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

February 21, 2024 EA2023-1107

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 Wildomar District

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Stacey Ocampo and Norvik Ohanian of my staff conducted an electric distribution audit of Southern California Edison's (SCE) Wildomar District from December 18, 2023 to December 22, 2023. 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 March 21, 2024, by electronic or hard copy, of all corrective measures taken by SCE to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, please 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

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Stacey Ocampo, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Patrol & Detailed Inspection records
- Repair Notifications
- Intrusive Testing Records
- Third Party Notifications
- Pole Loading Calculation 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 insuring that they are in good condition so as to conform with these rules.*

SCE's records indicated that from November 2018 through November 2023, SCE completed 36 patrol inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 5 pending patrol inspections that were past SCE's scheduled due date.

SCE's records indicated that from November 2018 through November 2023, SCE completed 1,616 detailed inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 65 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 of these rules.*

SCE's records indicated that from November 2018 through November 2023, SCE completed 995 underground inspections past SCE's scheduled due date. Additionally, as of the date of the audit, SCE had 17 pending underground inspections that were past SCE's scheduled due date.

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 November 2018 through November 2023, SCE completed 370 overhead work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 498 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 November 2018 through November 2023, SCE completed 109 underground work orders past SCE's due date for corrective action. Additionally, as of the date of the audit, SCE had 130 open underground work orders that were past SCE's scheduled due date for corrective action.

III. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	2361667E	Pole	Winchester
2	2361668E	Pole	Winchester
3	2352535E	Pole	Winchester
4	2352536E	Pole	Winchester
5	4357334E	Pole	Winchester
6	4065102E	Pole	Winchester
7	4065104E	Pole	Winchester
8	4065105E	Pole	Winchester
9	2199528E	Pole	Wildomar
10	2112638E	Pole	Wildomar
11	2112637E	Pole	Wildomar
12	2112636E	Pole	Wildomar
13	2112635E	Pole	Wildomar
14	2075095E	Pole	Wildomar
15	2075094E	Pole	Wildomar
16	2014458E	Pole	Wildomar
17	2014459E	Pole	Wildomar
18	2014457E	Pole	Wildomar
19	2245830E	Pole	Temecula
20	4275605E	Pole	Temecula
21	2245831E	Pole	Temecula
22	2347108E	Pole	Temecula
23	1999162E	Pole	Temecula
24	4357690E	Pole	Temecula
25	4275606E	Pole	Temecula
26	4275607E	Pole	Temecula
27	1999167E	Pole	Temecula
28	1999168E	Pole	Temecula
29	4140059E	Pole	Temecula
30	4140058E	Pole	Temecula
31	4140057E	Pole	Temecula
32	4140056E	Pole	Temecula
33	4140055E	Pole	Temecula
34	4140054E	Pole	Temecula
35	4140053E	Pole	Temecula
36	4140052E	Pole	Temecula
37	4140051E	Pole	Temecula
38	4140050E	Pole	Temecula
39	4583170E	Pole	Murrieta
40	2075397E	Pole	Murrieta
41	4583171E	Pole	Murrieta
42	4594324E	Pole	Murrieta

43	2075396E	Pole	Murrieta
44	4870401E	Pole	Murrieta
45	4865496E	Pole	Murrieta
46	1885573E	Pole	Murrieta
47	2307331E	Pole	Murrieta
48	4865495E	Pole	Murrieta
49	1930685E	Pole	Murrieta
50	1930686E	Pole	Murrieta
51	4060523E	Pole	Murrieta
52	4060522E	Pole	Murrieta
53	4060521E	Pole	Murrieta
54	4060520E	Pole	Murrieta
55	4534249E	Pole	Murrieta
56	4060518E	Pole	Murrieta
57	4060517E	Pole	Murrieta
58	4060516E	Pole	Murrieta
59	4752809E	Pole	Murrieta
60	4140011E	Pole	Murrieta
61	4776070E	Pole	Murrieta
62	2206513E	Pole	Lake Elsinore
63	1991000E	Pole	Lake Elsinore
64	1990999E	Pole	Lake Elsinore
65	1564256E	Pole	Lake Elsinore
66	4715481E	Pole	Lake Elsinore
67	1990998E	Pole	Lake Elsinore
68	1971449E	Pole	Lake Elsinore
69	1971446E	Pole	Lake Elsinore
70	4535362E	Pole	Lake Elsinore
71	4710873E	Pole	Lake Elsinore
72	1971445E	Pole	Lake Elsinore
73	2150202E	Pole	Wildomar
74	2150201E	Pole	Wildomar
75	1594431E	Pole	Wildomar
76	1668045E	Pole	Wildomar
77	4214053E	Pole	Wildomar
78	1668046E	Pole	Wildomar
79	2352576E	Pole	Wildomar
80	1796537E	Pole	Wildomar
81	2112831E	Pole	Wildomar
82	2112832E	Pole	Wildomar
83	2227882E	Pole	Menifee
84	4056723E	Pole	Menifee
85	4060159E	Pole	Menifee
86	4113412E	Pole	Menifee
87	4872691E	Pole	Menifee
88	213103	Pole	Wildomar
89	4952093E	Pole	Wildomar

90	4059937E	Pole	Wildomar
91	4871862E	Pole	Wildomar
92	1853895E	Pole	Wildomar
93	1853898E	Pole	Wildomar
94	4715991E	Pole	Wildomar
95	2181900E	Pole	Wildomar
96	2181899E	Pole	Wildomar
97	4908298E	Pole	Wildomar
98	4908297E	Pole	Wildomar
99	4532417E	Pole	Wildomar
100	4222673E	Pole	Wildomar
101	P5477380	Pad-mounted Transformer	Temecula
102	P5734140	Pad-mounted Transformer	Temecula
103	P5656516	Pad-mounted Switch	Temecula
104	P5541258	Pad-mounted Switch	Temecula
105	P5656515	Pad-mounted Switch	Temecula
106	5493806	Vault	Murrieta
107	P5502778	Pad-mounted Switch	Murrieta
108	P5502779	Pad-mounted Switch	Murrieta
109	5493807	Vault	Murrieta
110	P5466890	Pad-mounted Transformer	Murrieta

IV. Field Inspection – Violations List

We observed the following violations during the field inspections:

GO 95, Rule 18-A3, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards, A. Resolution of Potential Violations of General Order 95 and Safety Hazards, states in part:

> *(3) 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 entity of such safety hazard(s) no later than 10 business days after the discovery.*

For pole 2181900E, SCE needs to notify the third party to complete a pole transfer from a buddy 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 following facilities required maintenance:

- 4065105E – the down guy anchor supporting the pole was buried.
- 4357334E – the visibility strip was damaged and not fully attached to the pole.
- 1853898E – a "buddy pole" was not yet removed and left approximately a foot away from the pole.

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 poles were either missing or damaged:

- 4140057E
- 4140055E
- 4140054E
- 4140053E
- 2181899E

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 each of the following SCE poles:

- 4065102E – "WARNING – NEIGHBORHOOD WATCH PROGRAM IN FORCE" sign
- 4275605E – "SPEED LIMIT" sign
- 4140059E – "TRUST & WILL" advertisement sign
- 4594324E – "TRUST & WILL" advertisement sign
- 4865496E – "SLOW DOWN" sign
- 1991000E – light fixture
- 1564256E – "NOTICE – 24 HOUR VIDEO SURVEILLANCE" sign
- 4715481E – "PRIVATE PROPERTY" sign
- 4214053E – light fixture
- 2181900E – surveillance motion detector

GO 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.

An SCE down guy wire attached to pole 4222673E was in contact with a third-party communications conductor.

GO 95, Rule 44.1, Installation and Reconstruction, states in part:

> *Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.*

The pole loading calculations supplied by SCE for the following poles contained incorrect information:

- 2227882E – The pole loading data incorrectly recorded a composite fiberglass class H3 pole, which was found out to be a wooden class H1 pole at the time of the field inspection.
- 1991000E – The pole loading data incorrectly recorded a wooden pole, which was found out to be a composite fiberglass pole at the time of the field inspection.

GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wire 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 supporting each of the following poles was loose and not taut:

- 4594324E
- 2075094E

The span guy wire supporting pole 4060516E was loose and not taut.

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 outer most down guy wire attached to pole 4715991E did not have a guy marker.

GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment.*

The required working space on the following pad-mounted switch doors were obstructed by fences and could not be opened:

- P5656516
- P5541258