PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

October 5, 2023 EA2023-1142

Meredith Allen, Senior Director
Regulatory Relations
Pacific Gas & Electric Company (PG&E)
300 Lakeside Dr., Oakland, CA 94612

SUBJECT: Electric Distribution Audit of PG&E's Los Padres Division

Ms. Allen:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Stephen Lee of ESRB staff conducted an electric distribution audit of PG&E's Los Padres Division from August 28 to September 1, 2023. During the audit, ESRB staff conducted field inspections of PG&E's distribution facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than November 2, 2023, by electronic copy of all corrective actions and preventive measures taken by PG&E to correct the identified violations and prevent the recurrence of such violations.

The response should indicate the date each remedial action and preventive measure taken for the violations. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Section II and IV of the enclosed Audit Report. Please also provide records of the third-party notifications for the violations listed in Section V of the enclosed Audit Report.

If you have any questions concerning this audit, please contact Emiliano Solorio at (916) 216-0249 or Emiliano.Solorio@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Electric Distribution Audit Report for PG&E Los Padres Division

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
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Internal

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Internal

PG&E LOS PADRES DIVISION ELECTRIC
DISTRIBUTION AUDIT FINDINGS

August 28 – September 1, 2023

I. Records Review

During the distribution audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for PG&E's Los Padres Division:

- Electric Distribution Preventive Maintenance Manual, April 1, 2016
- TD-2305M-B006, Revised Distribution Inspection Guidelines, January 24, 2020
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, August 02, 2022
- Distribution facilities statistics and their wildfire risks, including equipment risks and vegetation risks
- Los Padres Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, July 2018 – June 2023
- Electric Corrective Notifications list, July 2018 – June 2023
- Reliability Indexes and Outage list, July 2018 – June 2023
- Los Padres New Projects list, July 2022 – June 2023
- Pole Loading Calculations list, July 2022 – June 2023
- Incoming Third-Party Notifications list, July 2018 – June 2023
- Outgoing Third-Party Notifications list, July 2018 – June 2023
- Inspector training records, July 2018 – June 2023
- Equipment test records, July 2018 – June 2023
- Intrusive Inspections, July 2022 – June 2023
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

Internal

II. Records Violations

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

1. Late Work Orders

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 Los Padres Division for the past 60 months (July 2018 – June 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 34,521 work orders by their assigned due date. Table 1 below breaks down the 34,521 late work orders by their given priority, including the total number of late work orders completed, pending, and canceled work orders, which are included in the total.

Table 1: Late Work Orders in Los Padres Division

Priority Code	Late Work Orders Completed	Late Work Orders Pending	Late Work Orders Cancelled	Total
A	731	66	-	**797**
B	1,032	99	124	**1,255**
E	6,988	22,155	2,978	**32,121**
F	40	239	69	**348**
Total	8,791	22,559	3,171	**34,521**

PG&E shall provide ESRB with its corrective action plan to complete the 22,559 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

PG&E Response:

Priority A EC Notifications

We provided 8,246 Priority A Electric Corrective (EC) notifications to California Public Utility Commission's (CPUC) Electric Safety & Reliability Branch (ESRB) staff within the response to Pre-Audit Data Request Set 3 (DR3), which included a list of all EC notifications created between July 3, 2018, and July 3, 2023. We performed an internal analysis of the entire data set and initially identified 731 Priority A EC notifications were completed late; the revised count is 670 of potentially late Priority A EC notifications that have now been completed as indicated in Table 1 below. Please note, this number includes work that is categorized as Priority A (e.g., the data includes Fire Rebuilds and Vegetation Management) but is not an "emergency" as that term is defined for Priority A.

The 670 potentially late 'completed' Priority A EC notifications are identified below in Table PG&E-1 by creation year.

Table PG&E-1

Notification Creation Date	Potentially Late Completed Count
2018	**68**
2019	**269**
2020	**93**
2021	**35**
2022	**38**
2023	**167**
Grand Total	**670**

Prior to 2020, we did not have adequate mechanisms to track immediate responses to Priority A Notifications. Due to the lack of a tracking mechanism, each of the identified late notifications would require an extensive manual review to validate the accuracy of the completion date. In 2020, we implemented a temporary repair process to accurately track when hazards are immediately mitigated. In June 2022, we published TD-2060S providing updated compliance requirements for Priority A Notification management.

Priority B EC Notifications

We provided 7,961 Priority B EC notifications to ESRB staff within the response to DR3, which included a list of all EC notifications created between July 3, 2018, and July 3, 2023. At the time that we submitted the Los Padres Distribution Pre-Audit Data Request response for Q03, we identified 1,255 potentially late Priority B EC notifications. We recently performed an updated internal analysis of the late work order data set and identified 1,274 potentially late Priority B EC notifications.

Priority E and F EC Notifications

We provided 55,028 Priority E and F EC notifications to ESRB staff within the response to DR3, which included a list of all EC notifications created between July 3, 2018, and July 3, 2023. At the time that we submitted the Los Padres Distribution Pre-Audit Data Request response for Q03, we identified 32,469 potentially late Priority B EC notifications. We performed an updated internal analysis of the late work order data set and identified 32,311 potentially late Priority E and F EC notifications.

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 in 2023 to reduce customer impact and improve operational efficiency and safer coworker conditions. Our work plan and WMP commitment is to reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA by 48 percent in 2023.

Starting in 2024, we will be prioritizing E and F tags through a bundled risk spend efficiency approach. A and B tags are not 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	117716445	425
B	117024056	1,369
E	117016897	1,362
F	117195341	735

PG&E identified work order #117716445 on August 5, 2019, to replace a broken pole with a required end date of August 26, 2019. PG&E did not complete the work until October 24, 2020.

PG&E Response:

We created EC notification 117716445 as a damage claim due to a third-party car pole hitting our streetlight. On August 5, 2019, we removed the streetlight pole and corrected the immediate hazard on the same day.
The delay in notification closure is a result of material and construction delays. Work has since been completed with closure in SAP by October 24, 2020.

PG&E identified work order #117024056 on April 13, 2019, to replace a decaying pole with a required end date of October 5, 2019. PG&E did not complete the work until July 5, 2023.

PG&E Response:
We created EC notification 117024056 on April 13, 2019, as part of a routine inspection to replace a decayed and rotten pole and crossarm. We performed safety reassessments on July 21, 2020, July 22, 2021, and July 12, 2022. The tag backlog is prioritized by risk so that the highest risk tags are added to the workplan. We reviewed this tag each year and did not prioritize on the workplan. We upgraded the tag in priority on April 13, 2023, and completed the work within a three-month window on July 5, 2023.

PG&E identified work order #117016897 on April 12, 2019, to replace a burned pole with a required end date of October 12, 2019. PG&E did not complete the work until July 5, 2023.

PG&E Response:
We created EC notification 117016897 on April 12, 2019, as part of a routine inspection to replace mini wedge connectors that were installed on primary jumpers and to trim down guy. On May 21, 2019, a pole replacement was noted. On June 2, 2021, and July 3, 2022, we performed a safety reassessment at this location. The tag backlog is prioritized by risk so that the highest risk tags are added to the workplan. Each year, this tag was re-reviewed and was not deemed as prioritized on the workplan. Work was completed on July 5, 2023.

PG&E identified work order #117195341 on March 30, 2019, to trim vegetation with a required end date of October 30, 2019. PG&E did not complete this work until November 3, 2021.

PG&E Response:
On March 30, 2019, we created EC notification 117195341 to trim vegetation near secondary as it was starting to show strain. On May 13, 2019, we determined that this area was still open for our routine maintenance work and added the job into our routine workstream. On May 24, 2019, our tree crew pruned and completed the work. This notification remained open in error in SAP. In September 2021, our business analyst noted that this notification remained open and pending. After confirming that the work was completed, we closed this notification in SAP on November 3, 2021.

2. Overhead Inspections

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:

"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."

2.1 ESRB staff identified that PG&E completed a total of 2,341 detailed overhead inspections of electric facilities past their GO 165 required completion date, as shown in attachment *"LateOHinspections"*.

2.2 Additionally, ESRB staff found that PG&E completed a total of 12,067 overhead patrols past their GO 165 required completion date for the maps shown in attachment *"LateOHpatrol"*.

PG&E Response:

In 2019, we did not inspect four Overhead (OH) detailed inspection assets identified on "*DRU12485_Atch01_ LateOHinspections.pdf*" in Los Padres Division on time due to a mapping error on our legacy map or electronic mobile technology. As part of our 2019 Wildfire Safety Inspection Program (WSIP), we verified the location of the asset in the field. During this inspection, the lead inspector discovered three additional poles. We completed our detailed inspection of all four OH assets on May 2, 2019, after the CPUC due date of April 18, 2019. These four poles have been added to our maps. We identified the four assets as late inspections in our 2020 GO 165 Annual Report.

In 2020, we did not inspect 71 OH detailed inspection assets identified on "*DRU12485_Atch01_ LateOHinspections.pdf*" in Los Padres Division on time but completed by year-end 2020. On August 15, 2020, unprecedented lightning strikes occurred throughout our territory resulting in multiple fires across California. As these fires grew, they were blended into the August Complex, the North Complex, the LNU Lightning Complex, the SCU Lightning Complex, the SQF Complex, and the Creek Fire. Because it took several months for these fires to be contained, many of our assets were not accessible due to the unsafe field conditions. During the time of the fires, our priority was to restore service to our customers safely, which also impacted these units from being completed on time. Furthermore, we had multiple PSPS events take place in September, October, and November compounding the planned patrol and detailed inspections. We identified and included the 71 assets as late inspections in our 2020 GO 165 Annual Report.

In 2021, we identified 2,266 OH detailed inspection assets identified on "*DRU12485_Atch01_LateOHinspections.pdf*" in Los Padres Division late due to prioritization. We prioritized our detailed inspections in HFTD areas prior to peak fire season from our WMP commitment in 2020. This change in inspection priorities caused a misalignment to CPUC due dates as defined in GO 165. Consequently, by the end of 2021, overhead detailed 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 2,266 assets as late Inspections in our 2021 GO 165 Annual Report.

In 2021, we identified 7,790 OH patrol assets identified on "*DRU12485_Atch02_LateOHpatrol.pdf*" in Los Padres Division late due to prioritization. We prioritized our detailed inspections in HFTD areas prior to peak fire season from our WMP commitment in 2020. This change in inspection priorities caused a misalignment to CPUC due dates as defined in GO 165. Consequently, by the end of 2021, overhead patrols 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 7,790 assets as late patrols our 2021 GO 165 Annual Report.

The 4,277 OH patrol assets identified as late on the "*DRU12485_Atch02_LateOHpatrol. pdf*" in Los Padres Division is considered preliminary data and can vary throughout the year as updates are received from our local divisions. The 2023 GO 165 Annual Report will not be published until July 1, 2024, therefore, we have yet to complete the investigation of these assets and are unable to provide the late justifications at this time. We have planned for these 4,277 assets to be patrolled and completed in 2023.

III. Field Inspection

During the field inspection, ESRB inspected locations listed in Table 3:

Table 3: List of Field Inspection Locations

Location #	SAP #	Structure Type	Structure Location/Address
1	103394122	Wood Pole	(34.6121058, -120.0764576)
2	101865684	Wood Pole	(34.6144079, -120.0764405)
3	101865714	Wood Pole	Camino Arroyo & Meadowvale Ln. Santa Ynez, CA
4	101914152	Wood Pole	1111 Camino Arroyo, Santa Ynez, CA
5	101865711	Wood Pole	3680 Camino Arroyo, Santa Ynez, CA
6	101914151	Wood Pole	3670 Camino Arroyo, Santa Ynez, CA
7	101865710	Wood Pole	1171 Lincoln St. Santa Ynez, CA
8	101865687	Wood Pole	1151 Lincoln St. Santa Ynez, CA
9	103972207	Wood Pole	1145 Lincoln St. Santa Ynez, CA
10	103313438	Wood Pole	821 Carriage Dr. Solvang, CA
11	101886069	Wood Pole	(34.6048651, -120.1028227)
12	103803816	Wood Pole	2852 Covered Wagon Solvang, CA
13	101886066	Wood Pole	2848 Covered Wagon Solvang, CA
14	101916957	Wood Pole	2848 Covered Wagon Solvang, CA
15	101886067	Wood Pole	2848 Covered Wagon Solvang, CA
16	101870524	Wood Pole	(34.6166628, -120.1353090)
17	101913475	Wood Pole	(34.6160759, -120.1354997)
18	104029246	Wood Pole	Fir Ave. & 2nd Pl. Solvang, CA

Location #	SAP #	Structure Type	Structure Location/Address
19	101914890	Wood Pole	1637 Fir Ave. Solvang, CA
20	101889097	Wood Pole	1631 Fir Ave. Solvang, CA
21	101889098	Wood Pole	1618 Fir Ave. Solvang, CA
22	108250157	Pad Mount Transformer	1632 Mission Dr. Solvang, CA
23	101899262	Wood Pole	(34.6866723, -120.5952139)
24	101899261	Wood Pole	(34.6865389, -120.5958439)
25	101899260	Wood Pole	(34.6864054, -120.5964202)
26	101899259	Wood Pole	(34.6864595, -120.5969728)
27	101917540	Wood Pole	(34.6821346, -120.6047790)
28	101899257	Wood Pole	(34.6817577, -120.6051257)
29	101872177	Wood Pole	Mead Ln. & Telephone Rd. Santa Maria, CA
30	101917366	Wood Pole	(34.8661980, -120.3833087)
31	101872176	Wood Pole	(34.8659155, -120.3833100)
32	101872221	Wood Pole	(34.8657378, -120.3833087)
33	103907263	Wood Pole	Clark Ave. & Telephone Rd. Orcutt, CA
34	101872222	Wood Pole	(34.8653802, -120.3838562)
35	101872223	Wood Pole	(34.8654118, -120.3843058)
36	101902878	Wood Pole	455 Dyer St. Orcutt, CA
37	101902878	Wood Pole	(34.8645849, -120.4426220)
38	101902877	Wood Pole	120 S. Gray St. Orcutt, CA

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
39	101902873	Wood Pole	122 S. Gray St. Orcutt, CA
40	101902872	Wood Pole	(34.8646465, -120.4433261)
41	101875526	Wood Pole	201 W. Newlove Dr. Santa Maria, CA
42	101875522	Wood Pole	209 W. Newlove Dr. Santa Maria, CA
43	101875523	Wood Pole	219 W. Newlove Dr. Santa Maria, CA
44	101919409	Wood Pole	223 W. Newlove Dr. Santa Maria, CA
45	101875524	Wood Pole	305 W. Newlove Dr. Santa Maria, CA
46	101919410	Wood Pole	311 Newlove Dr. Santa Maria, CA
47	107324004	Sub-Surface Transformer	Pier Ave. & Lakeside Ave. Oceano, CA
48	107294943	Sub-Surface Transformer	345 Pier Ave. Oceano, CA
49	101910074	Wood Pole	1270 Lakeside Ave. Oceano, CA
50	101910073	Wood Pole	1330 Lakeside Ave. Oceano, CA
51	101928786	Wood Pole	Juanita Ave. & Lakeside Ave. Oceano, CA
52	101910071	Wood Pole	381 Juanita Ave. Oceano, CA
53	101910070	Wood Pole	361 Juanita Ave. Oceano, CA
54	101881766	Wood Pole	791 Hanford St. Pismo Beach, CA
55	101855197	Wood Pole	711 Hanford St. Pismo Beach, CA
56	101855196	Wood Pole	681 Hanford St. Pismo Beach, CA
57	101928736	Wood Pole	651 Hanford St. Pismo Beach, CA
58	101881602	Wood Pole	6830 Monte Rd. San Luis Obispo, CA

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
59	101925640	Wood Pole	(35.1884008, -120.6966417)
60	104030653	Wood Pole	(35.1883197, -120.6961076)
61	101890013	Wood Pole	13805 El Camino Real Atascadero, CA
62	101890011	Wood Pole	(35.4358838, -120.6209360)
63	101890012	Wood Pole	(35.4359889, -120.6208324)
64	101890030	Wood Pole	(35.4369101, -120.6200968)
65	101890010	Wood Pole	(35.4361424, -120.6213846)
66	103947686	Wood Pole	13715 El Camino Atascadero, CA
67	101933809	Wood Pole	(35.4364896, -120.6225701)
68	101933808	Wood Pole	13700 El Camino Atascadero, CA
69	101929851	Wood Pole	5175 Aguila Ave. Atascadero, CA
70	104131970	Wood Pole	(35.4894091, -120.6801655)
71	101929850	Wood Pole	(35.4889519, -120.6799808)
72	101896447	Wood Pole	(35.4898970, -120.6807231)
73	101929852	Wood Pole	(35.4899589, -120.6806879)
74	107339857	Pad Mount Transformer	101 Coleman Dr. Morro Bay, CA
75	107263919	Splice Box	(35.3716238, -120.8623086)
76	107277590	Splice Box	(35.3710683, -120.8634536)
77	101878391	Splice Box	1805 Andrews St. San Luis Obispo, CA

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
78	103808608	Wood Pole	1797 Andrews St. San Luis Obispo, CA
79	103396543	Wood Pole	1793 Andrews St. San Luis Obispo, CA
80	101878409	Wood Pole	1394 Andrews St. San Luis Obispo, CA
81	103808609	Wood Pole	1450 Andrews St. San Luis Obispo, CA
82	101849076	Wood Pole	Grand Ave. & Wilson St. San Luis Obispo, CA
83	101849077	Wood Pole	615 Grand Ave. San Luis Obispo, CA
84	101849080	Wood Pole	607 Grand Ave. San Luis Obispo, CA
85	103796190	Wood Pole	1694 Wilson St. San Luis Obispo, CA
86	101930130	Wood Pole	640 Park St. San Luis Obispo, CA
87	107354983	Splice Box	Broad St. & Monterey St. San Luis Obispo, CA
88	107536387	Sub-Surface Transformer	975 Broad St. San Luis Obispo, CA
89	107536357	Splice Box	Broad St. & Palm St. San Luis Obispo, CA

IV. Field Inspection – Violations List

ESRB observed the following violations during the field inspection:

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

   "Electrical supply and communications 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 4.

Table 4: GO 95, Rule 31.1 Findings

Location	Finding	Notes
6	Woodpecker holes were found near top of the pole.	
14	Secondary insulator was chipped. Transformer bushing had damage.	
33	Pole had damaged visibility strips.	PG&E has existing EC notification 119603497 to repair the visibility strips. PG&E repaired the visibility strips in field.
37	Pole has a loose guy wire.	PG&E has existing EC notification 110475511 to repair the guy wire.
38	Ground wire was exposed.	PG&E has existing EC notification 119671034 to repair the exposed ground wire. PG&E repaired the ground wire molding in field.
45	Underarm bus is coming off of crossarm.	
50	Corrosion is found on insulators.	Finding was added to existing PG&E EC notification 101910073.
53	Dead end attachment has corrosion damage.	
54	Guy wire anchor is corroded.	PG&E has existing EC notification 123827797 to repair the guy wire anchor.

85	Secondary reducer boot was damaged.	PG&E has existing EC notification 123256269 to repair the reducer boot. The reducer boot was repaired in field.

PG&E Response:

Location 6: We disagree with the finding that we are out of compliance due to woodpecker holes being found near the top of the pole. 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 and would have been identified during its monitored Asset Inspection Cycle. During the CPUC Audit of this location, our Division Compliance Inspector added notes regarding woodpecker damage assessment to the preexisting EC notification 123970833 that will be tracked to completion through our maintenance program.

Location 14: We agree with the finding that we are out of compliance due to a secondary insulator found to be chipped with a damaged transformer bushing. During the CPUC Audit of this location, our Division Compliance Inspector created an EC notification 126940842 to replace the cross arm with damaged bushing and chipped insulators that will be tracked to completion through our maintenance program.

Location 33: We disagree with the finding that we are out of compliance due to damaged visibility strips. As per GO 95, Rule 31.1 and 31.2, the damaged high-visibility strip did not pose an immediate risk of high potential impact to safety or reliability and would have been found during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector corrected the condition on site by replacing the broken visibility strip.

Location 37: We disagree with the finding that we are out of compliance due to a loose guy wire. As per GO 95, Rule 18, Appendix I, the loose guy wire did not pose an immediate risk of high potential impact to safety or reliability and would have been found during its monitored Asset Inspection Cycle. Our Division Compliance had a preexisting EC notification 110475511 to adjust the loose guy wire that will be tracked to completion through our maintenance program.

Location 38: We disagree with the finding that we are out of compliance due to an exposed ground wire. As per GO 95, Rule 31.1 and 31.2I, the exposed ground wire did not pose an immediate risk of high potential impact to safety or reliability. Our Division Compliance Inspector pointed out that we have a preexisting EC notification 119671034; however, he immediately corrected the condition on site by adding a ground wire molding.

Location 45: We agree with the finding that we are out of compliance due to an underarm buss coming off a crossarm. During the CPUC Audit of this location, our Division Compliance

Inspector created EC notification 126949219 to repair loose under arm buss that will be tracked to completion through our maintenance program.

Location 50: We disagree with the finding that we are out of compliance due to corrosion being found on insulators. During the CPUC Audit, our Division Compliance Inspector added replacing hardware to the preexisting EC notification 124712045 to adjust connectors. The EC notification will be tracked to completion through our maintenance program.

Location 53: We disagree with the finding that we are out of compliance due to deadend attachment having corrosion damage. During the CPUC Audit, our Division Compliance Inspector added replacing hardware to the preexisting EC notification 113166869 that will be tracked to completion through our maintenance program.

Location 54: We disagree with the finding that we are out of compliance due to a guy wire anchor being corroded as we had a preexisting EC notification 123827797 to replace a corroded anchor. This notification will be tracked to completion through our maintenance program.

Location 85: We disagree with the finding that we are out of compliance due to a damaged secondary reducer boot as we had a preexisting EC notification 123256269 to replace this item. During the CPUC Audit, our Division Compliance Inspector corrected the condition on site and installed a new reducer boot.

2. **General Order 95, Rule 34 – Foreign Attachments** states:

"Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight 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.

Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner's or owners' consent."

ESRB's finding is listed in Table 5:

Table 5: GO 95, Rule 34 Finding

Location	Finding	Notes
33	Foreign attachment found on pole.	PG&E corrected the finding in the field.

PG&E Response:

Location 33: We disagree with the finding that we are out of compliance due to a foreign object ("advertisement" poster) being found on the pole. This condition did not pose an immediate risk of high potential impact to safety or reliability and would have been identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site by removing the sign.

3. **General Order 95, Rule 51.6-A – High Voltage Marking** 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. 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 6:

Table 6: GO 95, Rule 51.6-A Findings

Location	Finding	Notes
4	High Voltage sign was missing.	
5	High Voltage sign was broken.	PG&E has existing EC notification 123970883 for repair.
7	High Voltage sign was missing.	PG&E has existing EC notification 123970834 to install a new sign.
11	High Voltage sign was missing.	PG&E has existing EC notification 110413477 to install a new sign.
24	High Voltage sign was broken.	Finding was added to existing EC notification 123908751 for repair.

34	High Voltage sign was missing.	PG&E has existing EC notification 101872222 to install a new sign.
37	High Voltage sign was broken.	PG&E has existing EC notification 119671081 for repair.

PG&E Response:

Location 4: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as this condition would have been found during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector added replacing the High Voltage sign to the preexisting EC notification 121644432 to address woodpecker damage. The EC notification will be tracked to completion through our maintenance program.

Location 5: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a preexisting EC notification 123970883 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

Location 7: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a preexisting EC notification 123970834 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

Location 11: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a preexisting EC notification 110413477 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

Location 24: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a preexisting EC notification 123908751 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

Location 34: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a preexisting EC notification 119603437 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

Location 37: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a preexisting EC notification 119671081 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

4. **GO 128, Rule 17.1, Design, Construction and Maintenance** states:

"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 7:

Table 7: GO 128, Rule 17.1 Findings

Location	Finding	Notes
48	Vault lid is missing HV marking.	PG&E has existing EC notification 123970834 to install a new marking.
74	HV warning marker was found painted over.	PG&E corrected the finding in field.
89	Vault lid is missing HV marking.	

PG&E Response:

Location 48: We disagree with the finding that we are out of compliance due to a missing high voltage marking on vault lid as we had a preexisting EC notification 116941291. to install a new High Voltage sign that will be tracked to completion through our maintenance program.

Location 74: We disagree with the finding that we are out of compliance due to a high voltage marking being painted over on a pad mount transformer. The maintenance need for this item would have been identified during its monitored Asset Inspection Cycle as per GO 128, Rule 17.1 and 17.2. During the CPUC Audit, our Division Compliance Inspector corrected the condition onsite.

Location 89: We disagree with the finding that we are out of compliance due to a missing high voltage marking on the vault lid. The maintenance need for this item would have been identified during its monitored Asset Inspection Cycle as per GO 128, Rule 17.1 and 17.2. We created an EC notification 126960452 to repair the lid that will be tracked to completion through our maintenance program.

5. **GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures** states:

"Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity."

ESRB's finding is listed in Table 8:

Table 8: GO 128, Rule 17.8 Finding

Location	Finding	Notes
89	No mark of ownership found on vault cover.	

PG&E Response:

Location 89: We disagree with the finding that we are out of compliance due to no mark of ownership on the vault cover. This condition is considered as a maintenance item and would have been identified during its monitored Asset Inspection Cycle as per GO 128, Rule 17.1 and Rule 17.2. We created an EC notification 126960452 to make necessary repairs that will be tracked to completion through our maintenance program.

V. Observations

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

"(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 GO 95."

ESRB's findings are listed in Table 9:

Table 9: GO 95, Rule 18-A Findings

Location	Finding	Notes
12	Communication guy wire was slacked.	
14	Tree was touching above the communications guy bob insulator. There was an abandoned communication service drop.	

21	There was an abandoned communication service drop.	
33	Communications conductor was in contact with PG&E down guy.	PG&E created a third-party notification in field.
38	Communications ground wire was exposed.	PG&E repaired the exposed ground wire in field.

41	There was an abandoned communication service drop.	
53	Ground rod was above the ground.	
55	There was an abandoned communication service drop.	
62	Communications ground wire was exposed.	
64	Communications conductor has a broken lashing wire.	
71	There was an abandoned communication service drop. Communication guy wire was slacked.	
72	Communications ground wire was exposed.	

PG&E Response:

We disagree that we are out of compliance with the third-party utility findings listed above. 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. As requested, see attachments for the following Third Party Utility Notification locations:

Please find attached Third Party Notifications associated with each finding.

Location	Finding	Attachments
12	Communication guy wire was slacked.	- *DRU12485_Atch03_TPU-SAPID 103803816_CONF.pdf*
14	Tree was touching above the communications guy bob insulator. There was an	- *DRU12485_Atch04_TPU-SAPID 101916957_CONF.pdf*

	abandoned communication service drop.	
21	There was an abandoned communication service drop.	- *DRU12485_Atch05_TPU-SAPID 101889098_CONF.pdf*
33	Communications conductor was in contact with our down guy.	- *DRU12485_Atch06_TPU-SAPID 103907263_CONF.pdf*
38	Communications ground wire was exposed.	- *DRU12485_Atch07_TPU-SAPID 101902877_CONF.pdf*
41	There was an abandoned communication service drop.	- *DRU12485_Atch08_TPU-SAPID 101875526_CONF.pdf*
53	Ground rod was above the ground.	- *DRU12485_Atch09_TPU-SAPID 101910070_CONF.pdf*
55	There was an abandoned communication service drop.	- *DRU12485_Atch10_TPU-SAPID 101855197_CONF.pdf*
62	Communications ground wire was exposed.	- *DRU12485_Atch11_TPU-SAPID 101890011_CONF.pdf*
64	Communications conductor has a broken lashing wire.	- *DRU12485_Atch12_TPU-SAPID 101890030 - Item 1_CONF.pdf*
64	Communications conductor has a broken lashing wire.	- *DRU12485_Atch13_TPU-SAPID 101890030 - Item 2_CONF.pdf*
71	There was an abandoned communication service drop. Communication guy wire was slacked.	- *DRU12485_Atch14_TPU-SAPID 101929850 - Item 1_CONF.pdf*
71	There was an abandoned communication service drop. Communication guy wire was slacked.	- *DRU12485_Atch15_TPU-SAPID 101929850 - Item 2_CONF.pdf*
72	Communications ground wire was exposed.	- *DRU12485_Atch16_TPU-SAPID 101896447_CONF.pdf*