*

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

August 19, 2022 EA2022-966

Melvin Stark
Principal Manager, T&D Compliance Integration
Southern California Edison Company
1 Innovation Way
Pomona, CA 91786

Subject: Audit of Southern California Edison's Blythe District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Eric Ujiiye and Calvin Choi of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Blythe District from March 7, 2022, to March 11, 2022. 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 September 19, 2022, 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 Eric Ujiiye at (213) 620-2598 or eric.ujiiye@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, Electric Safety and Reliability Branch, CPUC
Eric Ujiiye, Utilities Engineer, ESRB, 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
- 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 165, Section III-B, 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 insuring that they are in good condition so as to conform with these rules.*

SCE's records indicated from 2017 to 2022, SCE had 189 annual grid patrol inspections and 414 overhead detailed inspections that were completed or pending completion past the scheduled due date.

GO 165, Section III-B, 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 from 2017 to 2022, SCE had 38 underground detailed inspections that were completed or pending completion past the scheduled due date.

Pre-2018 version of GO 95, Rule 18-A: Resolution of Safety Hazards and General Order 95 Nonconformances, states in part:

> *Each company (including utilities and CIPs) is responsible for taking appropriate corrective action to remedy safety hazards and GO 95 nonconformances posed by its facilities.*

Current GO 95, Rule 18-A: Resolution of Safety Hazards and General Order 95 Nonconformances, states in part:

> *Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.*

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 2017 to 2022, SCE had 87 overhead notifications that were completed or pending completion past the 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 2017 to 2022, SCE had 11 underground notifications that were completed or pending completion past the 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.	4061284E	Pole	Blythe
2.	1052-CRT	Pole	Blythe
3.	4318225E	Pole	Blythe
4.	4138226E	Pole	Blythe
5.	2267796E	Pole	Blythe
6.	2311212E	Pole	Blythe
7.	1840971E	Pole	Blythe
8.	4847016E	Pole	Blythe
9.	4793350E	Pole	Blythe
10.	4948097E	Pole	Blythe
11.	4666651E	Pole	Blythe
12.	2073744E	Pole	Blythe
13.	1921829E	Pole	Blythe
14.	39063	Pole	Blythe
15.	238514S	Pole	Blythe
16.	2325106E	Pole	Vidal
17.	2325111E	Pole	Vidal
18.	2325112E	Pole	Vidal
19.	2325107E	Pole	Vidal
20.	2325108E	Pole	Vidal
21.	4092899E	Pole	Vidal
22.	4459476E	Pole	Vidal
23.	2325110E	Pole	Vidal
24.	2350519E	Pole	Vidal
25.	2316044E	Pole	Vidal
26.	2316045E	Pole	Vidal
27.	1280229E	Pole	Vidal
28.	1280388E	Pole	Vidal
29.	1280389E	Pole	Vidal
30.	1280390E	Pole	Vidal
31.	2267777E	Pole	Vidal
32.	1280395E	Pole	Vidal
33.	4816470E	Pole	Vidal
34.	1280396E	Pole	Vidal
35.	4186938E	Pole	Vidal
36.	4186938E	Pole	Vidal
37.	1280430E	Pole	Vidal
38.	1812475E	Pole	Vidal
39.	1280428E	Pole	Vidal
40.	4635025E	Pole	Vidal

41.	V5001677	Vault	Blythe
42.	P5445815	Pad mount	Blythe
43.	P5445816	Pad mount	Blythe
44.	P5445817	Pad mount	Blythe
45.	P5445812	Pad mount	Blythe
46.	P5445811	Pad mount	Blythe
47.	P5445810	Pad mount	Blythe
48.	P5445850	Pad mount	Blythe
49.	P5495642	Pad mount	Blythe
50.	P5445807	Pad mount	Blythe
51.	HH for P5445806	Hand Hole	Blythe
52.	P5445813	Pad mount	Blythe
53.	P5176191	Pad mount	Blythe
54.	P5419246	Pad mount	ERP
55.	P5419194	Pad mount	ERP
56.	P5176202	Pad mount	ERP
57.	P5519237	Pad mount	ERP
58.	P5445836	Pad mount	ERP
59.	P5445835	Pad mount	ERP
60.	P5445635	Pad mount	ERP
61.	38925	Pole	Desert Center
62.	38926S	Pole	Desert Center
63.	4891648E	Pole	Desert Center
64.	4891647E	Pole	Desert Center
65.	4793929E	Pole	Desert Center
66.	4594649E	Pole	Desert Center
67.	1812284E	Pole	Desert Center
68.	1812283E	Pole	Desert Center
69.	1812282E	Pole	Desert Center
70.	4766670E	Pole	Desert Center
71.	59371	Pole	Blythe
72.	2117208E	Pole	Blythe
73.	2117207E	Pole	Blythe
74.	2117206E	Pole	Blythe
75.	4714177E	Pole	Blythe
76.	4259509E	Pole	Blythe
77.	339222S	Pole	Blythe
78.	4794469E	Pole	Blythe
79.	2310790E	Pole	Blythe
80.	339556	Pole	Blythe
81.	447998E	Pole	Blythe
82.	4757292E	Pole	Blythe
83.	4061288E	Pole	Blythe
84.	1812444E	Pole	Blythe
85.	1641073E	Pole	Blythe

86.	4472997E	Pole	Blythe
87.	1812472E	Pole	Blythe
88.	2350578E	Pole	Blythe
89.	439448	Pole	Blythe
90.	4320368E	Pole	Blythe

IV. Field Inspection Violations List

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

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.*

Facilities attached to the following poles were not maintained for their intended use:

- Pole 1921829E – A secondary riser conduit attached to the pole was damaged and cut near the base.
- Pole 2325112E – A transformer supported attached to the pole had secondary leads with deteriorated insulation.
- Pole 1280396E – A "buddy pole" was not yet removed and left approximately a foot away from the pole.
- The down guy wire attached to each of the following poles was was buried above the anchor attachment point:
    - Pole 4061284E
    - Pole 1280390E
    - Pole 1280430E
    - Pole 2350578E

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 parking sign was attached to the surface of Pole 2325106E.

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 the following SCE poles were damaged and/or missing:

- Pole 1052-CRT – The pole did not have “HIGH VOLTAGE” markings on one side of the cross-arm.
- Pole 4318225E – The markings partially displayed “HIG VOL” on one side of the cross-arm and damaged and illegible on the other.
- Pole 2311212E - The markings partially displayed “HIGH VOL” on one side of the cross-arm.
- Pole 2325107E - The markings partially displayed “VOLTAGE” on one side of the cross-arm.
- Pole 4459476E - The pole did not have “HIGH VOLTAGE” markings on one side of the cross-arm.
- Pole 2316045E - The pole did not have “HIGH VOLTAGE” markings on the top cross-arm and displayed “HIGH VOL” on the lower cross-arm that was in buck arm formation.
- Pole 1812475E - The markings partially displayed “HIGH” on one side of the cross-arm.
- Pole 38925 - The pole did not have “HIGH VOLTAGE” markings on one side of the cross-arm.
- Pole 2117207E - The pole did not have “HIGH VOLTAGE” markings on one side of the cross-arm.
- Pole 2117206E - The pole did not have “HIGH VOLTAGE” markings on one side of the cross-arm.
- Pole 4061288E - The markings partially displayed “VOLTAGE” on one side of the top cross-arm.
- Pole 4320368E - The markings partially displayed “H VOLTAGE” on one side of the cross-arm.

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 attached to the following poles was damaged:

- Pole 2325108E – The ground moulding was pulling away from the pole, exposing the ground wire at the public level and a section of the ground moulding was missing at the communication level.
- Pole 2267777E - The ground moulding was damaged, exposing the ground wire above the public level.
- Pole 1812475E - The ground moulding was missing a section, exposing the ground wire below the transformer.
- Pole 1641073E - The ground moulding was pulling away from the pole, exposing the ground wire at the public level

GO 95, Rule 56.2, 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 .*

A down guy wire attached to Pole 1812444E was not maintained taut.

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.*

- Pad mounted Transformer P5445835 had signs of oil leakage at the base of the transformer; additionally, the padmount was supported on a damaged base pad.
- SCE Handhole P5445806 – A lid securement screw point was broken.