PG&E KERN DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
NOVEMBER 18-22, 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 Kern Division:

- TD-2305M, Electric Distribution Preventive Maintenance Manual, March 29, 2024
- TD-2305M-JA02, Job Aid: Overhead Assessment, March 25, 2024
- TD-2305M-JA03, Job Aid: Underground Inspection, August 4, 2022
- TD-2305M-JA13, EC Job Aide: Create, Complete Cancel EC Notifications – Field Employees, April 2016
- TD-2305S, Electric Distribution Maintenance Requirements, January 31, 2020
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, Rev2: August 02, 2022
- TD-2301S, Patrols and Detailed/Intrusive Inspections of Electric Overhead and Underground Distribution Facilities, Rev1: May 15, 2020
- TD-8123S-B001, Level 2 Priority B Tag Management Requirements, April 2024
- Electric Corrective Notifications list, September 2019 – September 2024
- Patrol and Inspection Records list, September 2019 – September 2024
- Kern Division Reliability Indexes and Outage list, September 2019 – September 2024
- Kern Division New Projects list, September 2023 – September 2024
- Pole Loading Calculations list, September 2023 – September 2024
- Incoming Third-Party Notifications list, September 2019 – September 2024
- Outgoing Third-Party Notifications list, September 2019 – September 2024
- Inspector training records, September 2019 – September 2024
- Equipment test records, September 2019 – September 2024
- Intrusive Inspections, September 2023 – September 2024
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review
- Kern Division Quality Management Audit Results, 2019– 2024

II. Records Violations

ESRB staff observed the following violations during the record review portion of the audit:

1. **General Order (GO) 95, Rule 18-B (1), Maintenance Programs** 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."

PG&E's TD-2305M, Electric Distribution Preventive Maintenance Manual, March 29, 2024, does not define priority codes nor specify time frames for repairs. Previous revisions of TD-2305M listed both priority codes and specified time frames for corrective action.

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 7 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).*

a) PG&E's TD-2305M-JA03, Underground Job Aid, August 4, 2022, instructs inspectors to assign a priority or to prioritize based on condition when a non-conformance is found. TD-2305M-JA03 does not provide guidance nor contain definition of priority levels nor correction completion intervals. TD-2305M-JA03 previously used the parent document, PG&E's TD-2305M, to define priorities. The current revision of PG&E's TD-2305M no longer contains priority definitions nor completion intervals.[1]

PG&E Response:

We will include the EC priority table in the next update to the Underground job aid, TD-2305M-JA-03, for consistency with the Overhead job aid because the priority table was removed from the EDPM Manual (March 2024). Currently, we cannot provide an expected revision date. Our guidance documents default to a 5-year review cycle that may be shortened or extended as needed. Prior to a revision, we ensure all stakeholders have been notified and any other applicable documents are updated with the changes to the

Underground Job Aid, TD-2305M-JA03.

b) ESRB staff reviewed work orders created within the Kern Division from September 2019 through September 2024 and determined that PG&E did not address a total of 26,263 work orders (42.4%) by their required assigned due

[1] ESRB has noted this finding in previous audits since June 2024. ESRB requested a revision date from PG&E to address the inconsistencies listed. PG&E responded that no revision is scheduled outside of a five-year review.

date.[2] Table 1 below breaks down the 26,263 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 Kern Division

Priority Code	Late Work Orders Completed	Late Work Orders Pending*	Late Work Orders Cancelled	Total by Priority
A	2,407	3	127	2,537
X[3]	2	–	11	13
B	1,788	143	149	2,080
E	981	20,143	369	21,493
F	5	131	4	140
Total	**5,183**	**20,420**	**660**	**26,263**

* As of September 23, 2024

PG&E shall provide ESRB with its corrective action plan to complete the 20,420 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

PG&E Response:

Priority A EC Notifications
We are unable to recreate the totals in the table above. Please note that response below utilizes the 3 late Work Orders Pending and EC Notifications that we identified in the Pre-Audit Data Request: DRU14133. PG&E has reviewed the open late Priority A EC notifications that were identified in the Pre-Audit Data Request and completed those notifications.

Priority X EC Notifications
No X tags were pending.

Priority B EC Notifications
We are unable to recreate the totals in the table above. We reviewed the 107 late pending Priority B EC Notifications that were identified in the Pre-Audit Data Request: DRU14133, and we have since addressed 88: we completed 81 notifications and canceled 7. The remaining 19 are pending completion.

Priority E EC Notifications
We are unable to recreate the totals in the table above. We reviewed the 20,448 late pending Priority E EC Notifications that were identified in the Pre-Audit Data Request: DRU14133, and we have since addressed 199: we completed 72 notifications and canceled 127. The remaining 20,249 are pending completion.

Priority F EC Notifications
We are unable to recreate the totals in the table above. We reviewed the 144 late pending Priority F EC Notifications that were identified in the Pre-Audit Data Request: DRU14133, and we have since addressed 3: we completed 3 notifications and canceled 0. The remaining 141 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 TD8123S-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. In 2023 and 2024, PG&E targeted the specific high risk work and has reduced >73% of the risk from backlog* tags by EoY 2024 (compared to the target of 68%). By end of 2025, PG&E is forecasted to remove >80% of the risk (compared to the target of 77%) from the backlog *.
*Backlog tags are open ignition EC notifications known as of January 5, 2023, and found prior to Jan 1, 2023, in HFTD/HFRA locations.

In 2025, we are continuing to expand the 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 work orders as of September 23, 2024.

Table 2: Most Overdue Work Orders**

Priority Code	Most Past Due Work Orders (WO#s)	Number of Days Past Due***
A	122217958	521
X	129112269	30
B	117937891 & 117937898	1,454
E	118092289	1,674
F	119963929	1,016

**Days past due determined using the Required End Date noted in Data Request Response 3
***As of September 23, 2024

PG&E identified work order #122217958 (A tag) on October 17, 2021, to replace a broken pole with a required end date of November 7, 2021. The notification was completed on April 12, 2023, and, as of September 23, 2024, PG&E's records indicate that the order is closed.

PG&E Response (A-Tag):
Notification #122217958 was due to a 3rd party vehicle collision to a streetlight-only pole. The pole was removed the same day as the collision, therefore fully mitigating any public safety risk. The notification was marked for extension in accordance with the reasonable circumstances under the General Order for permitting delays and assigned new due date of April 14, 2023. The notification was completed on time on April 12, 2023.

PG&E identified work order #129112269 (X-tag) on May 19, 2024, to replace burned pole with a required end date of May 26, 2024. The notification was completed on June 25, 2024, and, as of September 23, 2024, PG&E's records indicate that the order is closed.

PG&E Response (X Tag):
An incorrect date was carried over into SAP and we determined that notification #129112269 was discovered on June 21, 2024 and repaired on June 25, 2024. Therefore, the X-tag was repaired within the allowed 7-day timeframe.

[2] DRU14133_Q03_Atch01_Kern_update_Work Order History_CONF
[3] PG&E's Pre-Audit Preliminary Analysis for Audit Readiness, did not include data for Priority Code X.

PG&E identified work order #117937891 (B tag, same dates as next work order) on October 1, 2019, to replace a decayed pole with a required end date of September 30, 2020. PG&E's records indicate that the order is open as of September 23, 2024.

PG&E Response (B Tag):
Notification #117937891 was created as an E-tag and upgraded to Priority B on June 13, 2024 with a funded repair date of November 24, 2024. The work was completed on November 24, 2024.

PG&E identified work order #117937898 (B tag, same date as above) on October 1, 2019, to replace a decayed pole with a required end date of September 30, 2020. PG&E's records indicate that the order is open as of September 23, 2024.

PG&E Response (B Tag):
Notification #117937898 was created as an E-tag and upgraded to Priority B on June 13, 2024 with a funded repair date of November 24, 2024. The work was completed on October 9, 2024.

PG&E identified work order #118092289 (E tag) on October 23, 2019, to replace a pole with a required end date of February 23, 2020. PG&E's records indicate that the order is open as of September 23, 2024.

PG&E Response (E Tag):
PG&E uses a risk informed prioritization approach to address the highest risk issues on our system. Maintenance tags generated through inspection programs and routine activities are assigned a priority based on the potential safety impact.
Open work order (tags or notifications) prioritization uses priority levels A, B, X, E, F, and H.
E tags represent conditions considered to have a moderate potential safety or reliability impact.
We plan on addressing our backlog of open tags by bundling EC notifications by isolation zone to maximize the number of notifications completed within a single outage and/or planned day of work. We develop bundles during our annual planning process, and we prioritize the bundles based on risk reduction and executability. This E-tag (EC Notification #118092289) remains in the backlog of open tags due to its priority with respect to other tags in the backlog.

PG&E identified work order #119963929 (F tag) on October 10, 2020, to install a missing high voltage sign with a required end date of October 30, 2021. The notification was completed on August 11, 2024, and, as of September 23, 2024, PG&E's records indicate that the order is closed.

PG&E Response (F Tag):
Notification #119963929 was created as E tag on October 10, 2020 to install missing high sign with a required end date of October 30, 2021 and later downgraded to priority F on January 12, 2024 after inspection. The notification was completed on August 11, 2024, and, as of September 23, 2024, PG&E's records indicate that the order is closed.

c) ESRB staff identified 2,410 late or late pending Kern Division Priority A work orders (22.2% of total A Priority work orders) created from September 2019 through September 2024.[4] This value is significantly greater than the 1,599 late or late pending reported by PG&E.[5] ESRB noted that 1,979 work orders completed after the required due date were designated by PG&E as "On-Time, Complete".[6] PG&E did not explain why they consider those Priority A work orders as completed on time. GO 95 Rule 18 B (1) (a) (i) Leve1 1 states "*Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority*".

Per TD-2305M-JA13, PG&E's practice is to mark Priority A work order as "TEMP" when the work can be finished within 30 days[7], instead of assigning the Priority A tag to a lower priority. GO 95 Rule 18 B (1) (a) (i) Leve1 1 states "*Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority*" [8]

PG&E Response:
In DRU14133_Q03_ Atch01_Kern_update_Work Order History_CONF, priority A EC Notifications are not evaluated to the Required End Date to determine compliance timeliness. Please refer to DRU14923 – EA2024-1244 PG&E Kern Dist Audit Data Request Post Audit #2 for details on how Complete – Late, Complete – On Time, and Complete statuses are determined. Also, please note that the count of 1,599 Late Work Orders Completed was included in error and "TEMP" is formalized in TD-2060P-08 (not TD-2305M-JA13).

d) PG&E's current Job Aid TD-2305M-JA13 (EC Job Aid: Create, Complete Cancel EC Notifications – Field Employees, April 2016) lists Priority Levels A, B, E, and F. The procedure does not list Priority Level X which is cited in current TD-

[4] DRU14133_Q03_Atch01_Kern_update_Work Order History_CONF
[5] DRU14133_Q14_Atch1_Kern Distribution Audit_Response
[6] In DRU14133_Q14_Atch1_Kern Distribution Audit_Response, PG&E states, "Late Work Orders Completed exclude all on-time completed, pending, or cancelled work order notifications. Note, the count for Priority A work includes potentially late completed notifications" footnote, p. 1.
[7] DRU-5786_Multi-Division Data Request Response p. 3
[8] In DRU-5786_Multi-Division Data Request Response, PG&E states, "Due to limitations in SAP Work Management System, notifications cannot be converted efficiently to lower priorities. Hence, our definition for Temp is as follows: IF remaining work can be completed within 30 days after temporary repairs, THEN leave the Priority A notification open and SELECT "TEMP" status in SAP by COB the next business day." p. 3. The limitations of a utility's work management system does not exempt the utility with compliance with the General Orders.

2305M-JA02 (Overhead Job Aid, March 2024). Additionally, the corrective action intervals cited in current TD-2305M-JA13 do not align with the values cited in current TD-2305M-JA02. See Table 3.
indicate that the order is closed.

Table 3: Comparison of Corrective Action Intervals

Priority	2305M-JA13	2305M-JA02
A	Immediate Response	Within 24 hours
X	Not listed	Up to 7 days
B	0-3 Months	Up to 6 months
E	3 to 12 Months	6 to 36 Months[9]
F	UG: 3 Years OH: 5 Years	Up to 60 months

PG&E Response:
We agree with this finding. It will be addressed in the next revision of the Job Aid TD-2305M-JA13.

e) Additionally, PG&E's Priority E (Level 2) non-conformance correction period listed in TD-2305M-JA02 is 6 to 36 months which does not meet Rule 18-B (1) ii requirement that worker safety non-conformances be corrected within 12 months.[10]

PG&E must update procedures to provide inspectors consistent guidance for non-conformance Priority (Safety Hazard Level) and corrective action intervals.

PG&E Response:
TD-2305M-JA13 is in the process of being updated and timelines will be revised. Regarding TD-2305M-JA02 our inspectors have the ability to upgrade or give an E priority tag a sooner due date between 6 to 36 months.

[9] TD2305M-JA02, Job Aid: Overhead Assessment, March 25, 2024 Tier 3: Up to 6 months, Tier 2: up to 12 months, Non-HFTD: up to 36 months.
[10] Ibid. p. 5 TD-2305M-JA02, Job Aid: Overhead Assessment, March 25, 2024

f) ESRB staff reviewed PG&E's Inspector Training log and noted three inspectors (1.9 % of 156 inspectors) who had no training records found.[11] [12]

PG&E must provide evidence that all inspectors are trained and qualified to perform the required inspections.

PG&E Response:
We are unable to find a signed Initial / refresher training record for these individuals. In 2019 and 2020, these records were in hard copy form and not properly uploaded to our MyLearning System. We have made recent enhancements to our roster documentation practice which includes upgrading to electronic rosters to prevent missing scanned copies.

2. **GO 165, Section III-C, Record Keeping** states in part:

*"The utility shall maintain records for (1) at least ten (10) years of patrol **and** detailed inspection activities, and (2) the life of the pole for intrusive inspection activities."*

PG&E's TD-2305M, Electric Distribution Preventive Maintenance Manual, March 29, 2024, Record Retention, Record Retention Requirement, GO 165 Record Retention Guidelines Table lists requirements of 2 inspection cycles or 5 years with minimum record retention of 5 to 10 (years, note: no time unit is specified, in context, years is implied). See Figure 1.

2 G.O. 165 Record Retention Guidelines

RECORD TYPE	REQUIREMENT	MINIMUM RECORD RETENTION
OH Inspection Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Inspection cycles or 5 years, whichever is longer	10
UG Inspection Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Inspection cycles or 5 years, whichever is longer	6
OH Patrol Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Patrol cycles or 5 years, whichever is longer	5
UG Patrol Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Patrol cycles or 5 years, whichever is longer	5

Figure 1: GO 165 Record Retention Guidelines, TD-2305M

Per GO 165, Section III-C, records shall be maintained for at least 10 years for patrol and inspection activities. PG&E's TD-2305M, Electric Distribution Preventive Maintenance Manual and practices do not meet the minimum record retention requirement as prescribed in GO 165. [13]

PG&E Response:
We agree with this finding that the table in the EDPM is incorrect and is not consistent with our practice of maintaining patrol and inspection records for at least 10 years. Currently, we cannot provide an expected revision date. Our guidance documents default to a 5-year review cycle that may be shortened or extended as needed. Prior to a revision, we ensure all stakeholders have been notified and any other applicable documents are updated with the changes to the Electric Distribution Preventative Maintenance Manual, TD-2305M.

[11] DRU14133_Q11(a)_Atch01_KE Inspector List 2019-2024_CONF
[12] Out of privacy concerns, the names and LANs of the employees are not listed in this report.
[13] ESRB has noted this finding in previous audits since June 2024. ESRB requested a revision date from PG&E to address the inconsistencies listed. PG&E responded that no revision is scheduled outside of a five-year review.

3. **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."*

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

	Patrol		Detailed		Intrusive	
	Urban	Rural	Urban	Rural	Urban	Rural
Transformers						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Switching/Protective Devices						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Regulators/Capacitors						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Overhead Conductor and Cables	1	2[1]	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

a. ESRB staff identified that PG&E completed a total of 26,469 patrol and detailed inspections (3.8%) of padmount/underground (UG) and overhead (OH) electric facilities past their GO 165 required completion date, as shown in Table 4.

Table 4: Late Overhead Patrols and Inspections in East Bay Division[14]

Year	OH Patrol	OH Detailed Inspection	UG Patrol	UG Detailed Inspection	Total Structures
2019[15]	-	-	-	-	0
2020	-	-	-	1	1
2021	11,204	13,957	-	-	25,161
2022	-	-	-	-	0
2023	1,296	5	-	-	1,301
2024*	3	-	-	3	6
Total	12,503	13,962	0	4	**26,469**

* Preliminary information, final report due July 1, 2025

PG&E Response:

Please note that Table 4 is copied from the Kern AFR report provided by ESRB. The inclusion of "East Bay Division" appears to be an error. The counts have been confirmed for the Kern Division.

In 2020, the 1 Underground (UG) Inspection in our service territory of Kern Division was late due to human error and access constraints. Our Inspector was unable to initially inspect our asset because of a homeless encampment. In addition, the local Compliance Supervisor misunderstood that vault inspections could be completed by year end. However, it needed to be done by the map due date, so it was not planned accordingly. Once we were able to obtain access, the asset was inspected on November 12, 2020, after the due date of September 5, 2020. We identified and included this 1 asset as a late inspection in our 2020 GO 165 Annual Report.

In 2021, the 13,957 Overhead (OH) inspections and 11,204 Overhead (OH) assets patrolled in our service territory of Kern 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 work plan reflects both the WMP commitment dates and the GO 165 due dates. We identified and included the 13,957 assets as late inspections and 11,204 assets as late patrols in our 2021 GO 165 Annual Report.

In 2023, the 1,296 Overhead (OH) assets patrolled in our service territory of Kern Division were late due to human error. We validated map due dates after the patrols were complete. This validation effort identified incorrect due dates for the map, which we updated to reflect the correct dates. This caused the patrols to be completed late after the GO 165 due dates. We identified and included the 1,296 OH assets as late patrols in our 2023 GO 165 Annual Report.

Also in 2023, the 5 Overhead (OH) inspections in our service territory of Kern Division were late due to the below reasons resulting in an additional field visit to inspect after the due date.

- One late due to inspection quality
- Three late due to mapping discrepancy
- One late due to human error

We identified and included the 5 OH assets as late inspections in our 2023 GO 165 Annual Report.

In 2024, the 3 Overhead (OH) assets patrolled and 3 Underground (UG) assets inspected in our service

territory of Kern Division are late; however, this is preliminary data. We are currently vetting through our 2024 Overhead and Underground patrol and inspection workplan. The final counts of assets will be published in the 2024 GO 165 Annual report on July 1, 2025.

a. In compliance with GO 165, PG&E's Patrols and Detailed/Intrusive Inspections of Electric Overhead and Underground Distribution Facilities (TD-2301S), published on May 15, 2020, states the following:

"Intrusive Inspection Testing Cycle of Wood Poles – In addition to wood pole patrols, the following intrusive inspection interval criteria must be met:

- *Poles that have passed an intrusive inspection require an intrusive test within **20 years** of the previous intrusive test."*

ESRB staff reviewed the intrusive inspection records from September 24, 2023 to September 23, 2024 and identified that PG&E completed a total of 64 intrusive inspections of their wood poles past their GO 165 required completion date. The most past due inspections are shown in Table 5.

Table 5: Latest Intrusive Inspections in Kern Division

Equipment Number	Equipment Description	Most Recent Inspection Date	Previous Inspection Date	Days Past Due	PG&E's Response
104153918	Pole - Class: 5 : Wood : 25	6/15/2024	1/1/1999	1,992	We agree with the CPUC finding. The pole record did not exist in SAP until 2023, and therefore could not have been included on cycle 2(2005) or cycle 3 (2015) maintenance plans.
103352898	Pole - Class: 4 : Wood : 40	6/4/2024	1/1/1999	1,981	We agree with the CPUC finding. Visually inspected on 3/9/2011 under Equipment ID 100144460.
103230727	Pole - Class: 1 : Wood : 50	5/24/2024	1/1/1999	1,970	We agree with the CPUC finding. A 1999 intrusive inspection tag on pole; no PTT inspection records in SAP.
104170044	Pole - Class: 6 : Wood : 25	5/23/2024	1/1/1999	1,969	We agree with the CPUC finding. The pole record did not exist in SAP until 2023, and therefore, could not have been included on cycle 2 maintenance plan in 2005 nor cycle 3 maintenance plan in 2015.
103097712	Pole - Class: 3 : Wood : 45	5/15/2024	1/1/1999	1,961	We agree with the CPUC finding. Intrusively inspected on 2/08/2011 under Equipment ID 100121746.

103227468	Pole - Class: 1 : Wood : 45	12/16/2023	1/1/1999	1,810	We agree with the CPUC finding. Visually inspected on 8/10/2011 under Equipment ID 100201417.
103345578	Pole - Class: 4 : Wood : 40	12/1/2023	1/1/1999	1,795	We agree with the CPUC finding. Our records indicate the pole was incorrectly identified as not in the field on 10/6/2010 under SAP ID# 100151921. It appears in 2014 a map correction was processed creating new SAP ID# 103345578. Because of the 2010 error, we missed the next cycle for intrusive testing.
103370390	Pole - Class: 4 : Wood : 40	12/1/2023	1/1/1999	1,795	We agree with the CPUC finding. A 1999 intrusive inspection tag on pole; no PTT inspection records in SAP.
103370411	Pole - Class: 4 : Wood : 45	11/30/2023	1/1/1999	1,794	We agree with the CPUC finding. A 1999 intrusive inspection tag on pole; no PTT inspection records in SAP.

b. ESRB identified insufficient HFTD 3 distribution tower inspection records to demonstrate PG&E's compliance of GO 165 requirements. In HFTD Tier 3 areas, patrol inspections are required annually. ESRB staff reviewed inspection records of selected distribution towers and found:

[14] DRU14620_Q049(c)_KE Late Units (2019-2024) – Calculated individual units, not Plat Maps
[15] 11 OH inspections were conducted late in 2019, but these occurred prior to the audit look-back period.

i. No inspection was conducted in 2020 on distribution towers #103912810 [16] and 103912593.[17] These towers are in an HFTD Tier 3 area requiring annual inspections as required by GO 165, Section III-B Table 1. [18]

PG&E Response:
PG&E self-reported that the patrol inspection was missed for 2020, in our 2022 Q1 PNC Report.

ii. No inspection was conducted in 2023 on distribution towers #103912810 [19] and 103912593.[20] These towers are in an HFTD Tier 3 area requiring annual inspections as required by GO 165, Section III-B Table 1. [21]

PG&E Response:
The patrol inspection for 2023 was performed by the Transmission personnel. Please see table below referencing the inspection information for these assets.

Distribution SAP ID#	Transmission SAP ID	Inspection Date
103912593	43249615	April 18, 2023
103912810	43249486	April 14, 2023

iii. PG&E inspectors misidentified the distribution towers #103912810 and 103912593 as transmission assets and did not conduct the required distribution inspections for 2020 and 2023. Entries in the distribution tower inspection records in July 2020 and April 2023 state:

1. Prompt: "*Is this asset approved for an inspection?*"
   Response "*No*."
2. Comment "*Structure is in the field; Pole is a transmission-only pole. It is inspected by another program*." [22]

PG&E's TD-2305M-JA02, Job Aid , Pole/Structures, Distribution Towers / Steel Lattice states "*General Guidance: You are required to record a distribution inspection for structures carrying distribution voltage*."

PG&E Response:
The 2020 and 2023 Transmission detailed inspection covers all items done by a Distribution detailed inspection. Please refer to page 66 in previously submitted attachment, DRU14133_Q02(c)i_Atch17_TD-2305M-JA02 (Rev 13, 2024)_CONF.

iv. PG&E inspection log [23] incorrectly states that distribution towers #103912810 and 103912593 were inspected in 2020 and 2023 when these towers were not inspected in 2020 and 2023.

PG&E Response:
Our 2020 and 2023 inspections for the subject towers were visited and found to belong to another program. As stated above, we, self-reported that these assets were missed in 2020. Because our EDPM Manual Rev 1 (March 2024) states an inspection may be considered as a patrol, we do not agree this was out of compliance. Please see response ii above for the 2023 inspection records.

v. PG&E inspection log [24] incorrectly lists the Wildfire Tier for distribution

tower #103912810 as "Neither" [neither Tier 2 nor Tier 3]. The tower is in an HFTD Tier 3 area.[25] ESRB notes that the Wildfire Tier listed for #103912810 in 2021, 2022, and 2023 entries correctly lists Tier 3.

PG&E Response:
We agree with this finding. It is currently listed accurately in EDGIS and the InspectApp.

---

[16] Inspection record DRU14740_Q03_Atch10_2020 OHI 103912810_CONF dated June 20, 2020 incorrectly states that the facility is a transmission only pole and not approved for inspection.
[17] Inspection record DRU14740_Q03_Atch02_2021 OHI 103912593_CONF dated June 20, 2020 incorrectly states that the facility is a transmission only pole and not approved for inspection.
[18] ESRB reviewed PG&E transmission inspection records DRU14740_Kern Post-Audit Response to determine if other programs inspected these two towers. No transmission inspection was conducted in 2020 or 2023. Transmission inspections were conducted on July 2, 2021, March 22, 2022, and May 30, 2024.
[19] Inspection record DRU14740_Q03_Atch13_2023 OHI 103912810_CONF dated April 29, 2023 incorrectly states that the facility is a transmission only pole and not approved for inspection.
[20] Inspection record DRU14740_Q03_Atch05_2023 OHI 103912593_CONF dated April 29, 2023 incorrectly states that the facility is a transmission only pole and not approved for inspection.
[21] See ESRB review of transmission note above.
[22] See inspection records cited above.
[23] DRU14133_Q04(a)_Atch01_KE PI Data (2019-2024) 2020-2024 Asset Based tab. See entries for Equipment #103912810 and 103912593 in 2020 and 2023.
[24] Ibid, #103912810 on 7/20/2020.
[25] CPUC High Fire-Threat District (HFTD) Map

Distribution towers SAP #103912810 and 103912593 are part of the former Midway-Santa Maria transmission line. The line was converted from transmission to distribution assets prior to 2019. Inspection records of the two distribution towers indicate that no lattice towers along the converted Midway-Santa Maria were inspected as required by GO 165, Section III-B Table 1 in 2020 and 2023.

PG&E must implement procedures and conduct training to assure that all structures are inspected at the required intervals.

PG&E Response:

PG&E Electric Asset Management (EAM) is working to establish a consistent process to manage asset conversions from Transmission to Distribution. This is a highly complex issue, and the team is engaging key stakeholders from multiple functional areas. In addition, the team is working through the management of change process to develop guidance documents and training that meet the requirements of the process that is being established. Further, EAM is tracking this process development through the corrective action program.

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."*
>
> PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, March 25, 2024 Rev. 13, Miscellaneous Other Compelling Abnormal Conditions, Guy Broken/Slack/Corroded states, *"Pole must be straight with Guy no more than an arm's length (3ft) from taut, that does not have significant impact on the structural integrity of the pole."* See Figure 2.

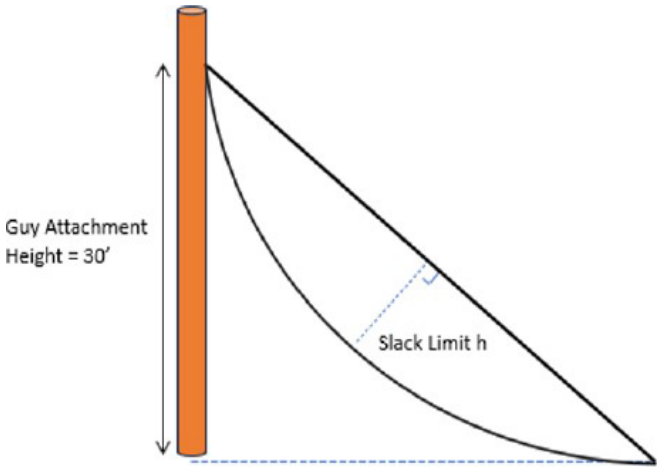

Figure 2: Guy slack limit, TD-2305M-JA02

> Per GO 95, Rule 56.2, guys are to be maintained taut. [26] PG&E's TD-2305M-JA02 allows a deviation from taut by as much as 3 feet without regard to length or angle of attachment. [27]
>
> PG&E's TD-2305M-JA02, Job Aid, Miscellaneous Other Compelling Abnormal Conditions, Guy Broken/Slack/Corroded does not comply with GO 95, Rule 56.2 requiring guys to be maintained taut in all circumstances.

PG&E Response:
Utility bulletin (TD-2305M-JA02-B005) has been published to address this issue.

[26] Taut: Stretched or pulled tight; not slack. Oxford English dictionary.
[27] ESRB revised PG&E's FDA Tag Evaluation, Guy Loose/Adjust ATS Report 006.4.3-23.9 Sept 2023, an analysis of guy slack limits to achieve a taut guy at a lean of 10 %. The analysis assumed 30-foot attachment points and various angles of down guys. The analysis did not evaluate stresses on poles without guying per Rule 56.2 nor the effects of slack guys on Safety Factors per Rule 44. The analysis included the statement: "Pole overload and pole lean are two different phenomena, and pole may be overloaded without guy support before overall lean reaches [PG&E's] allowable limit."

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities in PG&E's Kern Division, listed in Table 6:

Table 6: Kern Division Field Inspection Locations

Location	Structure Type	SAP ID Number	Latitude	Longitude
1	Wood Pole	103996879	35.31718333	-119.0117806
2	Wood Pole	100155547	35.31759167	-119.0116722
3	Wood Pole	103921340	35.31605833	-119.0117556
4	Underground Vault	107117614	35.31486111	-119.0115583
5	Underground Vault	107111402	35.31403056	-119.0115194
6	Wood Pole	100201379	35.40710833	-119.0253056
7	Wood Pole	100201374	35.41008056	-119.0255278
8	Wood Pole	100201363	35.40749722	-119.0255194
9	Wood Pole	100203955	35.40769167	-119.0255444
10	Wood Pole	103906100	35.41368056	-119.0356
11	Wood Pole	100143650	35.41366111	-119.0360417
12	Wood Pole	100241020	35.41393611	-119.036025
13	Wood Pole	100239926	35.41415833	-119.0360944
14	Wood Pole	100239925	35.41412778	-119.03575
15	Underground Vault	108325405	35.30214722	-119.0782778
16	Padmount	108244625	35.30215833	-119.079225
17	Padmount	108244628	35.30179722	-119.0677958
18	Pedestal	107064283	35.30258056	-119.0779333
19	Padmount	108244627	35.30301389	-119.0781028
20	Wood Pole	100151944	35.17950556	-119.0028611
21	Wood Pole	100151941	35.17952778	-119.0015917
22	Wood Pole	100230512	35.17946944	-119.0030222
23	Wood Pole	100238426	35.40293056	-119.1530444
24	Wood Pole	104211145	35.40283611	-119.1528944
25	Wood Pole	100122056	35.40251944	-119.1525028
26	Wood Pole	100122054	35.40201667	-119.1519
27	Wood Pole	108325466	35.40244722	-119.1529472
28	Padmount	107068232	35.43363056	-119.07055
29	Underground Vault	107127188	35.43385	-119.0708778
30	Underground Vault	107072026	35.43399167	-119.0709
31	Underground Vault	107072020	35.43380278	-119.070825
32	Underground Vault	107068902	35.43475833	-119.0714861
33	Padmount	107067968	35.43473056	-119.0714111
34	Wood Pole	100214111	35.52590833	-118.7429806
35	Wood Pole	100214114	35.60773889	-118.9497
36	Wood Pole	100214119	35.60898889	-118.9496694
37	Wood Pole	100214121	35.609675	-118.9497083
38	Wood Pole	100214140	35.61055833	-118.9496694

Location	Structure Type	SAP ID Number	Latitude	Longitude
39	Wood Pole	100214125	35.61146667	-118.9496694
40	Wood Pole	100214145	35.61140556	-118.9495556
41	Wood Pole	103235906	35.61323056	-118.9496694
42	Wood Pole	100182472	35.59020278	-119.3375472
43	Wood Pole	100182468	35.59059444	-119.3375639
44	Wood Pole	100182464	35.59086944	-119.3376833
45	Wood Pole	100182402	35.58981667	-119.3371417
46	Wood Pole	100139180	35.60416389	-119.3490917
47	Wood Pole	103126228	35.63789722	-119.3316028
48	Wood Pole	100180275	35.50886944	-119.2727972
49	Wood Pole	100180277	35.50927778	-119.2730417
50	Wood Pole	100160951	35.50944167	-119.2729556
51	Underground Vault	108250600	35.510625	-119.2726361
52	Underground Vault	107118426	35.51065	-119.2742694
53	Underground Vault	107129123	35.51066111	-119.2754667
54	Padmount	107063746	35.51071667	-119.2763528
55	Padmount	107157703	35.49932778	-119.2897194
56	Padmount	107146161	35.49944722	-119.2885806
57	Wood Pole	100203672	35.49948611	-119.2887583
58	Wood Pole	100203676	35.49965	-119.2892306
59	Wood Pole	100203678	35.49988056	-119.2901222
60	Wood Pole	100203679	35.49985	-119.2907944
61	Lattice Tower	103912810	35.11004167	-120.0948333
62	Lattice Tower	103912593	35.10995833	-120.0929861
63	Wood Pole	100193462	35.109975	-120.09285
64	Wood Pole	100193463	35.11126667	-120.0927111
65	Wood Pole	100167429	35.06164444	-120.0103611
66	Wood Pole	103253906	35.06053611	-120.0116889
67	Wood Pole	100220339	34.92818889	-119.652625
68	Wood Pole	100190895	34.927525	-119.6527417
69	Wood Pole	100190900	34.92738056	-119.6527778
70	Wood Pole	100190905	34.927375	-119.6515056
71	Wood Pole	103902539	34.92739167	-119.6539167
72	Wood Pole	100190909	34.93781667	-119.6325694
73	Wood Pole	100219955	34.92694167	-119.5412611
74	Wood Pole	100189623	34.92698333	-119.5418556
75	Wood Pole	100219920	34.92677778	-119.5393528
76	Wood Pole	100197968	35.39982222	-119.4615944
77	Wood Pole	104179845	35.39922222	-119.45275
78	Wood Pole	103834220	35.39928889	-119.4522389
79	Wood Pole	100196257	35.39926667	-119.4519361
80	Wood Pole	100196453	35.39924167	-119.4519806
81	Wood Pole	100209819	35.40086389	-119.4703222
82	Wood Pole	100209821	35.40067222	-119.4702611
83	Wood Pole	100209793	35.40086667	-119.4698417

Location	Structure Type	SAP ID Number	Latitude	Longitude
84	Wood Pole	100172404	35.48994444	-119.5444556
85	Wood Pole	103135176	35.49983333	-119.5432889

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. **GO 95, Rule 18 A (3), Resolution of Potential Violations of General Order 95 and Safety Hazards** states:

> *"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."*

ESRB's finding related to the above rule is listed in Table 7:

Table 7: GO 95, Rule 18 A (3) Finding

Loc	Finding	Notes	PG&E Response:
43	Non-conformance incorrectly assigned.	Work order EC 127214313 created for an exposed ground of PG&E equipment. The exposed ground was NOT associated with PG&E equipment but for communications equipment. PG&E created a third-party notification for this issue.	EC Notification is 119760195, not 127214313. Agree with Finding - Created TPN 129842200 to address this condition.

2. **GO 95, Rule 22.8 A (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."*

ESRB's finding related to the above rule is listed in Table 8:

Table 8: GO 95, Rule 22.8 A (1) Finding

Loc	Finding	Notes	PG&E Response:
81	Exposed ground	Existing work order EC 127214313, for pole replacement. Work order priority increased to X priority.	Agree with Finding

3. **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."*

ESRB's findings related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 31.1 Findings

Loc	Finding	Notes	PG&E Response:
6	Excessive pole lean.		Disagree with Finding – pole lean is within 10% allowable lean.
7	Missing animal guard.	Work order EC #129833013 created during audit to correct issue.	Agree with Finding – EC Tag 129833013 created for condition found.
14	Service drop detached from the weatherhead.	Work order EC #129833791 created during audit to correct issue.	Agree with Finding – EC Tag 129833791 created for condition found.
26	Missing animal guard.	Work order EC #129836518 created during audit to correct issue.	Agree with Finding – EC Tag 129836518 created for condition found.
34	Four splices in span, roadside phase		Disagree with Finding – conductor was installed in 1989 therefore it is grandfathered per GO 95 and not a GO 165 violation.
46	Misidentified pole. Incorrect bar code and SAP number on pole and map.		Agree with Finding- RW Notification 130905410 for Map Correction.
47	Misidentified pole. Incorrect bar code and SAP number on pole and map.		Agree with Finding- RW Notification 130905410 for Map Correction.
49	Missing XFMR animal guard		Agree with Finding – will be addressed under existing EC Tag 124048531 for pole replacement.
70	Excessive pole lean.		Agree with Finding – EC Tag 129849228 created for condition found.
75	Bent pole, overloaded.		Agree with the Finding – EC Tag 129852690 created for condition found.

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

> *"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)."*

ESRB's finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 35 Finding

Loc	Finding	Notes	PG&E Response:
14	Strain on service drop.	Work order EC #129833791 created during audit to correct issue.	Agree with Finding – EC Tag 129833791 created for condition found.

5. **GO 95, Rule 38, Minimum Clearance of Wires from Other Wires** states in part:

> *"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. "*
>
> *Table 2, Case 19 C: The radial separation between guys and conductors supported on the same poles for communication conductors (Including Open Wire, Cables and Service Drops) must be at least 3 inches."*

ESRB's findings related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 38 Findings

Loc	Finding	Notes	PG&E Response:
11	Insufficient clearance between down guy and communication line.		Disagree with Finding - TPN 129833495 created for condition found.
42	Insufficient clearance between down guy and communication line.		Disagree with Finding - TPN 129842200 created for condition found.

6. **GO 95, Rule 56.7-B Anchor Guys** states:

> *"In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule"*

ESRB's finding related to the above rule is listed in Table 12:

Table 12: GO 95, Rule 56.7-B Finding

Loc	Finding	Notes	PG&E Response:
22	Vegetation spanning down guy insulator.	Repaired in field.	Agree with Finding – condition fixed in field.

7. **GO 95, Rule 54.8 C (4) Clearances between Supply Service Drops and Other Conductors** states:

> *"The radial clearance between supply service drop conductors and communication service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches."*

ESRB's finding related to the above rule is listed in Table 13:

Table 13: GO 95, Rule 54.8 C (4) Finding

Loc	Finding	Notes	PG&E Response:
14	Insufficient service drop clearance to communication service drops.	Work order EC #129833791 created during audit to correct issue.	Agree with Finding – EC Tag 129833791 created for condition found.

8. **GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires** states:

> *"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."*

ESRB's finding related to the above rule is listed in Table 14:

Table 14: GO 95, Rule 56.2 Finding

Loc	Finding	Notes	PG&E Response:
82	Slack span guy, 4 ft deflection.	Over road.	Agree with Finding – EC Tag 129853085 created for issue found.

9. **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 finding related to the above rule is listed in Table 15:

Table 15: GO 95, Rule 56.9 Finding

Loc	Finding	Notes	PG&E Response:
65	Missing down guy marker.	Repaired in field.	Agree with Finding – condition fixed in field.

10. **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. 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 related to the above rule are listed in Table 16:

Table 16: GO 95, 51.6 A Findings

Loc	Finding	Notes	PG&E Response:
24	Missing High Voltage Sign.	Repaired in field.	Agree with Finding – condition fixed in field.
44	Damaged High Voltage Sign.	Work order EC #129842280 created during audit to correct issue.	Agree with Finding – EC Tag 129842280 created for condition found.
84	Damaged High Voltage Sign.		Agree with Finding – added FDA to existing EC Tag 121974645.
85	Missing High Voltage Sign.		Agree with Finding – EC Tag 129853352 created for condition found.

11. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states in part:

> *"Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity."*

ESRB's finding related to the above rule is listed in Table 17:

Table 17: GO 128, Rule 17.8 Finding

Loc	Finding	Notes	PG&E Response:
4	Faded, unreadable mark of ownership.	Repaired in field.	Agree with Finding – condition fixed in field.

12. GO 95, Rule 18-B (1), Maintenance Programs 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:*
>
> *(iv) 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.*
>
> *(v) 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.

(vi) 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."

During the field audit, ESRB observed the following existing non-conformances with past due corrective actions. ESRB findings related to the above rules are listed in Table 18:

Table 18: Observed Field Findings with Past Due Work Orders

Loc	Non-conformance	GO / Rule	Existing EC	HFTD Tier	Due Date
1	Missing HV sign	95/51.6 A	124809346	Non-HFTD	10/2023
3	Loose animal guard, primary	95/31.1	124809296	Non-HFTD	10/2023
13	Decayed pole	95/49.1 A (1)	118473819	Non-HFTD	4/2024
35	Replace pole, decayed	95/49.1 A (1)	123883223	Tier 2	5/2020 FSR: 8/2024
36	Replace pole, decayed	95/49.1 A (1)	117170564	Tier 2	5/2020 FSR: 8/2024
37	Replace pole, decayed	95/49.1 A (1)	117170565	Tier 2	6/2023 FSR: 8/2024
38	Replace cross arm	95/49.2 C (44)	123881537	Tier 2	6/2023 FSR: 8/2024
49	Replace pole	95/49.1 A (1)	124048531	Non-HFTD	7/2023
61	Broken tower/replace	95/48.2 (44)	121370374	Tier 3	5/2022
76	Broken crossarm	95/49.2 C (44)	127196631	Non-HFTD	10/2024
76	Animal guard broken, replace	95/31.1	127196631	Non-HFTD	10/2024
79	Incorrect connector	95/31.1	127197762	Non-HFTD	10/2024
80	Broken crossarm	95/49.2 C (44)	127197488	Non-HFTD	10/2024
80	High sign missing	95/51.6 A	127197488	Non-HFTD	10/2024
81	Decayed cross arm	95/49.2 C (44)	127214313	Non-HFTD	10/2024

Loc	Non-conformance	GO / Rule	Existing EC	HFTD Tier	Due Date
81	Decayed pole	95/49.1 A (1)	127214313	Non-HFTD	10/2024
83	Decayed pole	95/49.1 A (1)	127213903	Non-HFTD	10/2024
83	Decayed cross arm	95/49.2 C (44)	127213903	Non-HFTD	10/2024
83	Loose hardware	95/49.2 C	127213903	Non-HFTD	10/2024

PG&E response:

In response to Table 18, please reference the **Corrective Action Plan for Tag Completion and Going Forward Compliance** response provided in Section II – Records Violations.

Note: These findings are already included in the records review section of this report.

V. Observations

1. Existing Non-Conformances.

ESRB observed the following non-conformances during the field portion of the audit. PG&E has previously noted these non-conformances and has pending, on-time work orders to correct the non-conformances. ESRB observed non-conformances with pending work orders are listed in Table 19.

Table 19: Observed Field Findings with On-Time Pending Work Orders

Loc	Non-conformance	GO / Rule	Existing EC	HFTD Tier
1	Loose animal guard primary	95/31.1	124809346	Non-HFTD
12	Down guy marker	95/56.9	128719806	Non-HFTD
20	Buried anchor	95/31.1	126827850	Non-HFTD
26	Idle facility, remove	95/31.6	111477435	Non-HFTD
34	High voltage sign missing	95/51.6 A	123886309	Tier 2
34	HW Framing	95/49.2 C	123886309 Due 6/23 FSR 8/24	Tier 2
39	High voltage sign missing	95/51.6 A	123881535	Tier 2
39	Cross arm decay	95/49.2 C (44)	123881535	Tier 2
63	High voltage sign missing	51.6 A	118996037	Tier 3
65	Splice under tie wire	95/31.1	128751227	Tier 2
66	Bird caged conductor	95/31.1	128751102	Tier 2
67	High voltage sign missing	95/51.6 A	129076270	Non-HFTD
67	Missing visibility strips	95/31.1	129076270	Non-HFTD
69	High voltage sign missing	95/51.6 A	129070989	Non-HFTD
69	Incorrect connector (secondary on primary)	95/31.1	129070989	Non-HFTD
71	High voltage sign missing	95/51.6 A	129076445	Non-HFTD
79	X Arm broken	95/49.2 C (44)	127197762	Non-HFTD
84	Buried anchor	95/31.1	121974645	Non-HFTD

2. 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."

During the field inspection, ESRB observed the following third-party safety concerns listed in Table 20:

Table 20: Third-Party Audit Observations

Location	Finding	Notes	PG&E's Response
1	Unsecure communications equipment box.		Created TPN 130862887 to address this condition.
6	Unattached vertical communications line Broken/loose lashing from communication lines.		Created TPN 129832975 to address this condition.
8	Unattached vertical communications line. Broken communications ground.		Created TPN 129833132 to address this condition.
10	Communication lines secured with ropes rather than proper messenger material.		Created TPN 129837465 to address this condition.
11	Broken communication ground.	PG&E created a third-party notification for this issue during the audit (TPN 129833495).	Created TPN 129833495 to address this condition and communication line insufficient clearance with down guy.
13	Broken/loose lashing from communication lines.	PG&E created a third-party notification for this issue during the audit (TPN 129833690).	Created TPN 129833690 to address this condition.
42	Strain on communications service drop.	PG&E created a third-party notification for this issue during the audit (TPN 129422200).	Correct TPN is 129842184. Created TPN 129842184 to address this condition and communication line insufficient clearance with down guy.

43	Exposed communication ground.	PG&E created a third-party notification for this issue during the audit (TPN 129842184).	Correct TPN is 129842200. Created TPN 129842200 to address this condition.
44	Exposed communication ground.	PG&E created a third-party notification for this issue during the audit (TPN 129842323).	Created TPN 129842323 to address this condition.
44	Customer wire on supply service drop.	PG&E created a third-party notification for this issue during the audit (TPN 129842204).	Created TPN 129842204 to address this condition.
50	Loose communication ground.	PG&E created a third-party notification for this issue during the audit (TPN 129072642).	Created TPN 129072642 to address this condition.
58	Exposed communication ground.	PG&E created a third-party notification for this issue during the audit (TPN 129844584).	Created TPN 129844584 to address this condition.
60	Broken communication riser cover.	PG&E created a third-party notification for this issue during the audit (TPN 129844645	Created TPN 129844645 to address this condition.
77	Lashing loose from communication lines.	PG&E created a third-party notification for this issue during the audit (TPN 129852772).	Created TPN 129852772 to address this condition.
82	Communication guy marker missing, Exposed communication ground, Low communication line over road (~15 ft.)		Created TPN 130826598 to address this condition.
85	Loose vertical communication line.		Created TPN 129853289 to address this condition.