

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 9, 2015

EA2014-30

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 Sacramento Division

Dear Mr. Babar:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Ivan Garcia of my staff conducted an electric audit of PG&E's Sacramento Division from November 3-7, 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 March 9, 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](mailto:iag@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue 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  
Ivan Garcia, Utilities Engineer, CPUC

## AUDIT FINDINGS

<b>A.</b>	<b>Location:</b>	<b>PG&amp;E – Sacramento Division</b>
	<b>Date Visited by CPUC:</b>	11/3/2014- 11/7/2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Late Inspection</u></b>	
	<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&amp;E’s facilities were not inspected as required by GO 165:</p> <ul style="list-style-type: none"> <li>• One underground enclosure in Map Q1212 was inspected late on 4/19/2011. The enclosure should have been inspected by 12/31/2010</li> <li>• One pole in Map L2415 (EC Notification #106587978) was inspected late on 4/16/2013. The pole should have been inspected by 12/31/2012.</li> <li>• One pole in Map K2824 (EC Notification #106588333) was inspected late on 4/16/2013. The pole should have been inspected by 12/31/2012.</li> <li>• 37 overhead facilities in Map N12 were patrolled late in 2013. The overhead facilities should have been patrolled by 12/31/2012.</li> <li>• 76 overhead facilities in Map M1223 were patrolled late in 2013. The overhead facilities should have been patrolled by 12/31/2012.</li> <li>• 168 overhead facilities in Map M1224 were patrolled late in 2013. The overhead facilities should have been patrolled by 12/31/2012.</li> <li>• 77 overhead facilities in Map M1225 were patrolled late in 2013. The overhead facilities should have been patrolled by 12/31/2012.</li> <li>• 93 overhead facilities in Map M1219 were patrolled late in 2013. The overhead facilities should have been patrolled by 12/31/2012.</li> <li>• 2 poles in Map M1710 were inspected late on 3/20/2014. The poles should have been inspected by 12/31/2013.</li> <li>• One underground enclosure on Map M1907 was inspected late on 3/21/2014. The enclosure should have been inspected by 12/31/2013.</li> <li>• 7 overhead maps with a total of 167 facilities missed a patrol and/or an inspection cycle.</li> <li>• 21 underground maps with a total of 119 facilities missed a patrol and/or an inspection cycle.</li> </ul>	

PG&E failed to provide us with records indicating that the following maps were inspected:

- Map L2415 with twenty-eight overhead facilities
- Map Q2319 with one overhead facility
- Map O20 with one underground facility
- Map O22 with one underground facility
- Map S2412 with fifty-one underground facilities
- Map S2305 with two underground facilities
- Map P2414 with eighteen underground facilities
- Map R1122 with seventeen underground facilities
- Map S13 with one underground facility
- Map P2008 with one underground facility
- Map Q21 with two underground facilities
- Map V2524 with one underground facility
- Map L2OT with one underground facility
- Map L2OU with one underground facility
- Map Q2110 with one underground facility
- Map Q2323 with six underground facilities
- Map Q27 with one underground facility
- Map R23 with one underground facility
- Map S2422 with one underground facility
- Map S1307 with six underground facilities
- Map S1312 with two underground facilities

<b>B.</b>	<b>Location:</b>	<b>PG&amp;E – Sacramento Division</b>
	<b>Date Visited by CPUC:</b>	11/3/2014- 11/7/2014
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Late Work orders</u></b></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>PG&amp;E’s records indicated that from January 2009 to November 7, 2014, 14,068 work orders were completed past their scheduled date of corrective action per PG&amp;E’s Electric Notification Prioritization Standards.</p>	

C.	<b>Location:</b>	<b>PG&amp;E – Sacramento Division</b>
	<b>Date Visited by CPUC:</b>	11/3/2014- 11/7/2014
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Records Keeping</u></b></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&amp;E does not document all items requiring corrective action during an inspection. Specifically, PG&amp;E staff does not document “minor work”. PG&amp;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 violation discovered by ESRB engineers during the field audit was incorrectly documented and addressed by PG&E.

<b>D.</b>	<b>Location:</b> 5 <sup>th</sup> St. and Alhambra, Davis
	<b>Equipment No.:</b> Switch 20490
	<b>Previous Visit by PG&amp;E:</b> 9/24/2014
	<b>Date Visited by CPUC:</b> 11/6/2014
<b>Explanation of Violation(s):</b>	
<p><b><u>Electric Underground Notification Not Completed In The Field</u></b></p> <p>GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p><i>For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions know at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment."</i></p> <p>PG&amp;E's Electric Underground Notification #107413702, stated that a retainer wall was needed at Switch 20490. The notification also stated the work was completed on 9/24/2014. Our field inspection revealed that the retainer wall was not built as documented in notification #107413702. We request that you explain this discrepancy in your records.</p>	