

**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
2014 DISTRIBUTION INSPECTIONS SUBMITTED PURSUANT TO GENERAL
ORDER NO. 165**

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Dated: **July 1, 2015**

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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 Annual Report of distribution inspections completed in 2014 (“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 continuing to migrate 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 2016. 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.¹

I.

**SUMMARY OF SCE’S DISTRIBUTION INSPECTIONS DURING
CALENDAR YEAR 2014**

Type of Inspection (1)	Due (2)	Outstanding (3)
Patrols by Grid	17,524	0
Streetlight Patrols by Equipment	652,504	0
Overhead Detailed by Grid	2,866	0
Underground Detailed by Equipment	171,654	0
Wood Pole Intrusive by Pole	6,820	688

¹ Thus, for example, a query performed in connection with a future general rate case may turn up numbers that are not precisely the same as the numbers found in this Report.

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 2014

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 2014, SCE completed patrols on all 17,524 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. Both urban and rural streetlights were due for patrol in 2014. SCE patrolled 652,504 urban and rural streetlights, which comprised 100% of its streetlight inventory due in 2014 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 19 overhead detailed grid inspections over and above what was due in 2014; SCE completed 100% of the 2,866 inspections that were due in 2014. As noted in the Inspection Summary Table, there were no outstanding overhead detailed inspections in 2014.²

2. Underground and Pad-Mounted Equipment Detailed Inspections

SCE completed 171,699 underground and pad-mounted equipment detailed inspections. This represented more than 100% of the 171,654 such inspections that were due in 2014. As reflected in the Inspection Summary Table, there was a zero balance of outstanding underground detailed inspections in 2014.

3. Wood Pole Inspections (Intrusive and Visual)

In 2014, 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 inspections on all wood poles within a grid, not just those poles that happened to be due for an 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 6,820 wood poles were due for a wood pole inspection in 2014. As a result of its grid-based inspection program, SCE completed many more inspections in 2014 than were due pursuant to GO 165 requirements: more than 100,000 actual intrusive inspections (boring-type inspections) and more than 18,000 visual inspections.

A visual inspection includes sounding the pole using a tool such as a hammer and

² As indicated in the Summary Table above, SCE performs these overhead detailed inspections on a grid basis. We completed approximately 3,000 grids in 2014. Within those 3,000 grids, a total of 181 of the inspected poles had certain third-party constraints such as access or obstruction issues, and are marked for follow-up.

visually examining the pole rather than boring into the pole using a drill. Of the inspections that were due in 2014, there were 688 outstanding wood 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.

Respectfully submitted,

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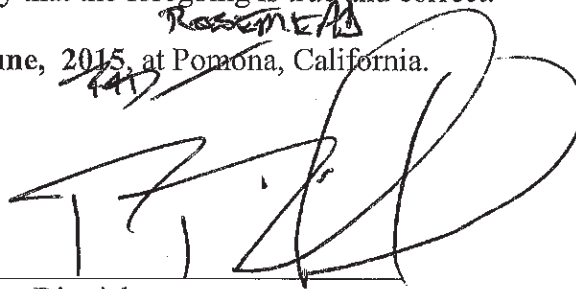
July 1, 2015

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 30th day of June, 2015, at Pomona, California.

A large, stylized handwritten signature in black ink, appearing to read 'Pete Dietrich', is written over a horizontal line. The signature is highly cursive and loops around itself.

Pete Dietrich
Senior Vice President, Transmission & Distribution
SOUTHERN CALIFORNIA EDISON COMPANY

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