



February 25<sup>th</sup>, 2025

RE: EA2024-1184

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

**SUBJECT:** Response to Audit Report detailing inspections of Kirkwood Meadows Public Utility District facilities dated Jan. 24, 2025

To Whom It May Concern,

Thank you for your January 24<sup>th</sup>, 2025, correspondence. The Kirkwood Meadows Public Utility District (KMPUD) takes compliance with all rules and regulations related to our electrical service seriously and strives to ensure that all CPUC General Orders are followed. Our response to your audit findings is as follows:

## II. Records Violations

KMPUD acknowledges that while regular inspections were made during this specified period, proper documentation of the inspections and overhead patrols was not available to the inspectors, as per the intent of GO 128, 165, and 174. To remedy this, KMPUD intends to do the following:

1. Document the detailed inspections for all underground distribution facilities per the required 3-year or 5-year cycles in accordance with GO 165 and retain the records in a format suitable for inspection.
2. Document the patrols and inspections of overhead transmission lines and retain the records in accordance with GO 165.
3. Document monthly substation inspections and retain the records in accordance with GO 174.

In addition to ensuring that the above documentation is completed promptly at the time of patrol and inspection, KMPUD intends to maintain digital copies of all documentation to allow for easy access during future CPUC inspections.

## IV: Field Inspection Violations

For each violation identified during the field inspection, please see the KMPUD response below:

### 1. GO 128, Rule 17.1 Findings and Response

Location #	Findings	Planned Response	Date of Completion (or Estimate)
19	Animal nest inside the transformer	De-energize transformer and remove nest.	6-15-2025
25	The lock is buried below grade	Remove dirt from concrete pad	5-23-2024

<b>Location #</b>	<b>Findings</b>	<b>Planned Response</b>	<b>Date of Completion (or Estimate)</b>
26	Animal nest inside the transformer	De-energize transformer and remove nest.	6-15-2025
28	The interior of the transformer is filled with dirt	De-energize transformer and remove dirt.	6-15-2025
35	The concrete pad is buried	Remove dirt from concrete pad	5-30-2024
38	The concrete pad is buried	Remove dirt from concrete pad	7-1-2025
39	The concrete pad is buried	Remove dirt from concrete pad	7-1-2025
54	Animal nest inside the transformer	De-energize transformer and remove nest.	6-15-2025

## 2. GO 128, Rule 17.8 Findings and Response

<b>Location #</b>	<b>Findings</b>	<b>Planned Response</b>	<b>Date of Completion (or Estimate)</b>
3	Deteriorated ownership sticker	Replace sticker.	7-1-2025
5	Missing ownership sticker	Replace sticker.	7-1-2025
6	Deteriorated ownership sticker	Replace sticker.	6-12-2024
33	Deteriorated ownership sticker	Replace sticker.	6-12-2024
37	Deteriorated ownership sticker	Replace sticker.	7-1-2025
41	Missing ownership sticker	Replace sticker.	7-1-2025
42	Missing ownership sticker	Replace sticker.	7-1-2025
56	Missing ownership sticker	Replace sticker.	7-1-2025

## 3. GO 128, Rule 32.7 Finding and Response

<b>Location #</b>	<b>Findings</b>	<b>Planned Response</b>	<b>Date of Completion (or Estimate)</b>
21	The top of the padmount is collapsing	Straighten and strengthen switch enclosure	8-15-2025

**4. GO 128, Rule 34.3 B Findings and Response**

<b>Location #</b>	<b>Findings</b>	<b>Planned Response</b>	<b>Date of Completion (or Estimate)</b>
30	Access to interior through gap at base	Fill in any holes with road base or concrete	8-15-2025
31	Access to interior through gap at base	Fill in any holes with road base or concrete	8-15-2025
47	Access to interior through gap at base	Fill in any holes with road base or concrete	8-15-2025

**5. GO 128, Rule 35.3 Marking and Guarding, Warning Signs**

<b>Location #</b>	<b>Findings</b>	<b>Planned Response</b>	<b>Date of Completion (or Estimate)</b>
3	Missing High Voltage (HV) Sign	Place High Voltage Sticker on outside	6-15-2025
4	Missing High Voltage (HV) Sign	Place High Voltage Sticker on outside	6-15-2025
5	Missing High Voltage (HV) Sign	Place High Voltage Sticker on outside	6-15-2025
6	Missing High Voltage (HV) Sign	Place High Voltage Sticker on outside	6-15-2025
12	Missing High Voltage (HV) Sign	Place High Voltage Sticker on outside	6-15-2025
13	Missing High Voltage (HV) Sign	Place High Voltage Sticker on outside	6-15-2025
31	Deteriorated HV sign	Replace High Voltage Sticker	6-15-2025
37	Deteriorated HV sign	Replace High Voltage Sticker	6-15-2025
41	Missing High Voltage (HV) Sign	Place High Voltage Sticker on outside	6-15-2025
42	Missing High Voltage (HV) Sign	Place High Voltage Sticker on outside	6-15-2025

**6. GO 174, Rule 12, General**

<b>Location</b>	<b>Findings</b>	<b>Planned Response</b>	<b>Date of Completion (or Estimate)</b>
KM Green	Expired Eyewash Station	Replace Eyewash	4-1-2025
KM Green	Fire Extinguisher is missing a tag	Replace extinguisher	4-1-2025
KM Green	Containment Pond is full of water	Pump pond	6-12-2024

All responses and repairs will be documented, and records will be maintained in compliance with the applicable GO.

**Conclusion:**

KMPUD will strive to ensure future compliance with all aspects of the applicable CPUC General Orders including (but not limited to) GO 95, 128, 165, AND 174. Corrections to all violations identified during the 2024 field inspection are being pursued, and are either rectified, or will be during 2025.

On behalf of the Kirkwood Meadows Public Utility District, I would like to thank the CPUC for their staff's candor, professionalism, and knowledge of their processes before, during, and after their visit to our facilities.

Please let us know if any additional information is needed.

A handwritten signature in black ink, appearing to read "J R Campbell". The signature is written in a cursive, slightly slanted style.

Jon R. Campbell  
Electric/ Propane Project Manager  
Kirkwood Meadows Public Utility District