

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 7, 2014

EA2014-003

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

SUBJECT: Audit of PG&E's Kern Division

Dear Mr. Singh:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Ivan Garcia and Raymond Cho of my staff conducted an electric audit of PG&E's Kern Division from February 24 - 28, 2014. 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 findings itemizing the violations is enclosed. Please advise me no later than August 8, 2014, 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 at (916) 928-5875 or ivan.garcia@cpuc.ca.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Fadi Daye".

Fadi Daye, P.E.
Acting Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Audit Findings

Cc: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC
Raymond Cho, Utilities Engineer, CPUC
Ivan Garcia, Utilities Engineer, CPUC
Adeel Babar, Supervisor, Pacific Gas & Electric

AUDIT FINDINGS

A.	Location:	PG&E – Kern Division
	Date Visited by CPUC:	2/24/2014 – 2/28/2014
	Explanation of Violation(s):	
	Late/Missing Inspection	
	<p>GO 165, Section III-B, Standards for Inspection, states:</p> <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 were not inspected as required by GO 165:</p> <ul style="list-style-type: none"> • • Five enclosures on the 2012 Underground Inspection of Map 2927152 were inspected late on 6/6/13. • Eight enclosures on the 2012 Underground Inspection of Map 3026011 were inspected late on 11/14/13. • One pole on the 2012 Overhead Patrol of Map 2927173 was inspected late on 11/14/13. • One enclosure on the 2010 Underground Inspection of Map 3027222 (in reference to Electric Corrective Notification #105202509) was inspected late on 10/14/11. <p>The pre-audit data response Q8b, (Map Gap) indicated that the following number of maps didn't meet the requirements of GO 165:</p> <ul style="list-style-type: none"> • 93 overhead maps with a total of 1524 facilities missed a patrol and/or an inspection cycle. • 139 underground maps with a total of 788 facilities missed a patrol and/or an inspection cycle. <p>The following maps indicated that some of PG&E's facilities have never been inspected. Please provide an inspection records, (maps and dates) for the following maps:</p> <ul style="list-style-type: none"> • Map 28201 with two underground facilities • Map 32265 with three underground facilities • Map 1026244 with one underground facility 	

B.	Location:	PG&E – Kern Division																																				
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We found several missing and/or late patrol and inspection maps to PG&E’s Overhead and Underground Master Patrols and Inspections (P&I) List. The following GO 165 violations are listed in the tables below:																																						
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Underground Patrols/Inspections (continued)	
Map	Finding
3027072	Missing 2011 and 2012 Patrols
3027366	Missing 2011 Patrol
3028141	Missing 2011 Patrol
3028203	Missing 2011 Patrol
3028293	Missing 2011 Patrol
3223233	Missing 2011 Patrol
2524115	Missing 2010 Inspection
2926346	Missing 2009 Inspection
2926352	Missing 2009 Inspection
2927133	Missing 2008 Inspection
2927134	Missing 2008 Inspection
3027023	Missing 2008 Inspection
3125162	Missing 2009 Inspection

C.	Location:	PG&E – Kern Division
	Date Visited by CPUC:	2/24/2014 – 2/28/2014
	Explanation of Violation(s):	
	<p>Late Work Worders</p> <p>GO 165, Section III-C, – Record Keeping, states in part:</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>Your records indicated that from January 2009 to February 21, 2014, 8,840 work orders were completed past their scheduled date of corrective action. Furthermore, 56 work orders are currently open past their scheduled date of corrective action.</p>	

D.	Location:	PG&E – Kern Division
	Date Visited by CPUC:	2/24/2014 – 2/28/2014
	Explanation of Violation(s):	
	<p><u>Records Keeping</u></p> <p>GO 165, Section III-C, Record Keeping, states in part:</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>	

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

E.	Location:	9901 San Fernando St., Lamont
	Pole No.:	Not Applicable
	Previous Visit by Utility:	5/21/2013
	Date Visited by CPUC:	2/25/2014
Explanation of Violation(s):		
<p><u>Exposed Ground Wire</u></p> <p>GO 95, Rule 54.6-B, Ground Wires, states in part:</p> <p><i>That portion of the ground wires attached on the face or back of wood cross-arms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).</i></p> <p>The ground wire was exposed at approximately 10 feet from the ground line..</p>		

F.	Location:	Southeast Corner of Burger Way and San Fernando St., Lamont
	Pole No:	Not Applicable
	Previous Visit by Utility:	5/21/2013
	Date Visited by CPUC:	2/25/2014
	Explanation of Violation(s):	
	<p data-bbox="240 583 553 617"><u>Exposed Ground Wire</u></p> <p data-bbox="240 655 883 688">GO 95, Rule 54.6-B, Ground Wires, states in part:</p> <p data-bbox="334 730 1321 840"><i>That portion of the ground wires attached on the face or back of wood cross-arms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).</i></p> <p data-bbox="240 877 1208 911">The ground wire was exposed at approximately 6 feet from the ground line.</p>	

G.	Location:	7500 San Fernando St., Lamont
	Pole No:	Not Applicable
	Previous Visit by Utility:	5/21/2013
	Date Visited by CPUC:	2/25/2014
Explanation of Violation(s):		
<u>Service Drop Clearance</u>		
<p>GO 95, Rule 54.8-B, Service Drops, 0 – 750 Volts, states in part:</p> <p><i>Service drop conductors shall have a vertical clearance of not less than 18 feet above public thoroughfares, except that this clearance may grade from 18 feet at a position not more than 12 feet horizontally from the curb line to a clearance of not less than 16 feet at the curb line, provided the clearance at the centerline of any public thoroughfare shall in no case be less than 18 feet.</i></p> <p>The vertical clearance of the service drop at the curb line at 9808 San Fernando St. was 13 ft. 8 in. The vertical clearance of the service drop at the curb line at 9812 San Fernando St. was 14 ft. 2 in. The vertical clearance of the service drop at 9816 San Fernando St. 15 ft. 4 in.</p>		

H.	Location:	Across from 9804 San Fernando St., Lamont 7415 Delight Ave., Lamont 9 Lamont
Pole No:		Not Applicable
Previous Visit by Utility:		5/21/2013
Date Visited by CPUC:		2/25/2014
Explanation of Violation(s):		
<p><u>Service Drop Clearance</u></p> <p>GO 95, Rule 54.8-B, Service Drops, 0 – 750 Volts, states in part:</p> <p><i>Service drop conductors shall have a vertical clearance of not less than 18 feet above public thoroughfares, except that this clearance may grade from 18 feet at a position not more than 12 feet horizontally from the curb line to a clearance of not less than 16 feet at the curb line, provided the clearance at the centerline of any public thoroughfare shall in no case be less than 18 feet.</i></p> <p>The vertical clearance of service drops at 7415 Delight Ave. and 9804 San Fernando St. were 13 ft. 6 in at the curb of a public thoroughfare.</p>		

I.	Location:	2007 Mineral Ct., Bakersfield
Equipment No:		T4531
Previous Visit by Utility:		1/28/2014
Date Visited by CPUC:		2/26/2014
Explanation of Violation(s):		
<p><u>Surface-Mounted Equipment</u></p> <p>GO 128, Rule 34.3-A, Self-contained Surface-mounted Equipment, states in part:</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>The padmount transformer at this location was not properly secured (bolted down) to the concrete pad.</p>		

J.	Location:	7504 Delight Ave., Lamont
	Pole No:	Not Applicable
	Previous Visit by Utility:	5/21/2013
	Date Visited by CPUC:	2/25/2014
Explanation of Violation(s):		
<p><u>Service Drop Clearance</u></p> <p>GO 95, Rule 54.8-B2b, Service Drops, 0 – 750 Volts, states in part:</p> <p><i>Over private driveways or lanes or other private property areas accessible to vehicles on premise used for residential purposes only, service drops shall have a vertical clearance of not less than 12 feet.</i></p> <p>The pole located at this address is leaning and causing the vertical clearance of the service drop to the home to approximately 8 ft. 2 in.</p> <p>PG&E is planning to replace the pole by December 31, 2018, which will provide higher clearance for the service drop. ESRB believes that this violation presents an immediate safety hazard and should be corrected immediately.</p>		