

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 15, 2014

EA2014-14

Adeel Babar
Supervisor – Regulatory Compliance
Pacific Gas and Electric Company
3401 Crow Canyon Road, #221E
San Ramon, CA 94583

SUBJECT: Audit of PG&E's Humboldt Division

Dear Mr. Babar:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Ivan Garcia and Jaime Lau of my staff conducted an electric audit of PG&E's Humboldt Division from June 9-13, 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 audit findings itemizing the violations is enclosed. Please advise me no later than January 19, 2015, 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 iag@cpuc.ca.gov.

Sincerely,

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

Fadi Daye, P.E.
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
Charlotte F. TerKeurst, Program Manager, Electric Safety and Reliability Branch
Alok Kumar, Senior Utilities Engineer, Supervisor, CPUC
Jamie Lau, Utilities Engineer, CPUC
Ivan Garcia, Utilities Engineer, CPUC

AUDIT FINDINGS

A.	Location:	PG&E – Humboldt Division
	Date Visited by CPUC:	6/9/2014-6/13/2014
	Explanation of Violation(s):	
	<u>Late Inspection</u>	
	<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>The following PG&E’s facilities were not inspected as required by GO 165:</p> <ul style="list-style-type: none"> • One enclosure in Map M018 was inspected late on 6/18/2012. The enclosure should have been inspected by 12/31/2011. • Four enclosures on the 2013 Underground Inspection of Map JJ17 were not inspected in 2013. The enclosures should have been inspected by 12/31/2013. • 33 overhead maps with a total of 1100 facilities missed a patrol and/or an inspection cycle. • 58 underground maps with a total of 104 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 record, (maps and dates) for the following maps:</p> <ul style="list-style-type: none"> • Map X02 with four overhead facilities • Map AA271 with twenty-nine overhead facilities • Map F17 with eighty-six overhead facilities • Map Y20 with fifty-eight overhead facilities • Map G17 with twenty-seven overhead facilities • Map SS04 with thirty-seven overhead facilities • Map R07 with fifteen overhead facilities • Map BB14 with seven overhead facilities • Map X15 with five overhead facilities • 46 Maps each with one underground facility • Map W2516 with 3 underground facilities • Map C11 with 2 underground facilities • Map L12 with 2 underground facilities 	

B.	Location:	PG&E – Humboldt Division
	Date Visited by CPUC:	2/24/2014 – 2/28/2014
	Explanation of Violation(s):	
	<p><u>Late Work orders</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>GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p><i>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.</i></p> <p>Your records indicated that from January 2009 to June 13, 2014, 10,542 work orders were completed past their scheduled date of corrective action.</p>	

C.	Location:	PG&E – Humboldt Division
	Date Visited by CPUC:	6/9/2014-6/13/2014
	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:

D.	Location:	Northwest corner of Hubbard Lane and Harris St., Eureka.,
	Pole No.:	Not Applicable
	Previous Visit by Utility:	4/16/2014
	Date Visited by CPUC:	6/11/2014
Explanation of Violation(s):		
<u>Guy Wire In Contact With Communication Conductor</u>		
<p>GO 95, Rule 56.4-C1, Clearances from conductors crossing in spans, states in part:</p> <p><i>The minimum clearances of conductors from span wires, guys and messengers are specified in Table 2....”</i></p> <p><i>Table 2, Case 1C, states in part that the clearance between a conductor span wire and communication conductor is 24 inches</i></p> <p>PG&E’s guy wire was in contact with a communication conductor at this location.</p>		

E.	Location:	624 Monument Rd., Rio Dell
	Pole No:	Not Applicable
	Previous Visit by Utility:	4/2/2014
	Date Visited by CPUC:	6/12/2014
Explanation of Violation(s):		
<u>High Voltage Signs Missing</u>		
<p>GO 95, Rule 51.6-A, High Voltage Marking of Poles, states in part:</p> <p><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height.).</i></p> <p>The pole was missing high voltage signs on both sides of the primary crossarm at this location.</p>		

F.	Location:	240 Belleview Ave., Rio Dell
	Pole No:	Not Applicable
	Previous Visit by Utility:	1/16/2014
	Date Visited by CPUC:	6/12/2014
Explanation of Violation(s):		
<p data-bbox="282 674 688 705">Climbing and Working Space</p> <p data-bbox="282 705 1289 774">GO 95, Rule 54.7-A3, Allowable Climbing Space Obstructions, does not allow communication service drops to be installed in the climbing space.</p> <p data-bbox="282 816 1446 886">The climbing space to the primary crossarm is obstructed by a communication service drop at this location.</p>		

G.	Location:	1600 Sunset Road, Eureka
	Pole No:	#110368775
	Previous Visit by Utility:	11/13/2013
	Date Visited by CPUC:	6/12/2014
Explanation of Violation(s):		
<u>High Voltage Signs Missing</u>		
<p>GO 95, Rule 51.6-A, High Voltage Marking of Poles, states in part:</p> <p><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height.).</i></p> <p>The pole was missing high voltage signs on both sides of the primary crossarm at this location.</p>		

H.	Location:	Southwest corner of alley between Harris St. and V St.
	Pole No:	Not Applicable
	Previous Visit by Utility:	2/4/2014
	Date Visited by CPUC:	6/11/2014
Explanation of Violation(s):		
<u>“SLOW” Sign Attached To Pole</u>		
<p>GO95, Rule 34, states in part:</p> <p style="text-align: center;"><i>“Unauthorized attachment of equipment foreign to the purposes of overhead electric line construction is not permitted.”</i></p>		
<p>A third-party attachment of a “SLOW” sign was attached to the pole at this location.</p>		