

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Order Instituting Investigation Into the Rates, Charges, Service And Practices of Pacific Gas and Electric Company.	Investigation 95-02-015
Application of Pacific Gas And Electric Company for Authority Among Other Things, To Decrease its Rates And Charges for Electric and Gas Service, and Increase Rates and Charges for Pipe Expansion Service.	Application 94-12-005
Order Instituting Rulemaking for Electric Distribution Facility Standard Setting.	Rulemaking 96-11-004

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)  
ANNUAL REPORT OF 2022 DISTRIBUTION INSPECTIONS SUBMITTED  
PURSUANT TO GENERAL ORDER NO. 165**

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Dated: **July 3, 2023**

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2022 DISTRIBUTION INSPECTIONS SUBMITTED PURSUANT TO GENERAL  
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**TABLE OF CONTENTS**

<u>Section</u>	<u>Title</u>	<u>Page</u>
I. SUMMARY OF SCE’S DISTRIBUTION INSPECTIONS DURING CALENDAR YEAR 2022.....		2
II. DETAILS OF SCE’S DISTRIBUTION INSPECTIONS DURING CALENDAR YEAR 2022.....		3
III. PATROLS.....		4
A.    Grid Patrols (Urban and Rural).....		4
B.    Streetlight Patrols (Urban and Rural) .....		4
IV. DETAILED INSPECTIONS .....		4
A.    Overhead Detailed Inspections by Pole (ODI) .....		5
B.    Underground and Pad-Mounted Equipment Detailed Inspections .....		6
C.    Wood Pole Inspections (Intrusive and Visual) .....		6

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Pursuant to General Order No. 165 (“GO 165”) and Decision No. (“D.”) 97-03-070 issued by the California Public Utilities Commission (the “Commission”), Southern California Edison Company (“SCE”) respectfully submits its Annual Report of distribution inspections completed in calendar year 2022 (“Report”). SCE submits this Report in accordance with D.12-01-032, issued in Rulemaking (“R.”) 08-11-005. That decision amended the GO 165 reporting requirements effective January 12, 2012.

The data in this Report is based on information retrieved from SCE’s Work Management System (“WMS”) at a particular juncture. SCE’s overhead and underground electric distribution system is large and dynamic. Equipment quantities, system configurations, and system conditions are continually changing as a result of many factors, including but not limited to: (1) customer-related issues or constraints; (2) weather and environmental conditions; (3) the addition and/or removal of equipment to accommodate new customer connections and load

growth; (4) requests from customers, cities, and governmental agencies to relocate facilities; (5) the sale and/or acquisition of existing distribution systems; and (6) the retirement and replacement of aging plant. In addition, minor errors may occur in the entry of data into WMS. For example, a large amount of data is entered into WMS by linemen, troublemen, and other field personnel that work on our electrical system. Although these field personnel receive training on the field tools (such as laptop computers or tablets), virtually none of these individuals are experts or specialists in data entry. Moreover, due in part to the fact that, over the many decades that SCE has served its customers, SCE has inherited certain grid assets from other utilities, SCE may occasionally discover an asset that was not mapped into SCE’s records, and thus may not have full information regarding the asset.

Additionally, we are (on an appropriately ongoing basis) continuing to migrate to new software platforms as warranted for the field tools (laptop computers and tablets) that field personnel utilize to record and transmit inspection and maintenance information into WMS. Those changes can affect how data gets created, utilized, and managed.

As a result of the above factors, the data in the WMS changes on a daily basis as new entries and corrections are made, and as assets are entered or removed from the system. Accordingly, a query to the WMS performed in the future will retrieve data that contains minor deviations from the data presented in the table below.

**I.**

**SUMMARY OF SCE’S DISTRIBUTION INSPECTIONS**  
**DURING CALENDAR YEAR 2022**

<b>Type of Inspection (1)</b>	<b>Due (2)</b>	<b>Outstanding (3)</b>	<b>Completed (4)</b>
Patrols by Grid	17,315	110	17,205
Streetlight Patrols by Equipment	456,416	0	456,416
Overhead Detailed by Poles	181,204	9,035	172,169
Underground Detailed by Equipment	172,290	25	172,265
Wood Pole Intrusive by Pole	2,193	434	1,759

Notes on the Summary Table:

*Column Number 1:* Each inspection type is defined by the basis for reporting “units” of the inspection. Patrols account for each grid inspected, where a grid is a defined geographical area averaging about three quarters of a square mile. Streetlight patrols, overhead detailed inspections and underground detailed inspections account for each equipment and structure inspected. Intrusive pole inspections account for each individual pole inspected.

*Column Number 2:* This column reports total inspections due in the reporting period and does not include outstanding inspections from prior years. Inspection records for years prior to 2022 are documented in SCE’s previous annual GO 165 reports, on file with the Commission.

*Column Number 3:* This column reports total required inspections that were not completed in the reporting period. It does not include outstanding inspections from prior years. That information is documented in SCE’s previous annual GO 165 reports, on file with the Commission.

*Column 4:* This column reports all completed inspections for the reporting period for each program.

## II.

### **DETAILS OF SCE’S DISTRIBUTION INSPECTIONS DURING CALENDAR YEAR**

**2022**

Below, SCE includes a narrative summary of the required GO 165 annual inspection performance data.

### III.

#### PATROLS

##### A. Grid Patrols (Urban and Rural)

As defined in GO 165, a patrol is a simple visual inspection of applicable utility equipment and structures. A patrol is designed to identify obvious structural problems and hazards. GO 165 requires annual patrols of applicable utility equipment and structures in urban areas and all high fire hazard areas, and biennial patrols in non-high fire rural areas. In 2022, SCE completed patrols on 17,205 urban and rural grids, which comprised 99.4% of its grids due for patrol-type inspections. There was an outstanding count of 110 grid patrol inspections to be conducted in 2023.

Please note that pursuant to GO 165, of the 110 outstanding grid inspections, 81 of the grids are located in rural areas, wherein the population density consists of less than 1,000 persons per square mile. Per GO 165, grid inspections located in rural areas are required every other year. However, under SCE's internal procedures, each grid is inspected annually. SCE is continuing to complete the remaining grids.

##### B. Streetlight Patrols (Urban and Rural)

GO 165 requires annual patrols of all urban streetlights, and biennial patrols of all rural streetlights. In 2022, SCE patrolled 456,416 streetlights, which comprised 100% of the Streetlight Patrols that were due.

### IV.

#### DETAILED INSPECTIONS

Per the GO 165 requirements for specific types of equipment, SCE performs more extensive inspections when conducting detailed inspections on overhead and underground assets.

**A. Overhead Detailed Inspections by Pole (ODI)**

SCE completed a total of 172,169 of the 181,204 overhead detailed inspections due in 2022, which comprised 95% of inspections that were due. There was an outstanding count of 9,035 overhead detailed inspections by pole that were not inspected due to a combination of access and obstructions and various system issues. The overhead detailed inspections will be conducted as soon as the various system issues are remedied, or access /obstruction issues are resolved. As of the filing of this report, SCE has inspected approximately 2,926 of the 9,035 outstanding 2022 overhead detailed inspections. As a result of its risk-based inspection program, SCE completed many more inspections in 2022 than were due pursuant to GO 165 requirements. Overall SCE conducted 334,732 ODIs in 2022.

As a separate matter, in late 2022 it came to SCE's attention that a portion of ODI inspection records from 2020-2022 appeared to have potential discrepancies. In 2020, SCE implemented an enhanced inspection form (the "Survey") as part of the overhead detailed inspection efforts. A combination of system implementation and training issues resulted in certain inspection records appearing to be inconsistent as between SCE's WMS and the Survey. Specifically, in certain instances SCE's WMS indicated that an inspection had been completed, while the Survey results indicated that the Survey could not be completed. In an abundance of caution, the potentially inconsistent inspection records for 2020, 2021 and 2022 were adjusted in SCE's WMS to indicate that inspection had not been completed. Approximately 10,000 structures in 2020 and 5,000 structures in 2021 appeared to be affected. All of these structures have been reassigned for inspection.

SCE self-reported the issue to the Safety and Enforcement Division ("SED") on April 25, 2023. SCE also self-reported the issue to the Office of Energy Infrastructure Safety ("OEIS") on May 5, 2023. SCE suggested that amended GO 165 Reports for calendar years 2020 and 2021 be filed, adjusting the completion rate to be lower (by approximately four percent for 2020 and two percent for 2021). SED and OEIS agreed with the suggestion to amend the prior reports, and to SCE's recollection they indicated that they were supportive of SCE's precautionary approach of

reassigning for inspection the potentially affected structures. SCE anticipates that the referenced amended reports (including clear delineation of the changes to them) will be filed with reasonable promptness following the submission of this current GO 165 Report.

**B. Underground and Pad-Mounted Equipment Detailed Inspections**

SCE completed 172,265 underground and pad-mounted equipment detailed inspections, which comprised 99.99% of its underground and pad-mounted equipment due for inspections. As reflected in the Inspection Summary Table, there was an outstanding balance of 25 underground detailed inspections in 2022. These inspections may have been held up as a result of third-party constraints or other factors. The underground detailed inspections will be conducted as soon as the various issues are remedied, or access /obstruction issues are resolved. As of this filing, 8 of the 25 remaining UDI 2022 inspections have been completed.

**C. Wood Pole Inspections (Intrusive and Visual)**

In 2022, SCE was able to continue the grid-based inspection program that commenced in 2009. Under this program, we align our wood pole inspection cycles so that all poles located within the same grid share the same cycle. In other words, we perform intrusive inspections on all poles within a grid, not just those poles that happened to be due for intrusive inspection. As a result, in any given year the number of poles inspected will exceed the number of poles due to be inspected in the year.

A total of 2,193 wood poles were due for intrusive wood pole inspection in 2022 of which SCE completed 80.2% of those due. There was an outstanding balance of 434 intrusive pole inspections in 2022 due to a combination of access, environmental, and obstruction issues. As of the filing of this Report, 75 of the 434 outstanding intrusive inspections have been completed. As a result of its grid-based inspection program, SCE completed many more inspections in 2022 than were due pursuant to GO 165 requirements. Overall, SCE conducted 105,212 intrusive inspections (boring-type inspections) and 28,469 visual inspections. A visual



inspection includes sounding the pole using a tool such as a hammer and visually examining the pole rather than boring into the pole using a drill.

Respectfully submitted,

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KRIS G. VYAS

*/s/ Kris G. Vyas*

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July 3, 2023

**VERIFICATION**

I am the Vice President of Vegetation, Inspections & Operational Services for Southern California Edison Company, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29<sup>th</sup> day of June, 2023, at Pomona, California.

*/s/ Tracy Sanders*

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