

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 5, 2015

EA2014-032

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 East Bay Division

Dear Mr. Babar:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Jamie Lau and Raymond Cho of my staff conducted an electric audit of PG&E's East Bay Division from December 8 to 10, 2014. The audit included a review of PG&E's records and field inspections of PG&E's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than July 10, 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 Jamie Lau at (415) 703-2233 or [jamie.lau@cpuc.ca.gov](mailto:jamie.lau@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosure: Audit Findings

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, ESRB, CPUC  
Alok Kumar, P.E., Senior Utilities Engineer Supervisor, ESRB, CPUC  
Jamie Lau, P.E., Utilities Engineer, ESRB, CPUC  
Raymond Cho, P.E., Utilities Engineer, ESRB, CPUC

## Audit Findings

Company: PG&E – East Bay  
 Electric Distribution Audit  
 Date: December 8 to 10, 2014

<b>A.</b>	<b>Location:</b>	<b>PG&amp;E – East Bay Division</b>													
	<b>Date of CPUC Inspection:</b>	12/8/2014-12/10/2014													
	<b>Explanation of Violation(s):</b>														
	<b><u>Incomplete Inspections</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>Facilities in the following maps were not inspected on time as required by GO 165:</p>														
	<table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Map</th> <th style="text-align: center;">Units</th> <th style="text-align: center;">Inspection Type</th> <th style="text-align: center;">Year Missed</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">H0906</td> <td style="text-align: center;">8</td> <td style="text-align: center;">OH Patrol</td> <td style="text-align: center;">2013</td> </tr> <tr> <td style="text-align: center;">A0521</td> <td style="text-align: center;">5</td> <td style="text-align: center;">UG Patrol/Detailed</td> <td style="text-align: center;">2003 thru 2011</td> </tr> </tbody> </table>			Map	Units	Inspection Type	Year Missed	H0906	8	OH Patrol	2013	A0521	5	UG Patrol/Detailed	2003 thru 2011
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<b>B.</b>	<b>Location:</b>	<b>PG&amp;E – East Bay Division</b>
	<b>Date of CPUC Inspection:</b>	12/8/2014-12/10/2014
	<b>Explanation of Violation(s):</b>	
	<p data-bbox="250 426 883 464"><b><u>Past-Due Electric Corrective Notifications</u></b></p> <p data-bbox="250 499 1037 537">GO 165, Section III-C, – Record Keeping, states in part:</p> <p data-bbox="345 573 1289 716"><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 data-bbox="250 751 1276 789">GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="345 825 1255 968"><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 data-bbox="250 1003 1294 1041">GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="345 1077 1255 1220"><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 data-bbox="250 1297 1406 1482">Our audit found that 1,442 Electric Corrective (EC) notifications, from August 1, 2011 to October 31, 2014, were completed past their scheduled date of corrective action. Furthermore, 22 EC notifications were open past their scheduled date of corrective action. The past-due EC notifications include overhead and underground facilities.</p>	

<b>C.</b>	<b>Location:</b>	<b>PG&amp;E – East Bay Division</b>																					
	<b>Date of CPUC Inspection:</b>	12/8/2014-12/10/2014																					
	<b>Explanation of Violation(s):</b>																						
	<p data-bbox="250 426 586 457"><b><u>Late Equipment Tests</u></b></p> <p data-bbox="250 499 1040 531">GO 165, Section III-C, – Record Keeping, states in part:</p> <p data-bbox="345 573 1289 716"><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 data-bbox="250 758 1276 789">GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="345 831 1256 974"><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 data-bbox="250 1016 1276 1079">The following overhead equipment were tested late per PG&amp;E’s required deadlines:</p> <table border="1" data-bbox="337 1121 1333 1310"> <thead> <tr> <th data-bbox="337 1121 574 1157"><b>Equipment #</b></th> <th data-bbox="574 1121 760 1157"><b>Type</b></th> <th data-bbox="760 1121 1019 1157"><b>Required Date</b></th> <th data-bbox="1019 1121 1333 1157"><b>Test Date</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="337 1157 574 1192">TS141</td> <td data-bbox="574 1157 760 1192">Capacitor</td> <td data-bbox="760 1157 1019 1192">6/1/2011</td> <td data-bbox="1019 1157 1333 1192">8/10/2011</td> </tr> <tr> <td data-bbox="337 1192 574 1228">C689</td> <td data-bbox="574 1192 760 1228">Capacitor</td> <td data-bbox="760 1192 1019 1228">6/1/2011</td> <td data-bbox="1019 1192 1333 1228">10/27/2013</td> </tr> <tr> <td data-bbox="337 1228 574 1264">TV550</td> <td data-bbox="574 1228 760 1264">Capacitor</td> <td data-bbox="760 1228 1019 1264">6/1/2011</td> <td data-bbox="1019 1228 1333 1264">12/5/2013</td> </tr> <tr> <td data-bbox="337 1264 574 1304">TV633</td> <td data-bbox="574 1264 760 1304">Capacitor</td> <td data-bbox="760 1264 1019 1304">6/1/2011</td> <td data-bbox="1019 1264 1333 1304">12/5/2013</td> </tr> </tbody> </table>			<b>Equipment #</b>	<b>Type</b>	<b>Required Date</b>	<b>Test Date</b>	TS141	Capacitor	6/1/2011	8/10/2011	C689	Capacitor	6/1/2011	10/27/2013	TV550	Capacitor	6/1/2011	12/5/2013	TV633	Capacitor	6/1/2011	12/5/2013
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<b>D.</b>	<b>Location:</b>	<b>PG&amp;E – East Bay Division</b>
	<b>Date of CPUC inspection:</b>	12/8/2014-12/10/2014
	<b>Explanation of Violation(s):</b>	
	<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><i>All temporary attachments shall be restricted to installations where the period is estimated to be one year or less.</i></p> <p>GO 95, Rule 34, Foreign Attachments, states in part:</p> <p><i>Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.</i></p> <p>PG&amp;E’s East Bay Division has numerous “kicked-out poles” as a result of its joint pole reconstructions. The cut and kick method is a way of replacing an old pole with a new one. Once the old pole is replaced, it should be removed and disposed of properly. Attaching the old pole to the new pole and supporting it by a “peg leg”, ropes, braces, or other temporary means violates GO 95, Rule 31.1, and Rule 34. In addition, GO 95, Rule 49.1, addresses specific strength and depth requirements for all poles, the old pole in this case would not meet the pole depth requirements of GO 95. Within the East Bay Division, we found numerous locations as shown below with an old pole attached to a new pole:</p> <ol style="list-style-type: none"> <li>1) 2666 Milvia Street, Berkeley</li> <li>2) Corner of Carleton Street and Milvia Street, Berkeley</li> <li>3) 2813 8<sup>th</sup> Street, Berkeley</li> <li>4) 2910 Mc Clure Street, Oakland</li> <li>1) 4112 Webster Street, Oakland</li> <li>2) 4335 Webster Street, Oakland</li> <li>3) 465 42<sup>nd</sup> Street, Oakland</li> <li>4) 450 43<sup>rd</sup> Street, Oakland</li> </ol>	

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|  | <ol style="list-style-type: none"><li>5) 463 43<sup>rd</sup> Street, Oakland</li><li>6) 419 49<sup>th</sup> Street, Oakland</li><li>7) 400 Avon Street, Oakland</li><li>8) 420 Avon Street, Oakland</li><li>9) 424 Cavour Street, Oakland</li><li>10) 461 Cavour Street, Oakland</li><li>11) 5227 Lawton Avenue, Oakland</li><li>12) 5320 Shafter Avenue, Oakland</li><li>13) 5352 Shafter Avenue, Oakland</li><li>14) 5422 Shafter Avenue, Oakland</li><li>15) 5434 Shafter Avenue, Oakland</li><li>16) 5446 Shafter Avenue, Oakland</li></ol> |
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**We also discovered the following violation during our field inspection. This violation occurred during pole replacement and PG&E did not take any action to remedy the violation.**

<b>E.</b>	<b>Location:</b>	5842 Kingsley Circle, Oakland
	<b>Pole No.:</b>	N/A
	<b>Previous Visit by PG&amp;E:</b>	5/13/2014
	<b>Date Visited by CPUC:</b>	12/10/2014
<b>Explanation of Violation(s):</b>		
<p><b><u>Service Drop Radial Clearance</u></b></p> <p>GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop conductor and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p>A service drop at this location was in contact with a communication cable.</p>		