



Melvin Stark
Manager
Maintenance & Inspection
Power Delivery

April 29, 2010

Mahmoud (Steve) Intably, P.E. Utilities Engineer
California Public Utilities Commission
Consumer Protection and Safety Division
320 West 4th St., Ste. 500
Los Angeles, California 90013

Subject: General Order [GO] 165 Audit of SCE's Santa Monica District letter dated March 29, 2010.

Dear Mr. Intably,

Your letter dated March 29, 2010 requested that we advise you of our actions to address conditions identified during the Consumer Protection and Safety Division's (CPSD) audit in Southern California Edison's (SCE) Santa Monica District on January 25 to 29, 2010.

In your letter you stated that "SCE did not document all GO 95 and 128 violations at the time of its inspection." It is possible that the infractions referenced in your letter occurred after the detailed inspection, were inadvertently missed, or seen by the inspector and interpreted as not being in violation of a specific General Order rule.

Attached are the specific conditions mentioned in your letter and the corresponding actions SCE has or will be taking.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mel Stark".

Mel Stark
Manager, Maintenance and Inspection
2885 W. Foothill Blvd.
Rialto, CA 92476

cc: Fadi Daye, CPSD, Los Angeles
Raffy Stepanian, CPSD, Los Angeles

Attachment

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 23, 2010

Mel Stark
Manager, Maintenance & Inspection
Southern California Edison
2885 W. Foothill Blvd.
Rialto, CA 92376

CPUC File No.: EA2010-01

SUBJECT: Electric Audit of Southern California Edison's Metro West-Santa Monica District

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission (CPUC), I conducted an electric audit of SCE's Metro West-Santa Monica District from January 25-29, 2010. The audit included a review of your recent inspection records and a field inspection in areas where SCE recently performed inspections of overhead and underground facilities.

I found that SCE did not document all GO 95 and 128 violations at the time of its inspection. Attached to this letter is a list of the violations I observed during the audit.

Please advise me within 30 days of corrective measures taken by SCE regarding the above violations. If you have any questions, please contact me at (213) 576-7016.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mahmoud Intably".

Mahmoud (Steve) Intably, P.E.
Utilities Engineer
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

cc: Moses M. Varela, Manager Program Contract 3, Dist. Insp. & Maint. Program Power Delivery, 10060 Telegraph Road, Ventura, CA 93004

Enclosure: Compliance Audit Summary

Inspection Report

List of General Orders (GO) 95 and 128 violations that were observed during the audit and were not documented in SCE's inspection records.

GO 95, Rule 31.1 Design, Construction and Maintenance

Rule 31.1 states:

“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.

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.

All work performed on public streets and highways shall be done in such a manner that the operations of other utilities and the convenience of the public will be interfered with as little as possible and no conditions unusually dangerous to workmen, pedestrians or others shall be established at any time.”

The following poles had a bent/turned step:

1. 929558E
2. 929555E
3. 996027E

The following poles had a loose PVC pipe under a crossarm:

1. 4087578E
2. 689185E

Poles number 4531057E had street light in contact with a service drop.

Pole number 516636H had a damaged terminal box.

Pole number 929561E had a damaged riser.

Pole number 581671H had a sunken insulator.

GO 95, Rule 35 Tree Trimming

Rule 35 states:

“Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of limbs and foliage, in new construction and when circuits are reconstructed or repaired, whenever practicable. When a utility has actual knowledge, obtained either through normal

operating practices or notifications to the utility, that any circuit energized at 750 volts or less shows strain or evidences abrasion from tree contact, the condition shall be corrected by slacking or rearranging the line, trimming the tree or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the tree and conductor. Scuffing or polishing of the insulating covering is not considered abrasion. Strain on a conductor is present when there is additional tension causing a deflection of the conductor beyond the slack of the span. Contact between limbs and these conductors, in and of itself, does not constitute a violation of the rule.”

The following poles had service drops in contact with trees and showed signs of abrasion:

- | | |
|-------------|-----------------------------|
| 1. 4315995E | 5. 4458822E |
| 2. 4400409E | 6. 581671H |
| 3. 238389E | 7. 644162E (open secondary) |
| 4. 644164E | |

GO 95, Rule 35 Tree Trimming

Rule 35 states:

“Where overhead wires pass through trees, safety and reliability of service demand that tree trimming be done in order that the wires may clear branches and foliage by a reasonable distance. The minimum clearances established in Table 1, Case 13, measured between line conductors and vegetation under normal conditions, shall be maintained. (Also see Appendix E for tree trimming guidelines.)”

Pole number 4407631E supporting a primary conductor that had less than 18 inch of radial clearance from vegetation.

GO 95, Rule 51.6A High Voltage Marking

Rule 51.6A states:

“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. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.”

The following poles supported line conductors of more than 750 volts and were not marked with high voltage signs:

3. 1143182E
4. 4502028E

5. 4315995E

GO 95, Rule 93 Climbing Space

Rule 93 states:

“Climbing space shall be provided on all jointly used poles which support conductors and the provisions of Rules 54.7 and 84.7 are directly applicable to such poles. Climbing space on jointly used poles shall be so correlated between conductor levels that its position in relation to the pole is not changed by more than 90 degrees in a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.”

The following poles had climbing space obstructions that may pose a safety hazard:

- | | |
|------------------------|--------------------------|
| 1. 1638929E (cable) | 6. 18025Y (telephone) |
| 2. 516636H (telephone) | 7. 1826476E (cable) |
| 3. 788511E (telephone) | 8. 1408928E (cable) |
| 4. 471113H (telephone) | 9. 238387E (telephone) |
| 5. 542577H (telephone) | 10. 175589E (vegetation) |

GO 95, Table 2, Case 4C requires 4 ft clearance between communication conductors and supply conductors 0-750 volts.

Pole number 4476148E had a communication conductor that was less than 4 ft from a supply conductor.

GO 128, Rule 17.1 Maintenance

Rule 17.1 states:

“Systems shall be maintained in such condition as to secure safety to workmen and the public in general.”

Structure number P5393379 had a corroded casing.

Structure number 5393387 had a corroded cut off switch.

GO 165, Section IV, Paragraph 5: Standards for Inspection, Record-keeping, and Reporting

Paragraph 5 states:

“For all inspections, within a reasonable period, company records shall specify the circuit, area, or equipment inspected, the name of the inspector, the date of the inspection, and any problems identified during each inspection, as well as the

scheduled date of corrective action. For detailed and intrusive inspections, companies shall also rate the condition of inspected equipment. Upon completion

of corrective action, company records will show the nature of the work, the date, and the identity of persons performing the work”

SCE audit summary report for 2007-2010 showed that:

1. 24 Work Orders rated priority 1 were completed late.
2. 1088 Work Orders rated priority 2 were completed late.
3. 459 Work Orders rated priority 2 were still open/past due.