

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 13, 2019

EA2019-837

Randy R. Smith
Principle Manager, T&D Compliance Integration
Southern California Edison Company
1 Innovation Way
Pomona, CA 91786

Subject: Audit of Southern California Edison's Santa Barbara District

Mr. Smith:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Howard Huie and Kyle King of my staff conducted an electrical distribution audit of Southern California Edison's (SCE) Santa Barbara District from July 15, 2019 to July 19, 2019. 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 13, 2019, 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 Howard Huie at (213) 620-6503 or howard.huie@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "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: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC
Lee Palmer, Deputy Director, Office of Utility Safety, SED, CPUC
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC
Howard Huie, 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 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.

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.

GO 165, Standard III-B, Distribution Facilities, Standards for Inspections, states in part:

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.

SCE's records indicated that from 2014 to 2018, SCE completed 1 annual grid patrol inspection past its scheduled due date. SCE annual grid patrol workorder number 40327852 was scheduled to be completed by March 2019 but was not completed until August 2019.

SCE's records indicated that from 2014 to 2018, SCE completed 229 work orders past their due date for corrective action. Additionally, as of the date of the audit, SCE had 1,701 open work orders that were past their 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.

GO 128, Rule 17.2, Inspection, states in part:

Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance so as to conform with these rules.

GO 165, Standard III-B, Distribution Facilities, Standards for Inspections, states in part:

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.

SCE's records indicated that from 2014 to 2018, SCE completed 2 underground detailed inspections past their scheduled due date. SCE underground detailed inspection workorder number 901447874, for equipment numbered 203011691 and 206837458 was scheduled to be completed by May 2019 but was not completed until December 2019.

III. Field Inspections

My staff inspected the following facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	4041795E	pole	Santa Barbara
2	4041794E	pole	Santa Barbara
3	4421939E	pole	Santa Barbara
4	4130515E	pole	Santa Barbara
5	4130516E	pole	Santa Barbara
6	807860E	pole	Santa Barbara
7	4574306E	pole	Santa Barbara
8	4550502E	pole	Santa Barbara
9	2108932E	pole	Santa Barbara
10	4790949E	pole	Santa Barbara
11	4041990E	pole	Santa Barbara
12	4041991E	pole	Santa Barbara
13	4721925E	pole	Santa Barbara
14	614729E	pole	Santa Barbara
15	614730E	pole	Santa Barbara
16	674858E	pole	Santa Barbara
17	674859E	pole	Santa Barbara
18	674860E	pole	Santa Barbara
19	712472E	pole	Santa Barbara
20	4365716E	pole	Santa Barbara
21	499759E	pole	Santa Barbara
22	749775E	pole	Santa Barbara
23	1665217E	pole	Santa Barbara
24	4744271E	pole	Santa Barbara
25	4127570E	pole	Santa Barbara
26	4340061E	pole	Santa Barbara
27	1523427E	pole	Goleta
28	4339718E	pole	Goleta
29	1523426E	pole	Goleta
30	1523425E	pole	Goleta
31	1523424E	pole	Goleta
32	4339719E	pole	Goleta
33	1947168E	pole	Goleta
34	4460139E	pole	Goleta
35	S28154Y	pole	Goleta
36	P5477477	Mini Pad Transformer	Goleta
37	P5477476	Mini Pad Transformer	Goleta
38	S5318058	Sub Structure Switch	Montecito
39	P5318053	Min Pad Transformer	Montecito
40	B5032685	BURD Transformer	Carpentaria
41	V5621580	Vault Transformer	Carpentaria
42	S5031941	Sub Structure Switch	Carpentaria
43	P5317655	Pad Mount Transformer	Carpentaria
44	P5032485	Pad Mount Transformer	Carpentaria

IV. Field Inspection Violations List

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

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 on each of the following SCE poles were damaged and/or missing:

- 614730E – High Voltage sign damaged.
- 1523426E – Missing High Voltage sign.

GO 95, Rule 91.3-B, Stepping, Location of Steps, states:

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 Poles numbered 4460139E and S28154Y was less than 8 feet from the top of an adjacent masonry fence.

GO 95, Rule 54.7, Climbing and Working Space, states in part:

Climbing space shall be maintained from the ground level. Climbing space, measured from center line of pole, shall be provided on one side or in one quadrant of all poles or structures...

The climbing space on each of the following SCE poles was obstructed by vegetation from the base of the pole to above 7 feet:

- 674858E
- 4041795E
- 4041794E

GO 128, Rule 12.2, Maintenance, states in part:

Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules.

The hinge on padmounted transformer, P547746, was broken.