STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

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

June 21, 2022 EA2022-971

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 Palm Springs District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Richard Le and James Miller of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Palm Springs District from May 16, 2022 to May 20, 2022. 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 July 22, 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 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
Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC
Richard Le, Utilities Engineer, ESRB, SED, CPUC
James Miller, 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 February 2017 through February 2022, SCE completed 42 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 19 pending patrol inspections that were past SCE's scheduled due date.

- SCE's records indicated that from February 2017 through February 2022, SCE completed 2769 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 188 pending detailed inspections that were 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 February 2017 through February 2022, SCE completed 676 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 57 pending underground inspections that were 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 February 2017 through February 2022, SCE completed 201 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 64 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 February 2017 through February 2022, SCE completed 574 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 178 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 portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	4208003E	Pole	Morongo Indian Reservation
2	2267104E	Pole	Morongo Indian Reservation
3	2261705E	Pole	Morongo Indian Reservation
4	4627285E	Pole	Morongo Indian Reservation
5	4627840E	Pole	Morongo Indian Reservation
6	4636835E	Pole	Morongo Indian Reservation
7	4805790E	Pole	Morongo Indian Reservation
8	4030503E	Pole	Morongo Indian Reservation
9	4030831E	Pole	Morongo Indian Reservation
10	1593207E	Pole	Morongo Indian Reservation
11	4429294E	Pole	Morongo Indian Reservation
12	4183179E	Pole	Morongo Indian Reservation
13	4017844E	Pole	Morongo Indian Reservation
14	4959716E	Pole	Morongo Indian Reservation
15	4323780E	Pole	Morongo Indian Reservation
16	4017843E	Pole	Morongo Indian Reservation
17	332344S	Pole	Morongo Indian Reservation
18	4322762E	Pole	Morongo Indian Reservation
19	4937495E	Pole/Vegetation	Morongo Indian Reservation
20	4919041E	Pole/Vegetation	Morongo Indian Reservation
21	2097201E	Pole/Vegetation	Morongo Indian Reservation
22	2228330E	Pole/Vegetation	Morongo Indian Reservation
23	4603747E	Pole/Vegetation	Morongo Indian Reservation
24	4323764E	Pole	Cabazon
25	4323454E	Pole	Cabazon
26	4323455E	Pole	Cabazon
27	4323456E	Pole	Cabazon
28	4662104E	Pole	Cabazon
29	17116CWT	Pole	Cabazon
30	4806418E	Pole	Cabazon
31	4806417E	Pole	Cabazon
32	4806416E	Pole	Cabazon
33	4806415E	Pole	Cabazon
34	4806414E	Pole	Cabazon
35	4961601E	Pole	Whitewater
36	4487608E	Pole	Whitewater
37	1705733E	Pole	Whitewater
38	4323285E	Pole	Whitewater
39	2205107E	Pole	Whitewater

40	4487609E	Pole	Whitewater
41	4488071E	Pole	Whitewater
42	4639903E	Pole	Whitewater
43	4221787E	Pole	Whitewater
44	4029716E	Pole	Whitewater
45	4029717E	Pole	Whitewater
46	4029718E	Pole	Whitewater
47	4029719E	Pole	Whitewater
48	4029722E	Pole	Whitewater
49	4500823E	Pole	Whitewater
50	4500824E	Pole	Whitewater
51	4207370E	Pole	Whitewater
52	4323515E	Pole	Whitewater
53	4207369E	Pole	Whitewater
54	4183190E	Pole	Whitewater
55	4025939E	Pole	Whitewater
56	2021765E	Pole	Whitewater
57	235775S	Pole	Whitewater
58	2021764E	Pole	Whitewater
59	1821614E	Pole	Whitewater
60	4487802E	Pole	Whitewater
61	2207868E	Pole	Whitewater
62	1821644E	Pole	Whitewater
63	235833	Pole	Desert Hot Springs
64	235834	Pole	Desert Hot Springs
65	2350902E	Pole	Desert Hot Springs
66	4030062E	Pole	Desert Hot Springs
67	4861326E	Pole	Desert Hot Springs
68	4861990E	Pole	Desert Hot Springs
69	4861235E	Pole	Desert Hot Springs
70	2319162E	Pole	North Palm Springs
71	2319161E	Pole	North Palm Springs
72	4627876E	Pole	North Palm Springs
73	2319159E	Pole	North Palm Springs
74	4500160E	Pole	North Palm Springs
75	2319157E	Pole	North Palm Springs
76	4635670E	Pole	North Palm Springs
77	4823064E	Pole	North Palm Springs
78	4891787E	Pole	Palm Springs
79	4523425E	Pole	Palm Springs
80	57953	Pole	Palm Springs
81	1554598E	Pole	Palm Springs
82	57954	Pole	Palm Springs
83	S5004225	C1 Dome Transformer	Palm Springs
84	P5004224	Pad-mounted transformer	Palm Springs

85	S5004223	C1 Dome Transformer	Palm Springs
86	S5004222	C1 Dome Transformer	Palm Springs
87	5175628	Substructure with connectors	Palm Springs
88	4323790E	Pole	Palm Springs
89	4323791E	Pole	Palm Springs
90	33005S	Pole	Palm Springs
91	4636049E	Pole	Palm Springs
92	1597253E	Pole	Palm Springs
93	334062S	Pole	Palm Springs
94	1554570E	Pole	Palm Springs
95	1554571E	Pole	Palm Springs
96	4500161E	Pole	Palm Springs
97	4826276E	Pole	Palm Springs
98	B5520380	BURD Transformer	Indian Wells
99	B5045155	BURD Transformer	Indian Wells
100	5186821	BURD Transformer	Palm Desert
101	B5186822	BURD Transformer	Palm Desert
102	B5323380	BURD Transformer	Palm Desert
103	28823CWT	Pole	Palm Desert
104	28822CWT	Pole	Palm Desert
105	28824CWT	Pole	Palm Desert
106	28825CWT	Pole	Palm Desert
107	4466445E	Pole	Cathedral City
108	2160218E	Pole	Cathedral City
109	4030882E	Pole	Cathedral City
110	B5185996	BURD Connectors	Cathedral City
111	P5192725	Pad-mounted transformer	Cathedral City

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.*

- A visibility strip on pole 4030831E was damaged.
- The conduit bracket on pole 4030831E was unsecured.
- The ground moulding on pole 28825CWT was damaged.
- The ground moulding on pole 2160218E was damaged.

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.*

- Pole 4806418E had a "no trespassing" sign attached to it.

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

- An SCE guy wire attached to pole 332344S was in contact with a communication conductor.

GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 8, Column D requires the vertical separation between secondary and communications conductors supported on the same pole to be not less than 48 inches.

- The separation between SCE's secondary conductors and third-party communication conductors on pole 4323454E was less than 48 inches.
- An SCE service drop was in contact with a third-party communication service drop on pole 28822CWT.

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:

- 4500160E
- 4323455E
- 4323456E
- 2021765E
- 28825CWT
- 2160218E

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 to SCE pole 4500824E was loose and not taut.

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 28823CWT was located at a height of less than eight feet.

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.

- The hinge on the enclosure of C1 dome transformer S5004223 was damaged.