STATE OF CALIFORNIA GAVIN C. NEWSOM., *Governor*

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

October 28, 2025 EA2025-1327

Jonathan Moulton
Director of Asset Management
PacifiCorp
825 NE Multnomah Street, Suite 1700
Portland, OR 97232

SUBJECT: Electric Distribution Audit of PacifiCorp – Crescent City Division

Mr. Moulton:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Monica Hoskins and Rafael Herranz conducted an electric distribution audit of PacifiCorp's Crescent City Division from August 11 through 15, 2025. During the audit, ESRB staff conducted field inspections of PacifiCorp's distribution facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95, GO 128, and GO 165. A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than December 1, 2025, via electronic copy of all corrective actions and preventive measures taken by PacifiCorp 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 Distribution Audit Report for PacifiCorp Crescent City Division

Cc: Lee Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy, Water, CPUC
Chihsien "Eric" Wu, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
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Monica Hoskins, Utilities Engineer, ESRB, SED, CPUC
Rafael Herranz, Utilities Engineer, ESRB, SED, CPUC
Yongling Sun, Public Utility Resource Analyst, ESRB, SED, CPUC
Brian Pagel, Asset Planning Manager, PacifiCorp
Travis Rocha, Director of Line Inspection, PacifiCorp

PACIFICORP CRESCENT CITY DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
AUGUST 11 – 15, 2025

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, documents, procedures, and records for PacifiCorp's Crescent City Division:

- PacifiCorp's Inspection and Maintenance Procedures
- Open and late work orders from June 2020 to May 2025
- Completed work orders and cancelled work orders from June 2024 to May 2025
- Intrusive inspection records from June 2020 to May 2025
- Patrols and detailed inspections completed June 2020 to May 2025
- Reliability metrics and sustained outages for June 2020 to May 2025
- Statistics on overhead and underground facilities
- Division maps showing approximate locations of the plat maps administered by the division
- New Construction Projects list, June 2024 to June 2025
- Pole Loading Calculations list, June 2024 to June 2025
- Outgoing Third-Party Safety Hazard notifications sent June 2020 to May 2025
- List of inspectors and patrolmen active from June 2020 May 2025
- Records of all equipment tests completed May 2022 to April 2025

II. Records Violations

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

1. **General Order (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.*
>
> *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.*
>
> *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."*

PacifiCorp's *Transmission and Distribution System Condition Priorities and Correction Timeframes*: Asset Management Policy No. 292 (Revision 4) published on January 22, 2025, defines the priority codes and associated time frames for repair actions as follows:

GO 95 Priority	Company Priority	Energy Release Risk[1]	CA Suggested Correction Period			GO 95 Compliance Requirements[2]		
			Non-Tier	Tier 2	Tier 3	Non-Tier	Tier 2	Tier 3
Level 1	I[2]	All	Immediately	Immediately	Immediately	Immediately	Immediately	Immediately
Level 2	A	Y	30 days	30 days	30 days	12 months	12 months	6 months
	A	N	30 days	30 days	30 days	12 months	12 months	12 months
Level 2	B	Y	36 months	6 months	6 months	36 months	12 months	6 months
	B	N	36 months	36 months	36 months	36 months	36 months	36 months
Level 3	C	N	36 months	36 months	36 months	60 months	60 months	60 months

[1]Energy Release Risks are determined and distinguished in Procedure 069. These conditions may pose a fire risk.
[2]Compliance period in accordance with GO 95. "A" priority may compromise worker safety and correction period is shown as 12 months instead of 36 months. Before June 30, 2019, when the correction time periods were modified to account for the High Fire Threat District, correction time period was immediately for Level 1 and 59 months for Level 2. No time period was established for Level 3 priorities.
[2]Imminent Threat conditions were created May 2024 to differentiate conditions that require immediate repair.

ESRB's review of PacifiCorp's Crescent City Division work orders from June 2020 to May 2025 found that PacifiCorp had 149 out of a total of 1,637 (9.1%) late-pending work orders, 173 out of a total of 1,451 (11.9%) late-closed work orders, and 360 out of a total of 657 (54.8%) late-removed work orders. Late-pending work orders are work orders that have not been completed by their assigned due date based on their hazard level. Late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Late-removed work orders are work orders that were not corrected or cancelled in PacifiCorp's system prior to their assigned due date. Table 1 below breaks down all the 682 late work orders in PacifiCorp's Crescent City Division by hazard level and late work order type.

Table 1: Crescent City Division Late Work Orders

Priority Level	Late-Pending Work Orders[1]	Late-Closed Work Orders	Late-Removed Work Orders	Total Late Work Orders
Level 1	–	–	–	0
Level 2	119	19	321	459
Level 3	30	154	39	223
Total	149	173	360	**682**

[1]As of May 31, 2025

The work order for facility point `07113001.0158001 for a climbable riser into the primary and open wire secondary has the longest Priority Level 2-A past due date of 1,099 days. The work order had a suggested correction date of March 11, 2022 and was completed on March 14, 2025.

The work order for facility point `07216001.0299808 for missing bolt covers has the longest Priority Level 3-C past due date of 4,330 days. The work order had a suggested correction date of June 13, 2013 and was completed on April 21, 2025.

2. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc.** states in part:

   "Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind."

   a. PacifiCorp's *Clearance Table Condition Codes* NO 25: CLRBLDG designates the allowable clearance for power conductors from a building/sign. PacifiCorp references GO 95, Rule 86.6(f), which is not a rule in GO 95. PacifiCorp must adjust their clearance codes to reference GO 95, Rule 37, Table 1.

   b. PacifiCorp's *Clearance Table Condition Codes* NO 198: SVCDECK designates the allowable clearance for power service conductors from decks. PacifiCorp references GO 95, Rule 84.8-C(4)(b), which is only applicable to communication facilities. PacifiCorp must adjust their clearance codes to reference GO 95, Rule 37, Table 1.

3. **GO 95, Rule 31.2, Inspection of Lines** states in part:

   "Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard."

   GO 128, 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 these rules."

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."*

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

a. ESRB's review of PacifiCorp's overhead patrols and inspections for the Crescent City Division identified a total of 6 late overhead patrols and inspections out of a total of 34,505 (0.02%) from June 2020 to May 2025. PacifiCorp completed 1 overhead patrol inspection late and 5 overhead detailed inspections late.

b. ESRB's review of PacifiCorp's overhead patrols and inspections for the Crescent City Division identified a total of 132 late underground patrols and inspections out of a total of 5,708 (2.3%) from June 2020 to May 2025. PacifiCorp completed 70 underground patrols late and 62 underground detailed inspections late.

c. ESRB's review of PacifiCorp's intrusive inspections for the Crescent City Division identified a total of 228 late intrusive inspections from June 2020 to May 2025. PacifiCorp completed the 228 Pole Test and Treat (PTT) inspections more than 20 years after the previous inspection.

4. GO 165, Rule 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."

PacifiCorp uses their suggested correction dates as due dates in their records to ensure that work orders are completed within the required timeframes. ESRB identified 7 open Priority B and 3 Priority C work orders that have no suggested correction date or assigned due date, as required by GO 165, Rule III-C. Table 2 below details the overhead open work orders with no suggested correction dates.

Table 2: Work Orders with No Suggested Correction Date

Facility Point Name	Inspection Date	Priority
`07113001.0056503	3/21/2023	B
`07113001.0055500	3/21/2023	B
`07113001.0056500	3/21/2023	B
`07113001.0057503	3/21/2023	B
`07117002.0200304	3/2/2023	B
`07114001.0338500	3/15/2023	B
`07117002.0205208	3/9/2023	B
`07113001.0056501	3/21/2023	C
`07114001.0338501	3/22/2023	C
`07114001.0341600	3/15/2023	C

III. Field Inspection

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

Location	Asset Type	Facility Point Number	GPS Coordinates
1	Pole	`07218001.0041600	41.982500, -124.195278
2	Pole	`07218001.0041601	41.9824232, -124.1941108
3	Pole	`07219001.0041601	41.9825548, -124.1929588
4	Pole	`07218001.0176502	41.9520538, -124.2022084
5	Pole	`07218001.0176503	41.9524368, -124.2014959
6	Pole	`07218001.0176500	41.9521869, -124.2010490
7	Pole	`07218001.0176504	41.9517832, -124.2026912
8	Pole	`07218001.0266740	41.9270180, -124.1423840
9	Pole	`07218001.0267762	41.9272058, -124.1418905
10	Pole	`07218001.0266800	41.9277987, -124.1424343
11	Pole	`07217001.0137160	41.8596757, -124.1223607
12	Underground Switch Gap	`07217001.0137180	41.8596757, -124.1223607
13	Pole	`07217001.0137161	41.8605824, -124.1222490
14	Pole	`07217001.0137100	41.8609210, -124.1222296
15	Pole	`07217001.0137260	41.8615305, -124.1222692
16	Pole	`07217001.0137261	41.8622014, -124.1223245
17	Underground Padmount Transformer	`07217001.0137080	41.8594477, -124.1223298
18	Underground Padmount Transformer	`07217001.0136080	41.8588776, -124.1245822
19	Underground Splice Cabinet	`07217001.0136082	41.8592644, -124.1245054
20	Underground Padmount Transformer	`07217001.0136081	41.8592619, -124.1242657
21	Pole	`07217001.0276803	41.8418835, -124.1632389
22	Pole	`07217001.0276804	41.8421603, -124.1630770
23	Pole	`07217001.0276805	41.8427737, -124.1627423
24	Pole	`07217001.0276900	41.8429970, -124.1624121
25	Pole	`07217001.0275400	41.8363093, -124.1664290
26	Pole	`07217001.0275441	41.8362031, -124.1660747
27	Pole	`07216001.0032103	41.8043536, -124.1709385
28	Pole	`07216001.0032102	41.8042288, -124.1712704
29	Pole	`07216001.0031204	41.8047559, -124.1720516
30	Pole	`07216001.0031203	41.8052065, -124.1727614
31	Pole	`07216001.0030302	41.8061217, -124.1741367
32	Pole	`07216001.0030301	41.8063814, -124.1743791
33	Pole	`07216001.0101502	41.7946311, -124.1732516
34	Pole	`07216001.0101440	41.7944478, -124.1727805

Location	Asset Type	Facility Point Number	GPS Coordinates
35	Pole	`07216001.0101402	41.7944256, -124.1723879
36	Pole	`07216001.0187403	41.7800374, -124.2197903
37	Pole	`07216001.0187402	41.7800462, -124.2191824
38	Pole	`07216001.0187400	41.7795304, -124.2192381
39	Pole	`07216001.0214902	41.7718880, -124.1861946
40	Pole	`07216001.0214904	41.7716387, -124.1859518
41	Pole	`07216001.0215903	41.7720561, -124.1852491
42	Pole	`07216001.0215920	41.7720561, -124.1852491
43	Pole	`07216001.0214903	41.7716610, -124.1852105
44	Pole	`07113002.0183704	41.521111, -123.987778
45	Pole	`07113002.0183601	41.520556, -123.988889
46	Pole	`07113002.0182600	41.520278, -123.989167
47	Pole	`07113002.0182601	41.520556, -123.989722
48	Pole	`07113002.0182700	41.521389, -123.989444
49	Pole	`07113002.0183705	41.521667, -123.988889
50	Pole	`07113001.0159800	41.522500, -124.032778
51	Pole	`07113001.0140801	41.522500, -124.032222
52	Pole	`07113001.0140800	41.521944, -124.031944
53	Pole	`07113001.0030000	41.540000, -124.050000
54	Pole	`07113001.0030001	41.540278, -124.049444
55	Pole	`07113001.0031001	41.539444, -124.049167
56	Pole	`07114001.0205001	41.583611, -124.085833
57	Pole	`07114001.0206004	41.583611, -124.085833
58	Pole	`07114001.0205003	41.583611, -124.086667
59	Pole	`07216001.0270760	41.7547153, -124.1748441
60	Pole	`07216001.0270660	41.7542661, -124.1748284
61	Pole	`07216001.0270661	41.7537714, -124.1747489
62	Pole	`07216001.0270601	41.7536891, -124.1744130
63	Padmount Switch Cabinet/Fuse Cabinet	Abandoned UG fuse cabinet	41.7536891, -124.1744130
64	Pole	`07216001.0270602	41.7534997, -124.1741186
65	Pole	`07216001.0209603	41.7673930, -124.1955236
66	Pole	`07216001.0209600	41.7673020, -124.1951079
67	Pole	`07216001.0209604	41.7674210, -124.1961060
68	Pole	`07216001.0209607	41.7679982, -124.1960782
69	Pole	`07216001.0201111	41.7598508, -124.2120668
70	Pole	`07216001.0200109	41.7598478, -124.2127287
71	Pole	`07216001.0200100	41.7604152, -124.2126009
72	Pole	`07216001.0200101	41.7606736, -124.2126210
73	Pole	`07216001.0200104	41.7611923, -124.2126026
74	Pole	`07216001.0200202	41.7615424, -124.2126619

Location	Asset Type	Facility Point Number	GPS Coordinates
75	Underground Padmount Transformer	`07216001.0290988	41.7581556, -124.2119937
76	Underground Switch Cabinet	`07216001.0290992	41.7579803, -124.2127531
77	Underground Padmount Transformer	`07216001.0290989	41.7579803, -124.2127531
78	Underground Padmount Transformer	`07216001.0291985	41.7575728, -124.2123451
79	Underground Padmount Transformer	`07216001.0193382	41.7626198, -124.2265434
80	Underground Junction Box	`07216001.0193383	41.7629271, -124.2274389
81	Underground Padmount Transformer	`07216001.0194380	41.7628001, -124.2256093
82	Underground Padmount Transformer	`07216001.0194280	41.7622919, -124.2244348
83	Underground Junction Box	`07216001.0194282	41.7620493, -124.2253894
84	Underground Padmount Transformer	`07216001.0194281	41.7620493, -124.2253894
85	Pole	`07216001.0198311	41.7636921, -124.2169458
86	Pole	`07216001.0198312	41.7638532, -124.2168579
87	Pole	`07216001.0198309	41.7641260, -124.2171389
88	Pole	`07216001.0198300	41.7641118, -124.2175466
89	Pole	`07216001.0198308	41.7641350, -124.2180746
90	Pole	`07216001.0198400	41.7644864, -124.2180713
91	Pole	`07216001.0198401	41.7649538, -124.2180693
92	Pole	`07117003.0082460	41.881275, -123.864441
93	Pole	`07117003.0082400	41.881111, -123.864167
94	Pole	`07117003.0083301	41.880556, -123.863333
95	Pole	`07117003.0083300	41.879722, -123.862500
96	Pole	`07117002.0207501	41.8513774, -123.9680465
97	Pole	`07117002.0207603	41.8518336, -123.9684431
98	Pole	`07117002.0207602	41.8524562, -123.9685638
99	Pole	`07117002.0207702	41.8533268, -123.9682309
100	Pole	`07117002.0207703	41.8538457, -123.9682356
101	Pole	`07117002.0205208	41.8457320, -123.9712933
102	Pole	`07117002.0205209	41.8455422, -123.9718495
103	Pole	`07117002.0205210	41.8455799, -123.9723994
104	Pole	`07117002.0205102	41.8455169, -123.9731464
105	Pole	`07116001.0168903	41.7880737, -124.0636062
106	Pole	`07116001.0167904	41.7873270, -124.0637584
107	Pole	`07116001.0167903	41.7872893, -124.0645524

Location	Asset Type	Facility Point Number	GPS Coordinates
108	Pole	`07116001.0167902	41.7871195, -124.0650221
109	Pole	`07116001.0167901	41.7872270, -124.0653550
110	Pole	`07116001.0093301	41.7934990, -124.0716984
111	Pole	`07116001.0093300	41.7933215, -124.0716549
112	Pole	`07116001.0093202	41.7923886, -124. 0723311
113	Pole	`07116001.0093201	41.7917612, -124.0724666
114	Pole	`07116001.0090901	41.8025931, -124.0779084
115	Pole	`07116001.0059800	41.8123384, -124.0802788
116	Pole	`07116001.0040702	41.8117041, -124.0796790
117	Pole	`07116001.0040701	41.8110307, -124.0791161
118	Underground Padmount Transformer	`07116001.0040280	41.8060568, -124.0783037
119	Underground Padmount Transformer	`07116001.0041180	41.8051533, -124.0786403
120	Underground Padmount Transformer	`07116001.0098381	41.7932443, -124.0627382
121	Underground Padmount Transformer	`07116001.0098281	41.7929373, -124.0627949
122	Underground Padmount Transformer	`07116001.0099380	41.7929388, -124.0608097
123	Underground Padmount Transformer	`07116001.0099381	41.7932048, -124.0604348
124	Underground Padmount Transformer	`07116001.0098380	41.7937254, -124.0628505
125	Pole	`07117001.0304400	41.836389, -124.110556
126	Pole	`07117001.0304700	41.8399645, -124.1092182

IV. Field Inspection Violations

ESRB identified 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."*

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

Table 3: GO 95, Rule 31.1 Findings

Location	Finding
1	The pole has an incorrect identification number that differs from the number listed on PacifiCorp's map.
2	The pole has dirty insulators that need washing.
3	The pole has dirty insulators that need washing.
15	The pole is missing the distribution identification and pole number plate.
33	The pole has dirty insulators that need washing. PacifiCorp has an existing tag to replace the pole.
38	The pole is missing the distribution identification and pole number plate.
45	The pole is missing visibility strips.[1]
46	The pole is missing visibility strips.
49	The pole is missing visibility strips.
54	The pole is missing the distribution identification and pole number plate.
56	The pole has an incorrect identification number that differs from the number listed on PacifiCorp's map.
58	The pole is missing the distribution identification and pole number plate.
70	The pole is missing visibility strips.
71	The pole is missing visibility strips.
73	The pole is missing visibility strips. The pole has dirty insulators that need washing.

[1] PacifiCorp Procedure 069 – Condition Codes, Code 176 requires any structure that is less than 4 feet of the curb or road edge to have visibility striping or protective-type barrier installed.

Location	Finding
74	The pole is missing visibility strips.
86	The pole is missing visibility strips.
91	The pole has dirty insulators that need washing.
96	The pole is missing the distribution identification and pole number plate.
99	The pole has loose insulator bolt plates that are not flush with the pole.
107	The pole has dirty insulators that need washing.

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

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

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

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

Table 4: GO 95, Rule 34 Finding

Location	Finding
64	The pole has an unauthorized third-party attachment.
66	The pole has an unauthorized third-party attachment obscuring the pole number.

3. **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 5:

Table 5: GO 95, Rule 35 Findings

Location	Finding
69	Excessive vegetation is surrounding the pole and impeding the climbing space. PacifiCorp has an existing tag for this issue.

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

“The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive.

Table 2, Case 19C: The radial separation between guys and span wires passing communication conductors (including open wire, cables, and service drops) supported on the same poles must be at least 3 inches.”

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

Table 6: GO 95, Rule 38 Finding

Location	Finding
39	The primary anchor down guy is in contact with the communication (Frontier) conductor.

5. **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 7:

Table 7: GO 95, Rule 51.6-A Findings

Location	Finding
4	The pole has a missing high voltage sign.
13	The pole has a missing high voltage sign.
15	The pole has a missing high voltage sign.
49	The pole has a missing high voltage sign.
64	The pole has a damaged high voltage sign.
67	The pole has a missing high voltage sign.
70	The pole has a damaged high voltage sign.
88	The pole has a damaged high voltage sign.
94	The pole has a damaged high voltage sign.

6. **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 Finding

Location	Finding
33	The pole has an exposed ground wire. PacifiCorp has an existing tag to replace the pole.
42	The pole has an exposed ground wire.
43	The pole has an exposed transformer ground wire.
45	The pole has an exposed transformer ground wire.
46	The pole has an exposed secondary ground wire.
51	The pole has an exposed secondary ground wire.
58	The pole has an exposed transformer ground wire.
61	The pole has an exposed transformer ground wire.
72	The pole has an exposed transformer ground wire.
73	The pole has an exposed transformer ground wire.
90	The pole has an exposed transformer ground wire.
97	The pole has an exposed transformer ground wire.
102	The pole has an exposed transformer ground wire.
114	The pole has an exposed transformer ground wire.

7. **GO 95, Rule 54.7-A(3)(j), Climbing and Working Space, Allowable Climbing Space Obstructions** states in part:

   "Bolts and their washers. However, bolts bonded to or used for the attachment of deadend hardware of circuits above 750 volts in wood crossarm configuration that project into the climbing space shall be covered with a non-conductive material as specified in Rule 22.8-C. If such bolts are bonded, a positive electrical contact shall be made."

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

Table 9: GO 95, Rule 54.7-A(3)(j) Findings

Location	Finding
96	The pole has missing transformer bolt covers. PacifiCorp has an existing tag for this issue.

Location	Finding
98	The pole has loose transformer bolt covers.
116	The pole has missing transformer bolt covers.

8. **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

Location	Finding
41	The secondary anchor down guy is slack.
42	The anchor down guy is slack.
107	The secondary anchor down guy is slack.

9. **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 findings related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 56.7-B Findings

Location	Finding
40	The pole has vegetation above the guy insulator that is contacting and grounding the primary and secondary anchor down guys.
70	The pole has vegetation above the guy insulator that is contacting and grounding the anchor down guy.

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

Table 12: GO 95, Rule 56.9 Finding

Location	Finding
48	The anchor down guy is missing a guy guard.

11. GO 95, Rule 59.4-A(2)(c) Grounding, Material and Size, Ground Rods (Ground Electrodes) states in part:

> *"Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground."*

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

Table 13: GO 95, 59.4-A(2)(c) Finding

Location	Finding
33	The pole has an exposed grounding rod. PacifiCorp has an existing tag to replace the pole.

12. GO 95, Rule 91.3-C, Stepping states:

> *"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. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps."*

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

Table 14: GO 95, Rule 91.3-C Finding

Location	Finding
72	The pole has a low pole step.

13. **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 findings related to the above rule are listed in Table 15:

Table 15: GO 128, Rule 17.8 Findings

Location	Finding
18	The padmount transformer is missing an ownership marking.
63	The padmount switch is missing an ownership marking.
78	The padmount transformer is missing an ownership marking.
118	The padmount transformer is missing an ownership marking.

14. **GO 128, Rule 35.3, Warning Signs** states:

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

    ESRB's finding related to the above rule is listed in Table 16:

Table 16: GO 128, Rule 35.3 Finding

Location	Finding
118	The padmount transformer has a faded high voltage sign.

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 17:

Table 17: Third-Party Observations

Location	Observation
1	The pole has a slack Spectrum anchor down guy.
3	Frontier has an incomplete pole transfer. The pole has a low Spectrum line with insufficient clearance.
5	Frontier has an incomplete pole transfer. The pole has Spectrum equipment in contact with an anchor down guy above the insulator bob.
6	The pole has an abandoned underground communications conductor.
8	The pole has an abandoned Frontier drop.
14	The pole has an exposed Spectrum ground wire.

Location	Observation
15	The pole has an unsecured Spectrum drop.
16	The pole has an abandoned communications ground wire.
21	Frontier has an incomplete pole transfer.
25	Frontier and Charter have incomplete pole transfers.
26	The communications pole has obstructed climbing space. PacifiCorp has an existing tag for this issue.
27	The pole has an unsecured Spectrum drop.
28	Communications has an incomplete pole transfer.
32	The pole has an abandoned communications drops. The pole has communication anchor down guys in contact above the insulator bobs.
39	The pole has a slack Spectrum anchor down guy.
40	The pole has a slack Spectrum anchor down guy.
43	The pole has an abandoned Frontier drop.
46	The pole has an unsecured communications drop.
48	The communications pole between Location 47 and Location 48 is leaning.
49	The Frontier conductor between the pole at Location 49 and the next pole is low and only supported by a stick.
50	The pole has a slack communications anchor down guy.
53	The pole has an abandoned communications drop.
56	The pole has an abandoned communications drop. The pole has communication conductors in contact. The pole has an unattached communications down guy with no anchor.
65	The pole has a slack communications anchor down guy.
69	Frontier has vegetation causing excessive strain and abrasion on drops between Location 69 and Location 70.
70	Frontier has an incomplete pole transfer. The pole has vegetation above the Spectrum anchor down guy insulator bob.
72	The pole has an exposed communications ground wire.
74	The pole has Frontier drops in contact with Spectrum facilities.
85	The pole has an abandoned communications drop.

Location	Observation
87	The pole has an unattached communications down guy with no anchor.
88	The pole has unsecured Frontier drops hanging from the Frontier equipment box.
89	The pole has an unattached Spectrum down guy with no anchor.
90	The pole has abandoned communications drops.
92	Spectrum has a low line unsupported by poles along Old Gasquet Toll Road, Gasquet.
96	The pole has an abandoned Spectrum drop.
97	The pole has vegetation causing excessive strain on a Spectrum drop.
100	The pole has a slack Spectrum down guy.
102	The pole has an abandoned Spectrum drop.
105	The pole has abandoned Frontier and Spectrum drops.
106	The pole has an abandoned Frontier drop.
108	The pole has an abandoned Frontier drop.
110	The pole has an unsecured Spectrum drop. The pole has a cut exposed Frontier ground wire.
111	The pole has a slack Spectrum down guy.
114	The pole has an abandoned Frontier drop.
116	The pole has Spectrum equipment in contact with Frontier facilities.
117	The pole has an unsecured Frontier riser. Communications drops in contact between Location 116 and Location 117.
123	Spectrum has underground equipment with no riser.
124	Spectrum has an uncovered underground enclosure. Frontier has underground equipment with no enclosure.