

**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)

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

Order Instituting Rulemaking for Electric
Distribution Facility Standard Setting.

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

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL REPORT OF
2013 DISTRIBUTION INSPECTIONS SUBMITTED PURSUANT TO GENERAL
ORDER NO. 165**

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Dated: **July 1, 2014**

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL REPORT OF 2013
DISTRIBUTION INSPECTIONS SUBMITTED PURSUANT TO GENERAL ORDER NO. 165**

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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 2013 Annual Report of distribution inspections completed in 2013 (“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), virtually none of these individuals are experts or specialists in data entry.

Additionally, we are migrating to a new software platform for the field tools (laptop computers) used by field personnel to record and transmit inspection and maintenance information into WMS. This migration began in late 2013 and will continue through 2014. Those changes affected how data was 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 could retrieve data that contains minor deviations from the data presented in the table below.

I.

SUMMARY OF SCE’S DISTRIBUTION INSPECTIONS DURING CALENDAR YEAR

2013

Type of Inspection (1)	Due (2)	Outstanding (3)
Patrols by Grid	17,538	0
Streetlight Patrols by Equipment	640,618	0
Overhead Detailed by Grid	2,381	0
Underground Detailed by Equipment	168,396	0
Wood Pole Intrusive by Pole	9,087	1,296

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 2013 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

2013

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 all high fire hazard areas, and biennial patrols in non-high fire rural areas. In 2013, SCE completed patrols on all 17,538 urban and rural grids, which comprised 100% of its grids due for patrol type inspections.

2. Streetlight Patrols

GO 165 requires annual patrols of all urban streetlights, and biennial patrols of all rural streetlights. In 2013, SCE patrolled 640,618 urban streetlights, which comprised 100% of its streetlight inventory due for streetlight patrol type inspections. Rural streetlights were not due for patrol in 2013.

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 7 overhead detailed grid inspections over and above what was due in 2013; SCE completed 100% of the inspections that were due.¹ As noted in the Inspection Summary Table, there were no outstanding overhead detailed inspections in 2013.

¹ A total of 2,381 overhead detailed grid inspections were due in 2013.

As a result of an internal quality control review in February 2014, SCE discovered potential “curbing” of overhead detailed inspections by a contract worker.² SCE followed up with an investigation, which ultimately led to termination of the contractor. All of the inspections completed in 2013 by this contractor were re-opened for re-inspection during the first and second quarter of 2014. (The contractor did not handle any inspections for SCE in 2012 or years prior.)

2. Underground and Pad-Mounted Equipment Detailed Inspections

SCE completed 168,436 underground and pad-mounted equipment detailed inspections. This represented more than 100% of the 168,396 such inspections that were due in 2013. As reflected in the Inspection Summary Table, there was a zero balance of outstanding underground detailed inspections in 2013.

3. Intrusive Wood Pole Inspections

In 2013, SCE was able to continue the grid-based inspection program that SCE 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 actually inspected will exceed the number of poles due to be inspected in the year.

A total of 9,087 wood poles were due for intrusive wood pole inspection in 2013. SCE completed 144,449 actual intrusive inspections and 26,165 visual inspections. A visual inspection includes a sounding and visual examination of the pole instead of borings. Of the inspections that were due in 2013, there were 1,296 outstanding intrusive pole inspections;

² “Curbing” is the improper practice of documenting the completion of an inspection that was not performed. SCE’s quality control process is designed to catch such incidents.

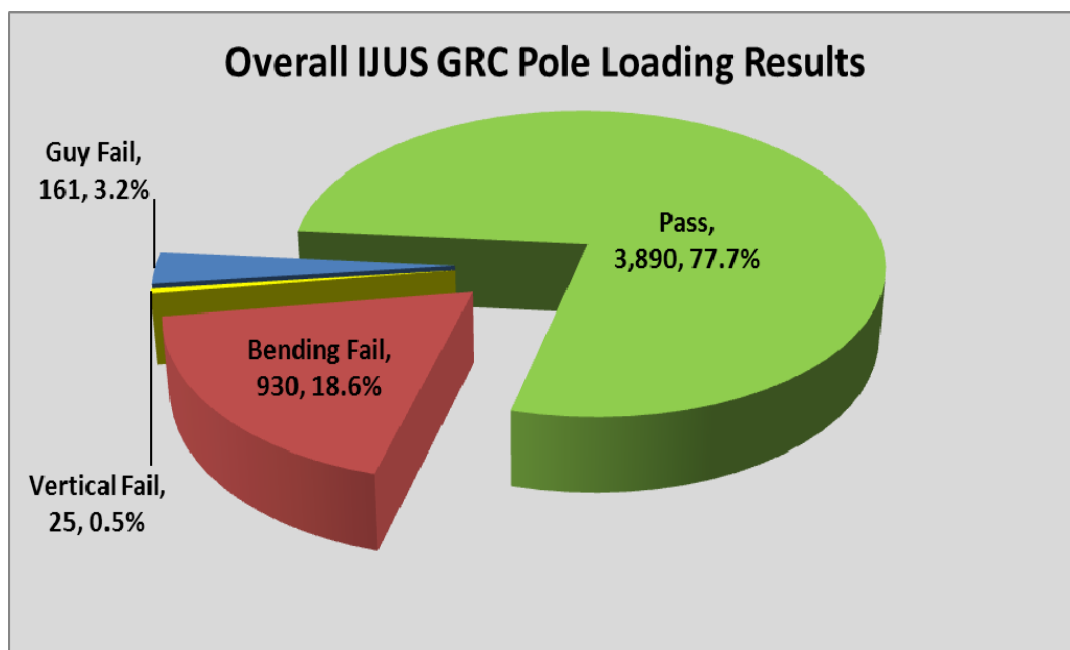
these inspections were held up as a result of third-party constraints such as access or obstruction issues, or because of difficulties in locating certain poles.

C. Pole Loading

As mandated in the 2012 General Rate Case (GRC), a systemwide randomized sample of 5,006 poles were analyzed by an independent contractor (IJUS) to assess whether or not these poles met strength requirements specified in General Order 95. This assessment took place during the first and second quarter of 2013 and the results of the assessment were filed with the CPUC on July 31, 2013. The 2012 GRC also required these results to be published in the GO 165 Report on 2013 activities. The results are set forth below.

The results of the 5,006 random and supplemental pole load calculations are as follows:

- 3,890 poles, or 77.7% of the total sample passed all G.O. 95 safety factors, including, where applicable, SCE's more stringent internal standards;
- 930 poles, or 18.6% of the total sample, failed the first criteria, the bending safety factor;
- of the remaining poles that passed the bending criteria, 25 poles, or less than 0.5% of the total sample, failed the vertical safety factor;
- of the remaining poles that passed both bending and vertical loading, 161 poles, or 3.2% of the total sample, had at least one or more guy wires that failed the guy safety factor.



Respectfully submitted,

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By: Kris G. Vyas

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July 1, 2014

VERIFICATION

I am Senior Vice President for Transmission and Distribution 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 **27th day of June, 2014**, at Pomona, California.

/s/ Pete Dietrich

Pete Dietrich

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) ANNUAL REPORT OF 2013 DISTRIBUTION INSPECTIONS SUBMITTED PURSUANT TO GENERAL ORDER NO. 165**, on all parties identified on the attached service list **R.96-11-004, and I.95-02-015**. Service was effected by one or more means indicated below:

- Transmitting the copies via e-mail to all parties who have provided an e-mail address.

- Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the office of one of the assigned Administrative Law Judge's.

**ALJ Kim Malcom
CPUC, Div of ALJ's
505 Van Ness Ave, Room 5115
San Francisco, CA 94102**

- Placing copies in properly addressed sealed envelopes and depositing such copies in the United States mail with first-class postage prepaid to all parties for those listed on the attached non-email list.

Executed this **July 1, 2014**, at Rosemead, California.

/s/ **Henry Romero**

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