

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 25, 2021

EA2020-881

Jorge DaSilva
Director – Electric Regional Operations
San Diego Gas and Electric (SDGE&E)
8315 Century Park Court, Suite CP22B
San Diego, CA 92123

SUBJECT: Audit of SDG&E's Orange County District

Mr. DaSilva:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Richard Le, Kyle King, and Derek Fong of my staff conducted an electric distribution audit of SDG&E's Orange County District from August 24, 2020 to August 28, 2020. The audit included a review of SDG&E's inspection and maintenance records and a field inspection of SDG&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 April 26, 2021, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Derek Fong at (213) 576 – 6850 or derek.fong@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: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, CPUC
Richard Le, Utilities Engineer, ESRB
Kyle King, Utilities Engineer, ESRB

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Pole load calculations
- Intrusive test records
- Diagnostic test records
- Third party safety hazard notifications
- SDG&E's inspection and maintenance program
- SDG&E vegetation management records

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 165, Section III-B, Standards for Inspection, states:

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.

GO 128, Rule 17.2, Inspection, states:

Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules.

SDG&E inspection records indicated that from 2015 to 2020, the following underground structures were inspected past the assigned due dates:

- Manhole M4753855789 – inspection due 2015. Inspection completed April 12, 2016.
- Manhole M4746656082 – inspection due 2015. Inspection completed April 12, 2016.
- Manhole M4749856151 – inspection due 2015. Inspection completed April 12, 2016.
- Manhole M4747856116 – inspection due 2015. Inspection completed April 12, 2016.

GO 95, Rule 18, Rule 18-B1, Maintenance Programs, states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...

GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:

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 known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.

SDG&E's records indicated that from 2015 to 2020, SDG&E completed 1 overhead work order (Notification No. 100007494876) past SDG&E's scheduled due date for corrective action for reasons other than being deferred.

GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:

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.

SDG&E's records indicated that from 2015 to 2020, SDG&E completed 2 underground work orders (Notifications No. 100006884105 and 100006884104) past SDG&E's scheduled due date for corrective action for reasons other than being deferred.

III. Field Inspection

My staff inspected the following facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	P126064	Pole	Orange County
2	P107511	Pole	Orange County
3	P1679535	Pole	Orange County
4	P167951	Pole	Orange County
5	P107330	Pole	Orange County
6	P320192	Pole	Orange County
7	P327180	Pole	Orange County
8	P327181A	Pole	Orange County
9	P225172	Pole	Orange County
10	P980021	Pole	Orange County
11	P224403	Pole	Orange County
12	P323811	Pole	Orange County
13	P226635	Pole	Orange County
14	P327175	Pole	Orange County
15	P327176	Pole	Orange County
16	P327177	Pole	Orange County
17	P327178	Pole	Orange County
18	P327179	Pole	Orange County
19	P107385	Pole	Orange County
20	P121600	Pole	San Clemente
21	P25593	Pole	San Clemente
22	P126674	Pole	San Clemente
23	220117	Pole	San Clemente
24	25592	Pole	San Clemente
25	P211202	Pole	San Clemente
26	P125730	Pole	San Clemente
27	P22591	Pole	San Clemente
28	P126831	Pole	San Clemente
29	P25590	Pole	San Clemente
30	P126830	Pole	San Clemente
31	P25589	Pole	San Clemente
32	P126829	Pole	San Clemente
33	P25588	Pole	San Clemente
34	P211203	Pole	San Clemente
35	P29992	Pole	San Clemente
36	P120573	Pole	San Clemente
37	P28311	Pole	San Clemente
38	P120574	Pole	San Clemente
39	P120575	Pole	San Clemente
40	P120576	Pole	San Clemente
41	P38991	Pole	San Clemente
42	P38992	Pole	San Clemente
43	P38993	Pole	San Clemente

44	P120067	Pole	San Clemente
45	P120066	Pole	San Clemente
46	P281285	Pole	San Clemente
47	P28127	Pole	San Clemente
48	P28126	Pole	San Clemente
49	P28125	Pole	San Clemente
50	P28124	Pole	San Clemente
51	P28123	Pole	San Clemente
52	P28122	Pole	San Clemente
53	P28121	Pole	San Clemente
54	P28120	Pole	San Clemente
55	P124824	Pole	San Clemente
56	P28119	Pole	San Clemente
57	P28118	Pole	San Clemente
58	P28117	Pole	San Clemente
59	P26860	Pole	San Clemente
60	P25597	Pole	San Clemente
61	P28116	Pole	San Clemente
62	P28115	Pole	San Clemente
63	P28114	Pole	San Clemente
64	P28113	Pole	San Clemente
65	P28112	Pole	San Clemente
66	P28111	Pole	San Clemente
67	P120654	Pole	Dana Point
68	P121661	Pole	Dana Point
69	P165718	Pole	Dana Point
70	P121902	Pole	Dana Point
71	P122302	Pole	Dana Point
72	P120656	Pole	Dana Point
73	P121348	Pole	Dana Point
74	P120657	Pole	Dana Point
75	P121854	Pole	Dana Point
76	P120658	Pole	Dana Point
77	P120659	Pole	Dana Point
78	P24114	Pole	Dana Point
79	P124439	Pole	San Clemente
80	P124368	Pole	San Clemente
81	P29022	Pole	San Clemente
82	P29023	Pole	San Clemente
83	P29024	Pole	San Clemente
84	P320113	Pole	San Clemente
85	P320492	Pole	San Clemente
86	P23860	Pole	San Clemente
87	P23858	Pole	San Clemente
88	P124817	Pole	San Clemente
89	P121494	Pole	San Clemente
90	P121495	Pole	San Clemente
91	P129385	Pole	San Clemente
92	P23859	Pole	San Clemente

93	P25544	Pole	San Clemente
94	P23849	Pole	San Clemente
95	P23850	Pole	San Clemente
96	P23851	Pole	San Clemente
97	P23852	Pole	San Clemente
98	P204287	Pole	San Clemente
99	P126439	Pole	San Clemente
100	P23828	Pole	San Clemente
101	D117541	Padmount	San Clemente
102	D100789	Padmount	San Clemente
103	D115219	Padmount	San Clemente
104	D121164	Padmount	San Clemente
105	D126011	Padmount	San Clemente
106	D138487	Padmount	San Clemente
107	D129040	Padmount	San Clemente
108	D141493	Padmount	San Clemente
109	D138296	Padmount	San Clemente
110	D117468	Padmount	San Clemente
111	D121075	Padmount	San Clemente
112	D137837	Padmount	San Clemente
113	D147627	Padmount	San Clemente
114	D147626	Padmount	San Clemente
115	D138055	Padmount	San Clemente
116	D147083	Padmount Switch	San Clemente
117	D132981	Padmount Switch	San Clemente
118	D137718	Padmount Fuse Box	San Clemente
119	D106082	Padmount	San Clemente

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections of SDG&E's Orange County District:

GO 95, Rule 31.1, Design Construction and Maintenance, states in part:

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.

SDG&E's facilities on the following poles required maintenance:

- Pole P226635 – visibility strip damaged
- Pole P28311 – missing pole number tag
- Pole P38993 – damaged conduit for a secondary ground
- Pole P28125 – damaged conduit strap
- Pole P28120 – damaged conduit strap
- Pole P28119 – damaged conduit strap and ground wire

GO 95, Rule 54.7, Climbing and Working Space, states in part:

Climbing space shall be maintained from the ground level. Climbing space, measured from center line of pole, shall be provided on one side or in one quadrant of all poles or structures with dimensions as specified in the following ...

The climbing space on the following poles was obstructed:

- Pole P25588 – a Cox communications cable was obstructing the climbing space
- Pole P28119 – a Cox communications cable was obstructing the climbing space
- Pole P28118 – third party was obstructing the climbing space

GO 95, Rule 54.6-B, Ground Wires, states in part:

That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).

The ground molding on the following poles was damaged:

- Pole P327181A
- Pole P38991
- Pole P28120

GO 95, Rule 18.B, Reporting and Resolution of Safety Hazards Discovered by Utilities, Notifications of Safety Hazards, states in part:

If a company, while performing inspections of its facilities, discovers a safety hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.

SDG&E did not report the third-party safety hazards on the following poles:

- Pole 25592 – third-party abandoned cables
- Pole P120066 – AT&T needs to complete pole transfer
- Pole P281285 – abandoned AT&T conduit
- Pole P28118 – Cox communications abandoned facilities
- Pole P25597 – third party communications need to complete pole transfer
- Pole P28116 – third party communications (“Freedom”) needs to complete pole transfer
- Pole P323811 – the centerline clearance between the pole and a third-party communications conductor passing unattached was 5 inches.

GO 95, Rule 54.8-C4, Clearance between Service Drops and Other Conductors, From Communication Service Drops, states in part:

The radial clearance between supply service drop conductors and communication service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.

Service drops on the following SDG&E poles had less than the minimum required radial clearance from a communication service drop:

- Pole P28115 – less than the minimum required clearance of 2 feet.
- Pole P121348 – less than the minimum required clearance of 1 foot.

GO 95, Rule 38, Table 2, Column C, Case 19 requires the radial separation between guys and communications conductors supported on the same pole to be 3 inches.

The down guy wire attached to SDG&E Pole P23858 was touching a communications cable.