

*Southern California Edison*  
*2023-WMPs – 2023-WMPs*

**DATA REQUEST SET Cal Advocates - SCE - 2023 WMP - 08**

**To: Cal Advocates**  
**Prepared by: Christopher Tang**  
**Job Title: Advisor**  
**Received Date: 4/5/2023**

**Response Date: 4/10/2023**

---

**Question 16:**

Referring to section 8.1.2.3 Distribution Pole Replacements and Reinforcements, on p.258 of your WMP, SCE states that:

As part of the Det Pole Program, SCE intrusively inspects poles through the Intrusive Pole Inspection (IPI) Program. An intrusive inspection involves drilling into the pole interior to identify and measure the extent of internal decay that is typically undetectable with external observation alone.

Regarding the Det Pole Program:

- a) What percentage of poles within SCE's service area have undergone Intrusive Pole Inspections (IPI) in the last 10 years?
- b) What is SCE's planned timeline for completing intrusive pole inspections on the remaining poles?
- c) How does SCE select and prioritize which poles to inspect and replace through the Deteriorated Pole Program? Please address how SCE considers age, location, wildfire risk, and any other factors.
- d) Please provide the total number of poles that have been repaired or replaced under the Det Pole Program in the last 10 years
- e) How many more poles are scheduled for repair or replacement between 2023 -2028?
- f) Are there any specific criteria or guidelines that SCE uses to determine whether a pole should be repaired, replaced, or left as-is under the Det Pole Program, and how are these decisions made?
- g) How does SCE track the progress of pole replacements and repairs to ensure that all poles identified for work are addressed in a timely manner?
- h) Please describe any challenges or bottlenecks that SCE has faced in implementing the Det Pole Program.
- i) How has SCE addressed the challenges noted in your response to the previous part?

**Response to Question 16:**

- a) *What percentage of poles within SCE's service area have undergone Intrusive Pole Inspections (IPI) in the last 10 years?*

SCE's IPI Program is required by General Order (GO) 165. GO 165 requires intrusive inspections for all poles by the time they reach 25 years in-service and then requires re-inspection at least once every 20 years for Distribution poles. The IPI program began in 1997 and the first cycle was completed by 2009. In 2009, SCE started to perform inspections on a "grid" basis to reduce travel time per inspection, as an efficiency measure and to normalize the number of inspections (and therefore replacements) required each year. SCE also began transitioning to a 10-year inspection

cycle, which the Commission approved, that meets and exceeds GO 165 requirements. SCE completed its first grid-based cycle in 2018. Furthermore, the IPI Program is required to comply with Rule 44.2 of GO 95, which mandates that pole loads calculated in anticipation of additional construction incorporate the results of an intrusive inspection completed within the previous five years for wood poles older than 15 years. It is not possible to report a fixed percentage for the total number of poles in SCE's territory as they are constantly being replaced, added, and removed on a daily basis, making the number of poles a variable figure.

*b) What is SCE's planned timeline for completing intrusive pole inspections on the remaining poles?*

As SCE stated in its response to SCE-2023-WMP-08 16.a, SCE intrusively inspects its poles on a recurring 10-year inspection cycle through its IPI Program with priority placed on structures approaching their GO 165 compliance dates.

*c) How does SCE select and prioritize which poles to inspect and replace through the Deteriorated Pole Program? Please address how SCE considers age, location, wildfire risk, and any other factors.*

The Det Pole Program is not an inspection program. SCE has different types of inspection programs, which each have different specific criteria in considering factors like remaining pole strength, visual defects, location, wildfire risk, and other potential risk factors. The Deteriorated Pole Program follows pole replacement guidelines mandated by G.O. 95 Rule 18 in regard prioritizing pole replacements.

*d) Please provide the total number of poles that have been repaired or replaced under the Det Pole Program in the last 10 years*

The table below provides the total number of poles replaced under the Det Pole Program between 2013-2022.

Type	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total
Distribution	11,092	11,050	19,395	15,280	11,986	11,811	9,238	7,777	9,983	9,520	106,040
Transmission	1,159	3,015	3,803	3,518	3,474	3,233	3,156	3,027	3,143	2,837	29,206
Total	12,251	14,065	23,198	18,798	15,460	15,044	12,394	10,804	13,126	12,357	135,246

*e) How many more poles are scheduled for repair or replacement between 2023 -2028?*

The table below provides the total number of pole repairs completed under the Det Pole Program between 2013-2022.

Type	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total
Total	0	0	0	0	96	400	251	402	305	271	1,725

SCE is including data for 2023-2025, which is the time period pertaining to this WMP. Data for 2026-2028 is more aptly the subject of SCE's 2025 General Rate Case, which is expected to be filed in May 2023.

The table below provides the number of Det Pole Program poles forecasted to be replaced between 2023-2025.

Type	2023	2024	2025	Total
Distribution	5,724	5,515	5,658	16,897
Transmission	2,303	2,620	2,179	7,102
Total	8,027	8,135	7,837	23,999

The table below provides the number of Det Pole Program poles forecasted to be repaired between 2023-2025.

Type	2023	2024	2025	Total
Distribution	325	325	300	950
Transmission	43	43	40	126
Total	368	368	340	1,076

- f) *Are there any specific criteria or guidelines that SCE uses to determine whether a pole should be repaired, replaced, or left as-is under the Det Pole Program, and how are these decisions made?*

Det Pole Program guidelines are described in SCE's material standard, Material Specification (MS)-454, which is attached to the response. MS-454 provides detailed instructions for inspectors on performing inspections and evaluating inspection results, including a definition of key metrics that determine the pole inspection failure criteria. Among these metrics is the Remaining Section Modulus (RSM), which is a numerical assessment of pole degradation. Depending on the RSM or visual condition, the pole is assigned a recommended action code (RAC), which indicates whether the pole passes the inspection (RAC 10), requires pole replacement (RACs 1-4), or requires a steel stub repair (RAC 5).

Sections 6.1 and 6.2 (pg. 29) of MS-454 include documentation that helps a qualified person determine whether a pole requires a replacement. Section 6.3 (pg. 30) of MS-454 includes

the methodology and criteria to determine a pole repair.

SCE has removed the signature page and version history from the document as it contained names and titles of SCE employees.

g) How does SCE track the progress of pole replacements and repairs to ensure that all poles identified for work are addressed in a timely manner?

SCE uses a variety of tools, processes, and project management principles to track the end-to-end progress of pole replacements and repairs to help ensure that all identified poles are addressed in a timely manner. SCE maintains a detailed inventory database of all utility poles and their condition. This allows SCE to prioritize poles that require the most urgent attention and track the progress of work orders as they are completed.

SCE utilizes various tools, such as digital forms to document and track the condition of each pole and assign work orders to repair or replace them as necessary. Additionally, SCE employs various reporting systems to track the progress of work orders and monitor completion rates. This allows SCE to quickly identify any issues or delays and take corrective action to ensure that all poles are addressed in a timely manner.

h) Please describe any challenges or bottlenecks that SCE has faced in implementing the Det Pole Program.

The Det Pole Program encountered and overcame several challenges such as changing regulatory requirements, fluctuating scope, engineering standard updates, and updates to High Fire Risk Areas that led to accelerating notification timeframes.

i) How has SCE addressed the challenges noted in your response to the previous part?

The Det Pole Program shifted priorities, scheduling, and resources to address changing regulatory requirements; effectively managed internal and vendor resources to accommodate fluctuating scope; worked with internal engineers and 3<sup>rd</sup>-party service providers to re-calculate pole loads after engineering standards updates; and updated compliance due dates and scheduling to correspond with updates to High Fire Risk Areas.