

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 15, 2025

EA2025-1318

Mr. Delmont Senter
Electric Superintendent
Trinity Public Utilities District
P. O. Box 1216 Weaverville, CA 96093

SUBJECT: Trinity Public Utilities District Audit Report

Mr. Senter:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Gordon Szeto conducted an audit of Trinity Public Utilities District Facilities from June 23 to 27, 2025. During the audit, ESRB staff conducted field inspections of Trinity's Electric 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, 128, 165 and 174. A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than October 13, 2025, via electronic copy of all corrective actions and preventive measures taken by Trinity 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 Gordon Szeto at (415) 603-9855 or gordon.szeto@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse", is located below the "Sincerely," text.

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

California Public Utilities Commission

Enclosure: CPUC Audit Report for Trinity Public Utilities District Facilities

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Chih sien "Eric" Wu, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Yi (Rocky) Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
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Gordon Szeto, Utilities Engineer, ESRB, SED, CPUC
Yongling Sun, Public Utilities Regulatory Analyst V, ESRB, SED, CPUC
Dave Delange, Assistant Superintendent, Trinity Public Utilities District

TRINITY PUBLIC UTILITIES DISTRICT
ELECTRIC AND SUBSTATION FACILITIES AUDIT FINDINGS
JUNE 23-27, 2025

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

1. Trinity Public Utilities District (TPUD) Wildfire Mitigation Plan, 2024 and 2025 Updates
2. Completed work orders with notifications from the past 12 consecutive calendar months, cancelled work orders with notifications from the past 12 consecutive calendar months, and late completed work orders from the last 60 calendar months.
3. Patrol and detailed inspection records from the past 60 consecutive calendar months.
4. Feeder reliability metrics and sustained outages in TPUD from the last 60 consecutive calendar months.
5. Master Map displaying the service area administered by TPUD.
6. New Construction Projects (both overhead and underground) in the last 12 consecutive calendar months not subject to a patrol or detailed inspection.
7. Pole loading calculations from the last 12 consecutive calendar months including completion dates.
8. Third Party Notifications sent in the last 60 consecutive calendar months and received in the last 60 consecutive calendar months.
9. List of inspectors and patrolmen active in TPUD from April 2020 to April 2025.
10. Completed equipment test records for reclosers and regulators from April 2022 to October 2024.
11. Intrusive pole inspection records in the last 36 consecutive calendar months prior to April 2025.
12. Vegetation Management Policies and Procedures and inspection records for the last 60 months.
13. Oil Test results in 2023 and May 2025 monthly inspection reports for Weaverville Mill Street and Hayfork Substations (out of 8 substations in total).

II. Records Violations

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

1. **General Order (GO) 95, Rule 44.1 Installation and Reconstruction** states in part:
“Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the

term “planned” applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.

The entity responsible for performing the loading calculation(s) for an installation or reconstruction shall maintain records of these calculations for the service life of the pole or other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.”

Finding:

TPUD should perform a pole loading calculation for the pole at Site Number 42. During the field audit at Site Number 42, it was noted that the upper portion of the pole is twisted and under torsion, and that there was a several foot long split at the top of the pole. It was observed that there were two conductor lines coming from the right side of the pole and three conductors coming from the left side of the pole, which may be causing unbalanced loads on the pole. TPUD personnel stated that a pole loading calculation for the pole had not been performed. The pole appears to be vulnerable to potential failure and may not have the safety factors specified in GO 95 Rule 44. TPUD should perform a pole loading calculation to determine if the safety factors are met and forward a copy of the calculation to ESRB.

2. GO 95, Rule 18.B Maintenance Programs and Rule 31.2 Inspection of Lines 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.”

“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.”

Finding:

a. The inspection records spreadsheet provided had 11,929 inspections listed, but did not describe the findings or deficiencies found in any of the inspections. Also, no patrol inspections were provided in the spreadsheet.

b. ESRB requested the training and qualification records for TPUD inspectors over the past five years. TPUD stated that it does not have an official training program for its inspectors.

c. The inspection record for field audit Site Number 24, Pole 12867, had latitude of 0 degrees latitude, -127.488694 longitude. The GPS coordinates are incorrect. Similar errors were found for Poles 12841 and 12847.

3. GO 165, Inspection Requirements for Electric Distribution and Transmission Facilities, 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.”

“Table 1 Distribution Inspection Cycles (Maximum Interval in Years) states Patrol inspections in rural areas shall be increased to once per year in Tier 2 and Tier 3 High Fire Threat District (HFTD)”.

GO 165, Rule III-C Record Keeping states:

“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. Such records shall be made available to parties or pursuant to Commission rules upon 30 days notice. Commission staff shall be permitted to inspect such records consistent with Public Utilities Code Section 314 (a).”

Finding:

a. The TPUD Wildfire Mitigation Plan (WMP), section VII.F, states that TPUD has a detailed system inspection patrol process complying with GO 165 requirements, which includes bi-annual drone and/or foot patrols for overhead circuits. The bi-annual inspection does not comply with GO 165 Table 1 annual patrol inspection requirement, as all TPUD facilities lie within Tier 2 HFTD.

b. During the field audit, TPUD staff in discussing the Geographic Information System (GIS) which imports inspection results into the GIS Mapping system monthly, stated that after five years, new patrol inspection results would over-write the prior patrol done five years earlier, and no record would be retained of the earlier patrol. This does not comply with GO 165 that records be retained for at least ten years.

4. GO 128, Construction of Underground Electric Supply and Communication Systems, Rule 17.2 Inspection states in part:

“Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules (See Rule 12.3).”

GO 128, Rule 17.7A Records states in part:

“Each party operating or owning facilities shall, upon request, provide information as to location of its underground facilities to any other party contemplating underground construction, or work, in the vicinity thereof. ...The responsibility for the maintenance of necessary records to comply with this rule rests with the party owning or operating the facilities. Such records shall be available for inspection at all times by the Commission or the Commission Staff.”

Finding:

a. The TPUD WMP states that underground line apparatus will have a detailed inspection performed every three years. In 2023, the TPUD WMP stated only 44 out of 1004 (about 4%) underground facilities were inspected, and in 2024 only 293 out of 1004 (about 29%) were inspected. Based on the 2023 and 2024 performance, TPUD is not projected to comply with the WMP UG inspection requirement.

b. TPUD failed to correctly document the installation of one of its facilities. During the field inspection at Site Number 48, ESRB inspected an UG padmount transformer that was installed several years earlier, but TPUD could not find the transformer in the TPUD GIS mapping system during the field inspection. Therefore, TPUD does not comply with the records requirement in GO 128, Rule 17.7A.

5. General Order (GO) 95, Rule 18.A Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

(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 a 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.”

Finding:

In response to the Pre-Audit Data Request (PADR), TPUD stated it did not send out any 3rd party notifications to other utilities over the past five years. However, during the field inspection, ESRB observed multiple 3rd party notifications that were needed on communication company’s facilities including several transfers of communication

equipment from old to new TPUD poles, low cable clearance to ground level, abandoned service drops, exposed ground wires, damaged splice case, inadequate clearance from communication cables to a primary riser, and insulators missing on guy wires. TPUD should ensure any deficiencies observed by inspectors that may be potential GO 95 violations by communications companies, be reported via 3rd party notifications.

6. General Order (GO) 95, Rule 18.B.(1), states in part:

“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.”*

Finding:

a. The WMP states qualified personnel perform all inspections, and system equipment in need of maintenance or repair is categorized according to the severity of the condition. Items rated Priority #1 are reported immediately to the appropriate Manager (Electric Superintendent, Supervising Foreman, or Vegetation Manager) and are addressed immediately to prevent failure or service interruption. Items rated Priority #2 are scheduled for maintenance to be performed within 30 days, and Priority #3 items are scheduled for maintenance to be performed in six months or as determined by the Electric

Superintendent. The work order spreadsheet had 1906 work orders from December 2019 to May 2025, and all the work orders were listed as Normal Priority without the priority numbers. ESRB asked TPUD how it records Priority #1 items requiring immediate repair, and TPUD stated that the repair would often be performed immediately and a work order would not normally be generated. TPUD should document all corrective work performed and specify the work order priorities according to its procedure .

b. The work order spreadsheet did not describe the corrective actions or work performed in any of the work orders.

c. The Vegetation Management work order records from July 2020 to October 2024, were missing the Completion Date and Priority information on most of the Vegetation Management records (about 980 out of 1016 records or 97%).

III. Field Inspection

During the field inspection, ESRB inspected the following Trinity Public Utility District Facilities:

Table 1: Field Audit Sites

Site #	Pole/Equipment#	Structure Type	Latitude	Longitude	City
1	2987	Wood Pole	40.7074403	-122.924629	Weaverville
2	2220	Wood Pole	40.727053	-122.932992	Weaverville
3	2219	Wood Pole	40.727401	-122.932724	Weaverville
4	2218	Wood Pole	40.727656	-122.932339	Weaverville
5	2111	Wood Pole	40.622480	-123.484925	Hyampom
6	2295	Wood Pole	40.623827	-123.480923	Hyampom
7	2294	Wood Pole	40.622390	-123.480916	Hyampom
8	2100	Wood Pole	40.616858	-123.464166	Hyampom
9	11295	Wood Pole	40.617239	-123.464974	Hyampom
10	11296	Wood Pole	40.616796	-123.464252	Hyampom
11	2302	Wood Pole	40.615694	-123.461610	Hyampom
12	2101	Wood Pole	40.613714	-123.457393	Hyampom
13	2102	Wood Pole	40.607280	-123.451792	Hyampom
14	11319	Wood Pole	40.607322	-123.451718	Hyampom
15	11318	Wood Pole	40.607271	-123.451589	Hyampom
16	2010	Wood Pole	40.616366	-123.444598	Hyampom
17	2011	Wood Pole	40.613937	-123.443589	Hyampom
18	Hayfork Substation	NA	40.552107	-123.162772	Hayfork
19	9150	Wood Pole	40.569472	-123.174905	Hayfork
20	9151	Wood Pole	40.570377	-123.174808	Hayfork
21	9152	Wood Pole	40.571301	-123.174593	Hayfork
22	9153	Wood Pole	40.571907	-123.174539	Hayfork

Site #	Pole/Equipment#	Structure Type	Latitude	Longitude	City
23	9154	Wood Pole	40.572514	-123.174465	Hayfork
24	12867	Service Drop Pole	Next to Site 23	Next to Site 23	Hayfork
25	3233	Wood Pole	40.740281	-123.253005	Big Bar
26	3234	Wood Pole	40.740534	-123.253843	Big Bar
27	3235	Wood Pole	40.740780	-123.254814	Big Bar
28	3236	Wood Pole	40.740964	-123.255352	Big Bar
29	3237	Wood Pole	40.741104	-123.255912	Big Bar
30	3238	Wood Pole	40.741277	-123.256436	Big Bar
31	3239	Wood Pole	40.741407	-123.256912	Big Bar
32	10509	Wood Pole	40.740321	-123.252229	Big Bar
33	3245	Wood Pole	40.741337	-123.251757	Big Bar
34	3246	Wood Pole	40.740936	-123.251034	Big Bar
35	3247	Wood Pole	40.740653	-123.250540	Big Bar
36	3244	Wood Pole	40.740819	-123.252023	Big Bar
37	6857	Wood Pole	40.733308	-123.258319	Big Bar
38	6858	Wood Pole	40.733529	-123.257812	Big Bar
39	6859	Wood Pole	40.733618	-123.257418	Big Bar
40	11940	Wood Pole	40.761503	-123.082618	Junction City
41	11942	Wood Pole	40.761018	-123.082590	Junction City
42	11943	Wood Pole	40.760529	-123.082616	Junction City
43	11945	Wood Pole	40.760503	-123.083465	Junction City
44	11946	Wood Pole	40.760585	-123.083762	Junction City
45	11947	Wood Pole	40.760749	-123.084321	Junction City
46	11948	Wood Pole	40.761219	-123.084787	Junction City
47	11949	Wood Pole	40.7618400	-123.084807	Junction City
48	Transformer	Underground Padmount	40.7618400	-123.084807	Junction City
49	11950	Wood Pole	40.762274	-123.084799	Junction City
50	11952	Wood Pole	40.763026	-123.084900	Junction City

Site #	Pole/Equipment#	Structure Type	Latitude	Longitude	City
51	3067	Wood Pole	40.649056	-122.946839	Douglas City
52	4/40	Transmission Wood Pole	40.649056	-122.946839	Douglas City
53	(4/19) 3068	Trans/Distrib Wood Pole	40.649145	-122.946691	Douglas City
54	(4/17) 3069	Trans/Distrib Wood Pole	40.649525	-122.946797	Douglas City
55	(4/18) 3070	Trans/Distrib Wood Pole	40.649844	-122.946888	Douglas City
56	(4/16) 3071	Trans/Distrib Wood Pole	40.650605	-122.946312	Douglas City
57	(4/15) 3072	Trans/Distrib Wood Pole	40.651128	-122.946030	Douglas City
58	7259	Wood Pole	40.650870	-122.945734	Douglas City
59	(4/14) 3073	Trans/Distrib Wood Pole	40.652044	-122.945540	Douglas City
60	(4/13) 3074	Trans/Distrib Wood Pole	40.652270	-122.945444	Douglas City
61	15939	Wood Pole	40.652155	-122.944765	Douglas City
62	15938	Wood Pole	40.652318	-122.944105	Douglas City
63	2609	Wood Pole	40.652693	-122.943591	Douglas City
64	T2610	Underground Padmount	Next to Site 63	Next to Site 63	Douglas City
65	3075	Wood Pole	40.652618	-122.945222	Douglas City
66	4/12	Transmission Wood Pole	40.653033	-122.944996	Douglas City
67	3076	Wood Pole	40.653033	-122.944996	Douglas City
68	J12851	Underground Junction Box	40.72	-122.931	Weaverville
69	5902	Wood Pole	40.738550	-122.948021	Weaverville
70	5907	Wood Pole	40.738345	-122.948486	Weaverville
71	5908	Wood Pole	40.738292	-122.949015	Weaverville
72	13428	Wood Pole	40.737977	-122.947354	Weaverville
73	5863	Wood Pole	40.731749	-122.941639	Weaverville
74	9484	Wood Pole	40.731810	-122.941456	Weaverville
75	Mill St Substation	NA	40.722796	-122.938744	Weaverville
76	7062	Wood Pole	40.721694	-122.831638	Lewiston
77	7063	Wood Pole	40.721805	-122.832140	Lewiston
78	7069	Wood Pole	40.720973	-122.827375	Lewiston

Site #	Pole/Equipment#	Structure Type	Latitude	Longitude	City
79	5756	Wood Pole	40.720730	-122.827649	Lewiston
80	7061	Wood Pole	40.714854	-122.819448	Lewiston
81	JuncBox next to 7061	Underground Junction Box	40.714854	-122.819448	Lewiston
82	7060	Wood Pole	40.715068	-122.818605	Lewiston
83	9844	Wood Pole	40.794792	-122.768678	Lewiston
84	9843	Wood Pole	40.794631	-122.768449	Lewiston
85	14979	Wood Pole	40.794740	-122.768600	Lewiston
86	2918	Wood Pole	40.689780	-122.853046	Lewiston
87	3731	Wood Pole	40.690207	-122.852336	Lewiston

V. Field Inspection Violations

ESRB observed the following violations during the field inspection:

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

“Electrical supply and 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.”

ESRB’s findings related to the above rule are listed in Table 2:

Table 2: GO 95, Rule 31.1 Findings

Site #	Violation Description
1	Pole top split.
11	Woodpecker damage on pole.
18	Distribution pole # 9848 has woodpecker damage.
18	Transmission pole with incoming 60kV line from Western Area Power Authority (WAPA) has woodpecker damage.
18	Distribution pole #9831 has woodpecker damage.
20	Pole top split and woodpecker damage on pole.
22	Woodpecker damage on pole. Sound test with hammer at pole base indicates decay/rot. There is also shell rot (outer bark coming loose) on lower portion of pole.
23	Woodpecker damage on pole.
25	Sound test with hammer at pole base indicates decay/rot.
26	Pole top split and woodpecker holes.
27	Sound test with hammer at pole base indicates decay/rot. Pole top split.
31	Woodpecker damage on pole.
32	Woodpecker damage on pole.
36	Sound test with hammer at pole base indicates decay/rot.
37	Woodpecker damage on pole. Sound test with hammer at pole base indicates decay/rot.
38	Pole top split.
40	Old pole needs to be removed.
45	Pole top split.
52	Missing pole ID tag.

53	Vegetation blocking access to down guys and street light is not working.
54	Street light is not working.
55	Remove UG riser and cable from old pole.
56	Woodpecker damage on pole.
57	Need additional High Visibility Strips.
61	Woodpecker damage on pole.
62	Pole top split.
68	UG Junction Box near golf course parking lot is damaged and was likely hit by vehicle. TPUD plans to add bollard.
70	Missing pole ID tag and inadequate clearance between service drop line and street light.
71	Woodpecker damage on pole and inadequate clearance between service drop line and street light.
72	Woodpecker damage on pole.
76	There is a birds nest on transformer and High Visibility Strip is loose.
77	Pole top split, Missing Pole Tag ID.
82	Woodpecker damage on pole.
83	There is a birds nest near B Phase equipment.

2. GO 95, Rule 34, Foreign Attachments states in part:

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

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

ESRB’s findings related to the above rule are listed in Table 3:

Table 3: GO 95, Rule 34 Findings

Site #	Violation Description
17	Greenleaf Ranch has bracket attached to pole.
17	Greenleaf Ranch fence is attached to pole
55	Unauthorized attachments on pole: Security Camera, Tow Away Zone sign, Security Camera sign.

69	Unauthorized attachments to pole: No Parking and Fire Lane signs.
70	Unauthorized attachments to pole.
76	Unauthorized attachment to pole address sign.

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

“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). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities.”

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

Table 4: GO 95 Rule 35 Findings

Site #	Violation Description
17	TPUD secondary service drop line going up hill is contacting tree branch and is under strain.
33	TPUD secondary service drop line going to equipment is contacting tree branch and is under strain.
39	TPUD secondary service drop line going down to house is contacting tree branch and is under strain.
56	TPUD secondary service drop line is contacting tree branch and is under strain.

4. GO 95, Rule 38 Minimum Clearances 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 9 requires Supply Conductors Service Drops 0 - 750 Volts to have 48 inches vertical separation from Communication Conductors (Column C).

Table 2 Case 19 requires Guys and span wires passing conductors supported on the same poles to have 3 inches clearance from Communication Conductors (Column C).

Table 2 Case 19 requires Guys and span wires passing conductors supported on the same poles to have 3 inches clearance from 0-750 Volts Including Service Drops (Column D)."

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

Table 5: GO 95 Rule 38 Findings

Site#	Violation Description
6	The secondary service drop does not have 48 inches separation from the Frontier Communication line (only about 40 inches).
58	TPUD down guy is contacting Frontier cable.
58	TPUD down guy from secondary service drop is less than 3 inches.

5. GO 95, Rule 44.3, Replacement states in part:

"Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade "C" construction that only support communication lines shall also conform to the requirements of Rule 81.3–A. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one."

ESRB's finding related to the above rule is listed in Table 6:

Table 6: GO 95 Rule 44.3 Finding

Site #	Violation Description
42	The top portion of the pole is twisted and under torsion and the pole is unbalanced with three conductors going to the left and only two conductors going to the right. There is also about a four-foot-long pole top split. A pole loading calculation is needed to confirm the safety factor requirements are met (Also see Records Violations II.1).

6. GO 95 Rule 51.6A Marking and Guarding, High Voltage Marking states in part:

“High Voltage Marking Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words “HIGH VOLTAGE”, or pair of signs showing the words “HIGH” and “VOLTAGE”, not more than six (6) inches in height with letters not less than 3 inches in height. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible.”

ESRB’s findings related to the above rule are listed in Table 7:

Table 7: GO 95 Rule 51.6A Findings

Site #	Violation Description
4	High Voltage Sign missing on lower crossarm.
18	High Voltage Sign is damaged on pole # 9831.
26	High Voltage Sign is coming loose.
28	High Voltage Sign is coming loose.
46	High Voltage Sign missing.
54	High Voltage Sign is coming loose.
55	High Voltage Sign is coming loose.
56	High Voltage Sign missing on middle and lower crossarms.
57	High Voltage Sign missing on middle crossarm.
60	High Voltage Sign is coming loose.
62	High Voltage Sign is coming loose.
63	High Voltage Sign is damaged.
75	High Voltage Sign is damaged on pole with incoming WAPA transmission line.

7. 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 8:

Table 8: GO 95 Rule 54.6.B Findings

Site #	Violation Description
6	Ground wire is exposed.
10	Ground molding is damaged.
11	Ground wire is exposed.
12	Ground wire is exposed.
23	Ground wire is exposed and molding is damaged.
29	Ground wire is exposed and molding is damaged.

31	Ground wire is exposed and molding is coming loose.
34	Ground wire is exposed.
36	Ground wire is exposed and molding is coming loose.
39	Ground wire is exposed.
42	Ground wire is exposed and molding is coming loose.
44	Ground wire is exposed and molding is missing.
59	Ground wire is exposed and molding is coming loose.
76	Ground wire is loose and unattached.

8. GO 95, Rule 54.7 Climbing and Working Space states in part:

“Climbing space shall be maintained from the ground level. Climbing space, measured from center line of pole, shall be provided on one side or in one quadrant of all poles or structures with dimensions as specified...”

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

Table 9: GO 95 Rule 54.7 Findings

Site #	Violation Description
7	Pole climbing obstruction by vegetation.
22	Pole climbing obstruction by vegetation.
28	Pole climbing obstruction by vegetation.
36	Pole climbing obstruction by vegetation.
40	Pole climbing obstruction by vegetation.
42	Pole climbing obstruction by vegetation.
46	Pole climbing obstruction by vegetation.
47	Pole climbing obstruction by vegetation.
49	Pole climbing obstruction by vegetation.
50	Pole climbing obstruction by vegetation.
77	Pole climbing obstruction by vegetation.

9. 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 findings related to the above rule are listed in Table 10:

Table 10: GO 95 Rule 56.2 Findings

Site #	Violation Description
1	Guy wire was loose/not taut.
22	Guy wire was loose/not taut.
38	Guy wire was loose/not taut.
43	Guy wire was loose/not taut.
53	Guy wire was loose/not taut.
56	Guy wire was loose/not taut.
59	Guy wire was loose/not taut.
76	Guy wire was loose/not taut.
83	Guy wire was loose/not taut.

10. 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 11:

Table 11: GO 95 Rule 56.9 Findings

Site #	Violation Description
38	Melted guy guard needs to be replaced.
42	Guy guard is missing on guy wire.
52	Guy guard is missing on guy wire.
56	Guy guard is damaged.
71	Guy guard is missing on guy wire.

11. GO 95, Rule 58.1B(3) Miscellaneous Equipment, Enclosed Equipment, Case and Lead Wire Clearances states in part:

“(Transformers, Capacitors, Regulators, etc. For purposes of this rule, enclosed means encased such as with case or tanks of equipment operated at greater than 750 volts).

Equipment cases, hangers, and other metal parts in contact therewith shall clear through bolts, arm braces of metal, and other hardware elements, by not less than 1.5 inches; except that such cases and hangers shall clear crossarm braces and crossarm through bolts by not less than 1 inch air–gap distance and 1.5 inch creepage distance.

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

ESRB's findings related to the above rule are listed in Table 12:

Table 12: GO 95 Rule 58.1B(3) Findings

Site #	Violation Description
15	Top bolt cover is loose for TPUD mounted equipment.
20	Transformer bolt insulator covers are missing and need to be installed.
26	Transformer bolt insulator covers are coming loose.
49	Transformer bolt insulator covers are missing and need to be installed.
55	Transformer bolt insulator covers are coming loose.
59	Transformer bolt insulator covers are missing and need to be installed.
61	Upper Transformer bolt insulator cover is coming loose.
76	Transformer bolt insulator cover is coming loose.
85	Transformer bolt insulator covers are coming loose.

12. GO 95, Rule 59.4(1) (a) Grounding, Material and Size, Grounding Conductors states in part:

“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 13 below:

Table 13: GO 95 Rule 59.4(2) Findings

Site #	Violation Description
5	Ground rod was exposed and not buried.
6	Ground rod was exposed and not buried.
16	Ground rod was exposed and not buried.

13. GO 95, Rule 91.3C Stepping states in part:

“Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step.”

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

Table 14: GO 95 Rule 91.3.C

Site #	Violation Description
39	Climbing step was 6 feet from ground line.

14. 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 surfacemounted 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 findings related to the above rule are listed in Table 15:

Table 15: GO 128 Rule 17.8 Findings

Site #	Violation Description
48	Padmount Transformer is missing TPUD ownership label and Transformer ID number.
64	Need to re-attach TPUD ID tag to transformer.
68	Junction box needs TPUD ownership label.
81	Junction box needs TPUD ownership label.

15. GO 174 Rules for Electric Utility Substations, Rule 32 Inspection Programs, Facilities states in part:

“32.1 Facilities subject to Inspection shall include, but are not limited to:

- *Batteries*
- *Buses*
- *Support Structures*
- *Capacitor Banks*
- *Circuit Breakers*
- *Fire Detection and Suppression System (Where applicable)*
- *Grounding System*
- *Insulators/Bushing/Arrestors*
- *Perimeter Fences and Gates*
- *Transformers*
- *Reactors*
- *Voltage Regulators”*

ESRB's findings related to the above rule are listed in Table 16:

Table 16: GO 174 Rule 32 Findings

Site #	Violation Description
18 (Hayfork Substation)	The incoming Voltage Recording-Meter Chart in the control room was not working.
18 (Hayfork Substation)	The fire extinguisher in the control room was last inspected in January 2024 instead of monthly.
75 (Mill Street Substation)	Ground rods are missing at three corner post locations on security fence.

VI. Field Observations

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 in Table 17:

Table 17: Third-Party Safety Concerns

Site #	Violation Description
1	Frontier Communications ground molding is only 7 ft 10 inches above ground line.

5	Frontier needs to transfer cable to new pole, has an abandoned service drop, and has low cable clearance < 18 ft (~11 ft) about 100 ft from pole on Blake Mountain Trail.
6	Frontier guy wire needs insulator bob.
20	Frontier guy wire needs insulator bob.
27	Frontier ground wire is exposed/damaged
40	Frontier guy wire is loose/not taut.
42	Frontier guy wire needs insulator bob.
44	Frontier guy wire needs insulator bob.
46	Frontier needs to transfer cable to new pole.
50	Frontier has damaged/open splice case on pole.
55	Frontier needs to transfer equipment to new pole and remove damaged guy wire from old pole.
58	Frontier needs to transfer equipment to new pole.
69	Frontier line does not have adequate clearance to street light fixture.
72	Velocity Communications (CATV) and Frontier do not have adequate clearance to 12 kV primary riser and need to lower their cables. Velocity and Frontier also do not meet clearance to street light fixture.
79	ATT needs to transfer equipment to new pole.
86	ATT needs to transfer equipment to new pole. Old pole was damaged in 2002 snowstorm. ATT has done nothing in over 23 years.
87	ATT needs to transfer equipment to new pole.