PG&E YOSEMITE DIVISION ELECTRIC DISTRIBUTION AUDIT FINDINGS
OCTOBER 16 – 20, 2023

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- PG&E's inspection and maintenance procedures.
- Electric Distribution Preventive Maintenance Manual, April 1, 2016.
- Overhead and underground facilities statistics.
- Completed work orders with notifications, canceled work orders with notifications, and open work orders with notifications from August 2018 to August 2023.
- Patrol and detailed inspection records from August 2018 to August 2023.
- Reliability metrics and sustained outages from August 2018 to August 2023.
- Yosemite Division map.
- New Construction projects (both overhead and underground) from September 2022 to September 2023.
- Pole loading and safety factor calculations completed from September 2022 to September 2023.
- Third Party Safety Hazard notifications sent and received from August 2018 to August 2023.
- Inspector list from August 2018 to August 2023 and inspector qualifications.
- Equipment test records from August 2018 to August 2023.
- Intrusive inspection records from September 2022 to September 2023.
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

II. Records Violations

ESRB observed the following violations during the record review portion of the audit:

1. **General Order (GO) 95, Rule 18-B, Maintenance Programs, (1)(a)** states in part:

   "Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.

   The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

   (i) Level 1 -- An immediate risk of high potential impact to safety or reliability:

   - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*

   (ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:

   - *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

   (iii) Level 3 -- Any risk of low potential impact to safety or reliability:

   - *Take corrective action within 60 months subject to the exception specified below."*

   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."

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.

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 [the] communication or supply lines and equipment.

ESRB staff reviewed late work orders completed within the Yosemite Division for the past 60 months (August 2018 – August 2023) shown in Table 1. PG&E's Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines the priority codes and associated time frames for the response/repair action as follows:

- *Priority A – Safety / Emergency Immediate Response An emergency is defined as any activity in response to an outage to customer(s) or an unsafe condition requiring immediate response or standby to protect the public.*
- *Priority B – Urgent Compliance (Due within 3 months)*
- *Priority E – Compliance (Due 3-12 months)*
- *Priority F – Compliance (For Regulatory Conditions, the Recommended Repair Date is the due date for the next Inspection (UG = 3 years, OH = 5 years)."*

ESRB staff reviewed late work orders and determined that PG&E did not address a total of 69,870 work orders by their assigned due date. Table 1 below breaks down the late work orders by their given priority, including the total number of late work orders completed, pending and cancelled work orders, which are included in the total.

Table 1: Late Work Orders in Yosemite Division

Priority Code	Late Work Orders Pending	Late Work Orders Completed	Late Work Orders Canceled	Total
A	43	2,488	692	**3,223**
B	735	4,373	418	**5,526**
E	40,585	13,557	6,409	**60,551**
F	362	93	115	**570**

Total	**41,725**	**20,511**	**7,634**	**69,870**

PG&E needs to provide ESRB with its corrective action plan to complete the 41,725 late pending work orders and its preventive actions to prevent any work orders to be addressed late in the future.

PG&E Response:

Priority A EC Notifications

The 43 A-notifications in Table 1 indicated as "Late Work Orders Pending", are completed, in the process of being cancelled, or remain open. The breakdown of notification status is as follows: 39 of these notifications have been completed and closed on time or cancelled and 3 notifications (124855901, 124921520 & 125508790) remain open pending the customer request to connect. All 42 of these rebuild notifications are customer-initiated service rebuild following a major fire event. Emergency conditions are remedied before the rebuild Priority A notification is created.

The one Priority A notification, related to Major Emergency Balancing Account (MEBA) (126620770) was completed and closed on time.

Priority B EC Notifications

We provided 12,602 Priority B EC notifications to ESRB staff within the response to DR3, which included a list of all EC notifications created between August 21, 2018, and August 20, 2023. At the time that we submitted the Yosemite Pre-Audit Data Request response for Q03, we identified 428 late open Priority B EC notifications. Since then, we recently performed a data refresh of late pending work orders and identified that we presently have 131 Priority B EC notifications remaining late open.

Priority E and F EC Notifications

We provided 101,833 Priority E and F EC notifications to ESRB staff within the response to DR3, which included a list of all EC notifications created between August 21, 2018, and August 20, 2023. At the time that we submitted the Yosemite Distribution Pre-Audit Data Request response for Q03, we identified 39,753 late open Priority E and F notifications. Since then, we recently performed a data refresh of late pending work orders and identified 37,990 Priority E and F EC notifications remaining late open.

Corrective Action Plan for Tag Completion and Going Forward Compliance

In 2019, we began the Wildfire Safety Inspection Program (WSIP) to proactively expand inspections of poles and associated equipment in High Fire Threat Districts (HFTD)/High Fire Risk Areas (HFRA) on an accelerated and enhanced basis to mitigate ignition risk. The WSIP inspections led to a significant increase in the volume of notifications.

Along with the WSIP inspections, other programs added notifications to the backlog such as Pole Test and Treat (PT&T), Post-Event Patrols, Patrol Inspections, and Infrared Inspections.

We have developed a plan to reduce the wildfire risk associated with the backlog of ignition-risk tags in HFTD/HFRA by 77 percent at the end of the 2023-2025 Wildfire Mitigation Plan (WMP) cycle. We submitted details of the work plan in PG&E's 2023-2025 WMP R3 (revision 3).

Our highest priority is to complete all A and B tags based on required compliance dates:

- Priority A tags require response by taking corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority; and

- Priority B tags are addressed within 3 months for potential violations that create risk of at least moderate potential impact to safety or reliability.

We divide remaining notifications into two groups: (1) ignition risk notifications in the HFTD/HFRA; and (2) non-ignition risk notifications in the HFTD/HFRA. Ignition risk notifications in HFTD/HFRA areas are the highest priority in this group of notifications. PG&E focuses on HFTD ignition risk tags as our risk analysis indicates that these types of tags contain 20 times more risk than non-ignition or non-HFTD tags.

Tags identified prior to 2023 will be prioritized by considering risk. We will begin bundling work by isolation zones starting in 2023 to reduce customer impact and improve operational efficiency and safer coworker conditions. Our 2023 work plan and WMP commitment was to reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA by 48 percent; in 2023 PG&E exceeded this target and reduced the backlog ignition-risk in HFTD/HFRA by over 52 percent. Our 2024 work plan and WMP commitment is to reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA by 68 percent (2023 and 2024 combined).

In 2024, we will expand prioritizing E and F tags through a bundled risk spend efficiency approach. A and B tags are not planned to be included in the bundling approach. While we anticipate that most of the E and F tags will be prioritized this way, there will be instances where a different approach may be warranted.

The bundled risk spend efficiency approach will enable us to execute EC notifications more efficiently by reducing the number of times we perform corrective work on the same circuit, executing more tags with the same resources, and reducing the number of clearances required to close tags. We are proposing to use the bundled risk spend efficiency approach through 2029 to reduce our backlog of tags.

Table 2 below identifies the most overdue non-exempt work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
A	118399821	876
B	117182871	1,426
E	117212924	1,489
F	117218848	1,355

PG&E identified work order # 118399821 on December 18, 2019, to replace a broken pole with a required end date of January 8, 2020. PG&E did not complete the work until June 2, 2022.

PG&E Response:
We created notification 118399821 for Tree Connect tag for our facilities attached to dead or dying trees. This EC notification documented in SAP as Priority A for CEMA (Catastrophic Emergency Memorandum Account) and not addressed as emergency hazards. This notification has been reassigned to a Non – Emergency program and has since been addressed, but the Work Type Code (WTC) is currently misassigned as Priority A.

PG&E identified work order #117182871 on May 8, 2019, to replace a broken pole with a required end date of November 8, 2019. PG&E has not completed the work order as of October 4, 2023.

PG&E Response:
We created a Priority E EC notification 117182871 on May 8, 2019, for a pole replacement. Our inspectors performed safety reassessments on July 8, 2020, April 7, 2021, and July 1, 2022, which confirmed the status of the pole had not escalated. On July 20, 2023, the priority of the notification was upgraded to a B priority based on our inspector recommendation. Due to resource constraints, this work is scheduled for completion by end Q1 2024.

PG&E identified work order #117212924 on May 10, 2019, to replace a broken pole with a required end date of September 6, 2019. PG&E has not completed the work order as of October 4, 2023.

PG&E Response:
We created a Priority E EC notification 117212924 on May 10, 2019, for pole top inspection and trimming limbs around service wire. On April 12, 2021, and June 27, 2022, the condition of the pole was reassessed and found in good condition; however, tree trimming was needed for overgrown vegetation. Based on risk ranking and completing the highest risk tags first, this work has been deferred to 2026 for completion.

PG&E identified work order #117218848 on June 12, 2019, to replace an anchor with a required end date of November 8, 2019. PG&E did not complete the work until July 25, 2023.

PG&E Response:
We created a Priority F EC notification 117218848 on May 12, 2019, to clear around the Anchor. An F tag is considered low potential impact to safety or reliability. As per GO 95 Rule 18, corrective action should be taken within 60 months. In this case, the required end date was incorrectly entered as November 8, 2019. Work was completed on July 25, 2023, before the 60 months requirement.

2. **General Order (GO) 95, Rule 31.2, Inspection of Lines** states in part:

> *"Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard."*

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

> *"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."*

ESRB identified that PG&E had completed a total of 33,204 overhead patrols and inspections past their assigned due dates in the last five years. Table 3 below breaks down the late overhead patrols and inspections by year and total structures late.

Table 3: Late Overhead Patrols and Inspections

Year	Inspection Type	Total Structures
2021	Patrols	23,408
2021	Inspections	9,796

PG&E Response:
In 2021 the 23,408 Overhead (OH) patrol assets and 9,796 Overhead (OH) inspections in PG&E's service territory of Yosemite Division were late as a result of our Wildfire Mitigation Plan (WMP) commitment in 2020 to prioritize our detailed inspections in HFTD areas prior to peak fire season. This change in inspection priorities caused a misalignment to CPUC due dates as defined in GO 165. Consequently, by the end of 2021, OH patrols and OH inspections were completed after their GO 165 due dates. We mitigated this error by ensuring our workplan reflects both the WMP commitment dates and the GO 165 due dates. We identified

and included the 23,408 assets as late patrols and 9,796 assets as late inspections in our 2021 GO 165 Annual Report.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities in Table 4:

Table 4: Field Inspection Locations

Location #	SAP ID	Structure Type	City
1	107180371	Secondary Box	Merced
2	107170486	Pad Mount Transformer	Merced
3	107170475	Pad Mount Transformer	Merced
4	107192572	Subsurface Transformer	Merced
5	107192561	Subsurface Transformer	Merced
6	103330857	Pole	North Fork
7	101057818	Pole	North Fork
8	101057817	Pole	North Fork
9	101057816	Pole	North Fork
10	104006745	Pole	North Fork
11	101059074	Pole	Yosemite Lakes
12	103815759	Pole	Yosemite Lakes
13	104145440	Pole	Yosemite Lakes
14	103817595	Pole	Yosemite Lakes
15	104123098	Pole	Yosemite Lakes
16	101050316	Pole	Yosemite Lakes
17	101050313	Pole	Yosemite Lakes
18	101050311	Pole	Yosemite Lakes
19	103329578	Pole	Yosemite Lakes
20	104039849	Pole	Oakhurst
21	101024512	Pole	Oakhurst
22	101024667	Pole	Oakhurst
23	101024513	Pole	Oakhurst
24	101079173	Pole	Bootjack
25	101079172	Pole	Bootjack
26	104084761	Pole	Bootjack
27	101039674	Pole	Twain Harte
28	101039750	Pole	Twain Harte
29	101039733	Pole	Twain Harte
30	101039736	Pole	Twain Harte
31	101057461	Pole	Mono Vista
32	101057460	Pole	Mono Vista
33	101057459	Pole	Mono Vista
34	104103766	Pole	Mono Vista
35	103357075	Pole	Mono Vista
36	101046622	Pole	Sonora
37	101046625	Pole	Sonora

38	101046620	Pole	Sonora
39	103917331	Pole	Jamestown
40	101051710	Pole	Jamestown
41	103349274	Pole	Jamestown
42	101051711	Pole	Jamestown
43	103917347	Pole	Jamestown
44	101283625	Pole	Copperopolis
45	101283316	Pole	Copperopolis
46	101283399	Pole	Copperopolis
47	101283400	Pole	Copperopolis
48	10123314	Pole	Copperopolis
49	102334081	Pole	East Oakdale
50	102334078	Pole	East Oakdale
51	102334079	Pole	East Oakdale
52	102334076	Pole	East Oakdale
53	102334077	Pole	East Oakdale
54	101187733	Pole	Volta
55	101179162	Pole	Los Banos
56	101179160	Pole	Los Banos
57	101179171	Pole	Los Banos
58	101179157	Pole	Los Banos
59	101179155	Pole	Los Banos
60	101179138	Pole	Los Banos
61	101175531	Pole	Dos Palos
62	101175534	Pole	Dos Palos
63	101175537	Pole	Dos Palos
64	101175525	Pole	Dos Palos
65	101175520	Pole	Dos Palos
66	101175515	Pole	Dos Palos
67	103165380	Pole	Parksdale
68	103165379	Pole	Parksdale
69	103165378	Pole	Parksdale
70	103165377	Pole	Parksdale
71	103165376	Pole	Parksdale
72	103215598	Pole	Madera
73	103307886	Pole	Madera
74	101217023	Pole	Madera
75	101217024	Pole	Madera
76	101217025	Pole	Madera
77	101135133	Pole	Madera
78	101135130	Pole	Madera
79	101135126	Pole	Madera
80	103387019	Pole	Madera
81	101135120	Pole	Madera

82	103352419	Pole	Gustine
83	101220259	Pole	Gustine
84	103791281	Pole	Gustine
85	101220253	Pole	Gustine
86	101220250	Pole	Gustine
87	101220246	Pole	Gustine
88	101220242	Pole	Gustine
89	101220236	Pole	Gustine
90	101220248	Pole	Gustine

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **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."*

ESRB's findings are listed in Table 5:

Table 5: GO 95, Rule 31.1 Findings

Location #	Findings	Notes
6	Woodpecker damage assessment	EC123925570 - Existing tag
8	Slack down guy with buried anchor	EC123925750 - Existing tag
9	Pole replacement - deterioration	EC117213957 - Existing tag
10	Woodpecker damage assessment	EC127288474 - New tag created
11	Pole replacement - deterioration	EC116880167 - Existing tag
27	Pole replacement - deterioration	EC117273304 - Existing tag
29	Conductor improperly attached	EC123873831 - Existing tag
30	Replace pole due to overload	EC121541482 - Existing tag
32	Pole replacement tag for deterioration should be canceled	EC124004637 - Existing tag
37	Replace pole due to overload	EC124357189 - Existing tag

41	Replace pole due to overload and deterioration	EC117692416 - Existing tag EC124149849 - Existing tag
42	Replace pole due to overload and deterioration	EC117115694 - Existing tag EC124158625 - Existing tag
46	Insulator on top of pole leaning due to pole top decay	EC120952639 – Existing tag updated
47	Insulator on top of pole leaning, slack down guy, missing visibility strip on pole	EC117042869 – Existing tag updated
50	Connector incorrectly installed	EC121401105 - Existing tag
54	Connector incorrectly installed	EC121902737 - Existing tag
55	Connector incorrectly installed	EC122098188 - Existing tag
56	Connector incorrectly installed	EC122098295 - Existing tag
57	Transformer on pole leaning due to loose hardware, woodpecker hole at the top of pole	EC12730467 - PG&E created a B tag to replace pole
61	Slack down guy	EC112867308 - Existing tag
64	Service drop connector detached from roof	Addressed in field
81	Connector incorrectly installed	EC126469170 - Existing tag
82	Connector incorrectly installed	EC124358185 - Existing tag
83	Connector incorrectly installed	EC124358002 - Existing tag
84	Pole set depth is too low	EC127344138 – New tag created
85	Pole replacement - deterioration	EC124357914 - Existing tag

PG&E Response:

Location 6: We disagree with the finding that we are out of compliance for the woodpecker holes noted near the top of the pole in this location since the pole had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the woodpecker damage did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the woodpecker damage had already been identified and documented in the pre-existing EC notification 123925570 and was being tracked to completion through our maintenance program.

Location 8: We disagree with the finding that we are out of compliance for the slack down guy with a buried anchor identified in this location since the down guy had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the slack down guy with a buried anchor did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the slack down guy with a buried anchor had already been identified and documented in the pre-existing EC notification 123925750 and was being tracked to completion through our maintenance program.

Location 9: We disagree with the finding that we are out of compliance for the deteriorated pole identified in this location since the pole had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the deteriorated pole did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the deteriorated pole had already been identified and documented in the pre-existing EC notification 117213957 and was being tracked to completion through our maintenance program.

Location 10: We disagree with the finding that we are out of compliance for the woodpecker holes noted near the top of the pole in this location since the pole had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the woodpecker holes did not pose an immediate risk of high potential impact to safety or reliability and would have been identified during the monitored Asset Inspection Cycle. During the CPUC Field Audit of this location, our Division Compliance Inspector created a new EC notification, 127288474, which will be tracked to completion through our maintenance program.

Location 11: We disagree with the finding that we are out of compliance for the deteriorated pole identified in this location since the pole had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the deteriorated pole did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the deteriorated pole had already been identified and documented in the pre-existing EC notification 116880167 and was being tracked to completion through our maintenance program.

Location 27: We disagree with the finding that we are out of compliance for the deteriorated pole identified in this location since the pole had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the deteriorated pole did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the deteriorated pole had already been identified and documented in the pre-existing EC notification 117273304 and was being tracked to completion through our maintenance program.

Location 29: We disagree with the finding that we are out of compliance for the improperly attached conductor identified in this location since the conductor had already been identified by our Inspection Teams.

As per GO 95, Rule 31.1 and 31.2, the improperly attached conductor did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the improperly attached conductor had already been identified and documented in the pre-existing EC notification 123873831 and was being tracked to completion through our maintenance program.

Location 30: We disagree with the finding that we are out of compliance for the overloaded pole identified in this location since the pole had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the pole did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the overloaded pole had already been identified and documented in the pre-existing EC notification 121541482 and was being tracked to completion through our maintenance program.

Location 32: We disagree with the finding that we are out of compliance for the pole having been misidentified as deteriorated and therefore tagged for replacement. As per GO 95, Rule 31.1 and 31.2, the misidentified pole did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the misidentified pole had already been noted and documented in the pre-existing EC notification 124004637 and was being tracked for cancellation through our maintenance program.

Location 37: We disagree with the finding that we are out of compliance for the overloaded pole identified in this location since the pole had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the pole did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the overloaded pole had already been identified and documented in the pre-existing EC notification 124357189 and was being tracked for to completion through our maintenance program.

Location 41: We disagree with the finding that we are out of compliance for the deteriorated and overloaded pole identified in this location since the pole had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the pole did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the deteriorated and overloaded pole had already been identified and documented in the pre-existing EC notification 117692416 and 124149849. The remediation work for these two notifications was being tracked to completion through our maintenance program.

Location 42: We disagree with the finding that we are out of compliance for the deteriorated and overloaded pole identified in this location since the pole had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the pole did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the deteriorated and overloaded pole had already been identified and documented in the pre-existing EC notification 117115694 and 124158625. The remediation work for these two notifications was being tracked to completion through our maintenance program.

Location 46: We agree with the finding that we are out of compliance for the insulator on top of pole leaning due to pole top decay. During the CPUC Field Audit of this location, our Division Compliance Inspector updated EC notification 120952639 to repair the pole and leaning insulator. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 47: We agree with the finding that we are out of compliance for the insulator on top of pole leaning, slack down guy, missing visibility strip on pole. During the CPUC Field Audit of this location, our Division Compliance Inspector updated EC notification 117042869 to address missing viz strips and leaning insulator. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 50: We disagree with the finding that we are out of compliance for the incorrectly installed connector identified in this location since the insulator had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the insulator did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the incorrectly installed connector had already been identified and documented in the pre-existing EC notification 121401105 and was being tracked to completion through our maintenance program.

Location 54: We disagree with the finding that we are out of compliance for the incorrectly installed connector identified in this location since the insulator had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the connector did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the incorrectly installed connector had already been identified and documented in the pre-existing EC notification 121902737 and was being tracked to completion through our maintenance program.

Location 55: We disagree with the finding that we are out of compliance for the incorrectly installed connector identified in this location since the insulator had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the connector did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the incorrectly installed connector had already been identified and documented in the pre-existing EC notification 122098188 and was being tracked to completion through our maintenance program.

Location 56: We disagree with the finding that we are out of compliance for the incorrectly installed connector identified in this location since the insulator had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the connector did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the incorrectly installed connector had already been identified and documented in the pre-existing EC notification 122098295 and was being tracked to completion through our maintenance program.

Location 57: We agree with the finding that we are out of compliance for the loose hardware causing the transformer to lean and a woodpecker hole at the top of the pole. During the CPUC Field Audit of this location, our Division Compliance Inspector created priority B EC notification 127304867 to replace the pole with loose hardware causing the transformer to lean and a woodpecker hole at the top of the pole. The remediation work for this EC notification will be tracked to completion through our maintenance program.

Location 61: We disagree with the finding that we are out of compliance for the slack down guy identified in this location since the insulator had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the down guy did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the slack down guy had already been identified and documented in the pre-existing EC notification 112867308 and was being tracked to completion through our maintenance program.

Location 64: We agree with the finding that we are out of compliance for the service drop connector being detached from the roof. During the CPUC Field Audit of this location, our Division Compliance Inspector remedied the service drop connector that had been detached from roof.

Location 81: We disagree with the finding that we are out of compliance for the incorrectly installed connector identified in this location since the insulator had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the connector did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the incorrectly installed connector had already been identified and documented in the pre-existing EC notification 126464170 and was being tracked to completion through our maintenance program.

Location 82: We disagree with the finding that we are out of compliance for the incorrectly installed connector identified in this location since the insulator had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the connector did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the incorrectly installed connector had already been identified and documented in the pre-existing EC notification 124358185 and was being tracked to completion through our maintenance program.

Location 83: We disagree with the finding that we are out of compliance for the incorrectly installed connector identified in this location since the connector had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the connector did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the incorrectly installed connector had already been identified and documented in the pre-existing EC notification 124358002 and was being tracked to completion through our maintenance program.

Location 84: We agree with the finding that we are out of compliance for the too low pole set depth. During the CPUC Field Audit of this location, our Division Compliance Inspector created EC notification 127344138 to reset the pole to the correct height. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 85: We disagree with the finding that we are out of compliance for the deteriorated pole identified in this location since the pole had already been identified by our Inspection Teams. As per GO 95, Rule 31.1 and 31.2, the pole did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted the deteriorated pole had already been identified and documented in the pre-existing EC notification 124357914 and was being tracked to completion through our maintenance program.

2. **GO 95, Rule 31.6, Abandoned Lines states:**

> *"Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use."*

ESRB's finding is listed in Table 6:

Table 6: GO 95, Rule 31.6 Finding

Location #	Finding
26	Old pole was left on the ground after it was replaced

PG&E Response:

Location 26: We agree with the finding that we are out of compliance for the old pole left on the ground after it was replaced with a new pole in this location. During the CPUC Field Audit of this location, our Division Compliance Inspector created EC notification 128083210 to remove the abandoned pole that was left on the ground. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

3. **GO 95, Rule 91.3C, Stepping states in part:**

> *"Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step."*

ESRB's findings are listed in Table 7:

Table 7: GO 95, Rule 91.3C Findings

Location #	Findings
38	Pole step installed too low
87	Pole step installed too low
89	Pole step installed too low

PG&E Response:

Location 38: We agree with the finding that we are out of compliance due to the pole step having been installed too low in this location. During the CPUC Field Audit of this location, our Division Compliance Inspector created EC notification 128041633 to remove the low pole step. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 87: We agree with the finding that we are out of compliance due to the pole step having been installed too low in this location. During the CPUC Field Audit of this location, our Division Compliance Inspector remedied the low pole step by removing it in the field.

Location 89: We agree with the finding that we are out of compliance due to the pole step having been installed too low in this location. During the CPUC Field Audit of this location, our Division Compliance

Inspector remedied the low pole step by removing it in the field.

4. **GO 95, Rule 37, Table 1** requires the following:

   5b. Basic minimum allowable vertical clearance of wires above ground in areas accessible to pedestrians only must be at least 10 feet for service drop of 0 – 750 volts.

   ESRB's finding is listed in Table 8:

Table 8: GO 95, Rule 37 Finding

Location #	Finding	Notes
65	Service drop low vertical clearance	Repaired in field

PG&E Response:

Location 65: We agree with the finding that we are out of compliance due to the service drop having a low vertical clearance in this location. During the CPUC Field Audit of this location, our Division Compliance Inspector rectified the service drop with a low vertical clearance. This finding was therefore documented as remedied and completed during the CPUC Field Audit.

5. **GO 95, Rule 51.6 – Marking and Guarding, High Voltage Marking** states:

   "A. High Voltage Marking

   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. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible."

   ESRB's findings are listed in Table 9:

Table 9: GO 95, Rule 51.6 Findings

Location #	Findings	Notes
7	Missing "High Voltage" Sign	EC112053097 - Existing tag
30	Missing "High Voltage" Sign	EC12154182 – Issue will be added to existing tag
48	Missing "High Voltage" Sign	EC120952410- Issue was added to existing tag

62	Missing “High Voltage” Sign	EC124300299 - Existing tag
78	Damaged “High Voltage” Sign	EC126463595 - Existing tag

PG&E Response:

Location 7: We disagree with the finding that we are out of compliance for the missing “High Voltage” sign identified in this location since it had already been marked for replacement. As per GO 95, Rule 51.6, the missing “High Voltage” sign did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted that the missing “High Voltage” sign had already been identified and documented in the pre-existing EC notification 112053097 and was being tracked to completion through our maintenance program.

Location 30: We disagree with the finding that we are out of compliance for the missing “High Voltage” sign identified in this location since it had already been marked for replacement. As per GO 95, Rule 51.6, the missing “High Voltage” sign did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted that the missing “High Voltage” sign had already been identified and documented in the pre-existing EC notification 121541482 and was being tracked to completion through our maintenance program.

Location 48: We disagree with the finding that we are out of compliance for the missing “High Voltage” sign identified in this location since it had already been marked for replacement. As per GO 95, Rule 51.6, the missing “High Voltage” sign did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted that the missing “High Voltage” sign had already been identified and documented in the pre-existing EC notification 120952410 and was being tracked to completion through our maintenance program.

Location 62: We disagree with the finding that we are out of compliance for the missing “High Voltage” sign identified in this location since it had already been marked for replacement. As per GO 95, Rule 51.6, the missing “High Voltage” sign did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted that the missing “High Voltage” sign had already been identified and documented in the pre-existing EC notification 124300299 and was being tracked to completion through our maintenance program.

Location 78: We disagree with the finding that we are out of compliance for the damaged “High Voltage” sign identified in this location since it had already been marked for replacement. As per GO 95, Rule 51.6, the missing “High Voltage” sign did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted that the missing “High Voltage” sign had already been identified and documented in the pre-existing EC notification 126463595 and was being tracked to completion through our maintenance program.

6. **GO 95, Rule 84.6.B, Ground Wires** states:

“Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in

Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7-foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.

Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8).”

ESRB’s findings are listed in Table 10:

Table 10: GO 95, Rule 84.6.B Findings

Location #	Findings	Notes
22	Exposed vertical ground wire	Repaired in field
23	Exposed vertical ground wire	Repaired in field
31	Exposed vertical ground wire	Partially repaired in field
81	Exposed vertical ground wire	Repaired in field
86	Exposed vertical ground wire	Repaired in field
89	Exposed vertical ground wire	Repaired in field

PG&E Response:

Location 22: We agree with the finding that we are out of compliance for the exposed vertical ground wire noted in this location. During the CPUC Field Audit of this location, our Division Compliance Inspector rectified exposed vertical ground wire noted. This finding was therefore documented as remedied during the CPUC Field Audit.

Location 23: We agree with the finding that we are out of compliance for the exposed vertical ground wire noted in this location. During the CPUC Field Audit of this location, our Division Compliance Inspector rectified exposed vertical ground wire noted. This finding was therefore documented as remedied and completed during the CPUC Field Audit.

Location 31: We agree with the finding that we are out of compliance for the exposed vertical ground wire noted in this location. During the CPUC Field Audit of this location, our Division Compliance Inspector partially rectified exposed vertical ground wire noted and created EC notification 120888653 which is tracked to completion through our maintenance program.

Location 81: We agree with the finding that we are out of compliance for the exposed vertical ground wire noted in this location. During the CPUC Field Audit of this location, our Division Compliance Inspector rectified exposed vertical ground wire noted. This finding was therefore documented as remedied and completed during the CPUC Field Audit.

Location 86: We agree with the finding that we are out of compliance for the exposed vertical ground wire noted in this location. During the CPUC Field Audit of this location, our Division Compliance Inspector rectified exposed vertical ground wire noted. This finding was therefore documented as remedied and completed during the CPUC Field Audit.

Location 89: We agree with the finding that we are out of compliance for the exposed vertical ground wire noted in this location. During the CPUC Field Audit of this location, our Division Compliance Inspector rectified exposed vertical ground wire noted. This finding was therefore documented as remedied and completed during the CPUC Field Audit.

7. **GO 95, Rule 35 – Vegetation Management** states in part:

> *"Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained. (Also see Appendix E for tree trimming guidelines.) These requirements apply to all overhead electrical supply and communication facilities that are covered by this General Order, including facilities on lands owned and maintained by California state and local agencies."*

ESRB's findings are listed in Table 11:

Table 11: GO 95, Rule 35 Findings

Location #	Findings	Notes
6	Vegetation contact on down guy above insulator	EC123925570 Issue was added to existing tag
31	Tree vine strain on down guy	EC112053097 - Existing tag
33	Vegetation contact on down guy above insulator	EC 128041630 – New tag created
35	Vegetation contact on down guy above insulator	EC 128041596 – New tag created
48	Vegetation contact on down guy above insulator	EC 120952410 Issue was added to existing tag
54	Vegetation contact on down guy above insulator	EC121902737 – Issue will be added to existing tag
77	Vegetation on secondary lines and down guy	EC126477847 – Existing tag
85	Vegetation strain on service drop	Repaired in field

PG&E Response:

Location 6: We agree with the finding that we are out of compliance for the vegetation being in contact with down guy above insulator. During the CPUC Field Audit of this location, our Division Compliance Inspector modified EC notification 123925570 to clear the vegetation from the down guy. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 31: We disagree with the finding that we are out of compliance for the tree vine strain on the down guy since this location has already been marked for remediation. As per GO 95, Rule 35, the tree vine strain on the down guy did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted that the tree vine strain on the down guy had already been identified and documented in the pre-existing EC notification 120888653 and was being tracked to completion through our maintenance program.

Location 33: We agree with the finding that we are out of compliance for the vegetation being in contact with down guy above insulator. During the CPUC Field Audit of this location, our Division Compliance Inspector created EC notification 128041630 to clear the vegetation from the down guy. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 35: We agree with the finding that we are out of compliance for the vegetation being in contact with down guy above insulator. During the CPUC Field Audit of this location, our Division Compliance Inspector created EC notification 128041596 to clear the vegetation from the down guy. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 48: We agree with the finding that we are out of compliance for the vegetation being in contact with down guy above insulator. During the CPUC Field Audit of this location, our Division Compliance Inspector added the vegetation clearance to the preexisting EC notification 120952410. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 54: We agree with the finding that we are out of compliance for the overgrown vegetation being in contact with down guy above the insulator. During the CPUC Field Audit of this location, our Division Compliance Inspector added the overgrown vegetation issue to the already existing EC notification 121902737 for clearing the overgrown vegetation from the down guy. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 77: We disagree with the finding that we are out of compliance for the overgrown vegetation on the secondary lines and down guy since this location had already been marked for clearance. As per GO 95, Rule 35 the overgrown vegetation on the secondary lines and down guy did not pose an immediate risk of high potential impact to safety or reliability. During the CPUC Field Audit of this location, our Division Compliance Inspector noted that the overgrown vegetation on the secondary lines and down guy had already been identified and documented in the pre-existing EC notification 126477847 and is being tracked to completion through our maintenance program.

Location 85: We agree with the finding that we are out of compliance for the overgrown vegetation having strain on the service drop. During the CPUC Field Audit of this location, our Division Compliance Inspector cleared the overgrown vegetation from the service drop. This finding was therefore documented as remedied

on site during the CPUC Field Audit.

8. **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.*
>
> *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 [the] communication or supply lines and equipment."*

ESRB's findings are listed in Table 12:

Table 12: GO 128, Rule 17.1 Findings

Location #	Findings	Notes
1	Secondary enclosure cracked	EC127284674 - New tag created
2	Missing direction tags on secondary cables	EC127285032 - New tag created
3	Missing direction tags on secondary cables	EC127284575 - New tag created

PG&E Response:

Location 1: We agree with the finding that we are out of compliance for the cracked secondary enclosure. During the CPUC Field Audit of this location, our Division Compliance Inspector created EC notification 127284674 to replace the secondary enclosure. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 2: We agree with the finding that we are out of compliance for the missing direction tags on secondary cables. During the CPUC Field Audit of this location, our Division Compliance Inspector created EC notification 127285032 to install the missing direction tags on secondary cables. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 3: We agree with the finding that we are out of compliance for the missing direction tags on secondary cables. During the CPUC Field Audit of this location, our Division Compliance Inspector created EC notification 127284575 to install the missing direction tags on secondary cables. The remediation work for this

EC notification is to be tracked to completion through our maintenance program.

9. GO 128, Rule 35.1, Identification of Cables states:

"Cables operating at a voltage in excess of 750 volts shall be permanently and clearly identified by tags or other suitable means to indicate their operating voltage and the circuit with which they are normally associated at each manhole or other commonly accessible location of the underground system."

ESRB's finding is listed in Table 13:

Table 13: GO 128, Rule 35.1 Finding

Location #	Finding
3	Missing voltage tags on primary cables

PG&E Response:

Location 3: We agree with the finding that we are out of compliance for the missing voltage tags on primary cables. During the CPUC Field Audit of this location, our Division Compliance Inspector created EC notification 127284575 to replace the missing voltage tags on primary cables. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

V. Observations

1. **GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards** states in part:

   (2) "Where a communications company's or an electric utility's (Company A's) actions result in potential violations of GO 95 for another entity (Company B), that entity's (Company B's) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.

   (3) 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 entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

   (4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO95."

Table 14 includes all non-PG&E (third-party) findings that ESRB observed during the audit:

Table 14: Observations

Location #	Findings
28	Communication line contacting down guy
29	Communication lines not transferred to new pole
65	Communication service drop low clearance from ground – addressed in field by PG&E
66	Exposed communications ground wire
76	Abandoned communications service drop – addressed in field by PG&E
79	Communications line with low vertical clearance
81	Exposed communications vertical ground wire

PG&E Response:

We acknowledge the third-party utility findings listed above. These findings were either pre-identified by our Inspection Teams or rectified on site during the CPUC Audit. As per GO 95, Rule 18-A, the conditions did not pose a significant threat to human life or property and would have been identified during its monitored Asset Inspection Cycle as per GO 95, Rule 31.2. Please see the table below for the listed findings and their associated referenced status:

Please find attached Third Party Notifications associated with each finding and listed in the table below.

Location	Finding	Reference
28	Communication line contacting down guy	TP Notif: 128078460
29	Communication lines not transferred to new pole	TP Notif: 127297505
65	Communication service drop low clearance from ground – addressed in field by PG&E	Addressed in Field
66	Exposed communications ground wire	TP Notif: 128038248
76	Abandoned communications service drop – addressed in field by PG&E	Addressed in Field
79	Communications line with low vertical clearance	TP Notif: 127308436
81	Exposed communications vertical ground wire	TP Notif: 127308523