

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 13, 2012

EA2013-003

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

SUBJECT: Audit of PG&E's North Bay Division

Dear Mr. Singh:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Ivan Garcia, Raymond Cho and Ryan Yamamoto of my staff conducted an electric audit of PG&E's North Bay Division from February 25 to March 1, 2013. 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 and a list area of concerns is enclosed. Please advise me no later than May 24, 2013 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, Ryan Yamamoto at (415) 703-2192 or ryan.yamamoto@cpuc.ca.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Raymond Fugere", written over a horizontal line.

Raymond Fugere, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Audit Summary

CC: Ryan Yamamoto, Senior Utilities Engineer, CPUC
Ivan Garcia, Utilities Engineer, CPUC
Raymond Cho, Utilities Engineer, CPUC
Curtis Todd Ryan, Supervisor, PG&E Gas & Electric

AUDIT SUMMARY

Company: PG&E – North Bay Division
 Electric Audit
 Date: February 25 to March 1, 2013

Violations

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| A. | Location: | PG&E – North Bay Division |
| | Date Visited by CPUC: | 2/25/2013-3/1/2013 |
| | Explanation of Violation(s): | |
| | <u>GO 165, Section III-B, – Standards for Inspection, states:</u> | |
| | <p style="text-align: center;"><i>“Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1.”</i></p> | |
| | <p>A pre-audit data request response indicated that the following facilities, from 2008 to 2012, were not inspected as required by GO 165:</p> <ul style="list-style-type: none"> • One facility on the 2009 Underground Inspection (Notification # 104100589) • One facility on the 2009 Underground Inspection (Notification # 104391048) • One facility on the 2009 Underground Inspection (Notification # 104391069) • One facility on the 2009 Underground Inspection (Notification # 104413204) • One facility on the 2010 Underground Inspection (Notification # 104031808) • One facility on the 2010 Underground Inspection of Map HH3402 • One facility on the 2010 Underground Patrol of Map RR4219 • One facility on the 2010 Overhead Patrol of Map II42 • One facility on the 2010 Overhead Patrol of Map RR4219 • One facility on the 2010 Overhead Patrol of Map II41 • One facility on the 2012 Overhead Inspection (Notification # 106655966) • One facility on the 2012 Overhead Inspection (Notification # 106657098) • The 2009 Overhead and Underground Patrol for map PP4122 was conducted late • The 2009 Underground Patrol for map QQ4216 was not conducted | |
| | <p>The pre-audit data response Q8b indicated that the following number of maps had issues and didn't meet the requirements of GO 165:</p> | |

- Eight (8) overhead maps were noted:
 - All eight overhead maps never have been patrolled or missed the patrol cycle in the previous 10 years)
 - Five of the eight overhead maps missed the detail inspection cycle in the previous 10 years
- 18 underground maps were noted:
 - 16 of the 18 underground maps have never been patrolled or missed the patrol cycle in the previous 10 years
 - All 18 of the underground maps have never been inspected or missed the detail inspection cycle in the previous 10 years

The below violations are in addition to the violations noted above:

- PG&E did not conduct an overhead inspection on a pole for Map QQ4013 in 2012.
- PG&E did not conduct an overhead inspection of a service drop to a private pole for Map SS3223 in 2012.

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| B. | Location: | PG&E – North Bay Division |
| | Date Visited by CPUC: | 2/25/2013-3/1/2013 |
| | Explanation of Violation(s): | |
| | <u>GO 165, Section III-C, – Record Keeping, states in part:</u> | |
| | <p><i>“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.”</i></p> <p>9520 work orders, from January 2008 to February 12, 2013, were completed past their scheduled date of corrective action. Furthermore, 3270 work orders are currently open past their scheduled date of corrective action.</p> <p>Furthermore, an additional 109 work orders were found to be late that were not noted in the pre-audit data request response.</p> | |

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| C. | Location: | PG&E – North Bay Division |
| | Date Visited by CPUC: | 2/25/2013-3/1/2013 |
| | Explanation of Violation(s): | |
| | <p><u>GO 165, Section III-C, – Record Keeping, states in part:</u></p> <p><i>“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.”</i></p> <p>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.</p> | |

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| D. | Location: | PG&E – North Bay Division |
| | Date Visited by CPUC: | 2/25/2013-3/1/2013 |
| | Explanation of Violation(s): | |
| | <p><u>GO 95, Rule 31.1 – Design, Construction and Maintenance, states in part:</u></p> <p><i>“For all particulars not specified in General Order 95, a supply or communications company is in compliance with this rule if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions.”</i></p> <p>PG&E’s EDPM manual requires inspectors to complete a Map Correction Form when they find discrepancies on their inspection maps. ESRB considers noting map errors in accordance with the EDPM manual an “accepted good practice”. Map discrepancies that are not noted by inspectors are not compliant with PG&E’s EDPM manual and are therefore violations of GO 95 Rule 31.1. For example, Overhead Map GG3310, contained mapping errors that were not noted by PG&E inspector during the inspection.</p> | |

The following violations that ESRB engineers discovered during the field audit and were not documented and addressed by PG&E during its last detailed inspection as required by General Order 165:

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| F. | Location: | 5341 Industrial Way, Benicia (QQ4317) |
| | Transformer No.: | T-3425 |
| | Previous Visit by Utility: | Reassessed Tag (Notification # 106245393) 2/6/13 |
| | Date Visited by CPUC: | 2/28/2013 |
| Explanation of Violation(s): | | |
| <p><u>Padmounted Transformer Not Secured in Place</u></p> <p>GO 128, Rule 34.3-A, Strength, States:</p> <p><i>“The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.”</i></p> <p>At this location, PG&E’s padmounted transformer case was not secured in place when installed.</p> | | |

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| G. | Location: | 57 Ridgewood Drive, San Rafael |
| | Pole No: | N/A |
| | Previous Visit by Utility: | Overhead Inspection Map SS3223 Completed 11/11/12 |
| | Date Visited by CPUC: | 3/1/2013 |
| Explanation of Violation(s): | | |
| <p><u>Broken Down Guy Guard</u></p> <p>GO 95 Rule 56.9, Guy Marker (Guy Guard), States:</p> <p><i>“A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.”</i></p> <p>At this location PG&E’s anchor guy guard was broken. This violation was not documented by PG&E staff when the pole was inspected.</p> | | |

AREA OF CONCERN

A. Inaccurate Patrol and Inspection Data

A data request response sent to the CPUC by PG&E prior to the audit included inaccurate patrol and inspection data for the years 2003 and 2012. The data inaccuracy made it difficult to verify compliance with GO 165. Furthermore, this raises questions about the integrity of PG&E's GO 165 reports.

B. Missing Patrol and Inspection Maps

During the review of patrol and inspection maps it was discovered that Maps SS3014 and TT3315 were missing patrol and inspection maps and logs.

C. Equipment Testing Records In Wrong Division

During the review of equipment testing records it was discovered that Regulator (Operating # 13589) was listed in the North Bay Division but located in the North Coast Division.

D. Equipment Testing Form Not Correctly Filled Out

During the review of equipment testing records it was discovered that Capacitor (Operating # 762) was not assigned a COE pin number as required by PG&E procedures.

E. Equipment Test Request But No Equipment Exist

During the review of equipment testing records it was discovered that a SCADA (CE # 106153612) equipment test was manually cancelled due to no SCADA equipment at the location.