PG&E STOCKTON DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
July 15 – July 19, 2024

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 Stockton Division:

- Electric Distribution Preventive Maintenance Manual, March 29, 2024
- 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
- Stockton Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, May 2019 – May 2024
- Electric Corrective Notifications list, June 2019 – May 2024
- Reliability Indexes and Outage list, June 2019 – May 2024
- Stockton New Projects list, June 2023 – May 2024
- Pole Loading Calculations list, June 2023 – May 2024
- Incoming Third-Party Notifications list, June 2019 – May 2024
- Outgoing Third-Party Notifications list, June 2019 – May 2024
- Inspector training records, June 2019 – May 2024
- Equipment test records, June 2019 – May 2024
- Intrusive Inspections, June 2023 – May 2024
- 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 Stockton Division for the past 60 months (June 2019 – May 2024), shown in Table 1. PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, page 5, published on March 23, 2024, defines the priority codes and associated time frames for the response/repair action as follows for overhead facilities:

- *Priority A – Immediate risk of high potential impact to safety and reliability (due within 24 hours).*
- *Priority X – At least moderate potential impact (due up to 5 days).*
- *Priority B – At least moderate potential impact (due up to 6 months).*
- *Priority E – At least moderate potential impact (due up to 6 months in HFTD Tier 3 areas, up to 12 months in Tier 2/HFTA area, up to 36 months in Non-HFTD areas).*
- *Priority F – Low potential impact (Due in 60 months).*

ESRB staff reviewed late work orders and determined that PG&E did not address a total of 50,676 (48.4%) out of 104,783 work orders by their assigned due date. Table 1 below breaks down the 50,676 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 Stockton Division[1,2]

Priority Code	Late Work Orders Completed	Late Work Orders Pending	Late Work Orders Cancelled	Total
A	1,922	1	558	**2,481**
X	-	-	-	**-**
B	2,786	662	429	**3,877**
E	8,153	32,677	3,178	**44,008**
F	41	246	23	**310**
Total	12,902	33,586	4,188	**50,676**

PG&E shall provide ESRB with its corrective action plan to complete the 33,586 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

The open Priority A tag (Notification 128803709) that was pending when the report was submitted has now been closed. The tag was created on May 19, 2024 and a temporary repair was done on May 20, 2024. The crew requested for a temp extension after mitigating the hazard. The tag was completed on June 13, 2024, thus completed on time.

Priority B EC Notifications

We reviewed the 676 late pending Priority B EC Notifications that were identified in the pre-audit data request, and we have since addressed 350: we completed 340 notifications and canceled 10. The remaining 326 are pending.

Priority E EC Notifications

We reviewed the 32,692 late pending Priority E EC Notifications that were identified in the pre-audit data request, and we have since addressed 2,127: we completed 1,447 notifications and canceled 680. The remaining 30,565 are pending completion.

Priority F EC Notifications

We reviewed the 251 late pending Priority F EC Notifications that were identified in the pre-audit data request, and we have since addressed 12: we completed 7 notifications and canceled 5. The remaining 239 are pending completion.

Corrective Action Plan for Tag Completion and Going Forward Compliance

In 2019, we began the Wildfire Safety Inspection Program (WSIP) to proactively expand inspections of poles and associated equipment in High Fire Threat Districts (HFTD)/High Fire Risk Areas (HFRA) on an accelerated and enhanced basis to mitigate ignition risk. The WSIP inspections led to a significant increase in the volume of notifications.

Along with the WSIP inspections, other programs added notifications to the backlog such as Pole Test and Treat (PT&T), Post-Event Patrols, Patrol Inspections, and Infrared Inspections.

We have developed a plan to reduce the wildfire risk associated with the backlog of ignition-risk tags in HFTD/HFRA by 77 percent at the end of the 2023-2025 Wildfire Mitigation Plan (WMP) cycle. We submitted details of the work plan in PG&E's 2023-2025 WMP R6 (revision 6).

Our highest priority is to complete all A and B tags based on required compliance dates:

- Priority A tags (Level 1 under GO 95) require response by taking corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority; and

- Effective April 29, 2024, Priority B (Level 2 under GO 95) tags are addressed within six months for potential violations that create risk of at least moderate potential impact to safety or reliability per bulletin *TD-8123S-B001 Level 2 Priority B Tag Management Requirements.*

We divide remaining notifications into two groups: (1) ignition risk notifications in the HFTD/HFRA; and (2) non-ignition risk notifications in the HFTD/HFRA. Ignition risk notifications in HFTD/HFRA areas are the highest priority in this group of notifications. Our focus is on HFTD ignition risk tags as our risk analysis indicates that these types of tags contain 20 times more risk than non-ignition or non-HFTD tags.

Tags identified prior to 2023 will be prioritized by considering risk. We began bundling work by isolation zones starting in 2023 to reduce customer impact and improve operational efficiency and safer coworker conditions. Our 2023 work plan and WMP commitment was to reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA by 48 percent. In 2023, we exceeded this target and reduced the backlog ignition-risk in HFTD/HFRA by over 52 percent. Our 2024 work plan and WMP commitment is to reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA by 68 percent (2023 and 2024 combined).

In 2024, we are expanding prioritization of E and F tags through a bundled risk spend efficiency approach. A and B tags are not planned to be included in the bundling approach. While we anticipate that most of the E and F tags will be prioritized this way, there will be instances where a different approach may be warranted.

The bundled risk spend efficiency approach will enable us to execute EC notifications more efficiently by reducing the number of times we perform corrective work on the same circuit, executing more tags with the same resources, and reducing the number of clearances required to close tags. We are proposing to use the bundled risk spend efficiency approach through 2029 to reduce our backlog of tags.

Table 2 below identifies the most overdue non-exempt work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
A	117675098	761
X	-	-
B	125209427	158
E	117291647	1,170
F	117812314	456

PG&E identified work order #117675098 on July 31, 2019, to install a service pole with a required end date of January 31, 2020. PG&E did not complete the work until March 2, 2022.

PG&E Response:

Priority A EC Notification
We created EC Notification 117675098 for a tree connect tag where our equipment was attached to a dead/dying tree. This EC notification was documented in SAP as a Priority A for Catastrophic Emergency Memorandum Account (CEMA). Shortly after, we determined that these types of A Tags do not belong under the CEMA program and were migrated to a non-emergency program. Prior to moving the A Tag, we found that estimating had already completed their work on the notification under Major Work Categories (MWC) 95. Due to system limitations, estimated jobs cannot be moved between MWC without redoing the entire estimate. To prevent any duplicative costs for this type of work, it was agreed that the work would be completed under MWC 95; however, costs associated A tags would be moved to the non-emergency program. We completed the work on March 2, 2022.

PG&E identified work order #125209427 on December 22, 2022, for a pole safety inspection with a required end date of March 22, 2023. PG&E did not complete the work until August 27, 2023.

PG&E Response:

Priority B EC Notification
We created EC Notification 125209427 on December 22, 2022 during a pole safety inspection for an inaccessible location due to snow. On August 28, 2023, our inspector performed a safety reassessment and requested that the tag be canceled due to being invalid. We subsequently confirmed the asset was a tree instead of a pole that would be addressed under Notification 120473769. We canceled 125209427 on May 7, 2024 and we removed the tree attachment and installed a clearance pole on June 5, 2024.

PG&E identified work order #117291647 on May 21, 2019, to replace a broken anchor with a required end date of November 21, 2019. PG&E did not complete the work until February 3, 2023.

PG&E Response:

Priority E EC Notification
We identified the hazard on May 21, 2019 and monitored conditions annually through the FSR process. We completed the repair on February 3, 2023.

PG&E identified work order #117812314 on August 27, 2019, to remove an idle facility with a required end date of February 27, 2020. PG&E did not complete this work until May 28, 2021.

PG&E Response:

Priority F EC Notification
We created EC Notification 117812314 on August 27, 2019 to remove an idle facility that was safely deenergized and did not have intended future use. An FSR was performed on June 3, 2020 to monitor conditions. We were able to successfully complete the work on May 28, 2021, within GO 95 Rule 18 Level 3 timeframes for corrective actions.

[1] Completed work orders were considered late if the completion date was after the authorized end date and more than one day after the notification date.
[2] Categorization of work orders as complete, open, or cancelled is based on the notification status provided by PG&E.

ESRB identified two late cancelled tags with completion dates, one late completed tag with an on-time completion date, five late completed tags that have no completion dates, 54 late open tags that have completion dates. A breakdown of some of the misassigned late category tags are shown below in Table 3.

PG&E Response:

We developed a Corrective Action Plan (CAP) 129740418 to address the identified issue.

Table 3: Misassigned Tags

Tag #	Assigned Late Category	Discrepancy
117519721	Late Cancelled	Has a completion date.
119366539	Late Cancelled	Has a completion date.
117689607	Late Complete	Has a completion date that is on-time.
126042443	Late Complete	Has no completion date.
126301935	Late Complete	Has no completion date.
125248770	Late Complete	Has no completion date.
124964807	Late Complete	Has no completion date.
127141236	Late Complete	Has no completion date.
118672152	Late Open	Has a completion date.
119193986	Late Open	Has a completion date.
122249231	Late Open	Has a completion date.
123880234	Late Open	Has a completion date.
125544944	Late Open	Has a completion date.

2. 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."

Table 1: Distribution Inspection Cycles (Maximum Intervals in Years)

	Patrol		Detailed		Intrusive	
	Urban	Rural	Urban	Rural	Urban	Rural
Transformers						
Overhead	1	2	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Switching/Protective Devices						
Overhead	1	2	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Regulators/Capacitors						
Overhead	1	2	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Overhead Conductor and Cables	1	2	5	5	---	---
Streetlighting	1	2	x	x	---	---
Wood Poles under 15 years	1	2	x	x	---	---
Wood Poles over 15 years which have not been subject to intrusive inspection	1	2	x	x	10	10
Wood Poles which passed intrusive inspection	---	---	---	---	20	20

ESRB identified that PG&E had completed a total of 24,411 (3.7%) out of 665,686 patrols and inspections past their assigned due dates in the last five years. Table 4 below breaks down the late patrols and inspections by year.

Table 4: Late Patrols and Inspections

Year	Inspection Type	Number of Late Inspections or Patrols
2019	Patrols	24
2020	Inspections	144
2021	Patrols	9,503
2021	Inspections	9,675
2022	Inspections	34
2023	Patrols	4,839
2023	Inspections	192

PG&E Response:

In 2019, the 24 Overhead (OH) assets patrolled in our service territory of Stockton Division were late due to the printed map that appeared to be blank. A new inspector signed and marked the map as zero facilities without confirming in the Electric Distribution Geographic Information System (EDGIS) as a control validation for potential units. This error was discovered during a map validation of zero units by using EDGIS to return a "value" for support structures (overhead poles) by the Compliance Support Team. After discovering this error, PG&E completed its patrol of all twenty-four (24) OH units on December 23, 2019, after the CPUC due date of October 28, 2019. We identified and included the 24 assets as late patrols in our 2019 GO 165 Annual Report.

In 2020, the 141 Overhead (OH) Inspections and 3 Underground (UG) inspections in our service territory of Stockton Division were late due to due to external weather events. On August 15, 2020, unprecedented lightning strikes occurred throughout our territory resulting in multiple fires across California. As these fires grew, they were blended into the August Complex, the North Complex, the LNU Lightning Complex, the SCU Lightning Complex, the SQF Complex, and the Creek Fire. Because it took several months for these fires to be contained, many of our assets were not accessible due to the unsafe field conditions. During the time of the fires, our priority was to restore service to our customers safely, which also impacted these units from being completed on time. Furthermore, we had multiple PSPS events take place in September, October, and November compounding the planned patrol and detailed inspections. Consequently, by the end of 2020, OH inspections were completed after their GO 165 due dates. We identified and included the 144 assets as late inspections in our 2020 GO 165 Annual Report.

In 2021, the 9,675 Overhead (OH) assets patrolled and 9,502 Overhead (OH) inspections in our service territory of Stockton Division were late due to 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, OH patrols and OH inspections were completed after their GO 165 due dates. We mitigated this error by ensuring our workplan reflects both the WMP commitment dates and the GO 165 due dates. We identified and included the 9,675 assets as late patrols and 9,502 assets as late inspections in our 2021 GO 165 Annual Report.

Additionally in 2021, we had one late Underground (UG) inspection in our service territory of Stockton Division was late due to an access constraint. Our initial attempt to inspect, inspector found the asset full of dirt; coordinate with crew to clean. Crew work required a city permit which impacted work to be completed on time. Inspection was completed on May 5, 2021. We identified and included the one asset as a late inspection in our 2021 GO 165 Annual Report.

In 2022, the 25 Overhead (OH) inspections in our service territory of Stockton Division are late due to access constraints:

- Two outstanding OH inspections due to access restriction from customer refusals.
- One late OH inspection due to incomplete inspection because inspector was unable to locate the switch that was outside of the substation.
- Three late OH inspections due to map validations after the inspection was completed. The map validations identified that either the map had an earlier CPUC due date or that the map was missing from the workplan when developed.

- Nine late OH inspections due to access restriction from customer refusals.
- 10 late OH inspections due to access restriction from vegetation overgrowth.

All late OH inspections were completed by year end 2022 except the two outstanding assets which were completed on May 20, 2023. We identified and included the 25 assets as outstanding and/or late inspections in our 2022 GO 165 Annual Report.

Additionally in 2022, we had nine late Underground (UG) inspections in our service territory of Stockton Division were late due to access constraints. Our Inspector was not able to inspect Underground asset during initial attempt. Our inspector created an electric corrective (EC) notification to ensure we tracked inspection to be completed. Once we were able to obtain access, the inspections were completed after their due date by year end 2022.

- Five late UG inspections due to access constraints
- Two late UG inspections due to customer refusals
- Two late UG inspections due to customer access

We identified and included the nine assets as late inspections in our 2022 GO 165 Annual Report.

In 2023, the 4,839 Overhead (OH) assets patrolled and 191 Underground (UG) assets inspected in our service territory of Stockton Division were late due to human error and inspection quality respectively. We validated map due dates after the patrols and inspections were completed. This validation effort identified incorrect due dates for the map, which we updated to reflect the correct dates. Because of the due date being changed, it caused these patrols and inspections as completed late. We identified and included the 4,839 assets as late patrols and 191 assets as late inspections in our 2023 GO 165 Annual Report.

Additionally in 2023, the one late Overhead (OH) inspection in our service territory of Stockton Division was late due to an inspection quality. Our inspector initially completed OH inspection of this asset on May 2, 2023. The inspection was rejected because the inspector had uploaded incorrect inspection photos; therefore, we had to re-inspect the asset and report the inspection as completed late on August 26, 2023. We identified and included this one asset as a late inspection in our 2023 GO 165 Annual Report.

III. Field Inspection

During the field inspection, ESRB inspected locations listed in Table 5:

Table 5: List of Field Inspection Locations

Location #	SAP #	Structure Type	Structure Location/Address
1	102132007	Wood Pole	(38.0667473, -121.1240922)
2	102132006	Wood Pole	(38.0664638, -121.1240309)
3	102130905	Wood Pole	(38.0665092, -121.1230193)
4	102133378	Wood Pole	(38.0587224, -121.1430725)
5	102133380	Wood Pole	(38.0587137, -121.1440277)
6	102133448	Wood Pole	(38.0586786, -121.1446071)
7	103858231	Wood Pole	(38.0545439, -121.1892421)
8	103870318	Wood Pole	(38.0545444, -121.1897323)
9	102137943	Wood Pole	(38.0545463, -121.1903036)
10	102137944	Wood Pole	(38.0546017, -121.1903331)
11	102137655	Wood Pole	11122 Comstock Rd. Waterloo, CA
12	102137657	Wood Pole	11175 Comstock Rd. Waterloo, CA
13	129223887	Wood Pole	3217 Miner Ave. Stockton, CA
14	102056485	Wood Pole	(37.9645201, -121.2486550)
15	101282213	Wood Pole	4121 Cedar Circle Angels Camp, CA
16	103953077	Wood Pole	4128 Cedar Circle Angels Camp, CA
17	104124722	Wood Pole	4149 Cedar Circle Angels Camp, CA
18	104160440	Wood Pole	4146 Cedar Circle Angels Camp, CA

Location #	SAP #	Structure Type	Structure Location/Address
19	101282209	Wood Pole	4087 Ponderosa Way Angels Camp, CA
20	103951344	Wood Pole	(38.0947629, -120.5008102)
21	101279618	Wood Pole	(38.0482981, -120.5240462)
22	101279620	Wood Pole	(38.0479593, -120.5234648)
23	101271419	Wood Pole	(38.0507846, -120.5289781)
24	107016158	Pad Mount Transformer	(38.0507379, -120.5290240)
25	103380638	Wood Pole	1404 Finnegan Ln. Angels Camp, CA
26	101269775	Wood Pole	1434 Finnegan Ln. Angels Camp, CA
27	101268992	Wood Pole	(38.0686921, -120.5403520)
28	101268987	Wood Pole	1298 Bush St. Angels Camp, CA
29	108209019	Junction Box	(38.0694597, -120.5408405)
30	101268219	Wood Pole	308 Clifton Ln. Angels Camp, CA
31	101265930	Wood Pole	195 Clifton Ln. Angels Camp, CA
32	103367821	Wood Pole	158 Clifton Ln. Angels Camp, CA
33	102318284	Wood Pole	(37.7402831, -121.1786390)
34	102318283	Wood Pole	(37.7405477, -121.1786480)
35	102318282	Wood Pole	23861 Austin Rd. Ripon, CA
36	107035508	Underground Switch	1018 Stuart St. Ripon, CA
37	107044698	Underground Junction Box	602 S. Wilma Ave. Ripon, CA
38	107044694	Underground Transformer	508 S. Wilma Ave. Ripon, CA

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
39	107022229	Underground Junction Box	1553 W. Colony Rd. Ripon, CA
40	107022227	Underground Junction Box	1553 W. Colony Rd. Ripon, CA
41	108233917	Pad Mount Transformer	1553 W. Colony Rd. Ripon, CA
42	108263425	Pad Mount Fuse Box	977 Heartland Dr. Manteca, CA
43	107021894	Underground Junction Box	977 Heartland Dr. Manteca, CA
44	107024226	Underground Junction Box	985 Heartland Dr. Manteca, CA
45	102093030	Wood Pole	936 Yolo St. Manteca, CA
46	103822581	Wood Pole	928 Yolo St. Manteca, CA
47	102093032	Wood Pole	916 Yolo St. Manteca, CA
48	103177294	Wood Pole	904 Yolo St. Manteca, CA
49	102093166	Wood Pole	447 Yolo St. Manteca, CA
50	102093165	Wood Pole	431 Edward Ave. Manteca, CA
51	102093174	Wood Pole	331 S. Powers Ave. Manteca, CA
52	104132518	Wood Pole	339 S. Powers Ave. Manteca, CA
53	102093172	Wood Pole	823 Trinity St. Manteca, CA
54	102141965	Wood Pole	807 Trinity St. Manteca, CA
55	102084932	Wood Pole	961 Alameda St. Manteca, CA
56	102084930	Wood Pole	937 Alameda St. Manteca, CA
57	107024724	Pad Mount Transformer	1718 Komenich Dr. Manteca, CA
58	107043195	Pad Mount Fuse Box	(37.8235792, -121.2451490)

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
59	107038497	Pad Mount Transformer	1902 London Ave. Manteca, CA
60	102092777	Wood Pole	1282 N St. Lathrop, CA
61	102092780	Wood Pole	15901 7th St. Lathrop, CA
62	103135263	Wood Pole	15901 7th St. Lathrop, CA
63	102092815	Wood Pole	15896 6th St. Lathrop, CA
64	102092832	Wood Pole	15868 6th St. Lathrop, CA
65	102092830	Wood Pole	15832 6th St. Lathrop, CA
66	102092808	Wood Pole	(37.8175526, -121.2775357)
67	102085450	Wood Pole	12030 Harlan Rd. Lathrop, CA
68	107040401	Pad Mount Transformer	12030 Harlan Rd. Lathrop, CA
69	102090130	Wood Pole	23197 N. Tretheway Rd. Acampo, CA
70	102090133	Wood Pole	(38.1961325, -121.1799784)
71	104029730	Wood Pole	(38.1950658, -121.1799533)
72	102090139	Wood Pole	(38.1950421, -121.1800025)
73	102090707	Wood Pole	22601 N. Tretheway Rd. Acampo, CA
74	103585129	Wood Pole	(38.2036348, -121.2443534)
75	102086238	Wood Pole	23991 N. Kennefick Rd. Acampo, CA
76	102085056	Wood Pole	4847 E. Jahant Rd. Galt, CA
77	102085057	Wood Pole	(38.2039275, -121.2581953)

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
78	102091190	Wood Pole	(38.1747827, -121.2962414)
79	103584983	Wood Pole	(38.1746396, -121.2960255)
80	102091185	Wood Pole	(38.1746427, -121.2969200)
81	107165430	Underground Transformer	18961 Lower Sacramento Rd. Woodbridge, CA
82	107143522	Underground Junction Box	(38.1547320, -121.3008428)
83	107030318	Pad Mount Transformer	(38.1547570, -121.3011898)
84	103199350	Wood Pole	939 E. Augusta St. Woodbridge, CA
85	103193684	Wood Pole	(38.1540594, -121.3025000)
86	107061242	Underground Switch	311 River Meadows Dr. Woodbridge, CA
87	107167094	Underground Transformer	253 River Meadows Dr. Woodbridge, CA
88	107078450	Underground Junction Box	6077 W. Banner St. Lodi, CA
89	107118194	Underground Junction Box	6077 W. Banner St. Lodi, CA
90	107038543	Pad Mount Transformer	10100 Trinity Pkwy. Stockton, CA
91	108292589	Underground Transformer	9742 Angel Ct. Stockton, CA
92	107056255	Underground Junction Box	3714 Hatchers Cir. Stockton, CA
93	107111198	Underground Switch	3711 Hatchers Cir. Stockton, CA
94	102113301	Wood Pole	6528 Herndon Pl. Stockton, CA
95	102066139	Wood Pole	5151 California Ave. Tracy, CA
96	102066137	Wood Pole	(37.7591874, -121.3698610)
97	102066133	Wood Pole	5690 California Ave. Tracy, CA
98	102065269	Wood Pole	(37.7505704, -121.3801463)

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
99	102075760	Wood Pole	22818-22800 Banta Rd. Tracy, CA
100	107037028	Underground Transformer	600 Pombo Square Dr. Tracy, CA
101	102119629	Wood Pole	2712 Holly Dr. Tracy, CA
102	103899500	Wood Pole	2768 Holly Dr. Tracy, CA
103	103572962	Wood Pole	2796 Holly Dr. Tracy, CA
104	107049865	Underground Transformer	3014 Dovenshire Dr. Tracy, CA
105	107049873	Underground Transformer	335 Marie Ave. Tracy, CA
106	102120072	Wood Pole	340 W. Whittier Ave. Tracy, CA
107	102120075	Wood Pole	354 W. Whittier Ave. Tracy, CA
108	102120071	Wood Pole	1845 Parker Ave. Tracy, CA
109	107041391	Underground Transformer	2040 Valerand Rd. Tracy, 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 6.

Table 6: GO 95, Rule 31.1 Findings

Location	Finding	Notes	PG&E Response
1	Pole was decayed/rotten.	PG&E has existing EC notification 124305015 to replace the pole.	Disagree with Finding- Existing EC for condition found
2	Pole was decayed/rotten.	PG&E has existing EC notification 124305020 to replace the pole.	Disagree with Finding- Existing EC for condition found
3	Pole was damaged/broken. Crossarm was decayed.	PG&E has existing EC notification 123294097 to replace the pole.	Disagree with Finding- Existing EC for condition found
4	Pole was decayed/rotten.	PG&E has existing EC notification 124234351 to replace the pole.	Disagree with Finding- Existing EC for condition found
6	Pole was damaged from woodpeckers.	PG&E has existing EC notification 124239016 to replace the pole.	Disagree with Finding- Existing EC for condition found
8	Bird guard was not sitting correctly on conductor.	PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field
11	Pole was decayed/rotten.	PG&E has existing EC notification 126613035 to replace the pole. (126614035)	Disagree with Finding- Existing EC 126614035 for condition found
13	Pole was damaged.	PG&E created EC notification 129223887 to repair pole.	Agree with Finding- EC created 129223887
14	Visibility strips were falling off.	PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field

21	Pole was decayed/rotten.	PG&E has existing EC notification 120863831 to replace the pole.	Disagree with Finding- Existing EC for condition found
22	Pole was decayed/rotten.	PG&E has existing EC notification 116883114 to replace the pole.	Disagree with Finding- Existing EC for condition found

27	Pole was decayed/rotten.	PG&E has existing EC notification 118145300 to replace the pole.	Disagree with Finding- Existing EC for condition found
30	Pole top is decayed.	PG&E has existing EC notification 119301148 to replace the pole.	Disagree with Finding- Existing EC for condition found
32	Electrical guy wire was within 3 inches of communications cable. Guy anchor was buried. Guy anchor was corroded.	PG&E unburied guy anchor in the field.	Disagree with Finding- Corrected in field
48	Pole was decayed/rotten.	PG&E has existing EC notification 126206246 to replace the pole.	Disagree with Finding- Existing EC for condition found
50	Crossarm was damaged/broken.	PG&E has existing EC notification 124236484 to repair the crossarm.	Disagree with Finding- Existing EC for condition found
51	Pole was burnt at top.	PG&E has existing EC notification 118449932 to replace the pole.	Disagree with Finding- Existing EC for condition found
55	Weatherhead had exposed connection.	PG&E has existing EC notification 123969750 to repair the connection.	Disagree with Finding- Existing EC for condition found
63	Pole had a low pole step.	PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field
73	Pole was damaged/broken.	PG&E created EC notification 121927774 to replace pole.	Disagree with Finding- Existing EC 121927774
75	Pole had a low pole step.	PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field
76	Pole was decayed/rotten.	PG&E has existing EC notification 126658831 to replace the pole.	Disagree with Finding- Existing EC for condition found

84	Crossarm was damaged/broken.	PG&E has existing EC notification 119526490 to repair the crossarm.	Disagree with Finding- Existing EC for condition found
94	Crossarm was damaged/broken.	PG&E has existing EC notification 124566331 to repair the crossarm.	Disagree with Finding- Existing EC for condition found
101	Pole has an idle facility.		Agree with Finding- EC created 129247291
108	Crossarm is decayed/rotten.	PG&E has existing EC notification 124908060 to replace the crossarm.	Disagree with Finding- Existing EC for condition found

2. **GO 95, Rule 54.6, 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)."

ESRB's findings are listed in Table 7.

Table 7: GO 95, Rule 54.6 Findings

Location	Finding	Notes	PG&E Response
9	Ground wire was exposed.	PG&E corrected the finding in the field.	Disagree with Finding-Corrected in field
106	Ground molding was broken/damaged.	PG&E has existing EC notification 113631269 to repair the molding. PG&E corrected the finding in the field.	Disagree with Finding-Existing EC 113631269 for condition found

3. **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."

ESRB's finding is listed in Table 8.

Table 8: GO 95, Rule 56.6-A Finding

Location	Finding	Notes	PG&E Response
11	Vegetation was found in contact above insulator bob providing a path to ground.		Agree with Finding - Corrected finding as minor work post-audit

4. **GO 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 findings are listed in Table 9.

Table 9: GO 95, Rule 56.9 Findings

Location	Finding	Notes	PG&E Response
49	Guy guard was damaged.	PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field
77	Guy marker was missing.		Disagree with Finding- Existing EC 119381283 for condition found

5. **GO 95, Rule 59.4-A(1)(a), Grounding** states:

"The grounding conductor from each ground rod to the base of the pole shall not be less than 1 foot below the surface of the ground."

ESRB's findings are listed in Table 10.

Table 10: GO 95, Rule 59.4-A(1)(a) Findings

Location	Finding	Notes	PG&E Response
7	Grounding rod was found above ground.	PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field
69	Ground rod was found above ground.	PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field

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

"Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

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

ESRB's finding is listed in Table 11:

Table 11: GO 95, Rule 34 Finding

Location	Finding	Notes	PG&E Response
14	Foreign attachment found on pole.	PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field

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 12:

Table 12: GO 95, Rule 51.6-A Findings

Location	Finding	Notes	PG&E Response
2	High Voltage sign was missing.	PG&E has existing EC notification 124305020 to install a new sign.	Disagree with Finding- Existing EC for condition found
3	High Voltage sign was missing.	PG&E has existing EC notification 123294097 to install a new sign.	Disagree with Finding- Existing EC for condition found
21	High Voltage sign was broken.	PG&E has existing EC notification 120863831 for repair.	Disagree with Finding- Existing EC for condition found
26	High Voltage sign was broken.	PG&E has existing EC notification 120911951 for repair.	Disagree with Finding- Existing EC for condition found
32	High Voltage sign was missing.	PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field
53	High Voltage sign was missing.	PG&E has existing EC notification 112859408 to install a new sign. PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field
54	High Voltage sign was broken.	PG&E has existing EC notification 124226422 for repair. PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field

55	High Voltage sign was missing.	PG&E has existing EC notification 123969750 to install a new sign. PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field
61	High Voltage sign was missing.	PG&E has existing EC notification 112690524 to install a new sign. PG&E corrected the finding in the field.	Disagree with Finding- Existing EC for condition found and corrected in-field
62	High Voltage sign was missing.	PG&E has existing EC notification 123749669 to install a new sign. PG&E corrected the finding in the field.	Disagree with Finding- Existing EC for condition found and corrected in-field

65	High Voltage sign was broken.	PG&E has existing EC notification 112692828 for repair.	Disagree with Finding- Existing EC for condition found
85	High Voltage sign was missing.	PG&E has existing EC notification 110273489 to install a new sign. PG&E corrected the finding in the field.	Disagree with Finding- Existing EC for condition found and corrected in-field
95	High Voltage sign was missing.	PG&E has existing EC notification 124713675 to install a new sign.	Disagree with Finding- Existing EC for condition found
97	High Voltage sign was missing.	PG&E has existing EC notification 124713730 to install a new sign.	Disagree with Finding- Existing EC for condition found
108	High Voltage sign was missing.		Agree with Finding- Corrected finding as minor work post-audit

7. **GO 95, Rule 58.1-B(3), From Hardware** states in part:

"…The minimum clearance of 1.5 inches need not apply to through bolts in metallic contact with equipment cases or metal parts thereof nor to through bolts supporting heel arms, provided the portion of such through bolts extending into the climbing space is covered with non-conducting material as specified in Rule 22.8."

ESRB's finding is listed in Table 13.

Table 13: GO 95, Rule 58.1-B(3) Finding

Location	Finding	PG&E Response
28	Bolt covers were found loose on transformer support through bolt.	Agree with Finding- Corrected finding as minor work post-audit

8. **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 14:

Table 14: GO 128, Rule 17.1 Findings

Location	Finding	Notes	PG&E Response
48	Lid frame was broken/damaged.	PG&E has existing EC notification 117845397 to repair.	Disagree with Finding- Existing EC for condition found
42	Retaining wall missing for ground mounted equipment.	PG&E has existing EC notification 119711206 for the finding. The EC notification was found under the wrong SAP number.	Disagree with Finding- Existing EC for condition found
58	Fusebox was missing 2021 inspection sticker in compartment 1.		Disagree with Finding- This was addressed in Post Audit Data request attachment: *DRU14045_Q01_Atch01_2021 UGI X1120_CONF.pdf.*
87	Enclosure was decayed/rotten.	PG&E has existing EC notification 122560278 to repair enclosure.	Disagree with Finding- Existing EC for condition found

89	Enclosure was full of debris.	PG&E has existing EC notification 124241330 to remove debris.	Disagree with Finding- Existing EC for condition found
104	Lid frame was broken/damaged.	PG&E has existing EC notification 123298256 to repair. PG&E repaired the lid in the field.	Disagree with Finding- Corrected in field

9. GO 128, Rule 35.5, Warning Signs states:

"Warning signs indicating high voltage shall be installed on an interior surface, or barrier if present, inside the entrance of vaults, manholes, handholes, pad mounted transformer compartments, and other above ground enclosures containing exposed live parts above 750 volts. Such warning signs shall also be installed on an exterior surface of all such pad mounted transformer compartments and other above ground enclosures. Such signs shall be clearly visible to a person in position to open any such access door, other opening, or barrier."

ESRB's finding is listed in Table 15:

Table 15: GO 128, Rule 35.5 Finding

Location	Finding	Notes	PG&E Response
105	High voltage sign was faded.	PG&E corrected the finding in the field.	Disagree with Finding- Corrected in field

V. Observations

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

"(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery."

"(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95."

ESRB's findings are listed in Table 16:

Table 16: GO 95, Rule 18-A Findings

Location	Finding	Notes	PG&E Response
5	There was an abandoned communications service drop.	PG&E removed the service drop in field.	Corrected in field
14	Communications had an abandoned service drop. Communications ground wire was broken.		Corrected in field
16	Communications needs to transfer conductors to new pole.		TPN opened 129226829
18	Communications needs to transfer conductors to new pole. Communications drop was in contact with guy wire.		TPN opened 129226882
20	Communications needs to transfer conductors to new pole.		TPN opened 129226994
23	Communications conductor was not secured to pole. Communications conductor had no riser.		TPN opened 129227524
27	Communications had an abandoned service drop.		TPN opened 129676007
30	Communications ground wire was exposed.		TPN opened 129229204
45	Communications ground wire was exposed.		Existing TPN 124247358 for condition found
46	Communications had an abandoned service drop.	PG&E removed the service drop in field.	Corrected in field

50	Communications conductor was not secured to pole. Communications had damaged overhead facilities.	PG&E has existing Third Party Notification 124236493 to correct the unsecured conductor. PG&E has existing Third Party Notification 124236485 for repairing damaged overhead facilities.	Existing TPN for condition found

51	Communications ground wire was exposed.	PG&E has existing Third Party Notification 124227316 to repair exposed ground.	Existing TPN for condition found
52	Communications conductor was not secured to pole.	PG&E created Third Party Notification 129232473 in the field for unsecured communications conductor.	TPN opened 129232473
53	Communications ground wire was exposed.	PG&E has existing Third Party Notification 124226722 to repair exposed ground.	Existing TPN for condition found
60	Communications ground wire was exposed.	PG&E has existing Third Party Notification 124057691 to repair exposed ground. PG&E corrected the finding in the field.	Existing TPN for condition found
66	Communications guy wire anchor was decayed.	PG&E has existing Third Party Notification 124074703 to repair guy anchor.	Existing TPN for condition found
69	Communications conductor was broken.	PG&E corrected the finding in the field.	Corrected in field
72	Communications guy wire anchor was buried.		TPN opened 129237582
76	Communications lashing wire was broken.		TPN opened 129239113
84	Communications ground wire was exposed.		TPN opened 129241815

	Communications had an abandoned service drop.		
95	Communications pedestal was fallen over.		TPN opened 129245984
97	Communications had an abandoned service drop.		TPN opened 129246767
101	Communications ground rod was exposed.		TPN opened 129247234
103	Communications guy guard was missing.	PG&E corrected the finding in the field.	Corrected in field