STATE OF CALIFORNIA GAVIN NEWSOM, *Governor*

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

June 26, 2023 EA2023-1056

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 Monrovia District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Stacey Ocampo of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Monrovia District from April 24, 2023 to April 28, 2023. 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 26, 2023, 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 Stacey Ocampo at (213) 266-4712 or Stacey.Ocampo@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
Stacey Ocampo, 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 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 2018 through February 2023, SCE completed 3 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 2 pending patrol inspections that were past SCE's scheduled due date.

- SCE's records indicated that from February 2018 through February 2023, SCE completed 7200 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 493 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 2018 through February 2023, SCE completed 264 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 8 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 2018 through February 2023, SCE completed 657 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 366 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 August 2017 through August 2022, SCE completed 91 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 96 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	104187E	Pole	Duarte
2	4694984E	Pole	Duarte
3	4606800E	Pole	Duarte
4	1669780E	Pole	Duarte
5	4814738E	Pole	Duarte
6	667917E	Pole	Duarte
7	667919E	Pole	Duarte
8	2354113E	Pole	Duarte
9	2222276E	Pole	Duarte
10	671810E	Pole	Duarte
11	671811E	Pole	Duarte
12	4221371E	Pole	Duarte
13	4221372E	Pole	Duarte
14	4470904E	Pole	Duarte
15	4752733E	Pole	Duarte
16	4694939E	Pole	Duarte
17	4081731E	Pole	Duarte
18	4160932E	Pole	Azusa
19	2222283E	Pole	Azusa
20	2222282E	Pole	Azusa
21	1942388E	Pole	Azusa
22	4741399E	Pole	Azusa
23	2222284E	Pole	Azusa
24	2222285E	Pole	Azusa
25	1918719E	Pole	Azusa
26	2288511E	Pole	Azusa
27	4741400E	Pole	Azusa
28	1471106E	Pole	Azusa
29	4160275E	Pole	Azusa
30	1969124E	Pole	Azusa
31	1969125E	Pole	Azusa
32	4279708E	Pole	Azusa
33	1969126E	Pole	Azusa
34	1969127E	Pole	Azusa
35	1969129E	Pole	Azusa
36	1969128E	Pole	Azusa
37	2288724E	Pole	Azusa
38	2288725E	Pole	Azusa
39	1079245E	Pole	Azusa

40	1060906E	Pole	Azusa
41	1060905E	Pole	Azusa
42	4516442E	Pole	Azusa
43	4516443E	Pole	Azusa
44	1887163E	Pole	Tujunga
45	1887162E	Pole	Tujunga
46	4431504E	Pole	Tujunga
47	4431505E	Pole	Tujunga
48	1887164E	Pole	Tujunga
49	340572M	Pole	Tujunga
50	1887170E	Pole	Tujunga
51	1887169E	Pole	Tujunga
52	478820E	Pole	Tujunga
53	4908658E	Pole	Tujunga
54	4820744E	Pole	Tujunga
55	1662070E	Pole	Tujunga
56	425624E	Pole	Tujunga
57	805955E	Pole	Altadena
58	959269E	Pole	Altadena
59	1349821E	Pole	Altadena
60	805954E	Pole	Altadena
61	805953E	Pole	Altadena
62	805952E	Pole	Altadena
63	1091985E	Pole	Altadena
64	1049248E	Pole	Altadena
65	1049240E	Pole	Altadena
66	1091752E	Pole	Altadena
67	1049241E	Pole	Altadena
68	1049242E	Pole	Altadena
69	1049243E	Pole	Altadena
70	1293024E	Pole	Altadena
71	1049245E	Pole	Altadena
72	1049246E	Pole	Altadena
73	1669893E	Pole	Temple City
74	1669885E	Pole	Temple City
75	1769062E	Pole	Temple City
76	1769061E	Pole	Temple City
77	223752E	Pole	Temple City
78	1222084E	Pole	Temple City
79	1669996E	Pole	Temple City
80	340664E	Pole	Temple City
81	4646632E	Pole	Temple City
82	340666E	Pole	Temple City
83	340667E	Pole	Temple City
84	4663160E	Pole	Temple City

85	319895E	Pole	Baldwin Park
86	4684816E	Pole	Arcadia
87	4160650E	Pole	Arcadia
88	488234H	Pole	Arcadia
89	1364053E	Pole	Arcadia
90	2222218E	Pole	Arcadia
91	495617H	Pole	Arcadia
92	4526510E	Pole	Arcadia
93	4883666E	Pole	Arcadia
94	4167941E	Pole	Arcadia
95	437611E	Pole	Arcadia
96	4427011E	Pole	Arcadia
97	437610E	Pole	Arcadia
98	55907H	Pole	Arcadia
99	1323690E	Pole	Arcadia
100	182961E	Pole	San Gabriel
101	1724556E	Pole	San Gabriel
102	250355E	Pole	San Marino
103	4774004E	Pole	San Marino
104	4160620E	Pole	San Marino
105	2310630E	Pole	San Marino
106	4353493E	Pole	San Marino
107	1363365E	Pole	Pasadena
108	1363366E	Pole	Pasadena
109	1363367E	Pole	Pasadena
110	1363368E	Pole	Pasadena
111	1363369E	Pole	Pasadena
112	1271562E	Pole	Pasadena
113	4209261E	Pole	Pasadena
114	4209260E	Pole	Pasadena
115	4555388E	Pole	Pasadena
116	4446251E	Pole	Pasadena
117	P5179462	Pad-mounted Transformer	La Cañada
118	P5008304	BURD Transformer	Arcadia
119	V5007434	Vault	Arcadia
120	5125933	BURD Transformer	East San Gabriel
121	5007341	Pad-mounted Transformer	Temple City
122	B5206241	BURD Transformer	Irwindale
123	B5206240	BURD Transformer	Irwindale
124	S5333203	Sub-surface Structure	Irwindale
125	P5333205	Pad-mounted Transformer	Irwindale

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.*

SCE's facilities on the following poles required maintenance:

- Pole 340667E: the visibility strip was missing.
- Pole 4516442E: the fire wrap was damaged.
- Pole 1769061E – an insulator attached to the secondary crossarm was sunken.

The "eye" of the SCE down guy anchor attached to the following SCE poles was damaged:

- 1669780E
- 1091752E
- 1049243E

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 Pole 1969125E was loose and not taut.

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:

- 4814738E
- 1049245E
- 4663160E
- 1669885E
- 488234H
- 2222285E
- 2288511E

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.*

Unauthorized foreign attachments were observed on the following SCE poles:

- Pole 2222283E had an unauthorized "No Fireworks" sign attached to it.
- Pole 1471106E had an unauthorized "No Trespassing" sign attached to it.
- Pole 1769061E had an unauthorized "Right Turn Only" sign attached to it.
- Pole 11942388E had an unauthorized camera attached to it.

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 Pole 488234H was damaged.

General Order 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be 3 inches.

The radial clearance between an SCE down guy wire and a third-party communications conductor on Pole 4446251E was less than 3 inches.