February 15, 2024

Rickey Tse, P.E.

Program and Project Supervisor

Electric Safety and Reliability Branch
Safety and Enforcement Division

California Public Utilities Commission

Re: City of Palo Alto Utilities Electric Facilities Audit Response

Dear Mr. Tse:

The City of Palo Alto Utilities (CPAU) is committed to the safe and reliable operation of the City's Electric Utility, and follows practices and procedures that mirror relevant safety guidelines in the California Public Utilities Commission (CPUC) General Orders (GOs), 95, 128, and 165. Although the City of Palo Alto Utilities is not subject to CPUC jurisdiction, as a locally owned municipal utility operated within the Charter City of Palo Alto, we appreciate the feedback from your staff to help us provide safe and reliable services and to ensure that we continue to operate in a safe manner to protect the public and our workers.

CPAU's Response:

#### **II. Records Violations**

# 1. General Order (GO) 95, Rule 18-B, Maintenance Programs GO 165, Section III-C, Record Keeping

- a. CPAU will specify the scheduled due dates of corrective actions in work orders tracked in our internal online maintenance system.
- b. CPAU will update its *Inspections and Maintenance Program* to provide a timeframe for completing Priority Level 3 repairs to ensure all issues are completed within 60 months, subject to any applicable GO 95 Rule, 18-B exceptions.

## 2. GO 95, Rule 31.2, Inspection of Lines GO 165, Section III-B, Standards for Inspection

CPAU routinely inspects its distribution facilities in accord with its *Inspections and Maintenance Program* and tracks those inspections using a calendar year method. CPAU has successfully achieved GO 165's 16-month inspection due date timeframe for overhead inspections using that method, with no missed inspections. However, CPAU will modify the *Inspections and Maintenance Program* to organize inspection intervals and implement due dates to provide additional assurance that they will continue to occur on time.

With regard to the 74 underground inspections identified as late in the audit report, we self-reported these underground patrols and inspections on July 27, 2023, before the August 7, 2023 on-site audit. The underground inspections require a 2-person unit and our organization has experienced severe staffing shortages, particularly during the COVID-19 pandemic. Even with the staffing shortages, our staff completed all underground inspections to the best of our ability and within a reasonable timeframe as shown in the report; there were no pending inspections at the time of the audit. To mitigate the ongoing staffing shortages and supplement our internal

staff, in September 2023 the CPAU executed a 3-year contract for external inspection services to complete all inspections on schedule.

## 3. GO 165, Section III-D, Reporting

GO 165 does not formally apply to the City of Palo Alto, since the CPAU is non-jurisdictional to the CPUC.<sup>1</sup> While the CPAU follows practices and procedures that closely mirror relevant safety practices of GO 165, 128 and 95 as part of the CPAU's longstanding commitment to safety and reliability, we do not dedicate staffing resources to annual reporting.

### **IV. Field Inspection Violations**

The attached document is responsive to the field violations noted in the audit report. Upon review of the identified violations, we examined the locations and found that 31 out of 91 were maintenance/repair/replace-related corrective actions and 9 were vegetation-related corrective actions. Nine of the items identified within the 31 maintenance/repair/replace-related category actually had no violations and required no corrective action. Our staff identified 14 of the remaining 21 maintenance/repair/replace-related issues prior to the audit and included them in our internal maintenance system for correction. The attached document summarizes the violations, status of corrective actions taken, and any pending items that have been scheduled to be resolved.

## V. Observations

The audit report noted various observations related to third-party attachments to CPAU poles. When CPAU notices a hazardous condition in the space controlled by telecommunications operators, we notify the responsible party of the condition, as described in the applicable General Orders. 48 out of 91 field violations were in the telecommunications space, and we have notified the third party responsible for each of them, as shown in the attached document. CPAU does not, however, have regulatory authority over attachments in the space owned by communications providers.

In conclusion, we would like to thank you for your timely response and comments regarding the audit Monica Hoskins and Gordon Szeto staff of the Electric Safety and Reliability Branch of the CPUC performed of the CPAU electric facilities from August 7 to August 11, 2023. CPAU enjoyed working with your team and appreciates the team's time spent performing the electric facilities audit by examining standards, procedures, records we provided, and by conducting field inspections. The feedback we've received from your staff during this audit has assisted us in improving our processes and procedures and overall compliance program.

Sincerely,

-DocuSigned by:

Dean Batchelor

Dean Batchelor, Director of Utilities

City of Palo Alto

Enclosure: CPUC Audit August 7-11, 2023 Corrective Actions Summary

<sup>&</sup>lt;sup>1</sup> See Section II, Applicability: "This General Order applies to all electric distribution and transmission facilities (excluding those facilities contained in a substation) that come within the jurisdiction of this Commission, located outside of buildings, including electric distribution and transmission facilities that belong to non-electric utilities."

Location	Equipment Identifier	Structure Type	GO/Rule/Observations	Finding(s)	Finding(s) Type	Corrective Action Status	Additional Data
				Pole 2168 is located along a paved road and has missing visibility strips,			
1	2168	Pole	GO 95, Rule 31.1	which are a required item on CPAU's OH inspection form.	Maintenance/Repair/Replace	Completed	
1	2168	Pole	GO 95, Rule 56.2	Pole 2168 has a slack span guy to the pole across San Antonio Road.	Maintenance/Repair/Replace	Completed	Previously Identified
			GO 95, Rule 18 (Third-Party	The communication lines between Pole 2168 and Pole 2169 have strain			·
1	2168/2169	Pole	Audit Observations)	and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
			GO 95, Rule 18 (Third-Party			,	
2	2169	Pole	Audit Observations)	Pole 2169 has a slack communications anchor down guy.	Observations	Notified 3rd Party	
			,	<b>0</b> ,		,	
2	2169	Pole	GO 95, Rule 56.2	Pole 2169 has a slack span guy to the pole across San Antonio Road.	Maintenance/Repair/Replace	Completed	Previously Identified
			· ·	Pole 2169 has vegetation above the down guy insulator that is contacting		·	,
2	2169	Pole	GO 95, 56.7-B	and grounding the anchor guy.	Tree Trimming/Vegetation	Completed	
					and the second s		
			GO 95, Rule 18 (Third-Party	Pole 2016 has slack communications anchor down guys and the			
3	2016	Pole	Audit Observations)		Observations	Notified 3rd Party	
3	2010	1 010	/ tadic observations,	Pole 2016 is located along a paved road and has missing visibility strips,	Observations	inotifica statutty	
3	2016	Pole	GO 95, Rule 31.1	which are a required item on CPAU's OH inspection form.	Maintenance/Repair/Replace	Completed	No Violation Found
5	2010	T OIC	GO 93, Naic 31.1	which are a required item on er Ao 3 off hispection form.	Warneenance, Repair, Replace	Completed	140 Violation Found
3	2016	Pole	GO 95, Rule 54.6-B	Pole 2016 has an exposed transformer ground wire.	Maintenance/Repair/Replace	Completed	Previously Identified
3	2010	1 OIC	GO 93, Naic 34.0 B	Tote 2010 has an exposed transformer ground wire.	Тиантенинесу перину перисе	Completed	Treviously lucitimed
				Pole 2016 has insufficient vegetation guards and vegetation above the			
2	2016	Pole	GO 95, 56.7-B	down guy insulator that is contacting and grounding the anchor guy.	Tree Trimming/Vegetation	Completed	
3	2010	Pole	GO 95, Rule 18 (Third-Party	Pole 2015 has communications ground moulding gaping and exposing the	Tree Tillilling/ Vegetation	Completed	
4	2015	Pole	Audit Observations)	ground wire.	Observations	Notified 2rd Darty	
4	2015	Pole	,	ground wire.	Observations	Notified 3rd Party	
_	1007	Dolo	GO 95, Rule 18 (Third-Party Audit Observations)	Dolo 1097 has a clask communications anchor down guy	Observations	Notified 2rd Darty	
5	1987	Pole	Audit Observations)	Pole 1987 has a slack communications anchor down guy.	Observations	Notified 3rd Party	
_	1007	Dele	CO OF Bula FC 3	Dala 1007 has a sleek span anahar dayin siyi	Maintonones/Donois/Donloss	Completed	Dravia valv Idantifia d
5	1987	Pole	GO 95, Rule 56.2	Pole 1987 has a slack span anchor down guy.  The Pole at 3583 South Court has communications conductors that are in	Maintenance/Repair/Replace	Completed	Previously Identified
_	2502	Dala	GO 95, Rule 18 (Third-Party		Ohaamustiana	Netified 2nd Deuts	
/	3583	Pole	Audit Observations)	contact.	Observations	Notified 3rd Party	
			CO OF D. I. 40 /Third D. d.	The communication of the state			
0	2004/2502	Dala	GO 95, Rule 18 (Third-Party	The communications lines between Pole at 3601 South Court and the Pole	Observations.	Net/Sed 2ed Best	
8	3601/3583	Pole	Audit Observations)	at 3583 South Court have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
			00.05 0 1.40/71:10				
	2647/2624		GO 95, Rule 18 (Third-Party	The communications lines between Pole at 3617 South Court and the Pole		N .: (2   2   2	
9	3617/3601	Pole	Audit Observations)	<u> </u>	Observations	Notified 3rd Party	
10	2244	D. I.	GO 95, Rule 18 (Third-Party	Pole 2244 has an incomplete communications pole transfer that is leading		National 2nd page	
10	2244	Pole	Audit Observations)	to low hanging communications drops.	Observations	Notified 3rd Party	6 1 1 1 100 1
10	2244	Pole	GO 95, Rule 54.6-B	Pole 2244 has an exposed ground wire.	Maintenance/Repair/Replace	Completed	Previously Identified
11	3641	Pole	GO 95, Rule 51.6-A	The Pole at 3641 South Court has damaged high voltage signs.	Maintenance/Repair/Replace	Completed	Previously Identified
			GO 95, Rule 18 (Third-Party	Pole 3954 has an exposed communications ground wire and			
15	3954	Pole	Audit Observations)	communication lines with strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
				Pole 3954 is located along a paved road and has missing visibility strips,			
15	3954	Pole	GO 95, Rule 31.1	which are a required item on CPAU's OH inspection form.	Maintenance/Repair/Replace	Completed	
				Pole 3954 has insufficient vegetation guards and vegetation above the			
15	3954	Pole	GO 95, 56.7-B	down guy insulator that is contacting and grounding the anchor guy.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
16	3953	Pole	GO 95, Rule 51.6-A	Pole 3953 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	No Violation Found
				Pole 3953 has vegetation above the down guy insulator that is contacting			
16	3953	Pole	GO 95, 56.7-B	and grounding the anchor guy.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	

Location	Equipment Identifier	Structure Type	GO/Rule/Observations		Finding(s) Type	Corrective Action Status	Additional Data
				Pole 2659 is located along a paved road and has missing visibility strips,			
17	2659	Pole	GO 95, Rule 31.1	which are a required item on CPAU's OH inspection form.	Maintenance/Repair/Replace	Completed	
18	2658	Pole	GO 95, Rule 51.6-A	Pole 2658 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	No Violation Found
19	2660	Pole	GO 95, Rule 51.6-A	Pole 2660 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	Previously Identified
			GO 95, Rule 18 (Third-Party	Pole 2552 has loose communications drops that are unsecured to the pole			
20	2552	Pole	Audit Observations)	and excessive communications drops hanging on the ground.	Observations	Notified 3rd Party	
							Back up driving mirror
21	2551	Pole	GO 95, Rule 34	Pole 2551 has an unauthorized third-party attachment.	Removed	Completed	attached to pole.
21	2551	Pole	GO 95, Rule 51.6-A	Pole 2551 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	
21	2551	Pole	GO 95, Rule 54.6-B	Pole 2551 has an exposed ground wire	Maintenance/Repair/Replace	Completed	Previously Identified
				Pole 2551 has a low service drop to 2895 Waverly Street that has less than			
21	2551	Pole	GO 95, Rule 54.8-B(3)	the required clearance and can be touched from the ground.	Maintenance/Repair/Replace	Completed	Previously Identified
			GO 95, Rule 18 (Third-Party				
21	2551	Pole	Audit Observations)	Pole 2551 has a loose communications lashing wire.	Observations	Notified 3rd Party	
			GO 95, Rule 18 (Third-Party				
23	5065	Pole	Audit Observations)	l · · · · · · · · · · · · · · · · · · ·	Observations	Notified 3rd Party	
24	1174	Pole	GO 95, Rule 51.6-A		Maintenance/Repair/Replace	Completed	No Violation Found
25	5073	Pole	GO 95, Rule 51.6-A		Maintenance/Repair/Replace	Completed	No Violation Found
				Pole 5162 has a communications drop attached to a tree and loose			
	5460		GO 95, Rule 18 (Third-Party	communications drops that are unsecured to the pole and coming out of			
26	5162	Pole	Audit Observations)	the moulding.	Observations	Notified 3rd Party	
		Underground		T			
27	6 1 8: 8	Secondary Service	CO 120 P 1 22 Z	The underground secondary service box at 1120 Newell Road has a	10		
27	Secondary Riser Box	Box	GO 128, Rule 32.7	, ,	Maintenance/Repair/Replace	Completed	
			CO OF B Is 40 (Third Bark	Pole 5163 has a slack communications anchor down guy and the			
20	F4.63	D-1-	GO 95, Rule 18 (Third-Party	communications lines between Pole 5163 and Pole 5162 have strain and		Notified 2nd Books	
28	5163	Pole	Audit Observations)	abrasion from excessive vegetation.	Observations	Notified 3rd Party	
20	F1C4	Dele	GO 95, Rule 18 (Third-Party	Dala F1C4 has loose communications draws that are unconsumed to the male	Observations	Notified 2nd Double	
30	5164	Pole	Audit Observations) GO 95, Rule 18 (Third-Party	Pole 5164 has loose communications drops that are unsecured to the pole. Guy Pole 5166 has vegetation above the insulator on the communications	Observations	Notified 3rd Party	
21	5166	Cury Dolo	Audit Observations)	anchor down guy.	Observations	Notified 3rd Party	
31	2100	Guy Pole	GO 95, Rule 18 (Third-Party	The communications lines between Pole 5183 and Pole 5165 have strain	Observations	Notified Std Party	
22	5183/5165	Dolo	Audit Observations)		Observations	Notified 3rd Party	
33	3103/3103	Pole	GO 95, Rule 18 (Third-Party	and abrasion from excessive vegetation.	Observations	Notified Std Party	
26	1034	Pole	Audit Observations)	Pole 1034 has broken and abandoned communications equipment.	Observations	Notified 3rd Party	
36	1054	Pole	Addit Observations)	Pole 1033 has a broken communications riser moulding and the	Observations	Notified Std Party	
			GO 95, Rule 18 (Third-Party	communications lines between Pole 1033 and Pole 1034 have strain and			
27	1033	Pole	Audit Observations)		Observations	Notified 3rd Party	
38	1033	Pole	GO 95, Rule 51.6-A	Pole 1032 has missing high voltage signs.	Maintenance/Repair/Replace	Completed	No Violation Found
36	1032	role	GO 95, Rule 18 (Third-Party	Fore 1032 has missing mgn vortage signs.	Maintenance/Repair/Replace	Completed	No violation i ound
39	4681	Pole	Audit Observations)	Pole 4681 has loose communications drops that are unsecured to the pole.	Observations	Notified 3rd Party	
39	7001	I VIE	GO 95, Rule 18 (Third-Party	Total 4001 has 1005e communications drops that are dissecured to the pole.	Object various	Notified Std Faity	
40	4682	Pole	Audit Observations)	Pole 4682 has loose communications drops that are unsecured to the pole.	Observations	Notified 3rd Party	
40	1002	T OIC	GO 95, Rule 18 (Third-Party	Total 1002 has 1003c communications drops that are dissecured to the pole.	O D S C I VILLO I I S	Trounica Sta Farty	
41	4683	Pole	Audit Observations)	Pole 4683 has loose communications drops that are unsecured to the pole.	Observations	Notified 3rd Party	
41	7003	I UIE	GO 95, Rule 18 (Third-Party	Total 4003 has 1003e communications drops that are dissecuted to the pole.	Object various	INOUTHER STREET FRITTY	
13	4653	Pole	Audit Observations)	Pole 4653 has an abandoned communications line.	Observations	Notified 3rd Party	
7.5	7000	1 OIC	GO 95, Rule 18 (Third-Party	Pole 4652 has loose communications equipment hanging off the	OBSCI VALIOIIS	ivodifica Sta Farty	
44	4652	Pole	Audit Observations)		Observations	Notified 3rd Party	
	1-002	II OIC	Addit Observations)	conductors.	Obscivations	product of a raty	

Section   Continue	Location	Equipment Identifier	Structure Type	GO/Rule/Observations	Finding(s)	Finding(s) Type	Corrective Action Status	Additional Data
	Location	Equipment lucitemen	Structure Type	Co, naie, observations	aB(2)	i mamg(s) i ypc	Corrective Action Status	Additional Bata
4489   Proc.   Control					Excessive vegetation is surrounding the service drop to 420 Tennyson			
25   24   24   24   24   25   25   25	46	4649	Pole	GO 95, Rule 35		Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
15   1649   Nule   105   Nule   18   Third Farmy   Process Add Note bear communications dress that are unexcurred in the policy and strain and advisation and advisation and advisation of the control of the policy of the poli				·				No Violation Found
46 494 Note Audit Observations (Party Party Note Co. S. Rule 28 This Party Note Co. S. Rule 2				,			·	
27   9612   Pole   Audit Observations   Observat				GO 95, Rule 18 (Third-Party				
Secondarian   Secondaria	46	4649	Pole	Audit Observations)	420 Tennyson Street.	Observations	Notified 3rd Party	
Solid Service Fine 562 has losse communications equipment hanging off the observations.  Audit Observations.  Audi				GO 95, Rule 18 (Third-Party	Pole 5612 has communications lines hanging low over a pedestrian			
Septimental process of the september of the service	47	5612	Pole	Audit Observations)	thoroughfare.	Observations	Notified 3rd Party	
Excessive vegetation is surrounding the service drop to 1450 Bryant  Server from Service field, 5013 and causing possible strain and attrastion.  The Chimming/Vegetation Scheduled for Completion < 3 months  School Audit Observations and Audit Observati				GO 95, Rule 18 (Third-Party	Service Pole 5613 has loose communications equipment hanging off the			
Sta3	48	5613	Pole	Audit Observations)	conductors.	Observations	Notified 3rd Party	
See 5633 Pole 6.09.5, Rule 3 Street from Service Pole 5613 and databased.  Sol 53,7614 Pole Audit Observations)  Sol 563,7614 Pole Audit Observations)  Sol 564,7614 Pole Audit Observations)  Sol 565,7614 Pole Audi								
Sta3								
SSL3/S614   Pole								
September   Policy   Audit Observations    and abrasion from excessive vegetation.   Observations   Observati	48	5613	Pole			Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
September   Sept				•				
Solid	49	5613/5614	Pole	·		Observations	Notified 3rd Party	
Science of Section 19 Pole						l.,		
State   Pole   Audit Observations   Soph, Rule 18 (Third-Party   Pole   Soph As a loose communications drop unsecured to the pole   Observations   Notified 3rd Party	50	5615	Pole	· · · · · · · · · · · · · · · · · · ·		Observations	•	
Say   Fole   Go 95, Rule 18 (Third Party	50	5440			-			
Section   Pole   Audit Observations   Pole   S994 has a loose communications drop unsecured to the pole.   Observations   Notified 3rd Party	52	5413	Pole		going to 320 Kellogg Avenue.	Observations	Vegetation	
Pole GO 128, Rule 17.1 Passe load break 4902 has a corroded fault indicator on one of the C GO 95, Rule 18 (Third-Party Audit Observations) Pole Audit Observations) GO 58, Rule 18 (Third-Party Audit Observations) Pole Audit Observations) GO 58, Rule 18 (Third-Party Audit Observations) GO 58, Rule 18 (Third-Party Audit Observations) Pole Audit Observations) GO 58, Rule 18 (Third-Party Audit Observations) GO 59, Rule 18 (Third-Party Audit Observations) GO 59, Rule 18 (Third-Party Audit Observations) Audit Observations) GO 59, Rule 18 (Third-Party Audit Observations) Audit Observations Audit Observations) Audit Observations Audit Observations Audit Observations) Audit Observations Audit Obser		5004	Dala		Dela 5004 has a large service disconnected by the series	Observations.	Notified 2nd Parks	
PAS 302 Pole GO 128, Rule 18 (Third-Party Audit Observations)  Pole Audit Observations (So 95, Rule 18 (Third-Party Audit Observations)  Pole 6601 Pole Audit Observations)  Pole 6602 Pole Audit Observations)  Pole 6603 Pole Audit Observations)  Pole 6604 Pole Audit Observations)  Pole 6605 Pole Audit Observations)  Pole 66060 Pole Audit Observations)  Pole 6607 Pole Audit Observations)  Pole 66080 Pole Audit Observations)  Pole 6609 Pole Audit Observations anchor down guy with missing insulators and be a communications anchor down guy with missing insulators.  Pole 6609 Pole Audit Observations)  Pole 6609 Pole Audit Observations)  Pole 6609 Pole Audit Observations  Pole 6609 Pole Audit Observati	55	5894	Pole	Audit Observations)		Observations	Notified 3rd Party	
90 6601 Pole Audit Observations) Pole 6601 has loose communications drops that are unsecured. 91 6602 Pole Audit Observations) Pole 6602 has an incomplete communications pole transfer leading to a buddy pole with loose guy wires. 94 6690 Pole Audit Observations) GO 95, Rule 18 (Third-Party Audit Observations) GO 95,	71	DN4 2402	Dolo	CO 128 Bulg 17 1		Maintenance/Denair/Denlace	Completed	No Violation Found
90 6601 Pole Audit Observations) 91 6602 Pole Audit Observations) 92 Audit Observations) 93 Audit Observations) 94 6690 Pole Audit Observations) 95 Audit Observations) 96 6691 Audit Observations) 97 37,3460,-122,1759 Pole GO 95, Rule 15.16-A 98 GO 95, Rule 18 (Third-Party Audit Observations) 99 Audit Observations) 90 6690 has a communications anchor down guy with missing insulators 99 Audit Observations) 90 Audit Observations) 90 Audit Observations) 90 Audit Observations) 91 Audit Observations) 92 Audit Observations) 93 Audit Observations) 94 Audit Observations) 95 Audit Observations) 96 Audit Observations) 96 Audit Observations) 97 Audit Observations) 98 Audit Observations) 99 Audit Observations) 99 Audit Observations) 99 Audit Observations) 90 Audit Observations) 91 Audit Observations) 92 Audit Observations) 93 Audit Observations) 94 Audit Observations) 95 Audit Observations) 95 Audit Observations) 96 Audit Observations) 96 Audit Observations) 97 Audit Observations) 98 Audit Observations) 99 Audit Observations) 99 Audit Observations) 99 Audit Observations 90 Audit Obse	/1	PIVI 3402	Pole		Pridse load break elbows.	Maintenance/Repair/Replace	Completed	No violation Found
91 6602 Pole Audit Observations buddy pole with loose guy wires.  92 GO 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  93 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  94 6690 Pole Audit Observations)  95 7051/6693 Pole Audit Observations)  96 6693 Pole Audit Observations)  97 37,3460, -122,1759 Pole GO 95, Rule 51.6-A  SO 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  98 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  99 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  90 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  90 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  91 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  92 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  93 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  94 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  95 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  96 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  97 OS1/6693 Pole Audit Observations)  98 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  99 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  99 OS 95, Rule 18 (Third-Party buddy pole with loose guy wires.)  90 Observations Notified 3rd Party  Observ	90	6601	Polo		Pole 6601 has loose communications drops that are unsecured	Observations	Notified 2rd Party	
91 6602 Pole Audit Observations) buddy pole with loose guy wires.  GO 95, Rule 18 (Third-Party Addit Observations) Pole 6690 has a communications anchor down guy with missing insulators.  GO 95, Rule 18 (Third-Party Addit Observations) Pole Audit Observations) Pole 6690 has a communications anchor down guy with missing insulators and abrasion from excessive vegetation. Doservations Observations Observations Observations Notified 3rd Party  Observations Notified 3rd Party  CPUC only provided GPS Coordinates, no pole and City owned per field check.  The Pole on Page Mill Road at 37.3460, -122.1759 has a damaged high voltage sign.  The Pole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy Not a CPAU Pole Field check.	90	0001	role		·	Observations	Notified Std Faity	
94 6690 Pole Audit Observations) 95 7051/6693 Pole Audit Observations) 96 6693 Pole Audit Observations) 97 37.3460, -122.1759 Pole GO 95, Rule 51.6-A 98 Fole GO 95, Rule 51.6-A 99 Fole GO 95, Rule 51.6-A 99 Fole GO 95, Rule 51.6-A 90 Fole GO 95, Rule 51.6-A 91 Fole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy with missing insulators. 92 Fole GO 95, Rule 51.6-A 93 Fole GO 95, Rule 51.6-A 94 Fole GO 95, Rule 51.6-A 95 Fole GO 95, Rule 51.6-A 96 Fole GO 95, Rule 51.6-A 97 States of the pole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy with missing insulators. 98 Fole GO 95, Rule 51.6-A 99 Fole GO 95, Rule 51.6-A 90 Fole GO 95, Rule 51.6-A 90 Fole GO 95, Rule 51.6-A 91 Fole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy. 91 Fole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy. 92 Fole GO 95, Rule 51.6-A 93 Fole GO 95, Rule 51.6-A 94 Fole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy. 95 Fole GO 95, Rule 51.6-A 96 Fole GO 95, Rule 51.6-A 97 Fole GO 95, Rule 51.6-A 98 Fole GO 95, Rule 51.6-A 99 Fole GO 95, Rule 51.6-A 99 Fole GO 95, Rule 51.6-A 90 Fole GO 95, Rule 51.6-A 91 Fole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy. 91 Fole GO 95, Rule 51.6-A 91 Fole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy. 92 Fole GO 95, Rule 31 (Third-Party	91	6602	Pole		·	Observations	Notified 3rd Party	
94 6690 Pole Audit Observations) Pole 6690 has a communications anchor down guy with missing insulators. Observations Notified 3rd Party  95 7051/6693 Pole Audit Observations) Audit Observations and abrasion from excessive vegetation. Observations Observations Notified 3rd Party  96 6693 Pole Audit Observations) Audit Observations) Audit Observations and abrasion from excessive vegetation. Observations Observations Notified 3rd Party  96 6693 Pole Audit Observations) Audit Observations) Audit Observations on the following guy with missing insulators and abrasion from excessive vegetation. Observations Observations Notified 3rd Party  97 37.3460, -122.1759 Pole GO 95, Rule 51.6-A voltage sign. The Pole on Page Mill Road at 37.3460, -122.1759 has a damaged high voltage sign. Not a CPAU Pole Not a CPAU Pole Field check.  98 Audit Observations Observations Notified 3rd Party  CPUC only provided GPS Coordinates, no pole number was listed in audit report and we deemed this pole not City owned per field check.  CPUC only provided GPS Coordinates, no pole number was listed in audit report and we deemed this pole not City owned per field check.  The Pole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down pole not City owned per field check.  The Pole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down pole not City owned per field check.	31	0002	l oic	•	buddy pole with 1005c gdy wires.	Observations	Notified Statistics	
For the communications lines between Pole 7051 and Pole 6693 have strain and abarssion from excessive vegetation.  Pole GO 95, Rule 18 (Third-Party Audit Observations) and abarssion from excessive vegetation.  Pole GO 95, Rule 18 (Third-Party Audit Observations)  Pole GO 95, Rule 18 (Third-Party Audit Observations)  Pole GO 95, Rule 51.6-A  The Pole on Page Mill Road at 37.3460, -122.1759 has a damaged high voltage sign.  Pole GO 95, Rule 51.6-A  The Pole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy with missing insulators and a communications riser with a broken C clamp.  Pole GO 95, Rule 51.6-A  The Pole on Page Mill Road at 37.3460, -122.1759 has a damaged high voltage sign.  Not a CPAU Pole  The Pole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy with missing insulators and abarssing insulators.  The Pole on Page Mill Road at 37.3460, -122.1759 has a damaged high voltage sign.  Not a CPAU Pole  Field check.	94	6690	Pole		Pole 6690 has a communications anchor down guy with missing insulators.	Observations	Notified 3rd Party	
95 7051/6693 Pole Audit Observations) and abrasion from excessive vegetation. Observations Notified 3rd Party  96 6693 Pole Audit Observations) Pole 6693 has a communications anchor down guy with missing insulators and a communications riser with a broken C clamp.  CPUC only provided GPS Coordinates, no pole number was listed in audit pole not City owned per field check.  97 37.3460, -122.1759 Pole GO 95, Rule 51.6-A voltage sign.  The Pole on Page Mill Road at 37.3460, -122.1759 has a damaged high voltage sign.  The Pole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down pole number was listed in audit report and we deemed this pole			. 5.5	•			Troumed order dieg	
Pole GO 95, Rule 18 (Third-Party Audit Observations)  Pole GO 95, Rule 18 (Third-Party Audit Observations)  Pole GO 95, Rule 18 (Third-Party Audit Observations)  Pole GO 95, Rule 51.6-A  Pole GO 95, Rule 56.2  By Dole GO 95, Rule 18 (Third-Party GO 95)  Pole	95	7051/6693	Pole	•		Observations	Notified 3rd Party	
96 6693 Pole Audit Observations) and a communications riser with a broken C clamp. Observations Notified 3rd Party  CPUC only provided GPS Coordinates, no pole number was listed in audit report and we deemed thi pole not City owned per field check.  Providing sign.  The Pole on Page Mill Road at 37.3460, -122.1759 has a damaged high voltage sign.  Not a CPAU Pole		,			Ţ		,	
CPUC only provided GPS Coordinates, no pole number was listed in audit report and we deemed thi pole not City owned per field check.  The Pole on Page Mill Road at 37.3460, -122.1759 has a damaged high voltage sign.  Not a CPAU Pole	96	6693	Pole	•	· · · · · · · · · · · · · · · · · · ·	Observations	Notified 3rd Party	
CPUC only provided GPS Coordinates, no pole number was listed in audit report and we deemed thi pole not City owned per guy.  Not a CPAU Pole					The Pole on Page Mill Road at 37.3460, -122.1759 has a damaged high			Coordinates, no pole number was listed in audit report and we deemed this pole not City owned per
Coordinates, no pole number was listed in audit report and we deemed thi pole not City owned per guy.  The Pole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy.  Not a CPAU Pole		,						
GO 95, Rule 18 (Third-Party	97	37.3460, -122.1759	Pole	GO 95, Rule 56.2		Not a CPAU Pole	Not a CPAU Pole	Coordinates, no pole number was listed in audit report and we deemed this pole not City owned per
	98	6594	Pole	•	Pole 6594 has a loose communications drop that is unsecured.	Observations	Notified 3rd Party	

**Report Description:** CPUC 2023 Audit - Summary of Corrective Actions

Location	Equipment Identifier	Structure Type	GO/Rule/Observations	Finding(s)	Finding(s) Type	Corrective Action Status	Additional Data
				Pole 6591 has a slack communications anchor down guy, a slack phone			
				anchor down guy, loose communications equipment hanging off the			
			GO 95, Rule 18 (Third-Party	conductors, and the communications lines between Pole 6591 and Pole			
100	6591	Pole	Audit Observations)	6593 have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
			GO 95, Rule 18 (Third-Party				
101	6592	Pole	Audit Observations)	Pole 6592 has a broken communications riser moulding.	Observations	Notified 3rd Party	
101	6592	Pole	GO 95, Rule 31.1	Pole 6592 has an abandoned buddy pole that needs to be removed.	Observations	Notified 3rd Party	
101 (not 105	0392	role	GO 33, Rule 31.1	Pole 6592 has an abandoned buddy pole that needs to be removed (Pole	Observations	Notified Std Faity	
as listed)	6592	Pole	GO 95, Rule 31.1	7046).	Observations	Notified 3rd Party	Duplicate item
103	6538	Pole	GO 95, Rule 56.2	Pole 6538 has a slack anchor down guy.	Maintenance/Repair/Replace	Completed	Duplicate Itelli
103	0336	Pole	GO 95, Rule 18 (Third-Party	Pole 6538 has communications lines with strain and abrasion from	Ivialite larice/ Repail/ Replace	Completed	
103	6538	Pole	Audit Observations)	excessive vegetation.	Observations	Notified 3rd Party	
103	0336	Pole	GO 95, Rule 18 (Third-Party	excessive vegetation.	Observations	Notified Std Party	
106	377	Dolo	, , , , , , , , , , , , , , , , , , , ,	Pole 0377 has an abandoned communications line.	Observations	Notified 2rd Darty	
106	3//	Pole	Audit Observations)		Observations	Notified 3rd Party	
100	250	Dolo	GO 95, Rule 18 (Third-Party	Pole 0250 has a slack communications anchor down guy and vegetation	Observations	Natified 2rd Party	
109 110	250 249	Pole Pole	Audit Observations) GO 95, Rule 54.6-B	above the insulator on the phone anchor down guy.		Notified 3rd Party	Previously Identified
110	249	Pole		Pole 0249 has an exposed ground wire.	Maintenance/Repair/Replace	Completed	Previously identified
110	240	Dele	GO 95, Rule 18 (Third-Party	Pole 0249 has a slack communications anchor down guy that is contacting	Observations	Notified 2nd Double	
110	249	Pole	Audit Observations)	the phone anchor down guy.	Observations	Notified 3rd Party	
111	7025	Dele	CO OF Dula 25	Excessive vegetation is surrounding the service drop to 742 Josina Avenue	Troo Trimming () (a gotation	School and for Computation 42 months	
111 114	7035 4464	Pole	GO 95, Rule 35	from Pole 7035 and causing possible strain and abrasion.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	Dravia valvida atific d
114	4404	Pole	GO 95, Rule 54.6-B	Pole 4464 has an exposed transformer ground wire.	Maintenance/Repair/Replace	Completed	Previously Identified
115	4465	Dele	CO 05 Dula 21 1	Pole 4465 is located along a paved road and has missing visibility strips,	Maintanana / Danair / Danlaga	Completed	Dravia valvida atifia d
115	4465 4468	Pole	GO 95, Rule 31.1	which are a required item on CPAU's OH inspection form	Maintenance/Repair/Replace	Completed	Previously Identified
117		Pole	GO 95, Rule 56.2	Pole 4468 has a slack span guy.	Maintenance/Repair/Replace	Completed	Previously Identified
118	4471	Pole	GO 95, Rule 51.6-A	Pole 4471 has missing high voltage signs.	Maintenance/Repair/Replace	Completed	No Violation Found
110	4.474	Dala	GO 95, Rule 18 (Third-Party	Pole 4474 has a loose communications drop that is unsecured to the pole		Netified 2nd Deute	
119	4471	Pole	Audit Observations)	and an abandoned communications line.	Observations	Notified 3rd Party	
120	2400	Pole	GO 95, Rule 51.6-A	Pole 2400 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	
				Excessive vegetation is surrounding the service drop to 2914 Sandra Place			
124	2914/2403	Pole	GO 95, Rule 35	from Pole 2403 and causing possible strain and abrasion.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
125	2405	Pole	GO 95, Rule 51.6-A	Pole 2405 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	
143	2703	I UIE	33, Nule 31.0-A	Excessive vegetation is surrounding the service on Pole 1657 and causing	imanitenance/ Nepan/ Nepiace	Completed	
133	1657	Pole	GO 95, Rule 35	possible strain and abrasion.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
133	1037	i die	50 93, Nule 33	Pole 2168 has a slack span guy to Pole 1659 and a slack span guy to Pole	Tree Hilling/ Vegetation	Jeneaulea for completion < 3 months	
134	2168/1659/1657	Pole	GO 95, Rule 56.2	1657.	Maintenance/Repair/Replace	Completed	Previously Identified
134	2100/1033/103/	ruie		1037.	ivianitenance, nepan, nepiace	Completed	r reviously lucillineu
135	5516	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 5516 has a loose communications drop that is unsecured to the pole.	Observations	Notified 3rd Party	
133	2210	rule	Addit Observations)	If the 3310 has a loose communications drop that is unsecured to the pole.	Observations	INOUTHER STU FAILY	