

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

Commission Order Instituting Investigation Into
the Rates, Charges, Services, and Practices of
Pacific Gas & Electric Company (U 39-M)

Order Instituting Rulemaking for Electric
Distribution Facility Standard Setting.

I.95-02-015
(Filed February 22, 1995)

R.96-11-004
(Filed November 8, 1996)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL REPORT OF
2011 DISTRIBUTION INSPECTIONS SUBMITTED PURSUANT TO GENERAL
ORDER NO. 165**

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Dated: **July 2, 2012**

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2011 DISTRIBUTION INSPECTIONS SUBMITTED PURSUANT TO GENERAL ORDER
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ORDER NO. 165**

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 2011 Annual Report of distribution inspections completed in 2011 (“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 are based on information retrieved from SCE’s Work Management System (“WMS”) at a single point in time. 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), virtually none of these individuals are experts or specialists in data entry.

Additionally, the enormous system conversion we undertook when we implemented SAP as a Company-wide technology solution in 2010 necessarily resulted in business process changes. Those changes affected how data was created, utilized, and managed.

I.

SUMMARY OF SCE’S DISTRIBUTION INSPECTIONS DURING CALENDAR YEAR

2011

Type of Inspection (1)	Due (2)	Outstanding (3)
Patrols by Grid	17,670	0
Streetlight Patrols by Equipment	638,994	0
Overhead Detailed by Grid	3,494	0
Underground Detailed by Equipment	179,601	13
Wood Pole Intrusive by Pole	13,454	908

Notes on the Summary Table:

Column Number 1: Each inspection type is defined by the basis for actually reporting “units” of the inspection. Patrols and overhead detailed inspections account for each grid inspected, where a grid is a defined geographical area averaging about three quarters of a square mile. Streetlight patrols 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 2011 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, as submitted to the Commission.

II.

DETAILS OF SCE'S DISTRIBUTION INSPECTIONS DURING CALENDAR YEAR

2011

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

A. Patrols

1. 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 biennial patrols in rural areas. In 2011, SCE completed patrols on all 17,670 urban and rural grids, which comprised 100% of its grids due for patrol type inspections.

2. Streetlight Patrols (Urban and Rural)

GO 165 requires annual patrols of all urban streetlights, and biennial patrols of all rural streetlights. In 2011, SCE patrolled 638,994 streetlights, which comprised 100% of its streetlight inventory due for streetlight patrol type inspections.

B. 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.

1. Overhead Detailed Inspections

As part of a work levelization strategy, SCE completed an additional 359 overhead detailed grid inspections over and above what was due in 2011; SCE completed 110% of the inspections that were due.¹ As noted in the Inspection Summary Table, there were no outstanding overhead detailed inspections in 2011.

During the course of administering SCE's quality assurance program for its inspections, SCE discovered that a single individual performing overhead detailed inspections appeared to be falsifying certain inspection records. SCE conducted an in-depth investigation. The investigation determined that this was an isolated case involving one individual, and was limited to year 2011. The individual's employment was terminated, and all of his inspections were fully re-inspected by other personnel in 2011. SCE self-reported this matter to the Commission. On December 8, 2011, SCE had an in-person meeting with Consumer Protection and Safety Division ("CPSD") Staff to discuss this matter and the remedial actions that SCE undertook. SCE followed up that meeting by providing a written summary to CPSD on December 9, 2011.

2. Underground and Pad-Mounted Equipment Detailed Inspections

SCE completed 184,387 underground and pad-mounted equipment detailed inspections. This represented 103% of the 179,601 such inspections that were due in 2011. As reflected in the Inspection Summary Table, there was a balance of 13 outstanding underground detailed inspections in 2011 due to access, scheduling, and data issues.

¹ A total of 3,494 overhead detailed grid inspections were due in 2011.

As SCE discussed in its previous GO 165 Report (submitted last year), SCE intended to increase the number of underground and pad-mounted detailed inspections in the Underground Detailed Inspection (UDI) program. This occurred because SCE expanded the program to encompass underground structures which may or may not actually contain equipment. During the course of data conversion from its legacy computer systems to SAP, SCE discovered certain data inconsistencies across legacy systems. In total, 34,948 underground structures were identified in SAP as containing no equipment. However, SCE's mapping systems indicate that 3,786 of these underground structures may actually contain equipment, and therefore require detailed inspection. SCE's legacy system would not produce a detailed inspection work order for empty underground structures. Therefore, these underground structures were excluded from the UDI program when SCE used the legacy systems.

The discovery of these potential data issues prompted SCE to include in the UDI program underground structures which might potentially contain equipment. All of the 3,786 structures identified through reference to SCE's mapping systems were added to the UDI program and detail-inspected in 2011, with the exception of 2 structures that had access issues. Of the 34,948 underground structures identified by SAP as containing no equipment, SCE completed detailed inspections of an additional 4,217 such structures in 2011. By the end of 2012, SCE expects to have performed detailed inspections and/or visual verification of the remaining 26,947 underground structures identified in SAP as containing no equipment. Any structures that are found to actually contain equipment will be detail-inspected and added to the UDI program.

3. Intrusive Wood Pole Inspections

In 2011, SCE was able to continue the increased level of intrusive pole inspections that SCE commenced in 2009. We were able to do so primarily as a result of SCE's transition to grid-based inspections and work levelization strategy, as outlined in SCE's Test Year 2009

General Rate Case. Under this strategy, 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, the number of poles actually inspected has far outpaced the number of poles due to be inspected in the year.

A total of 13,454 wood poles were due for intrusive wood pole inspection in 2011. SCE completed 81,604 actual intrusive inspections and 16,719 visual inspections. A visual inspection includes a sounding of the pole instead of borings. There were 908 outstanding intrusive pole inspections; these inspections were held up as a result of third-party constraints such as access or obstruction issues, or because of difficulties in locating certain poles.

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July 2, 2012

VERIFICATION

I am Vice President of Power Delivery for the Transmission and Distribution Business Unit of 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 **29th day of June, 2012**, at Pomona, California.

/s/ WALTER JOHNSTON

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