

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 21, 2012

EA2012-06

Jadwindar Singh
Manager, Distribution Compliance
Pacific Gas and Electric Company
245 Market St, #926
San Francisco, CA 94105

SUBJECT: Audit of PG&E's Yosemite Division

Dear Mr. Singh:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Ivan Garcia and Paul Penney conducted an electric audit of PG&E's Yosemite Division from April 16-20, 2012. The audit included a review of PG&E's records and field inspections of PG&E's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than July 23, 2012, by electronic or hard copy, of all corrective measures taken by PG&E to remedy and prevent such violations.

If you have any questions concerning this audit please contact, Ivan Garcia of my staff at (916) 928-5875 or Ivan.Garcia@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Stepanian", with a long horizontal line extending to the right.

Raffy Stepanian, P.E.
Program Manager
Electric Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary

CC: Ivan Garcia, Utilities Engineer, CPUC
Alok Kumar, Senior Utilities Engineer (Supervisor), CPUC
Raymond Fugere, Program and Project Supervisor, CPUC
Curtis Todd Ryan, Supervisor, PG&E Gas & Electric System Support

AUDIT SUMMARY

Company: PG&E – Yosemite Division
Electric Audit
Date: April 13 – 20, 2012

Programmatic Violations

GO 165, Section III-C, – Record Keeping, states in part:

“For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.”

6376 work orders, from 2009 to 2012, were completed past their scheduled date of corrective action. Furthermore, 11217 work orders are currently open past their scheduled date of corrective action.

GO 165, Section III-C, – Record Keeping, states in part:

“For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.”

PG&E does not document all items requiring corrective action during an inspection. Specifically, PG&E staff does not document minor work. PG&E staff only marks a tally mark indicating minor work, and does not specify the equipment identified for corrective action in the tally marks.

GO 165, Section III-C, – Record Keeping, states in part:

“The utility shall maintain records for (1) at least ten (10) years of the patrol and detailed inspection activities, and (2) the life of the pole for intrusive inspection activities.”

PG&E’s 2011 EDPM Manual Record Retention Matrix does not comply with the record retention requirements of GO 165. The intervals listed in the EDPM Manual Record Retention Matrix are shorter than those required of GO 165. For example, Underground Detailed Inspection records are shown to be only kept for 6 years instead of the 10 years required by GO 165.

GO 95 Rule 31.1 - Design, Construction and Maintenance and GO 128, Rule 17.1 – Design, Construction and Maintenance, both state 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.”

PG&E staff was unable to locate some of its facilities during the field portion of the audit, thus the condition of the equipment could not be verified. Due to the fact PG&E could not locate its facilities; PG&E is unable to ensure that its facilities are being maintained for their intended use. Specifically, PG&E staff was unable to locate two completed EC Notifications (#105604825 and #101830116) in the field.

Field Violations

A.	Location:	3329 Elizabeth Ln., Catheys Valley
	Pole No.:	N/A (Pole Location #2)
	Previous Visit by Utility:	Overhead Inspection Map 5175 Completed 11/6/2011
	Date Visited by CPUC:	4/19/2012
	Explanation of Violation(s):	
	<p><u>Primary Conductor Guy Grounded By Tree Branches.</u></p> <p>GO 95 Rule 56.6 A</p> <p><i>All portions of guys within both a vertical distance of 8 feet from the level of supply conductors of less than 35,500 volts and a radial distance of 6 feet from the surface of wood poles or structures shall not be grounded, through anchors or otherwise. Where necessary to avoid the grounding of such portions, guys shall be sectionalized by means of insulators installed at locations as specified in Rule 56.7.</i></p> <p>The tree branches at this pole location were in contact above the guy insulator on the primary conductor guy. The tree branches were grounding the primary conductor. This violation was not documented by PG&E staff when the pole was inspected.</p>	

B.	Location:	Intersection of Elizabeth Ln. and Trower Rd., Catheys Valley
	Pole No:	N/A (Pole Location #13)
	Previous Visit by Utility:	Overhead Inspection Map 5175 Completed 11/6/2011
	Date Visited by CPUC:	4/19/2012
	Explanation of Violation(s):	
	<p data-bbox="279 682 521 716"><u>Slack Anchor Guy</u></p> <p data-bbox="279 751 500 785">GO 95 Rule 56.2</p> <p data-bbox="370 827 1373 932"><i>Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.</i></p> <p data-bbox="279 974 1458 1041">The down guy was slack. This violation was not documented by PG&E staff when the pole was inspected.</p>	

C.	Location:	Intersection of Elizabeth Ln. and Trower Rd., Catheys Valley
	Pole No.:	N/A (Pole Location #14)
	Previous Visit by Utility:	Overhead Inspection Map 5175 Completed 11/6/2011
	Date Visited by CPUC:	4/19/2012
Explanation of Violation(s):		
<p data-bbox="253 657 493 688"><u>Slack Anchor Guy</u></p> <p data-bbox="253 730 472 762">GO 95 Rule 56.2</p> <p data-bbox="342 804 1341 909"><i>Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.</i></p> <p data-bbox="253 951 1425 1014">The down guy was slack. This violation was not documented by PG&E staff when the pole was inspected.</p>		