STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

September 25, 2023 EA2023-1144

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 Humboldt Division

Ms. Allen:

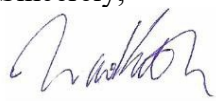
On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Thomas Roberts of ESRB staff conducted an electric distribution audit of PG&E's Humboldt Division from July 31 to August 4, 2023. During the audit, ESRB staff conducted 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 October 23, 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 Humboldt 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
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Robert Thomas, Senior Utilities Engineer, ESRB, SED, CPUC

Vincent Tanguay, Senior Director, Electric Compliance, PG&E
Sidney Dietz, Director, Regulatory Relations, PG&E
Roberto Morales, Senior Manager, Electric Compliance, PG&E
Tripti Uprety, Manager, Electric Compliance, PG&E
Electric Data Requests Mailbox (ElectricDataRequests@pge.com)

PG&E HUMBOLDT DIVISION ELECTRIC
DISTRIBUTION AUDIT FINDINGS

July 31 – August 4, 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 Humboldt 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
- Humboldt Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, June 2018 – May 2023
- Electric Corrective Notifications list, June 2018 – May 2023
- Reliability Indexes and Outage list, June 2018 – May 2023
- Humboldt New Projects list, June 2022 – May 2023
- Pole Loading Calculations list, March 2021 – May 2023
- Incoming Third-Party Notifications list, June 2018 – May 2023
- Outgoing Third-Party Notifications list, June 2018 – May 2023
- Inspector training records, June 2018 – May 2023
- Equipment test records, June 2018 – May 2023
- Intrusive Inspections, June 2022 – May 2023
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

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 Humboldt Division for the past 60 months (June 2018 – May 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 39,736 work orders by their assigned due date. Table 1 below breaks down the 39,736 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 Humboldt Division

Priority Code	Late Work Orders Completed	Late Work Orders Pending	Late Work Orders Cancelled	Total
A	2,919	67	0	**2,986**
B	1,799	49	238	**2,086**
E	8,450	19,561	6,310	**34,321**
F	93	167	83	**343**
Total	13,261	19,844	6,631	**39,736**

PG&E shall provide ESRB with its corrective action plan to complete the 19,844 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 identified 17,154 Priority A Electric Corrective (EC) Notifications to California Public Utilities Commission's (CPUC) Electric Safety & Reliability Branch (ESRB) staff in the response to Pre-Audit Data Request Set 3 (DR3), which included a list of all EC Notifications created between June 2018 and June 2023. We performed an internal analysis of the entire data set and identified 2,919 potentially late Priority A EC Notifications that have now been completed as indicated in Table 1 above. 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 2,919 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	493
2019	548
2020	312
2021	1,321
2022	214
2023	31
Grand Total	2,919

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 identified 8,559 Priority B EC Notifications in our response to DR3, which included a list of all EC Notifications created between June 1, 2018, and June 5, 2023. At the time that we submitted the DR3 response, we identified 2,086 potentially late Priority B EC Notifications. We recently performed an updated internal analysis of the late work order data set and identified that the count has increased to 2,402 potentially late Priority B EC Notifications due to upgrading EC Notifications from a lower priority.

Priority E and F EC Notifications

We identified 61,154 Priority E and F EC Notifications in our response to DR3, which included a list of all EC Notifications created between June 1, 2018, and June 5, 2023. At the time that we submitted the DR3 response, we identified 34,664 potentially late Priority E and F EC Notifications. We performed an updated internal analysis of the late work order data set and identified 34,347 potentially late Priority E and F EC Notifications.

Corrective Action Plan for Tag Completion and Going Forward Compliance

In 2019, PG&E 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 wildfire 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% over 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 have divided existing late 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/HFRA ignition risk tags as our risk analysis indicates that these tags contain 20 times more risk than non-ignition or non-HFTD tags.

Tags identified prior to 2023 will be prioritized based on risk. We are bundling work by isolation zones in 2023 to reduce customer impact and improve operational efficiency and safer coworker conditions. As a result of these efforts, we expect to reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA areas by 48% in 2023.

In 2024, PG&E will begin 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. PG&E is 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	114734024	1,318
B	116765415	1,162
E	117070461	1,357
F	117055301	1,328

PG&E identified work order #114734024 on June 27, 2018, to repair a burned pole with a required end date of July 18, 2018. PG&E did not complete the work until February 4, 2022.

PG&E Response:

We created EC Notification 114734024 on June 27, 2018, to replace a pole that was burnt during the Pawnee Fire. On August 22, 2018, we canceled the notification in error stating the pole did not need to be replaced. On February 4, 2022, a crew performed a field check and verified that the pole was replaced in 2018. We opened the notification and re-closed it in SAP on August 15, 2022, with the field check documentation that includes a photo of the new pole with a 2018 date nail.

PG&E identified work order #116765415 on March 19, 2019, to replace a leaning pole with a required end date of March 19, 2020. PG&E did not complete the work until May 25, 2023.

PG&E Response:

We created EC Notification 116765415 on March 19, 2019, as a priority E tag. On February 28, 2023, a field inspector recommended the priority of the notification be upgraded to B. On May 2, 2023, Planning and Scheduling exempted the notification from past due per an OEC Activation, with a due date of August 15, 2023. We completed the work on May 25, 2023.

PG&E identified work order #117070461 on April 20, 2019, to replace a decaying pole with a required end date of July 20, 2019. PG&E did not complete the work until April 7, 2023.

PG&E Response:

We created EC Notification 117070461 on April 20, 2019, as a priority E tag. Our inspectors

performed safety reassessments on May 30, 2020, and June 26, 2021, which confirmed the status of the pole had not escalated. Our crew replaced the pole on April 7, 2023. While this exceeds the time allowance in our internal EDPM manual, we completed the repair within GO 95 Rule 18 requirements for level 3 hazards.

PG&E identified work order #117055301 on April 18, 2019, for replacing a connector with a required end date of October 18, 2019. PG&E did not complete this work until June 7, 2023.

PG&E Response:

We created EC Notification 117055301 on April 18, 2019, as a priority E tag. On July 21, 2019, we updated the notification to Priority to H to incorporate the work into our hardening project. On November 13, 2020, the scope of the tag changed from crossarm replacement to connector replacement and was removed from the hardening project. We updated the priority to reflect the change in scope; it was changed from H to F priority with the due date April 18, 2024. Our crew completed the connector replacement on June 7, 2023.

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 10,556 detailed overhead inspections of electric facilities past their GO 165 required completion date, as shown in the PDF attachment "LateOHinspections".

2.2 Additionally, ESRB staff found that PG&E completed a total of 22,285 overhead patrols past their GO 165 required completion date for the maps shown in the PDF attachment *"LateOHpatrol"*.

PG&E Response:

In 2018, we did not inspect seven Overhead (OH) detailed inspection assets identified on "DRU12431_02_Atch01_LateOHinspections.pdf" on time in PG&E's Humboldt Division due to human error. An interim supervisor for the Humboldt Division performed a map review and missed that the inspector did not highlight seven poles, an indication that the poles had not been

inspected. The Humboldt Division Specialist discovered this error after the CPUC due date of the map by performing a secondary review of the map package. After discovering the error, we completed detailed inspections of the seven OH units on map O13 on September 17, 2018, after the CPUC due date of August 31, 2018. We have since filled the Humboldt Division Compliance Supervisor position, and there are two review steps that occur for each map completed by inspectors. Each completed map package is reviewed by the Compliance Supervisor and Specialist before the CPUC due date of the map. We included the seven assets identified as late inspections in our 2018 GO 165 Annual Report.

In 2020, we did not perform 1,073 OH detailed inspection assets identified on "DRU12431_02_Atch01_LateOHinspections.pdf" on time in PG&E's Humboldt Division; however, we completed the inspections by year-end 2020. On August 15, 2020, unprecedented lightning strikes occurred throughout our service territory resulting in multiple fires across California. As these fires grew, they 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, we could not access many of our assets 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 included the 1,073 assets identified as late inspections in our 2020 GO 165 Annual Report.

In 2021, we completed 9,352 OH detailed inspection assets identified on "DRU12431_02_Atch01_LateOHinspections.pdf" late in PG&E's Humboldt Division as a result of our 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, we completed OH detailed inspections 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 included the 9,352 assets identified as late Inspections in our 2021 GO 165 Annual Report.

In 2022, we completed 124 OH detailed inspection assets identified on "DRU12431_02_Atch01_LateOHinspections.pdf" late in Humboldt Division due to various access restrictions: Vegetation Overgrowth, Customer Refusal, Environmental Factors (active bird nest), and Map Validation (identified that either the map actually had an earlier CPUC due date or that the map was missing from the workplan when developed). Monthly validations are currently being performed in an effort to remediate these errors. We included the 124 assets identified as late inspections in our 2022 GO 165 Annual Report.

In 2020, we did not patrol 17,256 OH patrol assets identified on "DRU12431_02_Atch02_LateOHpatrol.pdf" on time in PG&E's Humboldt Division; however, we completed all late patrols 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 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, we could not access many of our assets 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 included 17,256 assets identified as late patrols in our 2020 GO 165 Annual Report.

In 2021, we patrolled 1,124 OH patrol assets identified on "DRU12431_02_Atch02_LateOHpatrol.pdf" late in PG&E's Humboldt Division as a result of our 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, we completed overhead patrols 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 included the 1,124 assets identified as late patrols in our 2021 GO 165 Annual Report.

The 3,905 OH patrol assets identified as late on the "DRU12431_02_Atch02_LateOHpatrol.pdf" in PG&E's Humboldt Division is considered preliminary data and can vary throughout the year as we receive updates from our local divisions. The 2023, GO 165 Annual Report will not be published until July 1, 2024. We can say with certainty that we completed patrols for these 3,905 assets in 2023 which were late due to human error.

3. Underground Inspections

GO 128, Rule 17.2, Inspection states in part:

"Systems shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition and conformance with all applicable requirements of these rules…"

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."

3.1 ESRB staff identified that PG&E completed a total of 150 detailed underground inspections of electric facilities past their GO 165 required completion date, as shown in the PDF attachment *"LateUGinspections"*.

3.2 Additionally, ESRB staff found that PG&E completed a total of 28 underground patrols past their GO 165 required completion date for the maps shown in the PDF attachment *"LateUGpatrol"*.

PG&E Response:

In 2018, we did not complete one Underground (UG) detailed inspection asset identified on

"DRU12431_03_Atch01_LateUGinspections.pdf" on time in PG&E's Humboldt Division due to human error. We originally assigned this map to an inspector in a timely manner; however, the inspector was assigned other work, and the interim supervisor did not re-assign the map to another inspector. After we discovered the error, we completed our detailed inspection of the one underground unit on Map T1609 on October 2, 2018, after the CPUC due date of September 25, 2018. We have filled the Humboldt Division Compliance Supervisor position, and the Compliance Supervisor and a Specialist perform a weekly review of maps assigned and unassigned that are coming due. In addition, Humboldt Division has reiterated to all inspectors the importance of completing all work prior to the CPUC due date. We included the one asset identified as late inspection in our 2018 GO 165 Annual Report.

In 2020, we did not complete 149 UG detailed inspection assets identified on "DRU12431_03_Atch01_LateUGinspections. pdf" on time in PG&E's Humboldt Division due to human error (137) and access issues (12). We submitted a Self-Report letter on June 11, 2021, for falsification of records of GO 165 inspections. On February 25, 2021, we discovered that a Contract Inspector supporting Humboldt, Sonoma, and Sierra Divisions was falsely documenting some underground inspections and patrols , and we terminated the Contract Inspector immediately. We reperformed and completed inspections on the impacted 2020 maps (137) by March 26, 2021. In addition, during our initial attempts to inspect 12 UG assets, we created cannot get in (CGI) notifications to complete detailed inspections due to various access restrictions: Map Errors, Access Constraints, Customer Refusal, and Customer Access Issues. We included these 149 assets identified as late inspections in our 2020 GO 165 Annual Report.

In 2020, we did not patrol 28 UG assets identified on "DRU12431_03_Atch02_LateUGpatrol.pdf" on time in PG&E's Humboldt Division; however, the patrols were 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 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, we could not access many of our assets 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 included the 28 assets identified as late patrols in our 2020 GO 165 Annual Report.

III. Field Inspection- Audit Locations

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

Table 3: List of Field Inspection Locations

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
1	107935198	Sub-Surface Secondary Splice Box	1477 Winchester Ave. McKinleyville, CA
2	108067019	Sub-Surface Transformer	3071 Bonanza St. McKinleyville, CA
3	108050094	Sub-Surface Transformer	3111 Bonanza St. McKinleyville, CA
4	107956872	Sub-Surface Transformer	3080 Little Pond St. McKinleyville, CA
5	100966376	Wood Pole	1452 Stromberg Ave. Arcata, CA
6	100966373	Wood Pole	1493 Stromberg Ave. Arcata, CA
7	100966371	Wood Pole	1525 Stromberg Ave. Arcata, CA
8	100966366	Wood Pole	1555 Stromberg Ave. Arcata, CA
9	100966368	Wood Pole	1560 Stromberg Ave. Arcata, CA
10	100965927	Wood Pole	(40.8683934, -124.1092625)
11	101012123	Wood Pole	2461 Bainbridge St. Eureka, CA
12	101012121	Wood Pole	2437 Bainbridge St. Eureka, CA
13	100977887	Wood Pole	2427 Bainbridge St. Eureka, CA
14	100977886	Wood Pole	3589 Dolbeer St. Eureka, CA
15	100996265	Wood Pole	(40.7294817, -124.2132406)
16	100996270	Wood Pole	1836 Mesa Ave. Eureka, CA
17	100996272	Wood Pole	1880 Mesa Ave. Eureka, CA

18	1100996273	Wood Pole	1906 Mesa Ave. Eureka, CA
19	100996278	Wood Pole	(40.7295747, -124.2110003)
20	107747379	Pad-Mount Transformer	1750 Alamar Way, Fortuna, CA
21	107748500	Pad-Mount Transformer	(40.5795032, -124.1523937)
22	100992200	Wood Pole	(40.5673319, -124.1265758)
23	100992193	Wood Pole	Naleen Dr. & Rohnerville Rd. Fortuna, CA
24	100992194	Wood Pole	1675 Naleen Dr. Fortuna, CA
25	100992464	Wood Pole	1655 Naleen Dr. Fortuna, CA
26	104054112	Wood Pole	(40.1191623, -123.8232578)
27	104054113	Wood Pole	(40.1195020, -123.8234432)
28	100985893	Wood Pole	(40.1197832, -123.8237520)
29	100985894	Wood Pole	(40.1202547, -123.8242754)
30	100985729	Wood Pole	170 Empire Ave, Redway, CA
31	100985819	Wood Pole	79 Oak Ave, Redway, CA
32	103943972	Wood Pole	145 Oak Ave, Redway, CA
33	100985817	Wood Pole	281 Redway Drive, Redway, CA
34	100985816	Wood Pole	286 Redway Drive, Redway, CA
35	100985815	Wood Pole	358 Redway Drive, Redway, CA
36	100985803	Wood Pole	380 Redway Drive, Redway, CA
37	103157334	Wood Pole	(40.0982455, -123.7975351)
38	100989040	Wood Pole	291 Sprowl Creek Rd, Garberville, CA

39	100989037	Wood Pole	277 Sprowl Creek Rd, Garberville, CA
40	102171767	Wood Pole	(39.4126709, -123.3413289)
41	102170583	Wood Pole	(39.4125831, -123.3422600)
42	102170585	Wood Pole	(39.4127004, -123.3428725)
43	102170586	Wood Pole	(39.4126722, -123.3433416)
44	102170588	Wood Pole	(39.4126870,-123.3439055)
45	102170589	Wood Pole	(39.4126738, -123.3443658)
46	102171722	Wood Pole	393 Redwood Ave, Willits, CA
47	102171721	Wood Pole	353 Redwood Ave, Willits, CA
48	102171720	Wood Pole	307 Redwood Ave, Willits, CA
49	102171718	Wood Pole	297 Redwood Ave, Willits, CA
50	102171716	Wood Pole	229 Redwood Ave, Willits, CA
51	102171712	Wood Pole	237 North Street, Willits, CA
52	102145218	Wood Pole	5355 5th St, Kelseyville, CA
53	102145220	Wood Pole	5335 5th St, Kelseyville, CA
54	104087899	Wood Pole	(38.9769306, -122.8357577)
55	45175188	Wood Pole	5330 5th St, Kelseyville, CA
56	102144878	Wood Pole	(38.9770555, -122.8368802)
57	102144881	Wood Pole	(38.9771894, -122.8377029)
58	102144882	Wood Pole	(38.9772695, -122.8379541)
59	102144889	Wood Pole	(38.9774626, -122.8380007)

60	107701693	Pad-Mount Transformer	3860 Walnut Way Kelseyville, CA
61	107679947	Pedestal Secondary Splice Box	3855 Walnut Way Kelseyville, CA
62	107699315	Pedestal Secondary Splice Box	(38.9734726, -122.8400425)
63	102144251	Wood Pole	(39.0103508, -122.8475416)
64	102144250	Wood Pole	(39.0108103, -122.8476033)
65	102144245	Wood Pole	(39.0112360, -122.8475389)
66	102144246	Wood Pole	(39.0118712, -122.8475305)
67	102202334	Wood Pole	(39.2773168, -123.2053211)
68	102170404	Wood Pole	(39.2652116, -123.2040776)
69	102170403	Wood Pole	(39.2653294, -123.2036555)
70	103384702	Wood Pole	(39.2659633, -123.2042127)
71	102170414	Wood Pole	(39.2660669, -123.2036541)
72	102170419	Wood Pole	(39.2664581, -123.2043143)
73	102169809	Wood Pole	(39.2647547, -123.2179362)
74	102169832	Wood Pole	(39.2647825, -123.2169814)
75	107816761	Sub-Surface Transformer	(39.1964489, -123.1985071)
76	107693557	Pad-Mount Transformer	461 Beltrami Dr, Ukiah, CA
77	107872466	Pedestal Secondary Splice Box	459 Beltrami Dr, Ukiah, CA
78	107872461	Pedestal Secondary Splice Box	449 Beltrami Dr, Ukiah, CA
79	107693566	Pad-Mount Transformer	(39.1934236, -123.2007852)
80	107693563	Pad-Mount Junction Box	(39.1934763, -123.2008328)
81	103949858	Wood Pole	240 Zinfandel Dr, Ukiah, CA

82	102172271	Wood Pole	211 Zinfandel Dr, Ukiah, CA
83	102172269	Wood Pole	251 Zinfandel Dr, Ukiah, CA
84	102172263	Wood Pole	301 Zinfandel Dr, Ukiah, CA
85	102172259	Wood Pole	311 Zinfandel Dr, Ukiah, CA
86	102172255	Wood Pole	351 Zinfandel Dr, Ukiah, CA
87	102194702	Wood Pole	(38.9732247, -123.1168780
88	102194703	Wood Pole	(38.9732672, -123.1170573)
89	103609490	Wood Pole	(38.9733790, -123.1169869)
90	102194704	Wood Pole	(38.9734257, -123.1176280)
91	102194705	Wood Pole	13251 Spring St, Hopland, 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
5	Ground wire was exposed. Pole and crossarm are rotten/decayed.	PG&E corrected the exposed ground wire in the field. PG&E has existing EC notification 119860964 to replace the pole and crossarm.
13	Ground wire was exposed.	PG&E corrected the finding in the field.
16	Guy wire anchor is broken/damaged. Pole has woodpecker damage.	PG&E has existing EC notification 121545326 to repair anchor and pole.
19	Vegetation is surrounding the entire pole.	PG&E has existing EC notification 126197223 to trim vegetation.
30	Vegetation ground clearance requires a 10 ft. radius.	PG&E has existing EC notification 126630874 to trim vegetation.
31	Pole was rotten/decayed.	PG&E has existing EC notification 121115076 to replace the pole.
32	Woodpecker hole was found near the top of the pole.	
33	Pole has woodpecker damage.	PG&E has existing EC notification 121115079 to repair the pole.
34	Pole has woodpecker damage.	PG&E has existing EC notification 121117779 to repair the pole.

46	Pole has woodpecker damage.	PG&E has existing EC notification 123447324 to repair the pole.
52	Pole was rotten/decayed.	PG&E has existing EC notification 119043208 to replace the pole.
53	Slack was found on down guy wire.	
58	Pole was rotten/decayed.	PG&E has existing EC notification 119094064 to replace the pole.
59	Broken riser boot was found on the pole.	PG&E corrected the finding in the field.
69	Woodpecker holes were found near the top of the pole.	
72	Pole is rotten/decayed.	PG&E has existing EC notification 116810917 to replace the pole.
82	Pole is rotten/decayed.	PG&E has existing EC notification 124225360 to replace the pole.
84	Guy anchor is eroded.	PG&E has existing EC notification 113025496 to repair the anchor.
91	Pole is rotten/decayed.	PG&E has existing EC notification 121639206 to replace the pole.

PG&E Response:

Location 5: We disagree with the finding that we are out of compliance due to an exposed ground wire as we had an existing EC notification 119860964 to replace the pole and crossarm which would also replace the ground wire molding. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site by replacing the molding cover.

Location 13: We disagree with the finding that we are out of compliance due to an exposed ground wire. The exposed ground would have been identified during the location's next monitored Asset Inspection Cycle. We last inspected this location in May 2019 and conditions and elements change. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site.

Location 16: Location 16 with SAP ID 100996270 did not have any GO 95 Rule 31.1 findings identified during the CPUC field audit. We do have an existing EC notification 126196822 for this location to adjust loose hardware framing that will be tracked to completion through our maintenance program. The EC Notification and field findings listed as location 16 in the table above were found at location 18.

Location 18 (SAP ID 100996273): We disagree with the finding that we are out of compliance due to a broken/damaged guy wire anchor and woodpecker damage as we had an existing EC notification 121545326 to repair the anchor and pole. We completed the work on August 22, 2023.

Location 19: We disagree with the finding that we are out of compliance due to vegetation surrounding the entire pole as we had an existing EC notification 126197223 to trim vegetation. The EC Notification will be tracked to completion through our maintenance program.

Location 30: We disagree with the finding that we are out of compliance due to vegetation ground clearance within a 10-foot radius around the pole as we had a pre-existing EC notification 126630874 to trim vegetation that will continue to be tracked to completion through our maintenance program.

Location 31: We disagree with the finding that we are out of compliance due to a rotten/decayed pole as we had a pre-existing EC notification 121115076 to replace the pole that will be tracked to completion through our maintenance program.

Location 32: We disagree with the finding that we are out of compliance due to woodpecker holes found near the top of the pole. As per GO 95, Rule 18, Appendix I, pole damage may not pose an immediate risk of high potential impact to safety or reliability and would have been identified during its monitored Asset Inspection Cycle. This map was last inspected in May 2021 and conditions and elements change. During the CPUC Audit of this location, our Division Compliance Inspector created EC notification 126725350 to assess the woodpecker damage 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 woodpecker damage as we had a pre-existing EC notification 121115079 to repair the pole 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 woodpecker damage as we had a pre-existing EC notification 121117779 to repair the pole that will be tracked to completion through our maintenance program.

Location 46: We disagree with the finding that we are out of compliance due to woodpecker damage as we had a pre-existing EC notification 123447324 to repair the pole that will be tracked to completion through our maintenance program.

Location 52: We disagree with the finding that we are out of compliance due to a rotten/decayed pole as we had a pre-existing EC notification 119043208 to replace the pole that will be tracked to completion through our maintenance program.

Location 53: We disagree with the finding that we are out of compliance due to a slack down guy wire. As per GO 95, Rule 18, Appendix I, the slack guy wire 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. This map was last inspected in June 2022 and conditions and

elements change. During the CPUC Audit of this location, our Division Compliance Inspector added notes to adjust the loose guy wire to the pre-existing EC notification 119043361. The EC notification will be tracked to completion through our maintenance program.

Location 58: We disagree with the finding that we are out of compliance due to a rotten/decayed pole as we had a pre-existing EC notification 119094064 to replace the pole that will be tracked to completion through our maintenance program.

Location 59: We disagree with the finding that we are out of compliance due to a broken riser boot that was found on the pole. As per GO 95, Rule 18, Appendix I, a broken riser boot 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. This map was last inspected in May 2020 and conditions and elements change. During the CPUC Audit, our Division Compliance Inspector corrected the condition on site.

Location 69: We disagree with the finding that we are out of compliance due to woodpecker holes found near the top of the pole. As per GO 95, Rule 18, Appendix I, pole damage may not pose an immediate risk of high potential impact to safety or reliability and would have been identified during its monitored Asset Inspection Cycle. This map was last inspected in July 2018 and conditions and elements change. During the CPUC Audit of this location, our Division Compliance Inspector created EC notification 126737970 to assess the woodpecker damage that will be tracked to completion through our maintenance program.

Location 72: We disagree with the finding that we are out of compliance due to a rotten/decayed pole as we had a pre-existing EC notification 116810917 to replace the pole that will be tracked to completion through our maintenance program.

Location 82: We disagree with the finding that we are out of compliance due to a rotten/decayed pole as we had a pre-existing EC notification 124225360 to replace the pole that will be tracked to completion through our maintenance program.

Location 84: We disagree with the finding that we are out of compliance due to an eroded guy anchor as we had a pre-existing EC notification 113025496 to repair the anchor that will be tracked to completion through our maintenance program.

Location 91: We disagree with the finding that we are out of compliance due to a rotten/decayed pole as we had a pre-existing EC notification 121639206 to replace the pole that will be tracked to completion through our maintenance program.

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 findings are listed in Table 5:

Table 5: GO 95, Rule 34 Findings

Location	Finding	Notes
16	Foreign attachment found on pole.	PG&E corrected the finding in the field.
54	Foreign attachment found on pole.	PG&E corrected the finding in the field.
55	Foreign attachment found on pole.	PG&E corrected the finding in the field.
68	Foreign attachment found on pole.	PG&E corrected the finding in the field.

PG&E Response:

Location 16: We disagree with the finding that we are out of compliance due to a foreign object ("free" 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 corrected the condition on site by removing the sign.

Location 54: We disagree with the finding that we are out of compliance due to a foreign object (yard sale sign) 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 corrected the condition on site by removing the foreign object.

Location 55: We disagree with the finding that we are out of compliance due to a foreign object (advertisement flyer) 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 corrected the condition on site by removing the foreign object.

Location 68: We disagree with the finding that we are out of compliance due to foreign objects (yard sale signs and advertisements) 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 corrected the condition on site by removing the foreign object.

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
27	High Voltage sign was broken.	PG&E has existing EC notification 126631328 for repair.
34	High Voltage sign was broken.	
35	High Voltage sign was broken.	PG&E has existing EC notification 121117773 for repair.
36	High Voltage sign was broken.	
39	High Voltage sign was broken.	PG&E has existing EC notification 123580857 to repair.
48	High Voltage sign was missing.	PG&E has existing EC notification 114367058 to install a new sign.
53	High Voltage sign was missing.	PG&E has existing EC notification 119043361 to install a new sign.
58	High Voltage sign was missing.	PG&E has existing EC notification 119094064 to install a new sign.

PG&E Response:

Location 27: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a pre-existing EC notification 126631328 to replace the 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 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 pre-existing EC Notification 121117779 to address woodpecker damage. The EC notification will be tracked to completion through our maintenance program.

Location 35: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a pre-existing EC notification 121117773 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

Location 36: 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 created notification 126725631 to replace the broken High Voltage sign that will be tracked to completion through our maintenance program.

Location 39: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a pre-existing EC notification 123580857 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

Location 48: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a pre-existing EC notification 114367058 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

Location 53: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a pre-existing EC notification 119043361 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

Location 58: We disagree with the finding that we are out of compliance due to a broken High Voltage sign as we had a pre-existing EC notification 119094064 to install a new High Voltage sign that will be tracked to completion through our maintenance program.

4. **General Order 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 finding is listed in Table 7:

Table 7: GO 95, Rule 35 Finding

Location	Finding	Notes
49	Tree causing strain on service drops.	PG&E has existing EC notification 123446804 to correct vegetation strain.

PG&E Response:

Location 49: We disagree with the finding that we are out of compliance due to a tree causing strain on service drops as we had a pre-existing EC notification 123446804 to correct the vegetation strain that will be tracked to completion through our maintenance program.

5. **General Order 95, Rule 56.9 – Guy Marker (Guy Guard)** states:

"A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker."

ESRB's finding is listed in Table 8:

Table 8: GO 95, Rule 56.9 Finding

Location	Finding	Notes
63	Guy marker was missing.	PG&E has existing EC notification 119047931 to install new guy marker. PG&E corrected the finding in the field.

PG&E Response:

Location 63: We disagree with the finding that we are out of compliance due to a missing guy marker as we had a pre-existing EC notification 119047931 to install new guy marker. During the CPUC Audit, our Division Compliance Inspector corrected the finding onsite by installing a guy marker.

6. **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 9:

Table 9: GO 128, Rule 17.1 Findings

Location	Finding	Notes
3	Fault indicator sight glass broken on vault lid.	PG&E has existing EC notification 124358092 to repair the lid.
20	Pad mount transformer was corroded.	PG&E has existing EC notification 122128419 to replace the transformer.
21	Pad mount transformer was corroded.	PG&E has existing EC notification 122129641 to replace the transformer.

PG&E Response:

Location 3: We disagree with the finding that we are out of compliance due to a broken fault

indicator sight glass on the vault lid as we had a pre-existing EC notification 124358092 to repair the lid that will be tracked to completion through our maintenance program.

Location 20: We disagree with the finding that we are out of compliance due to a corroded pad mount transformer as we had a pre-existing EC notification 122128419 to replace the transformer that will be tracked to completion through our maintenance program.

Location 21: We disagree with the finding that we are out of compliance due to a corroded pad mount transformer as we had a pre-existing EC notification 122129641 to replace the transformer that will 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:

   "(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 10:

Table 10: GO 95, Rule 18-A Findings

Location	Finding	Notes
16	There was an abandoned communications service drop. Communications service drop was in contact with PG&E service drop.	
24	There was an abandoned communication service drop.	
30	There was an abandoned communication service drop.	
31	There was an abandoned communication service drop.	
32	Communications service drop was in contact with PG&E service drop.	
33	There was an abandoned communication service drop.	
39	There was an abandoned communication service drop.	PG&E has existing third-party notification 123580869 sent to responsible utility.
48	Communications service drop was hanging low.	
67	Communications line has no riser guard and is not attached to the pole.	
68	Communications ground wire is exposed.	
81	Communication guy wire had a bent guy guard.	PG&E removed the guy guard in field.

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 the next Asset Inspection Cycles. We confirmed that there was a pre-existing Third-Party Notification for location 39, and we created Third-Party Notifications for the remaining locations. As requested, see attachments for the following Third-

Party Utility Notification locations:

Please find attached Third-Party Notifications associated with each finding.

Location	Finding	Attachment
16	There was an abandoned communications service drop. Communications service drop was in contact with PG&E service drop.	*DRU12431_05_Atch01_TPU - SAPID 100996270_CONF.pdf*
24	There was an abandoned communication service drop.	*DRU12431_05_Atch02_TPU - SAPID 100992194_CONF.pdf*
30	There was an abandoned communication service drop.	*DRU12431_05_Atch03_TPU - SAPID 100985729_CONF.pdf*
31	There was an abandoned communication service drop.	*DRU12431_05_Atch04_TPU - SAPID 100985819_CONF.pdf*
32	Communications service drop was in contact with PG&E service drop.	*DRU12431_05_Atch05_TPU - SAPID 103943972_CONF.pdf*
33	There was an abandoned communication service drop.	*DRU12431_05_Atch06_TPU - SAPID 100985817_CONF.pdf*
39	There was an abandoned communication service drop.	*DRU12431_05_Atch07_TPU - SAPID 100989037_CONF.pdf*
48	Communications service drop was hanging low.	*DRU12431_05_Atch08_TPU - SAPID 102171720_CONF.pdf*
67	Communications line has no riser guard and is not attached to the pole.	*DRU12431_05_Atch09_TPU - SAPID 102202334_CONF.pdf*
68	Communications ground wire is exposed.	*DRU12431_05_Atch10_TPU - SAPID 102170404_CONF.pdf*
81	Communication guy wire had a bent guy guard.	*DRU12431_05_Atch11_TPU - SAPID 103949858_CONF.pdf*