

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 20, 2021

TA2021-923

Heide Caswell
Pacific Power
T&D Asset Performance/Wildfire Mitigation
825 NE Multnomah St Suite 1700
Portland, OR 97232

SUBJECT: Transmission Audit of PacifiCorp's Alturas/Tulelake Districts

Dear Ms. Caswell:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Raymond Cho, Samuel Mandell, and Dmitriy Lysak of my staff conducted a transmission audit of PacifiCorp's Alturas/Tulelake Districts from September 28 through September 30, 2021. The audit included a review of PacifiCorp's transmission procedures and maintenance records, in addition to field inspections of PacifiCorp facilities within its Alturas/Tulelake Districts.

As a result of the audit, my staff identified violations of General Order 95. A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than January 17, 2021, via electronic transmittal of all corrective actions and preventive measures taken by PacifiCorp to correct the identified violations and prevent the recurrence of such violations.

If you have any questions concerning this audit, please contact Raymond Cho at (415) 703-2236 or raymond.cho@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Banu Acimis".

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

Enclosure: CPUC Transmission Audit Findings of PacifiCorp Alturas/Tulelake Districts

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer- Supervisor, ESRB, SED, CPUC
Rickey Tse, Senior Utilities Engineer- Supervisor, ESRB, SED, CPUC
Raymond Cho, Senior Utilities Engineer, ESRB, SED, CPUC

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Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC
Dmitriy Lysak, Utilities Engineer, ESRB, SED, CPUC

**CPUC TRANSMISSION AUDIT FINDINGS
PACIFICORP ALTURAS/TULELAKE DISTRICTS
September 28-30, 2021**

I. Records Review

During the transmission audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records for PacifiCorp’s Alturas/Tulelake Districts:

- Map and list of all transmission circuits in the districts
- PacifiCorp’s Visual Assurance Inspections, Transmission and Distribution Lines, Asset Management – Policy No. 011, Revision 2/18/2021
- PacifiCorp’s Correction Management Plan, Correction Time Periods and Compliance Requirements, Asset Management Policy No. 192, Dated 03/16/2020
- PacifiCorp’s Detailed Inspections for Transmission & Distribution Lines, Asset Management Policy No. 297, Dated 1/13/2017
- PacifiCorp’s Wood Pole Test & Treatment, Transmission and Distribution Lines, Asset Management Policy No. 298, Dated 1/13/2017
- PacifiCorp’s Transmission & Distribution Vegetation Management Program, Standard Operating Procedures, Dated 08/19/2019
- A summary list of detailed inspections performed including dates of the last two detailed inspections.
- A list of work pending, reassessed, completed and cancelled in the previous 12 months leading up to June 30, 2021.
- A list of capital projects completed between July 1, 2020, and June 30, 2021.
- A list of intrusive inspections performed in the previous 36 months leading up to June 30, 2021.
- Transmission and distribution vegetation inspections for the previous 12 months leading up to June 30, 2021.
- Five pole loading calculations.
- PacifiCorp’s General Order 165 Annual Filings from 2016 through 2021.

II. Records Review - Violations List

ESRB staff did not identify a records violation during the records review portion of the audit.

III. Field Inspection

ESRB staff inspected the following facilities in Table 1:

Table 1. Facility locations reviewed by ESRB Staff during the field audit.

Location No.	Circuit/Facility ID	Work Type	Structure No.
1	Line 4	ESRB Inspection	9/20
2	Line 4	ESRB Inspection	8/20
3	Line 4	ESRB Inspection	7/20
4	Line 4	ESRB Inspection	6/20
5	Line 4	ESRB Inspection	5/20
6	Line 4	ESRB Inspection	1/22
7	Line 4	ESRB Inspection	11/21
8	Line 4	ESRB Inspection	10/21
9	Line 4	ESRB Inspection	9/21
10	Line 41	ESRB Inspection	4/4
11	Line 41	ESRB Inspection	3/4
12	Line 41	ESRB Inspection	2/4
13	Line 41	ESRB Inspection	1/4
14	Line 41	ESRB Inspection	11/7
15	Line 41	ESRB Inspection	10/7
16	Line 41	ESRB Inspection	9/7
17	Line 41	ESRB Inspection	8/7
18	Line 41	ESRB Inspection	7/7
19	Line 41	ESRB Inspection	6/7
20	5L64	Vegetation Management (VM) Inspection	R#29

21	Line 5	New Construction 6955225	20/30
22	Line 41	Intrusive Inspection	12/31
23	Facility ID 537844373	Work Order	12/32
24	Facility ID 920897023	Work Order	10/33
25	Line 41	Intrusive Inspection	1/34
26	Facility ID 118562795	Work Order	1a/34
27	5L82	VM Work Order	R#46.4
28	Line 5	Work Order	3/4
29	Line 5	Work Order	5/4
30	Facility ID 330347020	Work Order	8/48
31	Unknown	VM Work Order	11/77
32	PL# 668005	New Construction 6983370	13/82
33	PL# 668005	Pole Load	1/87
34	PL# 668005	Pole Load	2/87
35	PL# 668005	Pole Load	3/87
36	PL# 668005	Pole Load	4/87
37	Facility ID 1852273	Work Order	14/92
38	Line 36	VM Work Order	R#58
39	Line 36	Intrusive Inspection	11/56
40	Line 5	New Construction 6839027	16/97
41	Line 5	New Construction 6839027	1/98

42	Line 5	New Construction 6839027	2/98
43	Line 36	VM Work Order	R#16.4

IV. Field Inspection – Violations List

ESRB staff observed the following violations during the field inspection:

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.

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.”

PacifiCorp’s Transmission & Distribution Vegetation Management Program Standard Operating Procedures states:

“6.2.2 Structure Clearances

Trees and brush should be cleared within a twenty-five-foot radius of transmission "H" or metal structures, a ten-foot radius of single pole construction and a five-foot radius of guy anchors. Clearing activities shall not damage poles, structures, guys or anchors. Grasses, forbs, ferns and other herbaceous species may be left around structures and guys.”¹

1. **GO 95, Rule 31.1** - Vegetation was found growing and in contact with the East leg of the tower at Location 28.

GO 95, Rule 51.6.A, High Voltage Marking of Poles states in part:

“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. A pair of signs

¹ PacifiCorp’s Response to Question 4 of ESRB’s Pre-audit Data Request, PacifiCorp’s Transmission & Distribution Vegetation Management Program Standard Operating Procedures, dated 08/19/2019, p.47.

may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.”

2. **GO 95, Rule 51.6A** - The following Location Numbers given in Table 1, exhibited an illegible or missing high voltage sign:
 - a. 19
 - b. 21
 - c. 23
 - d. 30

V. Follow-up Requests and Concerns

ESRB staff have the following additional requests regarding records reviewed:

1. In response to Question 8 of ESRB’s Pre-audit Data Request,² PacifiCorp reported finding a condition described as “CLIMBABLE RISER INTO PRIM/NEUTRL/OPEN WIRE SECONDARY” on June 24, 2021. PacifiCorp designated this condition as a Priority A with a Compliance Correction Due Date of July 31, 2021:

FAC_ID	MEM_ID	FAC_MEM	FPNO	MAP_LOC_NAME	POINT_NAME
		920897023-	668041/00		
920897023	26369	26369	10/033	668041/00	10/033

What is the status of this work order? If complete, provide the completion date. If not complete, explain the reasons for not completing the work identified and PacifiCorp’s plans to address the condition.

2. Location 19 exhibited a slack distribution down guy. Provide documentation regarding PacifiCorp’s efforts to address the condition.

² PacifiCorp’s Response to ESRB’s Pre-audit Data Request, dated August 9, 2021.