

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 10, 2023

E20201026-01

Mel Stark  
Principal Manager, T&D Compliance Integration  
Southern California Edison  
1 Innovation Way  
Pomona, CA 91768

**SUBJECT:** Notice of Violation

Mr. Stark:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Richard Le of my staff investigated an incident that occurred on October 26, 2020, involving Southern California Edison's (SCE) facilities located near East Santiago Canyon Road, in Silverado, California. A fire, later known as the Silverado Fire, ignited near SCE's overhead facilities.

On March 30, 2019, SCE's contractor replaced poles 1419541E and 1419546E (Subject Poles). The contractor set two new poles and transferred to the new poles SCE's three primary 12 kV conductors and five communication conductors that belonged to T-Mobile (previously Sprint), Cox Communication, AT&T Mobility, AT&T California, and Verizon.

The Southern California Joint Pole Committee (SCJPC) Handbook required SCE to send "Form 2," which is a notice of pole replacement work and opportunity to approve or disapprove SCE's facilities transfer, to all SCJPC members with facilities on the Subject Poles. SCE prepared and sent the form to T-Mobile on June 8, 2018. While Form 2 signals a utility's intent to conduct work, it does not communicate any estimated dates of completion. Instead, in accordance with the SCJPC Handbook, SCE was required to notify all pole users that work was completed within 30 days of completion.

However, SCE failed to provide any evidence to ESRB that it notified T-Mobile of the actual completion date prior to the incident. In fact, SCE didn't notify T-Mobile of the date it transferred T-Mobile's facilities until nearly two years later, on March 12, 2021. Since SCE transferred its facilities and T-Mobile's facilities without informing T-Mobile of the actual transfer date, SCE should have ensured that its facilities and T-Mobile's facilities complied with the requirements of General Order (GO) 95.

**GO 95, Rule 38, Minimum Clearances of Wires from Other Wires**, requires a minimum clearance of 72 inches (6 feet) between 12 kV conductors and communication conductors. GO 95, Rule, 38 allows for a five percent reduction of clearance in a Tier 3 HFTD. A five percent reduction in the required minimum vertical clearance would be equal to a separation of 68.4 inches (5.7 feet).

ESRB's investigation revealed that the vertical clearance was only 66 inches (5.5 feet) at the closest point between T-Mobile's conductor and SCE's middle conductor on the span between the Subject Poles. Furthermore, the vertical clearance was only 57.6 inches (4.8 feet) at the closest point between T-Mobile's conductor and SCE's southmost conductor on the span between the Subject Poles.

SCE violated GO 95, Rule 38 twice as follows:

1. The first violation relates to SCE's southmost conductor between the Subject Poles. At the closest point, SCE's southmost conductor and T-Mobile's conductor had a vertical clearance of 57.6 inches (4.8 feet). SCE transferred T-Mobile's facilities without informing T-Mobile of the actual transfer date. Therefore, SCE should have ensured that its facilities and T-Mobile's facilities complied with the requirements of GO 95 once the transfer was complete.
2. The second violation relates to SCE's middle conductor between the Subject Poles. At the closest point, SCE's middle conductor and T-Mobile's conductor had a vertical clearance of 66 inches (5.5 feet). SCE transferred T-Mobile's facilities without informing T-Mobile of the actual transfer date. Therefore, SCE should have ensured that its facilities and T-Mobile's facilities complied with the requirements of GO 95 once the transfer was complete.

**GO 95, Rule 31.1, 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.*

*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.*

SCE also violated GO 95, Rule 31.1 twice as follows:

1. The first violation is for not installing its 12 kV southmost conductor and T-Mobile's facilities properly during the pole replacement work. When SCE transferred T-Mobile's facilities, SCE should have ensured that clearance between SCE's 12 kV southmost conductor and T-Mobile's facilities between the Subject Poles, would always meet GO 95, Rule 38's requirements. SCE should have ensured that its 12 kV southmost conductor and T-Mobile's facilities would not contact each other or come close to contacting each other. The clearance between SCE's 12 KV southmost conductor and T-Mobile's conductor (which SCE transferred and installed), did not meet the clearance requirement of GO 95, Rule 38. Therefore, SCE violated GO 95, Rule 31.1, for failing to install its 12 kV southmost conductor and T-Mobile's facilities properly to allow them to maintain the required GO 95 clearance during local conditions known at the time of transfer.

2. The second violation is for not installing its 12 kV middle conductor and T-Mobile's facilities properly during the pole replacement work. When SCE transferred T-Mobile's facilities, SCE should have ensured that the clearance between SCE's 12 kV middle conductor and T-Mobile's facilities between the Subject Poles, would always meet the requirement of GO 95, Rule 38. SCE should have ensured that its 12 kV middle conductor and T-Mobile's facilities would not contact each other or come close to contacting each other. The clearance between SCE's 12 kV middle conductor and T-Mobile's conductor (which SCE transferred/installed) did not meet the clearance requirement of GO 95, Rule 38. Therefore, SCE violated GO 95, Rule 31.1, for failing to install its 12 kV middle conductor and T-Mobile's facilities properly to allow them to maintain the required GO 95 clearance during local conditions known at the time of transfer.

Please advise me no later than November 10, 2023, of corrective measures taken by your company to prevent the recurrence of such violations in the future. If you have any questions, you can contact me at (213) 576-7017 or [fadi.daye@cpuc.ca.gov](mailto:fadi.daye@cpuc.ca.gov).

Sincerely,



Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC  
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