

CPUC SUBSTATION AUDIT FINDINGS

PG&E Pismo Beach Headquarters

October 14 – 18, 2024

I. Records Review

During the substation audit, Electric Safety and Reliability Branch (ESRB) reviewed the following standards, procedures, and records for PG&E's Pismo Beach Headquarters (HQ):

- List of all PG&E substations in the Pismo Beach HQ
- Map showing all PG&E substations in the Pismo Beach HQ
- PG&E Substation Maintenance and Construction (SM&C) Manual, Utility Standard: TD-3322M, Revision 11, with attachments 1 through 12
- PG&E Utility Standard: TD-3328P, Revision 0, with attachments 2 through 4
- PG&E Mobile Substation Equipment – Maintenance and Operating Procedures, Utility Standard: TD-3468P-01, Revision 2, with attachments 1 through 3
- PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S, Revision 10, with attachments 1 through 13
- PG&E Substation Asset Performance Management (APM) Process, Utility Procedure: TD-3320P-36, Revision 0
- PG&E Substation SAP Work Management System (WMS) Process, Utility Procedure: TD-3320P-12, Revision 7, with attachments 2, 4 through 6, 12, and 14
- PG&E Substation Fire Protection Systems and Equipment – Inspection, Test and Maintenance: TD-3320P-07, Revision 3
- PG&E Substation General Work Procedures, Utility Standard: TD-3320S, Revision 2
- Explanation of PG&E inspector training policies
- List of all substation inspections conducted in the last five years for the Pismo Beach HQ
- List of all open/pending, completed, cancelled, and late work orders and maintenance items in the previous five years (January 2019- August 2024)
- Equipment lists for ESRB-selected substations
- Single-line diagrams of ESRB-selected substations
- Last two visual inspection checklists for ESRB-selected substations
- List of transformer banks that operated beyond nameplate capacity for the last five years (January 2019- August 2024) for ESRB-selected substations.
- Infrared Testing records for ESRB-selected substations in the last two years
- Most recent oil sample test results for ESRB-selected substations
- Most recent electric test results for ESRB-selected substations
- Training records for all substation and maintenance personnel in the past five years (January 2019- August 2024)
- Other relevant substation inspections for the past five years (January 2019- August 2024) for ESRB-selected substations
- Internal audit findings for Pismo Beach HQ for the past five years (January 2019- August 2024)

II. Records Violations

ESRB observed the following violations during the records review portion of the audit:

General Order (GO) 174, Rule 12, General states in part:

“Design, construction and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

GO 174, Rule 33, Records states:

“33.1 Electronic or hard copy records of completed inspections shall include, at a minimum:

- *Inspector name or identification*
- *Inspection date*
- *Brief description of identified discrepancies*
- *Condition rating (where applicable)*
- *Scheduled date of corrective action (where applicable)*

33.2 Electronic or hard copy records of completed Inspections shall be retained for not less than five (5) years.”

1. PG&E’s Substation Maintenance and Construction Manual, “Infrared Inspections”, Utility Standard: TD-3322M-09¹ details PG&E’s maintenance procedures for Infrared Inspections as follows:

“The repair priority codes shown in Table 1 determine the actions required for re-inspection or equipment repair.”

Table 1: PG&E’s Infrared Inspection Repair Priorities

Temperature Rise (ΔT)						
SAP Repair Priority Codes	Action	Direct View Targets Percent of Rated Load			Indirect View Targets	Main Tank compared to LTC
		0-40%	41- 81%	81-100%		
A	Immediate repair	> 100°C		> 125°C	> 10°C	> -5°C
A	Repair 30 days	80°-100°C		100°-125°C	NA	
B	Repair 90 days	86°-79°C	NA	80°-99°C	5°-9°C	-4° to -5°C
B	Re-inspect 90 days	15°-59°C	15°-79°C		2°-4°C	-2° to -3°C
NA	No action	< 15°C			< 2°C	≤ -1°C

¹ PG&E Utility Standard TD3322M-09, Published on April 6, 2023, Revision 11

- a. Based on the Infrared Inspection procedure, PG&E requires any anomalies to be assigned a repair priority code of either Priority A, for immediate repair or repair in 30 days, or Priority B, for repair or reinspection in 90 days. However, ESRB identified four hot-spot related notifications in the Pismo Beach HQ that were assigned Priority E, shown in Table 2.

Table 2: Infrared Inspection Priority E Hot-Spot Notifications

Substation	Notification Number	Priority	Notification Date	Completion Date	Out-of-Compliance Date
San Luis Obispo Sub	120826898	E	4/15/2021	4/16/2021	1/1/2023
Santa Maria Sub	125967896	E	4/20/2023	7/14/2023	1/1/2025
Santa Maria Sub	125969866	E	4/21/2023	4/21/2023	1/1/2025
Santa Maria Sub	126489553	E	6/30/2023	Open	1/1/2025

PG&E Response:

We agree that three of the notifications listed below were created with the incorrect priority code and we have corrected the notifications (120826898, 125967896, and 125969866) within our system of record, SAP. However, all three notifications were completed within the allowed timeframe for B-priority LC notifications per TD-3322S, so should not be considered a violation of G.O. 174, Rule 12.

In addition, LC 126489553 is for the replacement of Air Switch 195 and has been downgraded to a priority F notification to accommodate engineering and material procurement. We have corrected the description in SAP to eliminate any future confusion. Please see below for the updated dates provided in Table1PGE.

Table1PGE

Substation	Notification No	Priority	Completion Date	OOC Date	Status
San Luis Obispo Sub	120826898	B	4/16/2021	9/1/2021	Closed
Santa Maria Sub	125967896	B	7/14/2023	12/1/2023	Closed
Santa Maria Sub	125969866	B	4/21/2023	9/1/2023	Closed
Santa Maria Sub	126489553	F		1/1/2026	Open

2. PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S, establishes PG&E's required end dates and out-of-compliance dates as follows:

Table 3: Due Dates Per Priority Code Prior to April 2022²

Priority Code	Required End Date	Out-of-Compliance Date
A	Within 30 days	Close notifications (after removing the hazard [make safe] with either permanent or temporary repairs) within 30 days. Create a new lower priority notification immediately for any remaining work that will exceed 30 days.
B	Within 90 days	The out-of-compliance date is the 1 st day of the 2 nd month following the month in which the required end date occurs.
E	Within 365 days	The out-of-compliance date is the 1 st day of the year following the year in which the required end date occurs.

Table 4: Due Dates Per Priority Code After April 2022³

Priority Code	Required End Date	Out-of-Compliance Date
A	Within 30 days	Close notifications after removing the hazard [make safe] with either permanent or temporary repairs within 30 days. Create a new lower priority notification immediately for any remaining work that will exceed 30 days.
B	Within 90 days	The out-of-compliance date is the 1 st day of the 2 nd month following the month in which the repair date occurs.
E	Within 365 days	The out-of-compliance date is the 1 st day of the 2 nd month following the month in which the repair date occurs.
F	Greater than 365 days	There is no out-of-compliance date. This work will be completed when it is operationally efficient to perform the work.

Based on Table 3 and Table 4 above, ESRB noted that out of 5,434 Preventative and Corrective Line Corrective (LC) notifications created between January 2019 through August 2024, PG&E completed 71 (1.3%) notifications after their out-of-compliance dates. Therefore, PG&E did not perform maintenance in accordance with accepted good practices described in Utility Standard TD-3322S. See Tables 5 and 6 below for the past-due LC notifications:

² PG&E Utility Standard TD-3322S, October 2, 2020, Revision 7

³ PG&E Utility Standard TD-3322S, August 3, 2023, Revision 9

Table 5: Overdue Preventative LC Notifications

Notification Number	Priority	Completion Date	Out-of-Compliance Date	Days Late
122187950	E	8/9/2022	1/1/2022	220
119797857	E	3/31/2022	1/1/2022	89
120774267	E	3/10/2022	1/1/2022	68
119797853	E	3/4/2022	1/1/2022	62
119797854	E	3/4/2022	1/1/2022	62
119797855	E	3/4/2022	1/1/2022	62
119797851	E	3/3/2022	1/1/2022	61
119797852	E	3/3/2022	1/1/2022	61
119797856	E	3/3/2022	1/1/2022	61
119797838	E	3/2/2022	1/1/2022	60
119797839	E	3/2/2022	1/1/2022	60
119797850	E	3/2/2022	1/1/2022	60
119798642	E	2/13/2022	1/1/2022	43
119798642	E	2/13/2022	1/1/2022	43
124344289	E	1/25/2023	1/1/2023	24
124344289	E	1/25/2023	1/1/2023	24
124344507	E	1/25/2023	1/1/2023	24
124344507	E	1/25/2023	1/1/2023	24
124344508	E	1/25/2023	1/1/2023	24
124344508	E	1/25/2023	1/1/2023	24
121747516	E	11/4/2021	11/1/2021	3

PG&E Response:

We agree with one of the above 21 preventative maintenance (PR) notification record violations cited in table “Table 5: Overdue Preventative LC Notifications”. Please see the breakdown of these notifications in Table 2PGE below.

Table 2PGE

Priority Code	CPUC “Overdue Preventative LC Notifications”	PG&E Agrees overdue	PG&E Disagree completed on-time
E	21	1	20
Total	21	1	20

- PR notification 121747516 was completed three days past the out of compliance due date.

We disagree with the remaining 20 PR notifications cited in table “Table 5: Overdue Preventative LC

Notifications”. These notifications had deferral requests to the California Independent System Operator (CAISO). Per TD-3322S-Att03, preventative maintenance on equipment and systems covered by TD-3322S are eligible for deferral for any of the following scenarios:

- The equipment is scheduled to be replaced within 1 year, is already funded, and has an order assigned to the job.
- An operational constraint would or does exist (e.g., emergency equipment failure or clearance limitations).
- A deferral is requested by a customer (e.g., Diablo Canyon Power Plant [DCPP] or an end-use customer) where outage schedules are coordinated with the customer.

Table 6: Overdue Corrective LC Notifications

Notification Number	Priority	Notification Date	Completion Date	Out-of-Compliance Date	Days Late
115714396	E	1/22/2019	4/1/2022	1/1/2021	455
117224616	E	4/24/2019	12/27/2021	1/1/2021	360
119728478	E	7/7/2020	12/27/2022	1/1/2022	360
119803616	E	7/8/2020	12/22/2022	1/1/2022	355
119781938	E	7/11/2020	12/22/2022	1/1/2022	355
117567228	E	5/1/2019	12/1/2021	1/1/2021	334
120754379	E	4/5/2021	11/22/2023	1/1/2023	325
117267892	B	4/28/2019	6/25/2020	9/1/2019	298
119661221	E	8/22/2020	9/19/2022	1/1/2022	261
120073941	E	9/16/2020	9/19/2022	1/1/2022	261
119979299	E	11/3/2020	9/19/2022	1/1/2022	261
119997634	E	9/9/2020	9/12/2022	1/1/2022	254
119769631	E	9/14/2020	9/12/2022	1/1/2022	254
121962162	E	8/26/2021	9/8/2023	1/1/2023	250
122018178	E	9/9/2021	8/29/2023	1/1/2023	240
121802458	E	7/27/2021	7/27/2023	1/1/2023	207
121642488	E	6/30/2021	6/21/2023	1/1/2023	171
121419858	E	5/25/2021	6/12/2023	1/1/2023	162
121427011	E	5/25/2021	6/7/2023	1/1/2023	157
114769845	E	7/10/2018	4/27/2021	1/1/2021	116
123933859	E	6/27/2022	4/2/2024	1/1/2024	92
120732596	E	3/29/2021	3/28/2023	1/1/2023	86
120732597	E	3/29/2021	3/28/2023	1/1/2023	86
120031751	E	11/13/2020	3/24/2022	1/1/2022	82
120813711	E	4/14/2021	3/23/2023	1/1/2023	81
117388740	B	5/12/2019	12/6/2019	10/1/2019	66
117393740	B	5/12/2019	12/6/2019	10/1/2019	66

117394115	B	5/12/2019	12/6/2019	10/1/2019	66
117392873	B	5/12/2019	12/6/2019	10/1/2019	66
121492813	E	6/8/2021	3/3/2023	1/1/2023	61
124351043	E	8/23/2022	3/1/2024	1/1/2024	60
124774828	B	10/25/2022	4/25/2023	3/1/2023	55
119689815	E	8/28/2020	2/24/2022	1/1/2022	54
119692549	E	8/29/2020	2/24/2022	1/1/2022	54
119692650	E	8/29/2020	2/24/2022	1/1/2022	54

121642620	E	6/30/2021	2/23/2023	1/1/2023	53
127318521	B	10/21/2023	4/23/2024	3/1/2024	53
121445973	E	5/27/2021	2/15/2023	1/1/2023	45
120759031	E	4/6/2021	2/14/2023	1/1/2023	44
121445735	E	5/27/2021	2/14/2023	1/1/2023	44
118713988	E	3/17/2020	2/9/2022	1/1/2022	39
119926627	E	10/20/2020	2/9/2022	1/1/2022	39
123607394	B	5/7/2022	11/2/2022	10/1/2022	32
125268388	E	9/5/2022	1/19/2023	1/1/2023	18
124947476	E	11/29/2022	1/4/2024	1/1/2024	3
124947906	E	11/29/2022	1/4/2024	1/1/2024	3
124947907	E	11/29/2022	1/4/2024	1/1/2024	3
125170537	E	12/20/2022	1/4/2024	1/1/2024	3
125170538	E	12/20/2022	1/4/2024	1/1/2024	3
125170570	E	12/20/2022	1/4/2024	1/1/2024	3

PG&E Response:

We agree with 49 of the above 50 record violations cited in table “Table 6: Overdue LC Notifications”. Please see the breakdown of these notifications in Table 3PGE below.

Table 3PGE

Priority Code	CPUC “Overdue LC Notifications”	PG&E Agrees overdue	PG&E Disagree completed on-time
B	8	8	-
E	42	41	1
Total	50	49	1

We disagree with 1 of the record violations cited in table “Table 6: Overdue LC Notifications”.

- We disagree that LC 125268388 is past-due as this was completed prior to the out of compliance due date of January 1, 2024. The out of compliance date was incorrectly noted as 2023 instead of 2024 on the pre-audit data request, question 13, and we apologize for this oversight. This LC notification was completed on January 19, 2023, before the out of compliance date; therefore, this notification is not considered past-due

III. Field Inspection

During the field inspection, ESRB inspected the following 18 substations:

Substation	City
Oceano Substation	Oceano
Templeton Substation	Templeton
Atascadero Substation	Atascadero
Morro Bay Distribution Substation	Morro Bay
Perry Substation	Cambria
Cayucos Substation	Cayucos
Santa Ynez Substation	Ballard
Buellton Substation	Buellton
Zaca Substation	Buellton
Cabrillo Substation	Lompoc
Purissima Substation	Lompoc
Palmer Substation	Sisquoc
Sisquoc Substation	Orcutt
Santa Maria Substation	Santa Maria
San Luis Obispo Substation	San Luis Obispo
Gold Tree Substation	San Luis Obispo
CMC Substation	San Luis Obispo
Foothill Substation	San Luis Obispo

IV. Field Inspection – Violations List

ESRB noted the following violations of GO 174, Rule 12 during the field inspection:

GO 174, Rule 12, General states in part:

“...Substations shall be designed, constructed and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service.

Design, construction, and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

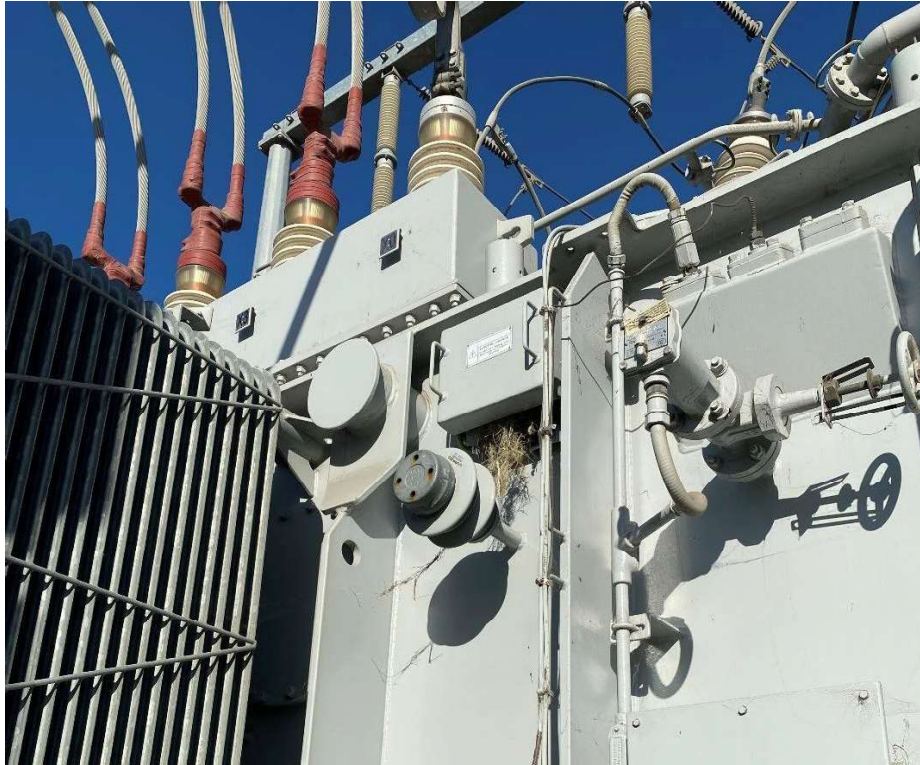
PG&E Response:

We appreciate the insight and feedback from the ESRB, as well as the support in helping us achieve our stand that everyone and everything is always safe. We agree with nine of the ESRB’s findings of violation and are committed to remedying these issues and striving to reduce and eliminate such findings in the future.

We do not believe some of the field observations qualify as violations of GO 174, Rule 12. Our Substation Inspection Program focuses on monthly and bi-monthly station inspections, along with our Enhanced Inspections (EI), Quality Verification (QV) audits, and Annual Infrared (IR) Inspections. These different levels of visual and technical assessments are conducted to indicate abnormal conditions before the equipment fails and to prevent unsafe events. 24 of the ESRB’s observations made during the field portion of the audit were previously identified and properly recorded in our system of record (SAP) as abnormal conditions during planned inspections. Each of these notifications were identified timely by our qualified electrical workers (QEWs) and scheduled for the appropriate corrective action in accordance with our maintenance standard/procedures and GO 174 requirements. Therefore, we do not believe that these 24 notifications qualify as GO 174, Rule 12 violations.

1. Oceano Substation

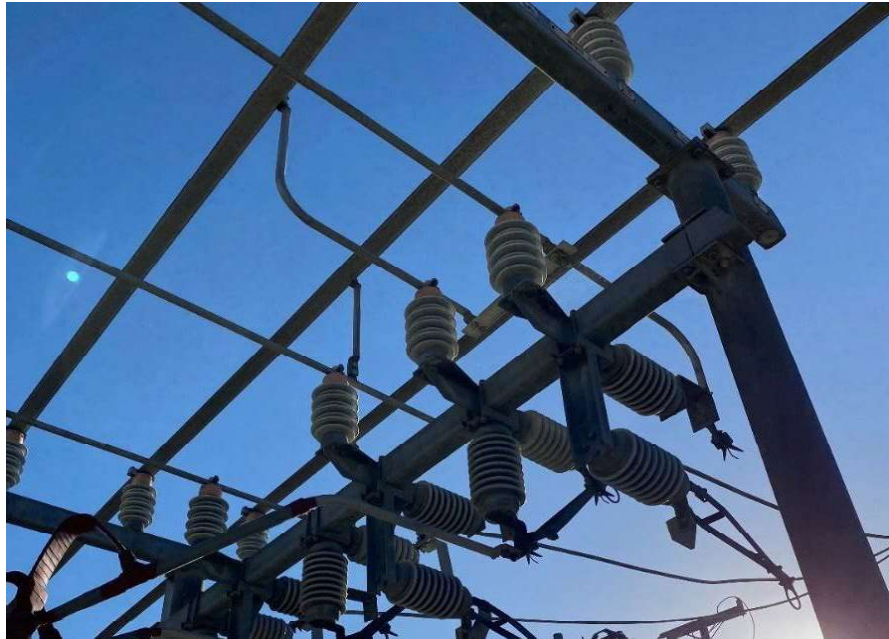
- 1.1. There are bird nests on Transformer Bank 2. PG&E has existing Notification #126370460 for this issue.



PG&E Response:

We agree a bird's nest was present on Transformer Bank 2 at Oceano Sub. This nonconformance has a pre-existing notification 126370460 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

- 1.2. The insulators throughout the substation are dirty. PG&E has existing Notification #126730044 for this issue.



PG&E Response:

We agree dirty insulators were present at Oceano Sub. This nonconformance has a pre-existing notification 126730044 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification was being worked in accordance with our maintenance procedures and was not past due. However, due to the quantity of recent rain (greater than 1 inch in 24 hours), these insulators have been cleaned and no longer require to be washed.

2. Templeton Substation

- 2.1. The display screen on the temperature monitor is damaged. PG&E has existing Notification #124514393 for this issue.



PG&E Response:

We agree the display screen on the temperature monitor is damaged at Templeton Sub. This nonconformance has a pre-existing notification 124514393 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

- 2.2. The insulator bushings for Circuit Breaker (CB) 22 have moss growing on them. PG&E has existing Notification # 128726581 for this issue.



PG&E Response:

We agree the insulator bushings for CB 22 have moss growing on them at Templeton Sub. This nonconformance has a pre-existing notification 128726581 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

- 2.3. The counter on CB 2111/2 is faded. PG&E has existing Notification #129655496 for this issue.



PG&E Response:

We agree the counter on CB 2111/2 is faded at Templeton Sub. This nonconformance has a pre-existing notification 129655496 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

- 2.4. The counter on CB 2113/2 is faded. PG&E has existing Notification #126878033 for this issue.



PG&E Response:

We agree the counter on CB 2113/2 is faded at Templeton Sub. This nonconformance has a pre-existing notification 126878033 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification was being worked in accordance with our maintenance procedures and was not past due. However, this work was completed on October 16, 2024.

3. Atascadero Substation

- 3.1. There is a sizeable gap between the lowest barbed wire and the top of the fence along the substation's southwest perimeter. PG&E must evaluate the security of this identified area to ensure it complies with PG&E's Perimeter Barrier and Fencing Standard.

PGE Response:

As previously stated in the supplemental request, fencing standards are updated over time due to shifts in safety concerns, technological advancements and environmental considerations. As conditions evolve, the company Civil Design Standard (CDS) published drawings are updated to reflect as such.

For each electric substation location, fences are built to reflect the CDS published at that time. These fences are visually inspected during routine station inspections and are updated as needed or if warranted due to safety concerns. This fence was built to the civil design standard published at the time of installation. We will continue to visually inspect the fencing during routine inspections.



- 3.2. One of the bushings on Transformer 1 is damaged. PG&E has existing Notification #128243310 for this issue.



PG&E Response:

We agree one bushing on Transformer 1 is damaged at Atascadero Sub. This nonconformance has a pre-existing notification 128243310 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification was being worked in accordance with our maintenance procedures and was not past due. However, this work was completed on December 3, 2024.

3.3 There are bird nests underneath the current transformers on CB 12 (left) and CB 32 (right). PG&E has existing Notification #129670237 for these issues.



PG&E Response:

We agree a bird's nest was present on CB 12 and CB 32 at Atascadero Sub. This nonconformance has a pre-existing notification 129670237 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

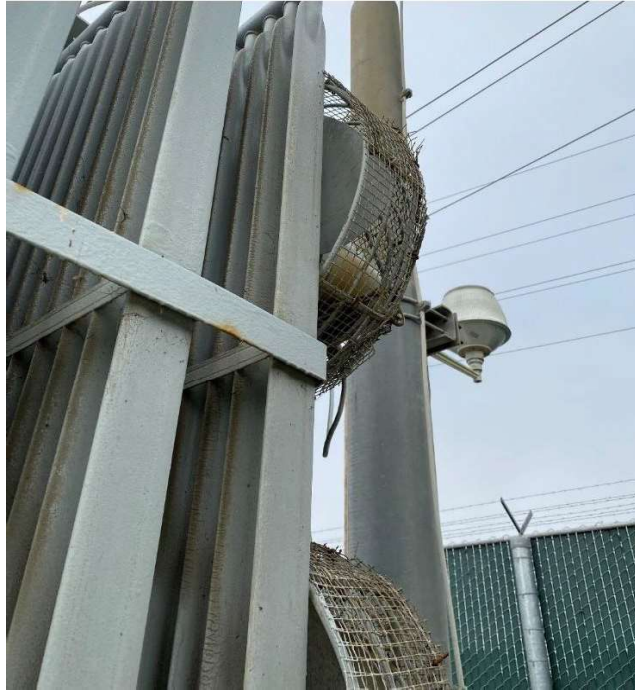
4. Morro Bay Distribution Substation

4.1. The transformer oil filter is approaching its replacement threshold of 30 psi. PG&E has existing Notification #128436108 to replace the oil filter.



PG&E Response:

We agree a transformer oil filter was reaching its replacement threshold at Morro Bay Distribution Sub. This nonconformance has a pre-existing notification 128436108 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.



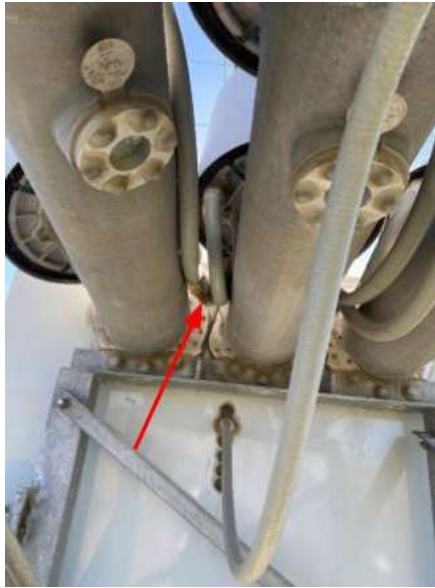
- 4.2. The top cooling fan on Transformer 21 could not start automatically and required manual assistance to start rotating. Additionally, there are large gaps in the fan blade covers that can expose workers to hazards. PG&E immediately created the Notification #129692075 to address the issue.

PG&E Response:

We agree with the finding of a top cooling fan on Transformer 21 not starting automatically at Morro Bay Substation. We created notification 129692075, which will be completed based on current work prioritization and material availability.

5. Cayucos Substation

- 5.1. There are bird nests underneath CB 32 (left) and CB 42 (right). PG&E immediately created the Notifications #129692079 and #129692078 to address these issues.



PG&E Response:

We agree with the findings of the Bird's nest on CB 32 and CB 42 at Cayucos Substation. We created notifications 129692079 and 129692078; these will be completed based on current work prioritization.

- 5.2. The counter on CB 1102/2 is faded. PG&E has existing Notification #124782774 for this issue.



PG&E Response:

We agree a faded counter at CB 1102/2 was present at Cayucos Sub. This nonconformance has a pre-existing notification 124782774 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

- 5.3. The weather stripping around the cabinet door on CB 1102/2 is damaged and needs to be replaced. PG&E immediately created the Notification #129692076 to address the issue.



PG&E Response:

We agree with the finding of the ripped weather stripping at 1102/2 at Cayucos Substation. We created notification 129692076, which will be completed based on current work prioritization and material availability.

6. Santa Ynez Substation

- 6.1. There is a gap in the animal abatement on CB 1101/2 that exposes the bus conductor.



PG&E Response:

We agree with the finding of the exposed bus conductor due to a gap in the animal abatement on 1102/2 at Cayucos Substation. We created notification 130717744, which will be completed based on current work prioritization and material availability.

7. Buellton Substation

- 7.1. The Load Tap Changer (LTC) Oil Filter Pump has been out of service since October 27, 2022, due to a leak. PG&E has existing Priority F Notification #124791416 for this issue. Although this Notification is not out-of-compliance yet, PG&E must repair the leak when practicable to ensure the oil in the LTC is being filtered and maintained properly.



PG&E Response:

We agree the LTC Oil Filter Pump was out of service due to a leak was present at Buellton Sub. This nonconformance has a pre-existing notification 124791416 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

8. Zaca Substation

- 8.1. The light for the “12 KV PCB 1102 TRIPPED” indicator on the station annunciator panel is burned out. PG&E has existing Notification # 129659693 for this issue.



PG&E Response:

We agree a burned-out light was present on the station annunciator panel at Zaca Sub. This nonconformance has a pre-existing notification 129659693 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

- 8.2. The LTC oil filter is at its replacement threshold of 30 psi and needs to be replaced.



PG&E Response:

We agree with the finding of the LTC oil filter needing changing at Zaca Substation. We created notification 129771711, which will be completed based on current work prioritization and material availability.

- 8.3. The bottom row of the display screen for the transformer oil temperature monitor is damaged and makes reading the values difficult.

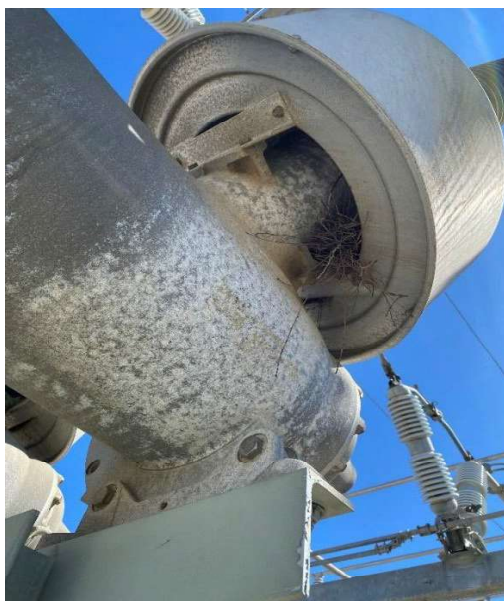


PG&E Response:

We agree with the finding of the impacted display on the Barrington LCD screen at Zaca Substation. We created notification 130717745, which will be completed based on current work prioritization and material availability.

9. Cabrillo Substation

- 9.1. There are bird nests under CB 152 (left) and CB 122 (right). PG&E has existing Notification # 129658296 for these issues.



PG&E Response:

We agree a bird's nest was present on CB 152 at Cabrillo Sub. This nonconformance has a pre-existing notification 129658296 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

We agree with the finding of the bird's nest on CB 122 at Cabrillo Substation and created notification 130717746, which will be completed based on current work prioritization and material availability.

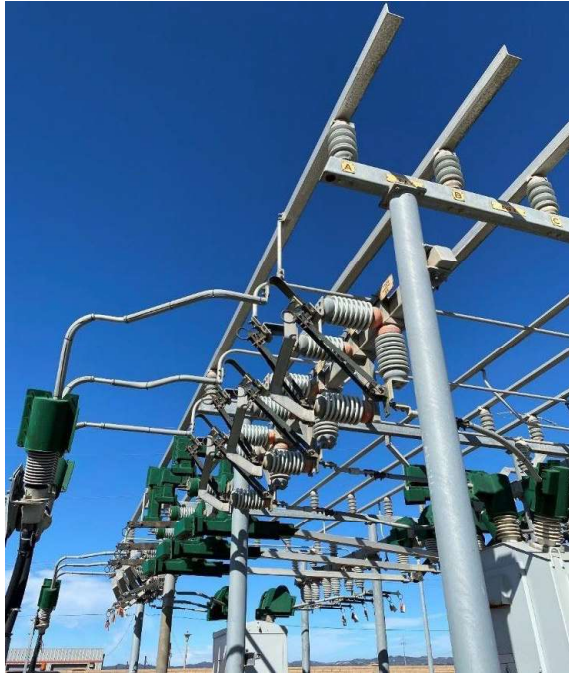
- 9.2. CB 1104/2 is showing evidence of corrosion. PG&E has existing Notification #127388956 for this issue.



PG&E Response:

We agree evidence of corrosion was present on Vacuum Breaker 1104/2 at Cabrillo Sub. This nonconformance has a pre-existing notification 127388956 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

- 9.3. The 12kV Bus 2A is loose at one of the insulator supports and is making an audible buzzing noise.



PG&E Response:

We agree with the finding of the loose bracket at the BUS support on 12kv Bus 2A at Cabrillo Substation. We created notification 130717748, which will be completed based on current work prioritization and material availability.

10. Palmer Substation

- 10.1. The high-side A phase fuse holder has a bird nest. PG&E has existing Notification #129669639 for this issue.



PG&E Response:

We agree a bird's nest was present on Bank 1 at Palmer Sub. This nonconformance has a pre-existing notification 129669639 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

10.2. The substation's perimeter fence is being affected by washout and erosion. PG&E has the existing Capital Project #74051741 for this issue.



PG&E Response:

We agree erosion and washout was present at the perimeter fence at Palmer Sub. This

nonconformance has a pre-existing Capital order #74051741 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this capital project is being worked in accordance with our maintenance procedures and is not past due.

- 10.3. There is a station service power cable running throughout the substation. PG&E has existing Notification #128225301 to remove the cable.



PG&E Response:

We agree a station service power cable was present running throughout the Palmer Sub. This nonconformance has a pre-existing notification 128225301 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

11. Sisquoc Substation

- 11.1. The Transformer Bank 3 LTC oil filter is approaching its replacement threshold of

30 psi. PG&E has existing Notification #127576246 to replace the oil filter.



PG&E Response:

We agree a transformer oil filter was reaching its replacement threshold at Sisquoc Sub. This nonconformance has a pre-existing notification 127576246 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification was being worked in accordance with our maintenance procedures and was completed on December 13, 2024.

- 11.2. There are abandoned bird nests and debris in the radiator fins on Transformer Bank
3. PG&E has existing Notification # 129670676 for this issue. During the audit, PG&E confirmed the bird nests were abandoned and cleaned debris out of the radiator fins.



PG&E Response:

We agree a bird's nest was present on Bank 3 at Sisquoc Sub. This nonconformance has a pre-existing notification 129670676 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification was being worked in accordance with our maintenance procedures and was not past due. However, these birds' nests were removed during the field audit.

- 11.3. The counter on CB 152 is faded. PG&E has existing Notification #125554093 for this issue.

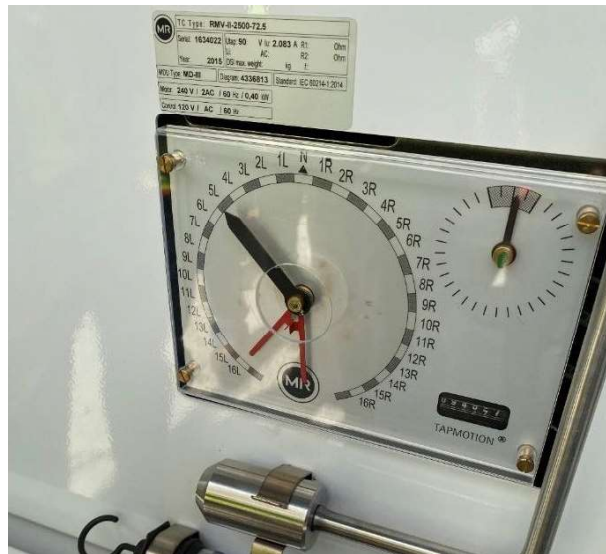


PG&E Response:

We agree a faded counter was present on CB 152 at Sisquoc Sub. This nonconformance has a pre-existing notification 125554093 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification was being worked in accordance with our maintenance procedures and was not past due. However, this work was completed on December 2, 2024.

12. Santa Maria Substation

- 12.1. The upper limit (raise) drag handle on the Transformer Bank 2 LTC is loose. PG&E has existing Notification #129599623 for this issue.



PG&E Response:

We agree a broken raise arm was present on Transformer Bank 2 LTC 1 at Santa Maria Sub. This nonconformance has a pre-existing notification 129599623 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

13. San Luis Obispo Substation

13.1 The oil level on the C Phase for Breaker 132 is high. PG&E has existing Notification #129670923 for this issue.



PG&E Response

We agree a high oil lever was present at CB 132 at San Luis Obispo Sub. This nonconformance has a pre-existing notification 129670923 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

13.2 Transformer Bank 4 is beginning to corrode. PG&E has existing Notification #127195590 to paint the transformer.



PG&E Response:

We agree rust was present on Bank 4 at San Luis Obispo Sub. This nonconformance has a pre-existing notification 127195590 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.

14. Foothill Substation

- 14.1. There are cracks in the secondary containment concrete berms around Transformer Banks 1 and 2. PG&E has existing Notification #129658915 for these issues.



PG&E Response:

We agree cracks was present on berms at Transformer Bank 1 and 2 at Foothill Sub. This nonconformance has a pre-existing notification 129658915 established in our system of record SAP prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this notification is being worked in accordance with our maintenance procedures and is not past due.