

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 7, 2025

EA2025-1357

Jennifer Kaminsky
Manager – Electric Assets & Compliance
San Diego Gas and Electric (SDG&E)
8315 Century Park Court, Suite CP22B
San Diego, CA 92123

Subject: Audit of SDG&E's Orange County District

Ms. Kaminsky:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), James Miller of my staff conducted an electric distribution audit of SDG&E's Orange County District from July 28 to August 1, 2025. The audit included a review of SDG&E's inspection and maintenance records and a field inspection of SDG&E's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than November 7, 2025, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent 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 also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact James Miller at (213) 660-8898 or James.Miller@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC

Audit Findings

I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records
- Late Inspections
- Work Orders Created from Inspections
- Repair Work Orders
- Intrusive Testing Records
- Third Party Notifications
- Pole Loading Calculation Records

II. Field Inspection

My staff inspected the following facilities during the field inspection portion of the audit:

No.	Facility Identification	Facility Type	Location
1	P226634	Pole	Rancho Mission Viejo
2	P226633	Pole	Rancho Mission Viejo
3	P226632	Pole	Rancho Mission Viejo
4	P226631	Pole	Rancho Mission Viejo
5	P322506	Pole	Rancho Mission Viejo
6	P226630	Pole	Rancho Mission Viejo
7	P226629	Pole	Rancho Mission Viejo
8	P226628	Pole	Rancho Mission Viejo
9	P226627	Pole	Rancho Mission Viejo
10	P226626	Pole	Rancho Mission Viejo
11	P226625	Pole	Rancho Mission Viejo
12	P226624	Pole	Rancho Mission Viejo
13	P226623	Pole	Rancho Mission Viejo
14	P226622	Pole	Rancho Mission Viejo
15	P226621	Pole	Rancho Mission Viejo
16	P226620	Pole	Rancho Mission Viejo
17	P108727	Pole	Rancho Mission Viejo
18	Z101560	Pole	Rancho Mission Viejo
19	P126570	Pole	San Juan Capistrano
20	P126575	Pole	San Juan Capistrano
21	P126576	Pole	San Juan Capistrano
22	P126577	Pole	San Juan Capistrano
23	P126578	Pole	San Juan Capistrano

24	P126579	Pole	San Juan Capistrano
25	P126580	Pole	San Juan Capistrano
26	P126571	Pole	San Juan Capistrano
27	P126572	Pole	San Juan Capistrano
28	P126573	Pole	San Juan Capistrano
29	P126574	Pole	San Juan Capistrano
30	P120066	Pole	South San Clemente
31	P120067	Pole	South San Clemente
32	P38993	Pole	South San Clemente
33	P38992	Pole	South San Clemente
34	P38991	Pole	South San Clemente
35	P120576	Pole	South San Clemente
36	P120575	Pole	South San Clemente
37	P120574	Pole	South San Clemente
38	P28311	Pole	South San Clemente
39	P120573	Pole	South San Clemente
40	P29992	Pole	South San Clemente
41	P28128J	Pole	South San Clemente
42	JP28127	Pole	South San Clemente
43	P28126	Pole	South San Clemente
44	P121646	Pole	South San Clemente
45	P28125	Pole	South San Clemente
46	P28124J	Pole	South San Clemente
47	P28123	Pole	South San Clemente
48	P128957	Pole	Dana Point
49	P185935	Pole	Dana Point
50	P128934	Pole	Dana Point
51	P128021	Pole	Dana Point
52	P128946	Pole	Dana Point
53	P128945	Pole	Dana Point
54	P128019	Pole	Dana Point
55	P128020	Pole	Dana Point
56	P320139	Pole	Dana Point
57	P128964	Pole	Dana Point
58	P128965	Pole	Dana Point
59	P128966	Pole	Dana Point
60	P128018	Pole	Dana Point
61	P128920	Pole	Dana Point
62	P127963	Pole	Dana Point
63	P220934	Pole	Laguna Niguel
64	P220933	Pole	Laguna Niguel
65	P220932	Pole	Laguna Niguel
66	P220935	Pole	Laguna Niguel

67	P38958	Pole	Laguna Niguel
68	P220936	Pole	Laguna Niguel
69	P220937	Pole	Laguna Niguel
70	P220938	Pole	Laguna Niguel
71	P220698	Pole	Laguna Niguel
72	P220699	Pole	Laguna Niguel
73	P197701	Pole	Laguna Niguel
74	P220700	Pole	Laguna Niguel
75	D221104	Padmounted Transformer	Rancho Mission Viejo
76	H132847	Hand Hole	Rancho Mission Viejo
77	D221096	Padmounted Transformer	Rancho Mission Viejo
78	SH2278949	Hand Hole	Rancho Mission Viejo
79	D221099	Padmounted Transformer	Rancho Mission Viejo
80	H182846	Hand Hole	Rancho Mission Viejo
81	D221098	Padmounted Transformer	Rancho Mission Viejo
82	D221102	Padmounted Transformer	Rancho Mission Viejo
83	H132848	Hand Hole	Rancho Mission Viejo
84	P221033	Padmounted Transformer	Rancho Mission Viejo
85	D221031	Padmounted Transformer	Rancho Mission Viejo
86	D219885	Padmounted Transformer	Rancho Mission Viejo
87	D219867	Padmounted Transformer	Rancho Mission Viejo
88	D108421	Fuse Cabinet	Laguna Niguel
89	H4979555849	Hand Hole	Laguna Niguel
90	W100193	Padmounted Switch	Laguna Niguel
91	D130315	Padmounted Capacitor Bank	Laguna Niguel
92	W100206	Padmounted Switch	Laguna Niguel
93	D105020	Fuse Cabinet	Laguna Niguel
94	H102110	Hand Hole	Laguna Niguel
95	D4812655776	Padmounted Transformer	Dana Point
96	D4823755752	Padmounted Transformer	Dana Point
97	D4825455713	Padmounted Transformer	Dana Point
98	D4819955747	Padmounted Transformer	Dana Point
99	D4822255708	Padmounted Transformer	Dana Point
100	P128855	Pole	San Clemente
101	P220418	Pole	San Clemente
102	P23058	Pole	San Clemente
103	P122348	Pole	San Clemente
104	P24132	Pole	San Clemente
105	P25058	Pole	San Clemente
106	P121075	Pole	San Clemente
107	P128854	Pole	San Clemente
108	P25591	Pole	San Clemente

III. Field Inspection – Violations List

My staff observed the following violations during the field inspection portion of the audit:

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.

The following overhead facilities required maintenance:

- A guy guard on a down guy wire attached to Pole No. P226632 was damaged and partially detached from the down guy wire.
- The visibility strips attached to Pole No. P128021 were damaged.

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](#).

A down guy wire attached to Pole No. P126573 was not taut.

General Order 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be three inches.

An SDG&E down guy wire attached Pole No. P126579 passed a third-party communications conductor supported on the same pole with less than three inches of radial clearance.

An SDG&E down guy wire attached Pole No. P126573 was in contact with a third-party communications conductor supported on the same pole.

An SDG&E down guy wire attached Pole No. P121646 was in contact with a third-party communications conductor supported on the same pole.

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.

An SDG&E down guy wire attached to Pole No. P128920 had no guy marker or guard attached to it.

GO 95, Rule 84.4–D4, Conductors Passing Supply Poles and Unattached Thereto, states:

The center line clearance between poles supporting supply conductors and any communication conductors which pass such poles unattached shall be not less than 22 1/2 inches (1 1/2 times the clearance specified in Table 1, Case 8), except where the supply pole is within 10 feet of the pole on which the communication conductors are supported. Where poles of the two lines are less than 10 feet apart, clearances not less than as specified in Table 1, Case 8, shall be maintained.

Two third-party communications conductors unattached to Pole No. P120067 were in contact with the surface of the pole.

GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.

Padmounted Capacitor Bank No. D130315 had extensive corrosion around its base and on the inside and outside of its access doors.