

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 31, 2024

EA2023-1143

Vincent Tanguay, Senior Director  
Electric Compliance, Electric Engineering  
Pacific Gas & Electric Company (PG&E)  
300 Lakeside Dr., Oakland, CA 94612

**SUBJECT:** Electric Distribution Audit of PG&E Sierra Division

Mr. Tanguay:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez and Gordon Szeto of ESRB staff conducted an electric distribution audit of PG&E's Sierra Division from November 13, 2023 through November 17, 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 **February 28, 2024**, 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.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Brandon Vazquez at (628) 249-2867 or [brandon.vazquez@cpuc.ca.gov](mailto:brandon.vazquez@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rickey Tse'.

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 Sierra 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  
Brandon Vazquez, Utilities Engineer, ESRB, SED, CPUC  
Gordon Szeto, Utilities Engineer, ESRB, SED, CPUC  
Anne Beech, Director of EO Compliance, PG&E  
Tripti Uprety, Manager of EO Compliance, PG&E  
Sean Mackay, Director of Investigations, PG&E  
Leah Hughes, Manager of Investigations, PG&E  
Jerrod Meier, Director of Governance and Reporting, PG&E  
Meredith Allen, VP of Regulatory Affairs, PG&E  
Spencer Olinek, Chief Regulatory Liaison, PG&E  
Electric Data Requests ([ElectricDataRequests@pge.com](mailto:ElectricDataRequests@pge.com))

**PG&E SIERRA DIVISION**  
**ELECTRIC DISTRIBUTION AUDIT FINDINGS**  
**November 13-17, 2023**

**I. Records Review**

During the audit, ESRB staff reviewed the following records:

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

**II. Records Violations**

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

*“Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.*

*Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate:*

- *Type of facility or equipment;*
- *Location, including whether the Safety Hazard or potential violation is located in the High Fire-Threat District;*
- *Accessibility;*
- *Climate;*
- *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.*

- (a) *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.*  
*EXCEPTION – Potential violations specified in Appendix J or subsequently approved through Commission processes, including.... The condition’s record in the auditable maintenance program must indicate the relevant exception and the date of the corrective action.”*

**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 the late Electric Corrective (EC) notifications within the Sierra Division from September 18, 2018 to September 18, 2023. PG&E’s Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines priority codes and associated time frames for EC notifications 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 the late EC notifications and determined that PG&E did not address a total of 102,342 EC notifications by their assigned due date (required end date). Of these 102,342 EC notifications, 82,695 were classified as “late non-exempt”, 409 were classified as “late-exempt”, and 13,889 were classified as “late canceled”.

Per GO 95, Rule 18B(1)(b), “*Correction times may be extended under reasonable circumstances, such as: third party refusal, customer issue, no access, permits required, system emergencies (e.g. fires, severe weather conditions).*” PG&E classifies EC notifications under these circumstances as “late-exempt” as they are exempted from completion by their assigned due date.

Table 1 below breaks down the 102,342 late EC notifications by the given priority, including the total number of late EC notifications, non-exempt/exempt late EC notifications, and late canceled EC notifications, which are included in the total.

**Table 1: Late EC Notifications**

<b>Priority Code</b>	<b>Total # Late EC Notifications</b>	<b>Total # Late Non-Exempt<sup>1</sup></b>	<b>Total # Late Exempt<sup>1</sup></b>	<b>Total # Late Canceled<sup>2</sup></b>
<b>A</b>	5,851	-	-	502
<b>B</b>	5,980	5,319	170	491
<b>E</b>	89,712	76,941	232	12,539
<b>F</b>	799	435	7	357
<b>Total</b>	<b>102,342</b>	<b>82,695</b>	<b>409</b>	<b>13,889</b>

<sup>1</sup> Total # Late Non-Exempt and Late Exempt only includes late complete and late open EC notifications.

<sup>2</sup> Total # Late Cancelled is a subset of the late EC notifications and includes items which were exempt, non-exempt, or found already completed.

Of the 82,695 non-exempt late EC notifications, PG&E completed one priority A notification approximately 2.5 years past its required end date. Table 2 below identifies the most overdue non-exempt EC notifications for each priority.

**Table 2: Most Overdue EC Notifications**

Priority Code	EC Notification #	Number of Days Past Assigned Due Date
A	117299359	899
B	116628422	1,480
E	115017085	1,631
F	116743809	1,468

PG&E identified EC notification #117299359 on 5/22/19 to remove a tree attachment on a dead tree and install a clearance pole in a Tier 3 HFTD with a required end date of 11/18/2019. PG&E did not complete the work until 5/5/22.

PG&E identified EC notification #116628422 on 3/3/2019 to replace a broken pole in a Tier 3 HFTD with a required end date of 8/30/2019. EC notification #116628422 was still open as of September 18, 2023.

PG&E identified EC notification #115017085 on 10/2/2018 to test an overloaded pole in a Tier 3 HFTD with a required end date of 4/1/2019. EC notification #115017085 was still open as of September 18, 2023.

PG&E identified EC notification #116743809 on 3/15/2019 to test an overloaded pole in a Tier 3 HFTD with a required end date of 9/11/2019. EC notification #116743809 was still open as of September 18, 2023.

**2. GO 95, Rule 31.2, Inspection of Lines** states in part:

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

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

*“Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1.”*

ESRB identified that PG&E had completed a significant number of overhead patrols and inspections past their assigned due dates. Table 3 below breaks down the late overhead patrols and inspections by year and total structures late.

**Table 3: Late Overhead Patrols and Inspections**

<b>Year</b>	<b>Inspection Type</b>	<b>Total Structures</b>
2019	Inspection	1
2020	Inspection	4,311
2021	Inspection	6,206
2021	Patrol	2,196
2022	Inspection	26
2023	Patrol	10,967

3. **GO 128, Rule 17.2, Inspection** states in part:

*“Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules.”*

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

*“Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1.”*

ESRB identified that PG&E completed two 2022 underground inspections past their assigned due dates:

- Map Y0601 – Inspection was due on 10/23/2022 per GO 165. PG&E completed the inspection on 11/4/2022.
- Map M1002 – Inspection was due on 9/4/2022 per GO 165. PG&E completed the inspection on 11/17/2022.

4. **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.”*

**PG&E EDPM Manual, published on April 1, 2016, Section 1, Maintain Compliance Inspector (CI) Qualification** states:

*“Before conducting PS&R patrols or inspections, PG&E Compliance Inspectors, hiring*

*hall, and contract personnel are required to be current with their journeymen classification and pass PS&R's compliance initial and annual trainings and assessment."*

ESRB reviewed PG&E Pre-Audit Data Request (DR) Response 11 which provided a list of active inspectors and patrolmen in the Sierra Division for the 60-month period requested in the DR, as well as their training/qualification records for this period to qualify them to perform GO 165 inspections. There were 31 Inspectors listed where there was "No Training Data" listed for a specific year over the 60-month period. ESRB sent a post-audit Data Request requesting the training records for the 31 inspectors and if the inspectors performed GO 165 patrols and inspections over the period.

PG&E responded that between the years of 2018-2021, training was documented on paper rosters. Upon completion of the training, the roster was sent to PG&E Academy. PG&E Academy entered course completion based on the roster information. PG&E stated that it thoroughly searched for the names in question and was unable to locate training records for the 31 inspectors from 2018-2021. PG&E also confirmed that these inspectors conducted GO 165 Patrols and Inspections in PG&E's Sierra Division during that timeframe.

ESRB acknowledges that poor paper record keeping may be an explanation for the missing 2018-2021 training records. However, PG&E's response does not address that six (6) inspectors in 2022 and two (2) inspectors in 2023 are missing training records.

ESRB requests explanation about how PG&E plans to address the patrols and inspections conducted by the 31 inspectors with missing training records and whether the work should be re-performed or demonstrate the work has been re-performed by a qualified inspector.

### III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities in PG&E's Sierra Division:

Location #	SAP ID/ Equipment #	Structure Type	Structure Location/Address	City
1	101391514	Wood Pole	38°45'41.92"N, 120°33'33.26"W	Pollock Pines
2	103313454	Wood Pole	38°45'42.77"N, 120°33'33.48"W	Pollock Pines
3	103666806	Wood Pole	38°45'29.10"N, 120°34'16.11"W	Pollock Pines
4	101391237	Wood Pole	38°45'28.63"N, 120°34'17.54"W	Pollock Pines
5	104014718	Fiberglass Pole	Roland Ct	Pollock Pines
6	104014695	Wood Pole	6496 Granite Trail	Pollock Pines
7	104014694	Wood Pole	6480 Granite Trail	Pollock Pines
8	101420465	Secondary Pole	6487 Granite Trail	Pollock Pines
9	104014693	Fiberglass Pole	6474 Granite Trail	Pollock Pines
10	101399393	Wood Pole	38°44'39.88"N, 120°44'50.84"W	Placerville
11	101419046	Wood Pole	38°44'37.88"N, 120°44'50.53"W	Placerville
12	101399388	Wood Pole	38°44'37.80"N, 120°44'48.53"W	Placerville
13	101415344	Wood Pole	3370 Texas Hill Dr	Placerville
14	101406228	Wood Pole	3370 Texas Hill Dr	Placerville
15	101415337	Wood Pole	1 Pole North of Loc 13	Placerville
16	101406138	Wood Pole	2 Poles North of Loc 13	Placerville
17	104166949	Wood Pole	3 Poles North of Loc 13	Placerville
18	101415656	Wood Pole	3621 Paydirt Rd	Placerville
19	101405985	Wood Pole	38°43'1.62"N, 120°46'18.03"W	Placerville
20	101405988	Wood Pole	38°43'3.56"N, 120°46'17.95"W	Placerville
21	101405478	Secondary Pole	704 Excelsior Rd	Placerville
22	101405476	Wood Pole	704 Excelsior Rd.	Placerville
23	101405474	Wood Pole	38°42'54.74"N, 120°48'16.72"W	Placerville
24	101405473	Secondary Pole	38°42'54.69"N, 120°48'14.49"W	Placerville
25	10407199	Tree Connect	1130 Hillcrest Blvd	Colfax
26	100016698	Wood Pole	1125 Hillcrest Blvd	Colfax
27	100016699	Wood Pole	1085 Hillcrest Blvd	Colfax
28	100016701	Wood Pole	1044 Hillcrest Blvd	Colfax
29	100016702	Wood Pole	1045 Hillcrest Blvd	Colfax
30	100016703	Wood Pole	1040 Golden Oak Ct	Colfax
31	100016704	Wood Pole	1060 Golden Oak Ct	Colfax
32	108305531	Junction Box	Saddleback Ln	Colfax
33	108305541	Padmount Transformer	Saddleback Ln	Colfax
34	100021865	Wood Pole	65 E Weimar Cross Rd	Weimar

35	100021867	Wood Pole	65 E Weimar Cross Rd	Weimar
36	103987750	Wood Pole	20 Weimar Cross Rd	Weimar
37	100021863	Wood Pole	10 Weimar Cross Rd	Weimar
38	100025824	Wood Pole	21035 N Manzanita Hills Dr	Weimar
39	100025825	Wood Pole	1 Pole North of Loc 38	Weimar
40	102352768	Wood Pole	21080 N Manzanita Hills Dr	Weimar
41	100033584	Wood Pole	17798 Applegate Rd	Applegate
42	100029954	Wood Pole	17798 Applegate Rd	Applegate
43	100029969	Wood Pole	17798 Applegate Rd	Applegate
44	103669655	Wood Pole	17423 Applegate Rd	Applegate
45	100029958	Wood Pole	38°59'34.56"N, 120°59'51.65"W	Applegate
46	100034558	Wood Pole	38°58'13.87"N, 121° 1'9.81"W	Clipper Gap
47	100034559	Wood Pole	38°58'12.93"N, 121° 1'10.78"W	Clipper Gap
48	100069798	Wood Pole	38°57'41.74"N, 121° 1'39.41"W	Clipper Gap
49	100069797	Wood Pole	38°57'40.55"N, 121° 1'40.94"W	Clipper Gap
50	100069795	Wood Pole	38°57'39.50"N, 121° 1'42.62"W	Clipper Gap
51	100070148	Wood Pole	649 Canyon Dr	Auburn
52	100069173	Wood Pole	639 Canyon Dr	Auburn
53	100069172	Wood Pole	609 Canyon Dr	Auburn
54	100069171	Wood Pole	609 Canyon Dr	Auburn
55	100045892	Wood Pole	120 Wescott Ct	Auburn
56	100045891	Wood Pole	105 Wescott Ct	Auburn
57	100045889	Wood Pole	38°53'47.55"N, 121° 3'48.03"W	Auburn
58	100045451	Wood Pole	38°52'46.20"N, 121° 4'8.61"W	Auburn
59	100045452	Wood Pole	38°52'46.50"N, 121° 4'10.16"W	Auburn
60	T-416028	Padmount Transformer	38°52'46.64"N, 121° 4'10.54"W	Auburn
61	100045450	Wood Pole	38°52'45.93"N, 121° 4'7.41"W	Auburn
62	107745656	Padmount Transformer	1419 Buckeye Ct	Auburn
63	107754548	Padmount Transformer	11151 Wildwood Dr	Auburn
64	100053697	Wood Pole	38°51'3.42"N, 121° 6'28.76"W	Auburn
65	100053696	Wood Pole	38°50'57.81"N, 121° 6'28.75"W	Auburn
66	103024401	Fiber Pole	38°51'0.24"N, 121° 6'28.82"W	Auburn
67	100053581	Wood Pole	38°51'5.47"N, 121° 6'28.71"W	Auburn
68	100053528	Wood Pole	38°50'16.84"N, 121° 6'9.71"W	Newcastle
69	100053526	Wood Pole	38°50'15.52"N, 121° 6'10.71"W	Newcastle
70	100053524	Wood Pole	38°50'14.91"N, 121° 6'11.21"W	Newcastle
71	100063412	Wood Pole	38°46'39.22"N, 121°13'54.38"W	Rocklin
72	100063411	Wood Pole	38°46'37.71"N, 121°13'53.14"W	Rocklin
73	100063410	Wood Pole	38°46'36.74"N, 121°13'50.48"W	Rocklin

74	100063648	Wood Pole	38°46'36.68"N, 121°13'48.19"W	Rocklin
75	100063409	Wood Pole	38°46'38.32"N, 121°13'47.09"W	Rocklin
76	100058806	Secondary Pole	38°46'58.22"N, 121°14'2.61"W	Rocklin
77	100058816	Wood Pole	38°46'57.85"N, 121°14'2.29"W	Rocklin

#### IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

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

*“Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.”*

- 1.1. Pole #103666806 located at GPS coordinates 38°45'29.10"N, 120°34'16.11"W (Location 3) is leaning more than 10%. PG&E has a preexisting EC notification (#120771241) to adjust the pole.
- 1.2. Pole #101419046 located at GPS coordinates 38°44'37.88"N, 120°44'50.53"W (Location 11):
  - a. Requires assessment due to woodpecker damage. PG&E has a preexisting EC notification (#119177954) to assess the pole.
  - b. Requires a tamp guard on the chance clamps. PG&E has a preexisting EC notification (#119177954) to install the tamp guard.
- 1.3. Pole #101406138 located 2 Poles North of Loc 13 in Placerville (Location 16) requires assessment due to woodpecker damage. PG&E has a preexisting EC notification (#120993636) to assess the pole.
- 1.4. Pole #101405985 located at GPS coordinates 38°43'1.62"N, 120°46'18.03"W (Location 19) has an incorrect connector. PG&E has a preexisting EC notification (#120755796) to replace the connector.
- 1.5. Pole #101405988 located at GPS coordinates 38°43'3.56"N, 120°46'17.95"W (Location 20):
  - a. Has a broken/damaged conductor. PG&E has a preexisting EC notification (#120756122) to repair the conductor.
  - b. Has a broken/damaged service connector. PG&E has a preexisting EC notification (#120756122) to replace the connector.
- 1.6. Secondary Pole #101405473 located at GPS coordinates 38°42'54.69"N, 120°48'14.49"W (Location 24) requires assessment due to woodpecker damage.
- 1.7. Service drop tree connect #104071999 located at 1130 Hillcrest Blvd in Colfax (Location 25) requires removal. PG&E has a preexisting EC notification (#126020879) to remove the tree connect and install a clearance pole.
- 1.8. Pole #100016699 located at 1085 Hillcrest Blvd in Colfax (Location 27):
  - a. Has a loose tie wire on the center phase. PG&E has a preexisting EC notification (#126208275) to fix the wire.
  - b. Has a damaged insulator. PG&E has a preexisting EC notification (#126208275) to repair the insulator.
- 1.9. Pole #100016701 located at 1044 Hillcrest Blvd in Colfax (Location 28) was missing the number “3” for Fuse #30269. PG&E added the number “3” during the audit and had a preexisting EC notification (#117808059) for the missing 3.
- 1.10. Pole #100016702 located at 1045 Hillcrest Blvd in Colfax (Location 29) requires

- assessment due to a woodpecker hole. PG&E created new EC notification #127485070 to assess the hole.
- 1.11. Pole #100021863 located at 10 Weimar Cross Rd in Weimar (Location 37):
    - a. Has loose crossarm hardware. PG&E has a preexisting EC notification (#126441451) to tighten the hardware.
    - b. Has a split and torsion/twisting at the pole top. PG&E has a preexisting EC notification (#126441451) to assess the pole.
  - 1.12. Pole #100025824 located at 21035 N Manzanita Hills Dr in Weimar (Location 38) has a service drop with loose lashing wire. PG&E has a preexisting EC notification (#126437191) to repair the lashing.
  - 1.13. Pole #100033584 located at 17798 Applegate Rd in Applegate (Location 41) has incorrect connectors. PG&E has a preexisting EC notification (#126358720) to replace the connectors.
  - 1.14. Pole #100029969 located at 17798 Applegate Rd in Applegate (Location 43):
    - a. Requires assessment due to woodpecker damage. PG&E has a preexisting EC notification (#126355995) to assess the pole.
    - b. Has damaged bird protection at the transformer bushing. PG&E has a preexisting EC notification (#126355995) to replace the bird protection.
  - 1.15. Pole #103669655 located at 17423 Applegate Rd in Applegate (Location 44) has a transformer with an oil leak. PG&E has a preexisting EC notification (#126354985) to replace the transformer.
  - 1.16. Pole #100034559 located at GPS coordinates 38°58'12.93"N, 121° 1'10.78"W (Location 47):
    - a. Requires assessment due to woodpecker damage. PG&E has a preexisting EC notification (#126396553) to assess the pole.
    - b. Requires bird protection on the transformer bushings. PG&E has a preexisting EC notification (#126396553) to install bird protection.
  - 1.17. Pole #100069798 located at GPS coordinates 38°57'41.74"N, 121° 1'39.41"W (Location 48) has loose hardware. PG&E has a preexisting EC notification (#126407461) to adjust the hardware.
  - 1.18. Pole #100069797 located at GPS coordinates 38°57'40.55"N, 121° 1'40.94"W (Location 49) requires assessment due to woodpecker damage. PG&E has a preexisting EC notification (#126405974) to assess the pole.
  - 1.19. Pole #100069795 located at GPS coordinates 38°57'39.50"N, 121° 1'42.62"W (Location 50) has loose hardware. PG&E has a preexisting EC notification (#126403676) to adjust the hardware.
  - 1.20. Pole #100069173 located at 639 Canyon Dr in Auburn (Location 52) has an incorrect connector. PG&E has a preexisting EC notification (#126081388) to replace the connector.
  - 1.21. Pole #100069171 located at 609 Canyon Dr in Auburn (Location 54) requires assessment due to woodpecker damage and a minor pole top split. PG&E created a new EC notification #127490208 to assess the pole.
  - 1.22. Pole #100045892 located at 120 Wescott Ct in Auburn (Location 55) requires a spreader bracket on the open wire secondary span over 35 feet. PG&E has a preexisting EC notification (#126155035) to install the spreader bracket.
  - 1.23. Pole #100045891 located at 105 Wescott Ct in Auburn (Location 56):

- a. Has a connector with deteriorated insulation requiring repair. PG&E has a preexisting EC notification (#126155949) to repair the connector.
  - b. Has damaged bird protection. PG&E has a preexisting EC notification (#126155949) to replace the bird protection.
- 1.24. Pole #100053697 located at GPS coordinates 38°51'3.42"N, 121° 6'28.76"W (Location 64):
- a. Has incorrect connectors. PG&E has a preexisting EC notification (#124153022) to install correct connectors.
  - b. Had a loose high-vis strip. PG&E fixed the vis strip during the audit.
- 1.25. Pole #100053696 located at GPS coordinates 38°50'57.81"N, 121° 6'28.75"W (Location 65) has a burnt connector. PG&E has a preexisting EC notification (#124152903) to replace the connector.
- 1.26. Pole #100063412 located at GPS coordinates 38°46'39.22"N, 121°13'54.38"W (Location 71) has incorrect connectors. PG&E has a preexisting EC notification (#126229247) to replace the connectors.
- 1.27. Pole #100063411 located at GPS coordinates 38°46'37.71"N, 121°13'53.14"W (Location 72) has vegetation strain on the anchor guy. PG&E has a preexisting EC notification (#126221039) to trim the vegetation.
- 1.28. Pole #100063409 located at GPS coordinates 38°46'38.32"N, 121°13'47.09"W (Location 75):
- a. Has a corroded transformer. PG&E has a preexisting EC notification (#126223954) to replace the transformer.
  - b. Has incorrect connectors. PG&E has a preexisting EC notification (#126223954) to replace the connectors.
- 1.29. Secondary Pole #100058806 located at GPS coordinates 38°46'58.22"N, 121°14'2.61"W (Location 76) is missing a secondary insulator. PG&E has a preexisting EC notification (#125739826) to install an insulator.
- 1.30. Pole #100058816 located at GPS coordinates 38°46'57.85"N, 121°14'2.29"W (Location 77) had two woodpecker holes. PG&E filled the holes during the audit.

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

*“Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained...”*

*When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that dead, rotten or diseased trees or dead, rotten or diseased portions of otherwise healthy trees overhang or lean toward and may fall into a span of supply or communication lines, said trees or portions thereof should be removed...*

*When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit*

*energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s)...*”

- 2.1. Pole #103666806 located at GPS coordinates 38°45'29.10"N, 120°34'16.11"W (Location 3) has 6 dead/dying trees within striking distance of the primary conductors. PG&E has a preexisting EC notification (#126971516) to remove the trees.
- 2.2. Pole #104014718 located on Roland Ct in Pollock Pines (Location 5) had a loose tree branch laying on a primary conductor. PG&E removed the tree branch during the audit.
- 2.3. Vegetation is causing abrasion on the service drop at Pole #100025824 located at 21035 N Manzanita Hills Dr in Weimar (Location 38). PG&E has a preexisting EC notification (#126437191) to trim the vegetation.
- 2.4. Vegetation is causing strain/abrasion on a PG&E fiber cable near Fiber Pole #103024401 located at GPS coordinates 38°51'0.24"N, 121° 6'28.82"W (Location 66). PG&E has a preexisting EC notification (#125845868) to trim the vegetation.
- 2.5. Vegetation is causing strain/abrasion on the service drop at Pole #100063412 located at GPS coordinates 38°46'39.22"N, 121°13'54.38"W (Location 71). PG&E has a preexisting EC notification (#126229247) to trim the vegetation.

**3. GO 95, Rule 44.3, Replacement** states:

*“Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades “A” and “B” construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade “C” construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade “C” construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one.”*

- 3.1. Pole #101415344 located at 3370 Texas Hill Dr in Placerville (Location 13) requires replacement due to woodpecker damage. PG&E has a preexisting EC notification (#126513017) to replace the pole.
- 3.2. Pole #101415337 located 1 Pole North of Loc 13 in Placerville (Location 15) requires replacement due to woodpecker damage. PG&E has a preexisting EC notification (#126512704) to replace the pole.
- 3.3. Pole #101415656 located at 3621 Paydirt Rd in Placerville (Location 18) requires replacement due to woodpecker damage. PG&E has a preexisting EC notification (#126351636) to replace the pole.
- 3.4. Pole #101405985 located at GPS coordinates 38°43'1.62"N, 120°46'18.03"W (Location 19) requires replacement due to woodpecker damage. PG&E has a preexisting EC notification (#120755796) to replace the pole.
- 3.5. Pole #101405988 located at GPS coordinates 38°43'3.56"N, 120°46'17.95"W

- (Location 20) is deteriorated/bowing thus requires replacement. PG&E has a preexisting EC notification (#120756122) to replace the pole.
- 3.6. Secondary Pole #101405478 located at 704 Excelsior Rd in Placerville (Location 21) is damaged/deteriorated thus requires replacement. PG&E has a preexisting EC notification (#126381308) to replace the pole.
  - 3.7. Pole #101405476 located at 704 Excelsior Rd in Placerville (Location 22) requires replacement due to woodpecker damage. PG&E has a preexisting EC notification (#126486029) to replace the pole.
  - 3.8. Pole #101405474 located at GPS coordinates 38°42'54.74"N, 120°48'16.72"W (Location 23) requires replacement due to woodpecker damage. PG&E has a preexisting EC notification (#120758166) to replace the pole.
  - 3.9. Pole #100021865 located at 65 E Weimar Cross Rd in Weimar (Location 34) is damaged/deteriorated thus requires replacement. PG&E has a preexisting EC notification (#126441685) to replace the pole.
  - 3.10. Pole #102352768 located at 21080 N Manzanita Hills Dr in Weimar (Location 40):
    - a. Has a broken crossarm. PG&E has a preexisting EC notification (#126428098) to replace the crossarm.
    - b. Has broken hardware/framing. PG&E has a preexisting EC notification (#126428098) to replace the hardware/framing.
  - 3.11. Pole #100029954 located at 17798 Applegate Rd in Applegate (Location 42):
    - a. Requires replacement due to woodpecker damage. PG&E has a preexisting EC notification (#120812048) to replace the pole.
    - b. Has a broken/damaged conductor requiring replacement. PG&E has a preexisting EC notification (#120812048) to replace the conductor.
  - 3.12. Pole #100069795 located at GPS coordinates 38°57'39.50"N, 121° 1'42.62"W (Location 50) is decayed/rotted thus requires replacement. PG&E has a preexisting EC notification (#126403676) to replace the pole.
  - 3.13. Pole #100070148 located at 649 Canyon Dr in Auburn (Location 51) has a damaged crossarm requiring replacement. PG&E has a preexisting EC notification (#126081238) to replace the crossarm.
  - 3.14. Pole #100069172 located at 609 Canyon Dr in Auburn (Location 53):
    - a. Is damaged/deteriorated thus requires replacement. PG&E has a preexisting EC notification (#126081884) to replace the pole.
    - b. Has a damaged/deteriorated crossarm requiring replacement. PG&E has a preexisting EC notification (#126081884) to replace the crossarm.
  - 3.15. Pole #100045891 located at 105 Wescott Ct in Auburn (Location 56) requires replacement due to woodpecker damage. PG&E has a preexisting EC notification (#126155949) to replace the pole.
  - 3.16. Pole #100045889 located at GPS coordinates 38°53'47.55"N, 121° 3'48.03"W in Auburn (Location 57) has a broken crossarm requiring replacement. PG&E has a preexisting EC notification (#127063528) to replace the crossarm.
  - 3.17. Pole #100045452 located at GPS coordinates 38°52'46.50"N, 121° 4'10.16"W (Location 59) is damaged/deteriorated thus requires replacement. PG&E has a preexisting EC notification (#123969237) to replace the pole.
  - 3.18. Pole #100045450 located at GPS coordinates 38°52'45.93"N, 121° 4'7.41"W (Location 61) is damaged/deteriorated thus requires replacement. PG&E has a

- preexisting EC notification (#123969434) to replace the pole.
- 3.19. Pole #100053528 located at GPS coordinates 38°50'16.84"N, 121° 6'9.71"W (Location 68) is damaged/deteriorated thus requires replacement. PG&E has a preexisting EC notification (#126152044) to replace the pole.
  - 3.20. Pole #100063412 located at GPS coordinates 38°46'39.22"N, 121°13'54.38"W (Location 71):
    - a. Is damaged/deteriorated thus requires replacement. PG&E has a preexisting EC notification (#126229247) to replace the pole.
    - b. Has a deteriorated crossarm and service drop. PG&E has a preexisting EC notification (#126229247) to replace the crossarm and service drop.
  - 3.21. Secondary Pole #100058806 located at GPS coordinates 38°46'58.22"N, 121°14'2.61"W (Location 76):
    - a. Is decayed/rotted thus requires replacement. PG&E has a preexisting EC notification (#125739826) to replace the pole.
    - b. Has a decayed/rotted crossarm. PG&E has a preexisting EC notification (#125739826) to replace the crossarm.
  - 3.22. Pole #100058816 located at GPS coordinates 38°46'57.85"N, 121°14'2.29"W (Location 77) has a crossarm with a horizontal full-length crack. PG&E created a new EC notification (#127496088) to replace the crossarm.

**4. GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, Use states in part:**

*“Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.”*

- 4.1. Pole #101406228 located at 3370 Texas Hill Dr in Placerville (Location 14) has a slacked anchor guy. PG&E has a preexisting EC notification (#126513177) to adjust the guy.
- 4.2. Pole #101406138 located 2 Poles North of Loc 13 in Placerville (Location 16) has a slacked anchor guy. PG&E has a preexisting EC notification (#120993636) to adjust the guy.
- 4.3. Pole #100053697 located at GPS coordinates 38°51'3.42"N, 121° 6'28.76"W (Location 64) has a slacked anchor guy. PG&E has a preexisting EC notification (#124153022) to adjust the guy.

**5. GO 95, Rule 56.6-A, Guys in Proximity to Supply Conductors of Less than 35,500 Volts states in part:**

*“All portions of guys within both a vertical distance of 8 feet from the level of supply conductors of less than 35,500 volts and a radial distance of 6 feet from the surface of wood poles or structures shall not be grounded, through anchors or otherwise. Where necessary to avoid the grounding of such portions, guys shall be sectionalized by means of insulators installed at locations as specified in Rule 56.7.”*

- 5.1. Pole #101406138 located 2 Poles North of Loc 13 in Placerville (Location 16) has

- vegetation contact at/above the guy bob. PG&E has a preexisting EC notification (#120993636) to trim the vegetation.
- 5.2. Pole #101405985 located at GPS coordinates 38°43'1.62"N, 120°46'18.03"W (Location 19) has vegetation contact at/above the guy bob. PG&E has a preexisting EC notification (#120755796) to trim the vegetation.
  - 5.3. Pole #103987750 located at 20 Weimar Cross Rd in Weimar (Location 36) has vegetation contact at/above the guy bob. PG&E has a preexisting EC notification (#120860556) to trim the vegetation.
  - 5.4. Pole #100045450 located at GPS coordinates 38°52'45.93"N, 121° 4'7.41"W (Location 61) had vegetation contact at/above the guy bob. PG&E trimmed the vegetation during the audit.
  - 5.5. Pole #100053696 located at GPS coordinates 38°50'57.81"N, 121° 6'28.75"W (Location 65) has vegetation contact at/above the anchor guy. PG&E has a preexisting EC notification (#124152903) to trim the vegetation.

**6. GO 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.”*

- 6.1. Pole #101406138 located 2 Poles North of Loc 13 in Placerville (Location 16) has a loose/damaged high voltage sign. PG&E added high voltage sign replacement to preexisting EC notification (#120993636).
- 6.2. Pole #101405988 located at GPS coordinates 38°43'3.56"N, 120°46'17.95"W (Location 20) has a deteriorated high voltage sign. PG&E has a preexisting EC notification (#120756122) to replace the sign.
- 6.3. Pole #101405476 located at 704 Excelsior Rd in Placerville (Location 22) has a deteriorated high voltage sign. PG&E has a preexisting EC notification (#126486029) to replace the sign.
- 6.4. Pole #100021865 located at 65 E Weimar Cross Rd in Weimar (Location 34) has a deteriorated high voltage sign. PG&E has a preexisting EC notification (#126441685) to replace the sign.
- 6.5. Pole #100025824 located at 21035 N Manzanita Hills Dr in Weimar (Location 38) has a deteriorated high voltage sign. PG&E has a preexisting EC notification (#126437191) to replace the sign.
- 6.6. Pole #100029954 located at 17798 Applegate Rd in Applegate (Location 42) is missing a high voltage sign. PG&E has a preexisting EC notification (#120812048) to install a sign.
- 6.7. Pole #100069798 located at GPS coordinates 38°57'41.74"N, 121° 1'39.41"W (Location 48) has a loose high voltage sign. PG&E has a preexisting EC notification (#126407461) to replace the sign.
- 6.8. Pole #100069797 located at GPS coordinates 38°57'40.55"N, 121° 1'40.94"W

(Location 49) has a loose high voltage sign. PG&E has a preexisting EC notification (#126405974) to replace the sign.

- 6.9. Pole #100069795 located at GPS coordinates 38°57'39.50"N, 121° 1'42.62"W (Location 50) has a damaged/deteriorated high voltage sign. PG&E has a preexisting EC notification (#126403676) to replace the sign.
- 6.10. Pole #100058816 located at GPS coordinates 38°46'57.85"N, 121°14'2.29"W (Location 77) has two loose high voltage signs. PG&E created a new EC notification (#127496088) to repair the signs.

**7. GO 95, Rule 54.6-B, Vertical and Lateral Conductors, Ground Wires** states in part:

*“That portion of the ground wire attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).”*

- 7.1. Pole #101405988 located at GPS coordinates 38°43'3.56"N, 120°46'17.95"W (Location 20) has broken/damaged ground molding and exposed ground wire. PG&E has a preexisting EC notification (#120756122) to replace the molding.
- 7.2. Pole #100045891 located at 105 Wescott Ct in Auburn (Location 56) has broken/damaged ground molding and exposed ground wire. PG&E has a preexisting EC notification (#126155949) to replace the molding.

**8. GO 128, Rule 34.3-A, Strength** states:

*“The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.”*

Padmount Transformer #107745656 located at 1419 Buckeye Ct in Auburn (Location 62) has a corroded enclosure. PG&E has a preexisting EC notification (#126043724) to replace the padmount.

**9. 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.”*

Padmount Transformer #107745656 located at 1419 Buckeye Ct in Auburn (Location 62) has cracked stress cone tape on the H1 phase. PG&E has a preexisting EC

notification (#126043724) to replace the tape.

## V. Observations

1. ESRB staff observed the following third-party potential safety concerns during the field inspection:

**GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities** states in part:

*“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property...”*

**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.”*

- 1.1. There is a communications buddy pole next to Pole #104014718 located on Roland Ct in Pollock Pines (Location 5).
- 1.2. There is a communications buddy pole next to Pole #104014695 located at 6496 Granite Trail in Pollock Pines (Location 6).
- 1.3. There is a communications buddy pole next to Pole #104014694 located at 6480 Granite Trail in Pollock Pines (Location 7).
- 1.4. There is a communications buddy pole next to Pole #104014693 located at 6474 Granite Trail in Pollock Pines (Location 9).
- 1.5. Pole #101406228 located at 3370 Texas Hill Dr in Placerville (Location 14):
  - Has a customer security camera. PG&E had a preexisting EC notification (#126513179) to remove the camera.
  - Has a slacked communication guy.

- 1.6. There was an abandoned phone service line wrapped on a fence adjacent to 1130 Hillcrest Blvd in Colfax (Location 25). PG&E removed the line during the audit.