PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 30, 2025 EA2025-1253/TA2025-1405/SA2025-1406

Jason Harston
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Plumas Sierra Rural Electric Cooperative
73233 State Route 70, Portola, CA. 96122

SUBJECT: Electric Facilities and Substation Audit of Plumas-Sierra Rural Electric Cooperative (PSREC)

Mr. Harston:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Monica Hoskins and Javier Reyes conducted an audit of PSREC's electric facilities and substation from June 16 through June 20, 2025. During the audit, ESRB staff conducted field inspections of PSREC's distribution, transmission and substation facilities, equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95, GO 128, GO 165 and GO 174. A copy of the audit findings itemizing the substation and electric facilities violations and observations is enclosed.

Please provide a response no later than October 30, 2025, via electronic copy of all corrective actions and preventive measures taken by PSREC to correct the identified violations and prevent the recurrence of such violations. Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Monica Hoskins at monica.hoskins@cpuc.ca.gov or (415) 652-1847.

Sincerely,

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

Enclosure: CPUC Electric Facilities and Substation Audit Report for Plumas-Sierra Rural Electric Cooperative

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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PLUMAS-SIERRA RURAL ELECTRIC COOPERATIVE (PSREC)
ELECTRIC DISTRIBUTION, TRANSMISSION, AND SUBSTATION AUDIT FINDINGS

JUNE 16 – 20, 2025

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following distribution and transmission documents, procedures, and records for Plumas-Sierra Rural Electric Cooperative (PSREC):

- PSREC Pole Strength and Structural Reports (2024–2025)
- Vegetation Management Plan
- Intrusive Pole Testing Records (2022–2024)
- Open Work Orders (2024 – 2025)
- Summary of Active, Completed, and Capitalized Work Orders (2024–2025)
- Monthly Work Order Statistics (2024–2025)
- Overhead and Underground Inspection and Patrols (2023 – 2025)
- Overhead and Underground facilities statistics
- Reliability Metrics and Outages (May 2020 – May 2025)
- Employee Positions and Training

ESRB staff reviewed the following substation documents, procedures, and records for PSREC:

- Substation Locations and Statistics
- Substation Inspections (2020 – 2025)
- Protection System Maintenance and Testing Program, Revision 11: May 1, 2024
- Infrared Inspections (2023 – 2025)

II. Records Violations

Part A. Distribution and Transmission

ESRB observed the following electric distribution and transmission violations during the record review portion of the audit:

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

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

   (1) Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

   Upon completion of the corrective action, the company's records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years.

   (2) Where a communications company's or an electric utility's (Company A's) actions result in potential violations of GO 95 for another entity (Company B), that entity's (Company B's) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.

   (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.

(5) A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at least ten (10) years, the documentation of the notice shall be maintained by both the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party."

PSREC does not record the third-party issues and safety hazards identified in their system. If there is a third-party safety issue found, PSREC will call the utility or resolve the issue. Additionally, they do not record any issues identified and sent to them from other utilities. PSREC must maintain records of the third-party issues identified and of all third-party notifications sent for safety hazards, as required by GO 95, Rule 18-A.[1]

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

"Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

Upon completion of the corrective action, the company's records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years."

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

"For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action."

a. PSREC does not assign due dates for issues identified in the field and does not have a consistent process for prioritizing work, since there are no priority codes or assigned timelines used in their work orders.

b. PSREC linemen resolve issues and nonconformances identified in the field immediately or day-of for minor issues. The linemen do not record the issues identified or their repairs. PSREC must maintain consistent records of all identified issues and completed repairs.

[1] The previous PSREC Electric Utilities Audit, November 15-9, 2021 (EA2021-925) identified the same issues with the incoming and outgoing third-party notifications.

3. **GO 95, Rule 18-B, 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 auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities.

(1) Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.

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

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

(a) The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:
- *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*

(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:
- *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

(iii) Level 3 -- Any risk of low potential impact to safety or reliability:

- *Take corrective action within 60 months subject to the exception specified below."*

GO 128, Rule 12.2, Maintenance states:

"Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules.

A. Electric Supply System - An Auditable and consistent maintenance program, see Rule 22.4, shall be in place to minimize deterioration of underground equipment."

GO 128, Rule 22.4, A Maintenance Program states:

"A Maintenance Program means a written policy that shall include the following key elements:

(1) Inspection intervals
(2) Rejection criteria
(3) Corrective actions"

PSREC states that they follow the guidelines in the CPUC general orders for their maintenance and inspection practices, but PSREC has not established a written audible maintenance program for their electric overhead and underground facilities.[2] PSREC must establish a maintenance program outlining the following:

- Prioritization for work orders and maintenance activities with timelines for correcting nonconformances
- Procedure for incoming and outgoing third-party notifications
- Record keeping and retention
- Procedure for patrols and inspections with required inspection intervals

4. **GO 165, Rule III-B, Standards for Inspections** states:

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

[2] The previous PSREC Electric Utilities Audit, November 15-9, 2021 (EA2021-925) identified the same issues with the missing audible maintenance program.

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	---	---
Padmount	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

(1) Patrol inspections in rural areas shall be increased to once per year in Tier 2 and Tier 3 of the High Fire-Threat District. (See GO 95, Rule 21.2-D)

Note: For the purpose of implementing the patrol and detailed inspection intervals in Table 1 above, the term "year" is defined as 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months, not to exceed the end of the calendar year in which the next inspection is due. A required inspection may be completed any time before the expiration of the associated inspection interval using this definition of "year," but not after. The completion of an inspection starts a new inspection interval that must be completed within the prescribed timeframe using this definition of "year." However, inspection intervals may be extended by up to six months in areas where the Governor of California or the President of the United States has declared an emergency or a disaster following a major earthquake or other catastrophe using the procedure set forth in Decision 13-06-011 issued in Rulemaking 08-11-005. The extension shall not exceed six months from the date that an emergency is declared or the date that a disaster is declared, whichever is earlier.

Note: For wood pole intrusive inspections, the term "year" is defined as a calendar year

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

> *"For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action."*

PSREC does not consistently perform rural patrols and inspections for their electric overhead and underground assets within the intervals required by GO 165, Rule III-B. PSREC maintains and monitors their system as they complete other work, but does not

inspect at regular intervals. As a result of the practice, PSREC does not have consistent records of the patrols and inspections performed on their overhead and underground facilities. PSREC must maintain auditable records outlining all issues identified during the patrols and inspections conducted following a procedure that meets the inspection intervals prescribed in GO 165 Table 1, including the date of each inspection, and the inspector performing the inspection.

5. **GO 165, Section III-D, Reporting** states

   "By July 1st each utility subject to this General Order shall submit an annual report for the previous year under penalty of perjury.

   The report shall list four categorical types of inspections: Patrols, Overhead Detailed, Underground Detailed and Wood Pole Intrusive. The report shall denote the total units of work by inspection type for the reporting period and the number of outstanding (not completed) inspections within the same reporting period for each of the four categories."

   PSREC does not submit annual GO 165 reports to the Commission as required by GO 165, Section III-D. PSREC must submit the annual reports by July 1st of each year.[3]

Part B. Substation

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

1. **GO 174, Rule 30.1, General** states:

   "Each Operator shall establish, update as needed, and follow an Inspection Program. At a minimum, this Program shall specify for each piece of equipment and system listed in Rule 32.1:

   - *Inspection activities*
   - *Frequency of Inspections*
   - *Record Keeping and retention"*

   GO 174, Rule 33.2, Records states:

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

   PSREC states that they "follow the guidelines in CPUC GO 165 and GO 174," but the *Protection System Maintenance and Testing Program* does not specify record retention

[3] The previous PSREC Electric Utilities Audit, November 15-9, 2021 (EA2021-925) identified the same issues with the annual reporting.

practices or require completed inspection records to be maintained for five years. PSREC must include record retention requirements in their substation procedures.

2. **GO 174, Rule 33.1, Records** states:

"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)."*

a. PSREC states that they "follow the guidelines in CPUC GO 165 and GO 174," but the provided inspections records for substations do not have assigned dates of corrective action for identified nonconformances. PSREC must maintain a consistent process for prioritizing work and assign dates of corrective action for all issues identified in substations.

b. PSREC only creates work orders for issues that require a crew and materials. If there is a minor issue that can be resolved by the substation lineman on the spot, no record is retained of the completed work. PSREC must maintain record of all issues identified and all completed repairs in the substations.

3. **GO 174, Rule 40, Annual Filings** states:

40.1 "No later than July 1st of each year, each Operator shall transmit to the Safety and Enforcement Division (SED), or its successor, an Inspection Program Summary.

Changes to the Inspection Program shall be reflected in the Inspection Program Summary, including the effective date of the change. Should no changes occur since the previous filing, the Operator shall transmit written correspondence confirming that no changes were made to the Program.

40.2 No later than July 1st of each year, each Operator shall transmit to the Safety and Enforcement Division (SED), or its successor, a report summarizing completed and past due Inspections for the prior calendar year."

PSREC does not submit annual reports to the Commission as required by GO 174, Rule 40. PSREC must submit the annual substation inspection program updates and inspection summaries by July 1st of each year.

III. Field Inspection

During the field inspection, ESRB inspected the following distribution and transmission facilities:

Location	Asset Type	Asset Number	GPS Coordinates
1	Pole	003200	(39.9519489, -120.8832289)
2	Pole	001075	(39.9523632, -120.8836567)
3	Pole	003202	(39.9530327, -120.884169)
4	Pole	001072	(39.9533103, -120.8837821)
5	Padmount Transformer	52173	(39.9533103, -120.8837821)
6	Pole	001071	(39.9533864, -120.8847865)
7	Pole	001070	(39.9541813, -120.8857005)
8	Padmount Junction Box	59322	(39.8876271, -120.7783283)
9	Pole	013457	(39.8876271, -120.7783283)
10	Pole	009823	(39.8876143, -120.7785751)
11	Pole	013974	(39.8874965, -120.7783635)
12	Pole	009163	(39.8870254, -120.7796372)
13	Pole	009164	(39.8867764, -120.7804419)
14	Padmount Transformer	52202	(39.7922445, -120.6428137)
15	Padmount Transformer	59310	(39.7921801, -120.6439252)
16	Padmount Transformer	52207	(39.79182, -120.6441595)
17	Padmount Transformer	52208	(39.7914693, -120.644818)
18	Padmount Transformer	52209	(39.7914328, -120.644937)
19	Padmount Transformer	52210	(39.7910698, -120.6458815)
20	Pole	G485	(39.8178723, -120.4722222)
21	Pole	G484	(39.8177314, -120.4735352)
22	Pole	G483	(39.8175504, -120.4740991)
23	Pole	014005	(40.3138247, -120.4950223)
24	Pole	014901	(40.3148404, -120.4950317)
25	Pole	014902	(40.3159116, -120.4950337)
26	Pole	014675	(39.9561029, -120.0325297)
27	Pole	013064	(39.9567984, -120.0318518)
28	Pole	013065	(39.9573504, -120.0313506)
29	Pole	013066	(39.9578963, -120.0307923)
30	Pole	013067	(39.9584216, -120.0302247)
31	Pole	002390	(39.9480311, -120.0353249)
32	Pole		(39.947654, -120.0362979)
33	Pole	015504	(39.8997463, -120.0149914)
34	Pole	015503	(39.8997463, -120.0149914)
35	Pole	17420	(39.8997463, -120.0149914)
36	Pole	006907	(39.7948505, -120.0769411)
37	Pole	006908	(39.794824, -120.0779318)
38	Pole	006910	(39.7948013, -120.0787915)

Location	Asset Type	Asset Number	GPS Coordinates
39	Pole	006912	(39.7947969, -120.0798657)
40	Pole	013450	(39.7953887, -120.0798546)
41	Pole	006226	(39.7834853, -120.0782899)
42	Pole	17820	(39.784057, -120.0782805)
43	Pole	17819	(39.784614, -120.0782537)
44	Pole	17818	(39.7851471, -120.0782319)
45	Pole	004629	(39.8215269, -120.47839)
46	Pole	004631	(39.8221058, -120.4775444)
47	Pole	004632	(39.8228412, -120.4765188)
48	Pole	004633	(39.8228654, -120.4753577)
49	Pole	004480	(39.8264961, -120.4171991)
50	Pole	004458	(39.8255769, -120.4179481)
51	Pole	004459	(39.8255545, -120.419031)
52	Pole	004457	(39.8255452, -120.4196848)
53	Pole	004456	(39.8255483, -120.4204962)
54	Pole	004455	(39.8255434, -120.4210242)
55	Padmount Transformer	56641	(39.7366293, -120.413389)
56	Padmount Transformer	56640	(39.7362923, -120.413109)
57	Padmount Transformer	56637	(39.7352445, -120.412638)
58	Padmount Junction Box	56635	(39.7357302, -120.4140756)
59	Padmount Transformer	56634	(39.7357302, -120.4140756)
60	Padmount Transformer	300	(39.7343423, -120.4146671)
61	Padmount Junction Box	56627	(39.734324, -120.4146215)
62	Pole	007945	(39.5815795, -120.3875623)
63	Pole	007947	(39.5817376, -120.3884226)
64	Pole	007948	(39.5819032, -120.3892867)
65	Pole	004247	(39.5821022, -120.3901349)
66	Pole	004246	(39.5822547, -120.3909858)
67	Pole	004245	(39.5824513, -120.392048)
68	Pole	004243	(39.5826562, -120.3932335)
69	Pole	009771	(39.674534, -120.2731178)
70	Pole	009772	(39.67375, -120.2730826)
71	Pole	009773	(39.6728968, -120.2730887)
72	Pole	009774	(39.6719838, -120.2730997)
73	Pole	006101	(39.8208296, -120.1843568)
74	Pole	006102	(39.8210624, -120.1831968)
75	Pole	006103	(39.821291, -120.1821142)
76	Pole	006104	(39.821564, -120.1810399)
77	Pole	006105	(39.8218073, -120.1799292)
78	Pole	006106	(39.822077, -120.1788261)

During the field inspection, ESRB inspected the following substation facilities:

Substation	GPS Coordinates
Quincy 1 Substation	(39.934372, -120.888363)
Quincy 2 Substation	(39.934969, -120.884593)
Greagle Substation	(39.771139, -120.617706)
Edgemont Substation	(40.312804, -120.492136)
Milford Substation	(40.155238, -120.351954)
Patton Substation	(40.144409, -120.170314)
Herlong Substation	(40.089852, -120.172352)
Beckworth Substation	(39.819687, -120.375257)
Marble Substation	(39.756982, -120.37095)
Chilcoot Substation	(39.798833, -120.159738)

IV. Field Inspection Violations

Part A. Distribution and Transmission

ESRB identified the following violations during the field inspection of distribution and transmission facilities:

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

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

ESRB's findings related to the above rule are listed in Table 1:

Table 1: GO 95, Rule 31.1 Findings

Location	Finding
12	The pole is missing visibility strips.
13	The pole is missing visibility strips.
23	The pole has a damaged cutout. PSREC has an existing work order for this issue.
49	The pole has woodpecker holes.
62	The primary conductor (neutral) has bird caging. PSREC has an existing work order for this issue.
64	The pole has a bird's nest on the distribution transformer.

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

> *"Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained. (Also see Appendix E for tree trimming guidelines.) These requirements apply to all overhead electrical supply and communication facilities that are covered by this General Order, including facilities on lands owned and maintained by California state and local agencies.*
>
> *Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. 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 2:

Table 2: GO 95, Rule 35 Finding

Location	Finding
46	Vegetation encroaching on the primary conductor (neutral) between Location 45 and Location 46 needs trimming.

3. **GO 95, Rule 49.3-C, Pins and Conductor Fastenings, Strength** states in part:

“Insulator pins and conductor fastenings shall be able to withstand the loads to which they may be subjected with safety factors at least equal to those specified in Rule 44.”

ESRB’s finding related to the above rule is listed in Table 3:

Table 3: GO 95, Rule 49.3-C Finding

Location	Finding
73	The pole has a loose nut on the roadside pin insulator. PSREC has an existing work order for this issue.

4. **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 top of such sign(s) shall be located between the level of the lowest line conductor, energized in excess of 750 volts, on the pole to no more than 40 inches below that conductor level (see Figure51–1).”

ESRB's findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 51.6-A Findings

Location	Finding
4	The pole has a missing high voltage sign.
7	The pole has a broken high voltage sign on one side of the crossarm.
12	The pole has a broken high voltage sign on one side of the crossarm.
21	The pole has a missing high voltage sign.
22	The pole has a missing high voltage sign.
23	The pole has a broken high voltage sign on one side of the crossarm.
24	The pole has a broken high voltage sign.
25	The pole has a broken high voltage sign on one side of the crossarm.
31	The pole has a broken high voltage sign on one side of the distribution crossarm.
38	The pole has broken and missing high voltage signs.
50	The pole has a broken high voltage sign on one side of the crossarm.
62	The pole has a broken high voltage sign on one side of the crossarm.
64	The pole has a broken high voltage sign on one side of the crossarm.
67	The pole has a missing high voltage sign.
69	The pole has a broken high voltage sign on one side of the crossarm.
70	The pole has a broken high voltage sign on one side of the crossarm. PSREC has an existing work order to replace the pole.
72	The pole has a broken high voltage sign on one side of the crossarm. PSREC has an existing work order to replace the pole.
73	The pole has a broken high voltage sign on one side of the crossarm.
74	The pole has a broken high voltage sign on one side of the crossarm.
77	The pole has a broken high voltage sign on one side of the crossarm.
78	The pole has a broken high voltage sign on one side of the crossarm.

5. **GO 95, Rule 54.6-B, Ground Wires** states in part:

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

   ESRB's findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 54.6-B Findings

Location	Finding
25	The pole has an exposed transformer ground wire.
50	The pole has an exposed transformer ground wire.
52	The pole has an exposed transformer ground wire.
54	The pole has an exposed transformer ground wire.

6. **GO 95, Rule 54.6-I, Attachment of Protective Covering** states in part:

   "Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion–resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position."

   ESRB's findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 54.6-I Findings

Location	Finding
2	The pole has damaged ground moulding exposing the transformer ground wire.
4	The pole has damaged ground moulding exposing the transformer ground wire.
7	The pole has damaged ground moulding exposing the transformer ground wire.
35	The pole has damaged ground moulding exposing the ground wire.
68	The pole has damaged ground moulding exposing the ground wire.

7. **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."

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

Table 7: GO 95, Rule 56.2 Finding

Location	Finding
7	The anchor down guy is slack.

8. **GO 95, Rule 56.7-B, Location of Sectionalizing Insulators, Anchor Guys** states in part:

   "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 8:

Table 8: GO 95, Rule 56.7-B Finding

Location	Finding
72	The pole has vegetation above the guy insulator that is contacting and grounding the primary anchor down guy. PSREC has upcoming tree trimming scheduled for this pole.

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

Table 9: GO 95, Rule 56.9 Findings

Location	Finding
12	The anchor down guy is missing a guy guard.
49	The anchor down guy is missing a guy guard.

10. **GO 95, Rule 59.4-A(1)(a), Grounding, Material and Size, Grounding Conductors** states in part:

    "(1) Grounding Conductors: The grounding conductors of the common neutral system shall conform to each of the following requirements:

    (a) 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 10:

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

Location	Finding
24	The pole has an exposed ground rod above the surface of the ground.
54	The pole has an exposed ground rod above the surface of the ground.

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

    "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 11:

Table 11: GO 128, Rule 17.8 Finding

Location	Finding
14	The padmount transformer has a faded ownership and warning label.

Part B. Substation

ESRB identified the following violations during the field inspection of substation facilities:

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."*

1. Quincy 1 Substation

1.1. The eyewash station in the control room is expired.

1.2. The Quincy 1 Distribution Transformer has one broken fan.

2. Quincy 2 Substation

2.1. The eyewash station in the control room is expired.

3. Greagle Substation

3.1. The eyewash station in the control room is expired.

4. Edgemont Substation

4.1. The Edgemont Transformer has an extra nitrogen tank that needs to be removed.

5. Milford Substation

5.1. The eyewash station in the control room is expired.

5.2. The MDS01 bus work has a bird's nest.

6. Patton Substation

6.1. The eyewash station in the control room is expired.

6.2. The underground 12kV feeder has a bird’s nest.

7. Herlong Substation

7.1. The 1202 Feeder 1 bus work has a bird’s nest.

8. Beckworth Substation

8.1. The eyewash station in the control room is expired.

8.2. Circuit Breaker BW02 has a faded counter.

8.3. The 1201-2 Feeder 1 has a bird’s nest inside the animal guard.

9. Marble Substation

9.1. The eyewash station in the control room is expired.

10. Chilcoot Substation

10.1. The fire extinguisher inside the control room is missing the monthly inspections.

10.2. The Voltage Regulator 12VR1 bus work has a bird’s nest.

10.3. Feeder 1 has oil residue and evidence of a possible oil leak.

V. Observations

1. **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 third-party safety concerns listed in Table 12:

Table 12: Third-Party Observations

Location	Observation
2	Abandoned riser (AT&T).
3	Broken ground molding and exposed ground rod (Plumas-Sierra Telecommunications (PST)).
4	Risers unattached to pole and abandoned line (AT&T).
6	Broken ground molding and exposed ground wire (PST).
7	Broken guy wire cover and riser guard unattached (AT&T).
10	Missing guy marker and insulator bob and loose guy wire (PST).
21	Missing insulator guy bob (AT&T). Missing insulator guy bob (PST).

Location	Observation
23	Exposed ground wire and ground rod (PST).
25	Risers not attached to pole and abandoned lines (AT&T).
36	Missing guy marker (PST).
45	Incomplete pole transfer (AT&T).
46	Incomplete pole transfer (AT&T).
47	Incomplete pole transfer (AT&T).
48	Incomplete pole transfer (AT&T).
51	Abandoned lines (AT&T).
69	Missing insulator guy bob (PST).