



February 26, 2026

Chron: DPO 26-001

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

Subject: Electric Substation Audit of Sacramento Municipal Utility District (SMUD)

Dear Mr. Tse:

Attached is SMUD's response to your letter dated December 29, 2025, regarding the audit of SMUD's substations conducted by Mr. Tom Roberts and Mr. Raphael Herranz from October 27 through October 31, 2025.

Please contact me if you have any questions regarding SMUD's responses.

Sincerely,

Raul Pantoja

Raúl Pantoja, P.E.

Manager, T&D Maintenance Planning & Standards

Energy Delivery & Operations

Sacramento Municipal Utility District

(916) 732-7285

Raul.Pantoja@smud.org

cc: Frankie McDermott
Laura Lewis
Amandeep Singh
Eric Poff
Christy Dray
Terry McNemar
John Trumbull
Tien Luu
Joy A. Mastache
Corporate Records

SMUD'S RESPONSE TO CPUC SUBSTATION AUDIT FINDINGS

The California Public Utilities Commission (CPUC) Electric Safety and Reliability Branch (ESRB) conducted an audit of the Sacramento Municipal Utility District (SMUD) distribution and transmission substations during the period from October 27 through October 31, 2025. Mr. Rickey Tse of the ESRB provided a summary of the audit findings to SMUD by letter dated December 29, 2025.

CPUC Resolution ESRB-11 dated July 11, 2024, expanded the scope of GO 174 to include substations subject to the California Independent System Operator's (CAISO) operational control and/or subject to the Federal Energy Regulatory Commission's (FERC) reliability standards. While SMUD and the CPUC have differing views regarding the CPUC's jurisdiction over SMUD under GO 174 and whether substations regulated by FERC fall within the CPUC's scope, SMUD has historically cooperated with the CPUC on general order audits. In the spirit of continued voluntary cooperation, SMUD provided access to its records and facilities related to the audit and appreciates the CPUC's input throughout the process.

SMUD's overarching objective is to provide safe, reliable, environmentally sustainable and economic electric power to its community. Key to SMUD's objective is to plan, maintain and operate a safe and reliable system, and we appreciate the CPUC's audit observations to the extent they help us achieve that objective. After reviewing the audit findings, SMUD disagrees with several findings as they are outside the scope of GO 174, factually inaccurate, or otherwise unsupported. Notwithstanding this disagreement, SMUD has addressed the auditors' observations as detailed in the specific responses that follow. As described below, **none of the observations noted in the findings identify critical conditions that affect the safety or operation of SMUD's facilities or electric system.**

Many of the observations reflected in the audit findings were also addressed in the information SMUD provided as part of the Pre-Audit Data Request (PADR) responses. SMUD observed that this information was not accounted for in the findings and for clarity this response restates the relevant information below in each specific case.

Responses to Specific Findings

In further voluntary cooperation, SMUD offers the following response to ESRB's audit findings. In many cases, notwithstanding its disagreement with the audit findings, SMUD issued Work Orders and planned to and/or completed work to resolve the identified conditions. These Work Orders were prioritized as "Urgent" solely to expedite the resolution of the audit findings. The "Urgent" prioritization was not based on SMUD's prioritization criteria and does not indicate any level of criticality for the conditions.

Section II – Records Violations

In recognition of the changes to GO 174 adopted through ESRB-11 (July 11, 2024), SMUD initiated the process to update its Substation Visual Inspection Plan and related references. These updates were finalized and approved as of November 5, 2025. The revised plan includes provisions for a transitional period, allowing for a comprehensive review and adjustment of existing work processes.

The 2025 update of SMUD’s Substation Visual Inspection Plan and associated references were not provided as part of the PADR to ESRB as they were finalized after the PADR requested five year period ending August 31, 2025. Nevertheless, on-going work pertaining to SMUD’s updated visual inspection plan transitional period is detailed below as related to ESRB’s observations.

ESRB found that SMUD’s corrective action records had three deviations from SMUD’s prioritization procedure and SMUD’s detailed response is below.

ESRB also identified one table of “Overdue Corrective Action Work Orders” listing notifications that were overdue. Notifications are the mechanism by which SMUD initiates corrective maintenance work. Substation corrective maintenance work is tagged with a Station Recorder Findings code in SMUD’s Work Management System.

1.
 - a. *ESRB Finding: SMUD provided records for 4,365 corrective actions identified between March 6, 2020, and September 19, 2025, which included completed, cancelled, and open work orders. Analysis of these records found the following deviations from SMUD’s prioritization procedure:*
 - i. *906 records did not include a priority code or due date,*
 - ii. *55 records had a priority of “Routine-< 24 months,” which is not included in SMUD’s prioritization procedure,*
 - iii. *19 records had a priority of “Routine/Unplan,” which is not included in SMUD’s prioritization procedure.*

In addition, there were 2,217 records of completed work orders that included a priority code with a response time, and of these 70 were completed late as shown in Table 2.

SMUD Response:

In the PADR, SMUD provided data pertaining to the corrective maintenance found through visual inspections that included 4,365 notifications. Based on the data, of the 4,365 notifications, 2,737 items were completed prior to the planned completion date and 15 (less than one percent) were completed subsequent to the planned completion date.

Of the 906 notifications cited as not including a priority code or due date, 815 were cancelled because the corrective work was submitted to SMUD Facilities for correction and/or duplicated work orders that already existed. In addition, 31 of the remaining 91 work orders were urgent, non-urgent, and/or reprioritized items reflecting the transition to SMUD's updated Substation Visual Inspection Plan and were completed within the response times prescribed in the updated Plan. The status of the final 60 work orders cited is as follows: 19 were completed within the prescribed response time and Work Order statuses were updated in SMUD's Work Management System, 2 were cancelled due to equipment removal or work transferred to a separate department, 35 are open and in the process of reprioritization as part of the Substation Visual Inspection Plan transition period, and the remaining 4 items have a Monitoring priority.

55 items with priority "Routine - <24 Month" of the 4,365 notifications are related to Rust that falls under Monitoring priority; they are subject to evaluation by SMUD's Civil Engineering per the Substation Equipment Corrosion Assessment Form and are assigned to Monitoring and prioritization as detailed in the Distribution Substation Visual Inspection Prioritization document, section 3.3.2. These records were assessed, provided a priority per the assessment form, and 38 of the items were completed within the prescribed response time. 2 items were cancelled and 15 are open and in progress. The Form and prioritization document were provided as part of item 3 of the PADR.

19 items with priority "Routine/Unplan" of the 4,365 notifications are related to transmission facilities. 16 of these items were completed prior to July 11, 2024, and 1 was completed in August 2025. The remaining 2 items were cancelled due to having an existing work order or incorrect notification type.

Of the 70 notifications that ESRB observed as completed late in "Table 2. Overdue Correction Action Work Orders", there are 55 items related to Rust and subject to monitoring and prioritization by Civil Engineering per the Substation Equipment Corrosion Assessment Form. Of these 55, 54 items are the same as the previously mentioned Rust-related items. The work orders for these 55 items were completed within the prescribed response time. The remaining 15 items were completed subsequent to the planned completion dates due to major repair required, parts lead times, resource constraints, and/or outage requirements that were outside of SMUD control. These items were completed promptly upon receiving necessary equipment, materials, and/or clearances.

- b. *ESRB Finding: ESRB's Pre-Audit Data Request (PADR) requested current and prior versions of documents relating to substation inspection and maintenance in questions 3 and 4, respectively. In response, SMUD provided two current documents: Distribution Substation Visual Inspection Plan and "Substation_Electrician_Procedure_Manual_BOW_2025." The former document is discussed in Section II.2 below. The Substation Electrician Procedure Manual provides a wide range of flow charts and procedures to guide electricians in performing substation testing, repair, and maintenance*

work, but it lacks information on a preventative maintenance program. The work described in this manual could be triggered by reported outages or faults, anomalous SCADA readings, and routine inspections, but accepted good practice also requires proactive maintenance work based on calendar intervals (e.g. every 6, 12, or 24 months), and/or the number of operational cycles as recorded on counters. SMUD's lack of a documented preventative maintenance plan is not consistent with accepted good practices, and a violation of Rule 12.

SMUD Response:

SMUD maintains a comprehensive inspection and maintenance program with planned intervals for preventive maintenance, supported by various inspection and test records provided in the PADR. It is SMUD's position that documentation provided for ESRB's PADR questions 3 and 4 are sufficient evidence of its substation inspection and maintenance standards and procedures that are within the scope of an audit based on GO 174. Documentation of a "preventative maintenance program" or "proactive maintenance work based on calendar intervals" inspections and work are above and beyond the "basic evaluation" as described in the "Inspection" definition under GO 174 Rule 21. As such, SMUD respectfully disagrees with ESRB's audit finding. SMUD requests this finding be excluded from the report.

c. *ESRB Finding: SMUD document*

"Substation_Electrician_Procedure_Manual_BOW_2025" includes a section on Battery Safety which describes protective equipment "to be available to all personal working with batteries," including an emergency eye wash facility. Section IV below describes some specific issues with eye wash stations, and ESRB observed that in general, SMUD's practices regarding eye wash stations is not consistent with industry best practices. ESRB observed many different types of eyewash stations during its field audit, but most older distribution stations did not have a permanent eyewash station adjacent to the substation battery bank. SMUD staff explained that substation personnel are required to keep eye wash bottles in their vehicles, but did not provide documentation of this assertion. Even if this is an official requirement, having eyewash in a vehicle which could be outside the substation perimeter is much less effective than having it directly adjacent to the battery bank. In case of an accident that temporarily blinds a worker, it would be very difficult to access eye wash even if it were in the bed of a truck parked right next to the battery enclosure. Nearly all recently constructed distribution substations ESRB inspected had eyewash stations attached to the door of the battery enclosure, indicating this is a common safe industry practice. SMUD should install eyewash stations adjacent to batteries in all of its substations to ensure compliance with Rule 12.

SMUD Response:

SMUD respectfully disagrees with ESRB's assertion regarding eyewash station practices. The California Code of Regulations, Title 8, Section 5185(n) states that "Facilities for quick drenching or flushing of the eyes and body shall be provided in accordance with Section 5162 unless the storage batteries are: (1) equipped with explosion resistant or flame arrestor type vents." SMUD is compliant with this requirement, as the batteries referenced in the Finding are equipped with vent caps on each cell, providing explosion resistance.

Furthermore, the "Substation_Electrician_Procedure_Manual_BOW_2025" (page 77) specifies: "If electrolyte gets into eyes, flush liberally for a minimum of 15 minutes with water or the portable eyewash solution supplied in substations and on crew trucks." Substation maintenance personnel performing battery maintenance are required to keep up-to-date eyewash bottles on their trucks, and the vehicles are parked within the substation perimeter, contrary to ESRB's assertion. The eyewash bottles are readily available, typically with the bin open for easy access in case of emergency.

While SMUD recognizes that eyewash bottles may physically be available in some battery enclosures of newer distribution substations, such a requirement is not mandated under Title 8, Section 5185 when explosion-resistant vents are installed. Accordingly, SMUD's practices are consistent with regulatory requirements and ensure sufficient protection for personnel performing battery maintenance.

2. *ESRB Finding: First, SMUD's Distribution Substation Visual Inspection Plan explicitly excludes transmission substations: "this inspection plan only applies to SMUD's distribution substations." A comparable document for transmission substations was not provide. In addition, SMUD only provided records of transmission substation inspections starting in August 2024. While the scope of SMUD's inspection plan is consistent with GO 174 when the document was issued in 2022, the scope of GO 174 expanded in July 2024 to include transmission substations. SMUD designates 29 of its 223 substations as not being distribution substations, which implies they are transmission substations. Based on the data provided by SMUD, it lacks a documented inspection program for non-distribution substations, and therefore is not compliant with Rule 30.1.*

SMUD Response:

As noted in our introduction, SMUD respectfully disagrees with the CPUC's Finding that SMUD lacks a documented inspection program for its transmission substations. SMUD's transmission substation visual inspection information is documented in a separate record designated as Critical Energy Infrastructure Information (CEII), which, in accordance with federal regulations, was not provided in response to the PADR.

SMUD maintains that, prior to July 2024, GO 174 did not require a visual inspection plan for transmission substations. SMUD's compliance documentation reflected the GO's requirements in effect at that time. After GO 174 was expanded in July 2024, SMUD was in the process of updating its distribution substation visual inspection plan and associated references to align with the revised scope. SMUD provided records for transmission substation inspections conducted after ESRB-11 became effective (July 11, 2024). The updated substation inspection plan and references were finalized and approved on November 5, 2025, and therefore were not available for submission with the ESRB's PADR.

ESRB Finding: Second, visual inspection is only one type of inspection that is typically performed at electric substations, as noted in GO 174 Rule 21. Rule 30.1 requires utilities to specify the inspection activities included in the inspection plan. SMUD's Distribution Substation Visual Inspection Plan acknowledges that it does not document all inspection activities: "The more detailed inspections and maintenance activities that may be required as a result of the basic visual and auditory inspections are not covered under this document." As noted above regarding Rule 12, utilities must follow best practices for the maintenance of its substations, and these best practices includes more than just visual inspections to ensure facilities are properly maintained. This is supported by SMUD's own records, which demonstrate that it performs infrared inspections and routine electrical and oil testing. ESRB acknowledges that there are limitations and some ambiguity in the Rule 21 definition of inspections, but based on auditing utilities statewide, there is clear consensus that inspection is one of the primary mean of establishing when maintenance is needed. The textbook definition of "inspection" is consistent with this interpretation: "Inspection, noun, a checking or testing of an individual against established standards" Since SMUD has not defined all of its inspection activities or provided the frequency of these activities or record requirements, it is not in compliance with Rule 30.1.

SMUD Response:

SMUD appreciates that the Finding recognizes SMUD has demonstrated a strong inspection and maintenance program, including best practices and that the Finding is focused simply on a lack of definition within the Substation Visual Inspection Plan position of all of its inspection activities. SMUD continues to maintain its Plan is aligned with GO 174, and that detailed inspection activities such as infrared (IR), routine electrical, and oil testing are beyond the definition of "Inspection" provided in GO 174 Rule 21 as a "basic evaluation". SMUD maintains that its inspection Plan and related documentation are consistent with GO 174 and requests this finding be excluded from the report.

ESRB Finding: Third, SMUD's response to ESRB data request Question 10 stated that "SMUD does not have fire suppression systems at distribution or transmission substations." Its Distribution Substation Visual Inspection Plan also states that "fire detection/suppression systems and reactors are not installed at SMUD's distribution

substations and hence are not included in this plan.” As noted in Section IV.3.1. below, ESRB’s field audit did not observe fire detection/suppression systems in distribution substations, but fire suppression systems were observed in transmission substations. Therefore, the three requirements of Rule 30.1 have not been met with respect to the inspection of fire detection and suppression systems.

SMUD Response:

SMUD affirms that fire suppression systems are not installed at its distribution or transmission substations. However, substations with control buildings are equipped with fire alarm systems. Contrary to ESRB’s field audit findings, the systems observed in transmission substations were fire alarm systems, not fire suppression systems. The inspection, testing, and maintenance (ITM) of these fire alarm systems are conducted semi-annually and annually by SMUD Facilities stationary engineers, in accordance with the requirements set forth in National Fire Protection Association (NFPA) code 72. SMUD maintains that these procedures are performed in strict compliance with all applicable standards and regulatory obligations. SMUD requests this finding be excluded from the report.

3. *ESRB Finding: SMUD’s Distribution Substation Visual Inspection Plan does not describe the training, experience, or instruction required for an inspector to be deemed qualified. In response to ESRB’s request for “a copy of the utility’s inspector training policy,” SMUD provided a document titled “Substation Maintenance Worker Training Program.” No other information regarding the training or qualification of inspectors was provided and SMUD has not shown that inspections are conducted by qualified personnel. Therefore, SMUD has not demonstrated compliance with Rule 30.2.*

SMUD Response:

SMUD asserts that inspections are conducted by qualified personnel, primarily those who have successfully completed the Substation Maintenance Worker Training Program, as detailed in item 11 of the PADR. The training records for the past five years ending August 31, 2025, for these individuals, as well as those pertaining to other substation inspection and maintenance personnel, were provided in item 21 of the PADR. SMUD maintains that these records demonstrate the requisite training, experience, and instruction for personnel performing inspections.

4. *ESRB Finding: ESRB records include two annual reports from SMUD for the calendar years 2014 and 2015, but no reports have been provided since that time. While both reports filed satisfy the requirements of Rule 40.2, the reports do not comply with Rule 40.1. Therefore, SMUD is not in compliance with Rule 40.*

SMUD Response:

It is SMUD’s position, consistent with that of other publicly owned utilities (POUs), that the CPUC lacks jurisdiction to impose prescriptive inspection and maintenance standards on POUs. This longstanding jurisdictional matter has been the subject of extensive correspondence, which need not be reiterated here. Nevertheless, SMUD is committed to cooperating with the CPUC in the implementation of safety standards reflected in GO 174 and recognizes GO 174 as an important benchmark for substation inspections. In keeping with this commitment, SMUD has furnished relevant documents to the CPUC in response to the PADR and has participated in the CPUC’s review and audit of SMUD’s substation facilities. SMUD maintains, however, that the CPUC’s expectation for annual GO 174 report filings is not aligned with the cooperative framework under which SMUD operates.

Accordingly, SMUD respectfully disagrees with the ESRB finding regarding annual GO 174 reporting. The cited finding relates solely to a reporting practice that does not directly serve public safety aspects of SMUD’s operations. Further, while annual reports in the CPUC’s preferred format are not submitted, SMUD publishes an annual report on its website summarizing completed substation visual inspections. SMUD’s inspection and maintenance programs as presented to the ESRB in the PADR are consistent with GO 174.

Section IV – Field Inspection Violations

SMUD’s responses are detailed below for each location. Where appropriate, photos of the field audit condition and the condition after correction are provided in Appendix A.

1. *ESRB Finding: STG Substation*
 - a. *Eyewash adjacent to the battery room expired in December 2022.*

SMUD Response:

SMUD disagrees with this finding. STG substation has a dedicated eyewash station onsite. Pictures of the eyewash station are provided in Appendix A. The expired eyewash bottle may have been made available during construction of the station and has been removed.

2. *ESRB Finding: STB Substation*
 - a. *Damaged counter on CB 5220.*

SMUD Response:

SMUD disagrees with this finding. The counter is neither damaged nor malfunctioning, as evidenced by the Load and Inspection Reports for July and August 2025, which were provided in response to the CPUC’s PADR item 16, and the count was observed during the site visit. SMUD acknowledges that, although the paint on one of the leading zeros has faded, the numbers are raised and remain legible if the counter reaches that count. The condition of the counter does not pose any safety or operational issues.

b. *Debris around Bank 3 and in the cooling fans.*

SMUD Response:

SMUD disagrees with the finding of “debris” around Bank 3. The plates/spare parts are for Bank 3 and not debris.

SMUD acknowledges that there was debris in the cooling fans for Bank 3; however, the condition of the cooling fans do not pose any safety or operational issues.

In the spirit of voluntary cooperation, Work Order 12037848 with an Urgent priority was created to tidy up the spare parts and remove debris on the radiator fans; the corrective work will be completed by April 20, 2026.

3. *ESRB Finding: LAK Substation*

a. *The substation has a fire suppression system.*

SMUD Response:

SMUD disagrees with this finding. LAK substation does not have a fire suppression system. The equipment shown in the picture is part of the fire alarm system as elaborated in Section II, item 2 above.

b. *Bird nest in CB 102 current transformer.*

SMUD Response:

SMUD disagrees with this finding. SMUD’s environmental team requests that bird nests not be removed unless they present a hazard, and in this instance, the nest does not pose any safety, reliability, or operational risk to the circuit breaker 102 current transformer. In the spirit of voluntary cooperation, the nests will be removed during the next scheduled maintenance for the circuit breaker in 2027.

c. *Damaged counter for CB 7210.*

SMUD Response:

SMUD disagrees with this finding. The counter is neither damaged nor malfunctioning, as evidenced by the Load and Inspection Reports for July and August 2025, which were provided in response to the CPUC’s PADR item 16, and the count was observed during the site visit. SMUD acknowledges that, although paint on a couple of the leading zeros has faded, the numbers are raised and remain legible if the counter reaches that count. The condition of the counter does not pose any safety or operational issues.

- d. *Exposed ground cable in the 69 kV yard near switch 7222 poses a tripping hazard.*

SMUD Response:

SMUD acknowledges that the exposed ground cable in the 69kV yard near switch 7222 could pose a tripping hazard. Work Order 12037899 with an Urgent priority was created to remove the exposed ground cable, and the corrective work will be completed by April 15, 2026.

4. *ESRB Finding: White Rock – Sunrise Substation*
 - a. *Two of the three surge arrester counters on Bank 1 have opaque and illegible screens.*

SMUD Response:

SMUD acknowledges that two of the three surge arrester counters on Bank 1 have opaque and illegible screens. However, SMUD disagrees with this finding, as the screens over the ammeter portion are not critical and do not pose a safety, reliability, or operational risk. The counters located at the top right of the surge arrester counter units are fully visible, operational, and functioning properly, thereby continuing to serve their primary purpose.

5. *ESRB Finding: COR Substation*
 - a. *Bird nests have fallen out of the transformer bank radiators and are resting on the cooling fans.*

SMUD Response:

SMUD disagrees with this finding. SMUD’s environmental team requests that bird nests not be removed unless they present a hazard, and in this instance, the nests do not pose any safety, reliability, or operational risk to the transformer cooling fans. In the spirit of voluntary cooperation, Work Order 12037849 with an Urgent priority was created to remove the bird nests resting on the cooling fans and the corrective work was completed on February 5, 2026. Pictures are provided in Appendix A.

6. *ESRB Finding: RSS Substation*
 - a. *Eyewash adjacent to the battery room expired in June 2023.*

SMUD Response:

SMUD disagrees with this finding. RSS substation has portable eyewash stations onsite that are inspected and water and solutions are changed out every quarter. Pictures of the portable eyewash stations are provided in Appendix A. The expired eyewash bottle observed during the audit was not designated for usage and has since been removed.

- b. *Bird nests on all phases of SW 301.*

SMUD Response:

SMUD disagrees with this finding. SMUD's environmental team requests that bird nests not be removed unless they present a hazard, and in this instance, the nests do not pose any safety, reliability, or operational risk to the switch. SMUD would not pursue a clearance that would interrupt operations or incur unnecessary costs solely for the removal of bird nests that do not constitute a hazard.

- c. *Hours counter for CB 300 is damaged.*

SMUD Response:

SMUD disagrees with this finding. The hours counter is functioning properly and is not damaged. The counter advances as expected, with each digit rotating in sequence, similar to an odometer. This indicates normal operation and does not reflect any fault.

7. *ESRB Finding: Eschinger – Bruceville Substation*
 - a. *Bird nest in voltage regulator radiator.*

SMUD Response:

SMUD disagrees with this finding. SMUD's environmental team requests that bird nests not be removed unless they present a hazard, and in this instance, the nest does not pose any safety, reliability, or operational risk to the voltage regulator radiator. In the spirit of voluntary cooperation, Work Order 11130579 with an Urgent priority was created to remove the bird nests in the voltage regulator radiator, and the corrective work will be completed by April 20, 2026.

8. *ESRB Finding: Franklin – Hood Franklin Substation*
 - a. *Bird nests in transformer radiator.*

SMUD Response:

SMUD disagrees with this finding. SMUD's environmental team requests that bird nests not be removed unless they present a hazard, and in this instance, the nests do not pose any safety, reliability, or operational risk to the transformer radiator. In the spirit of voluntary cooperation, Work Order 11130740 with an Urgent priority was created to remove the bird nests in transformer radiator, and the corrective work will be completed by April 20, 2026.

9. *ESRB Finding: Hood – Franklin Substation*
 - a. *ESRB's inspection was limited due to wasps within the metal-clad unit enclosure. Regular removal of wasp nests ensures inspection, maintenance,*

and repair work can be performed unimpeded while safeguarding worker health and safety.

SMUD Response:

SMUD acknowledges that wasps within the metal-clad enclosure limited ESRB's inspection as the substation is located in a rural area. SMUD performs monthly inspections and wasp nests get removed each month and plastic wasp traps for baits are put up around substation fence to help mitigate the number of wasps. In the spirit of voluntary cooperation, Work Order 11130706 with an Urgent priority was created to set up wasp traps, and the corrective work was completed on February 6, 2026. Pictures of the wasp traps are provided in Appendix A.

10. *ESRB Finding: CNX Substation*

- a. *Vegetation is growing over the perimeter fence.*

SMUD Response:

A SMUD's Facilities ticket (163051) was created on January 6, 2026, for this issue and the corrective work was completed on January 21, 2026. The vegetation growing over the perimeter fence in this instance did not pose a hazard or safety issue as it is far away from the switchyard equipment. Pictures of the completed work are in Appendix A.

11. *ESRB Finding: CAR Substation*

- a. *Bird nests in switch 5905 and 5901 Phase C.*

SMUD Response:

SMUD disagrees with this finding. SMUD's environmental team requests that bird nests not be removed unless they present a hazard, and in this instance, the nests do not pose any safety, reliability, or operational risk to the 5905 grounding switch or phase C of 5901 switch. SMUD would not pursue a clearance that would interrupt operations or incur unnecessary costs solely for the removal of bird nests that do not constitute a hazard.

- b. *Bird nest in capacitor bank 1 switch.*

SMUD Response:

SMUD disagrees with this finding. SMUD's environmental team requests that bird nests not be removed unless they present a hazard, and in this instance, the nest does not pose any safety, reliability, or operational risk to the capacitor Bank 1 switch. SMUD would not pursue a clearance that would interrupt operations or incur unnecessary costs solely for the removal of bird nests that do not constitute a hazard.

12. *ESRB Finding: 88th – Fruitridge Substation*

- a. *Bird nest in Bank 1 radiator.*

SMUD Response:

SMUD disagrees with this finding. SMUD’s environmental team requests that bird nests not be removed unless they present a hazard, and in this instance, the nest does not pose any safety, reliability, or operational risk to the transformer radiator. In the spirit of voluntary cooperation, Work Order 11130578 with an Urgent priority was created to remove the bird nest in Bank 1 radiator, and the corrective work will be completed by April 20, 2026.

13. *ESRB Finding: MC1 Substation*

- a. *Damaged counter on CB 914.*

SMUD Response:

SMUD disagrees with this finding. The counter is neither damaged nor malfunctioning, as evidenced by the Load and Inspection Reports for July and August 2025, which were provided in response to the CPUC’s PADR item 16, and the count was observed during the site visit. SMUD acknowledges that, although paint on some of the leading zeros has faded, the numbers are raised and remain legible if the counter reaches that count. The condition of the counter does not pose any safety or operational issues.

14. *ESRB Finding: HUR Substation*

- a. *Bird nests on many switches on the 115 kV bus. Image below is for 403 B phase.*

SMUD Response:

SMUD disagrees with this finding. SMUD’s environmental team requests that bird nests not be removed unless they present a hazard, and in this instance, the nests do not pose any safety, reliability, or operational risk to switches on HUR 115kV Bus. SMUD would not pursue clearances that would interrupt operations or incur unnecessary costs solely for the removal of bird nests that do not constitute a hazard.

- b. *Damaged counter on CB 5880.*

SMUD Response:

SMUD acknowledges that the Substation Load and Inspection Report for July 2025 provided with item 16 of CPUC’s PADR did not include data for CB 5880 and a report for August 2025 was missed. The appropriate reports for July and August 2025 with data for CB 5880 exist and could be provided to ESRB upon request.

Nonetheless, SMUD disagrees with this finding. The counter is neither damaged nor malfunctioning. SMUD acknowledges that, although paint on some of the numbers have faded, the numbers are raised and remain legible. The condition of the counter does not pose any safety or operational issues. In the spirit of voluntary cooperation, Work Order 12037530 with Urgent priority was created and the counter was replaced on February 4, 2026. Pictures of the completed work are in Appendix A.

APPENDIX A: Field Inspection Photographs

1. STG Substation

- a. Eyewash adjacent to the battery room expired in December 2022.

Before:



After:



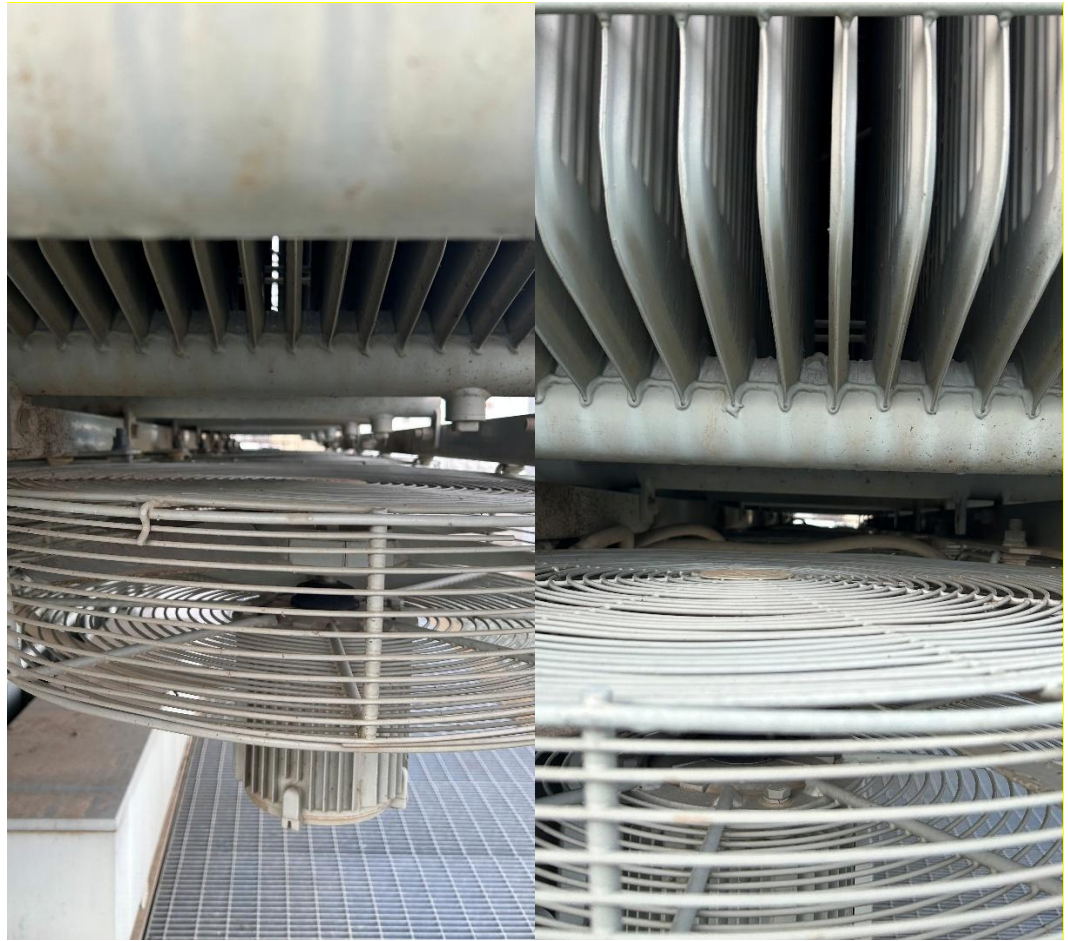
2. COR Substation

- a. Bird nests have fallen out of the transformer bank radiators and are resting on the cooling fans.

Before:



After:



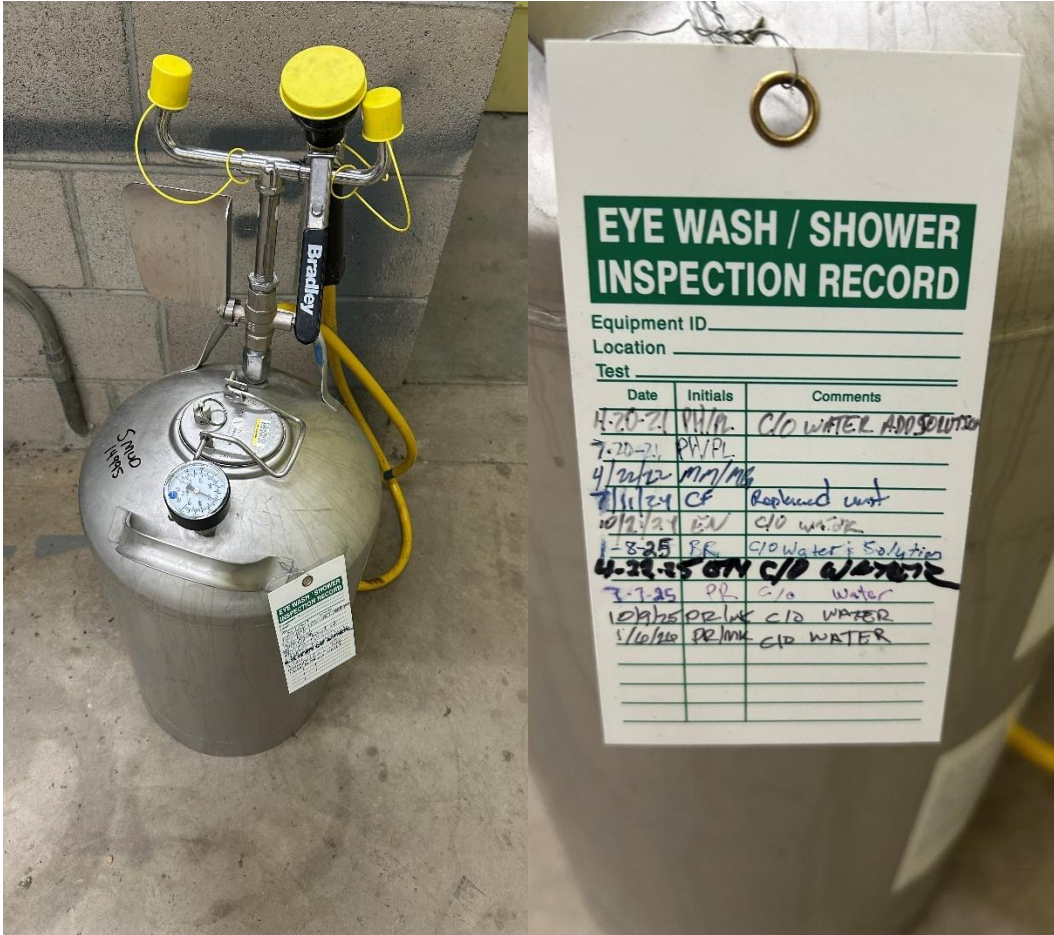
3. RSS Substation

- a. Eyewash adjacent to the battery room expired in June 2023.

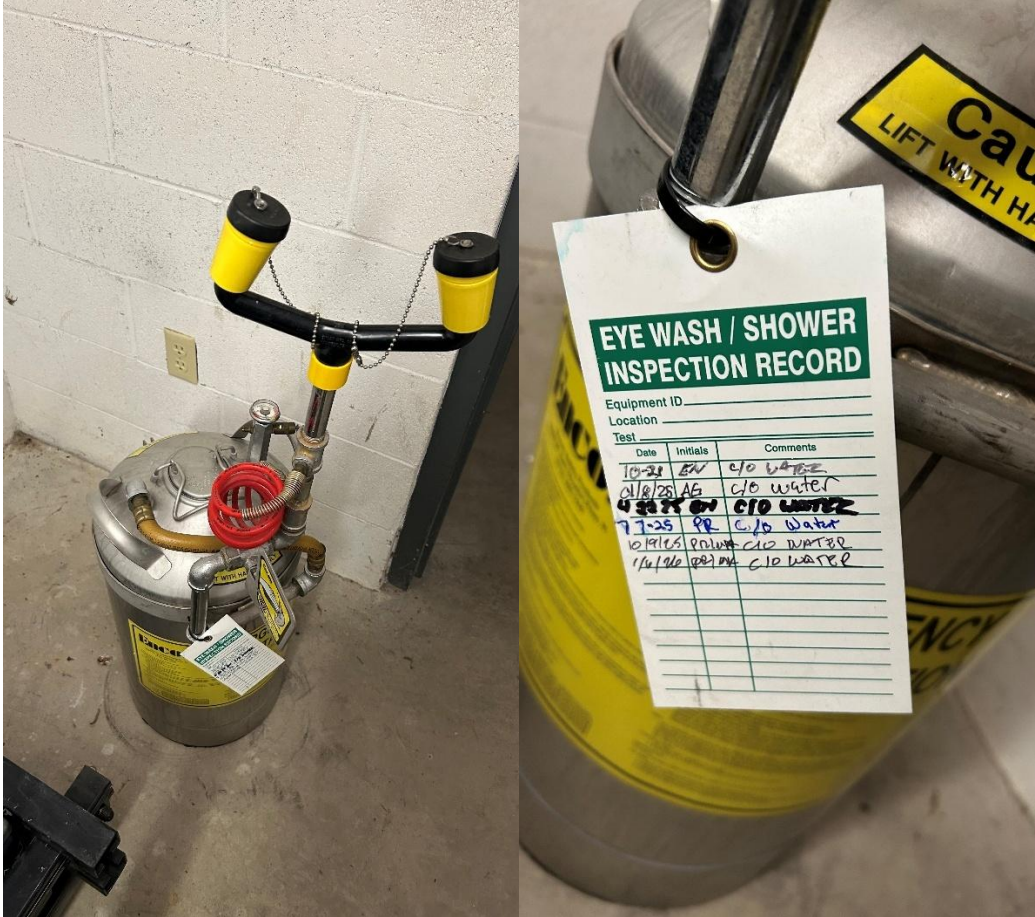
Before:



After:
 RSS portable eyewash 1.



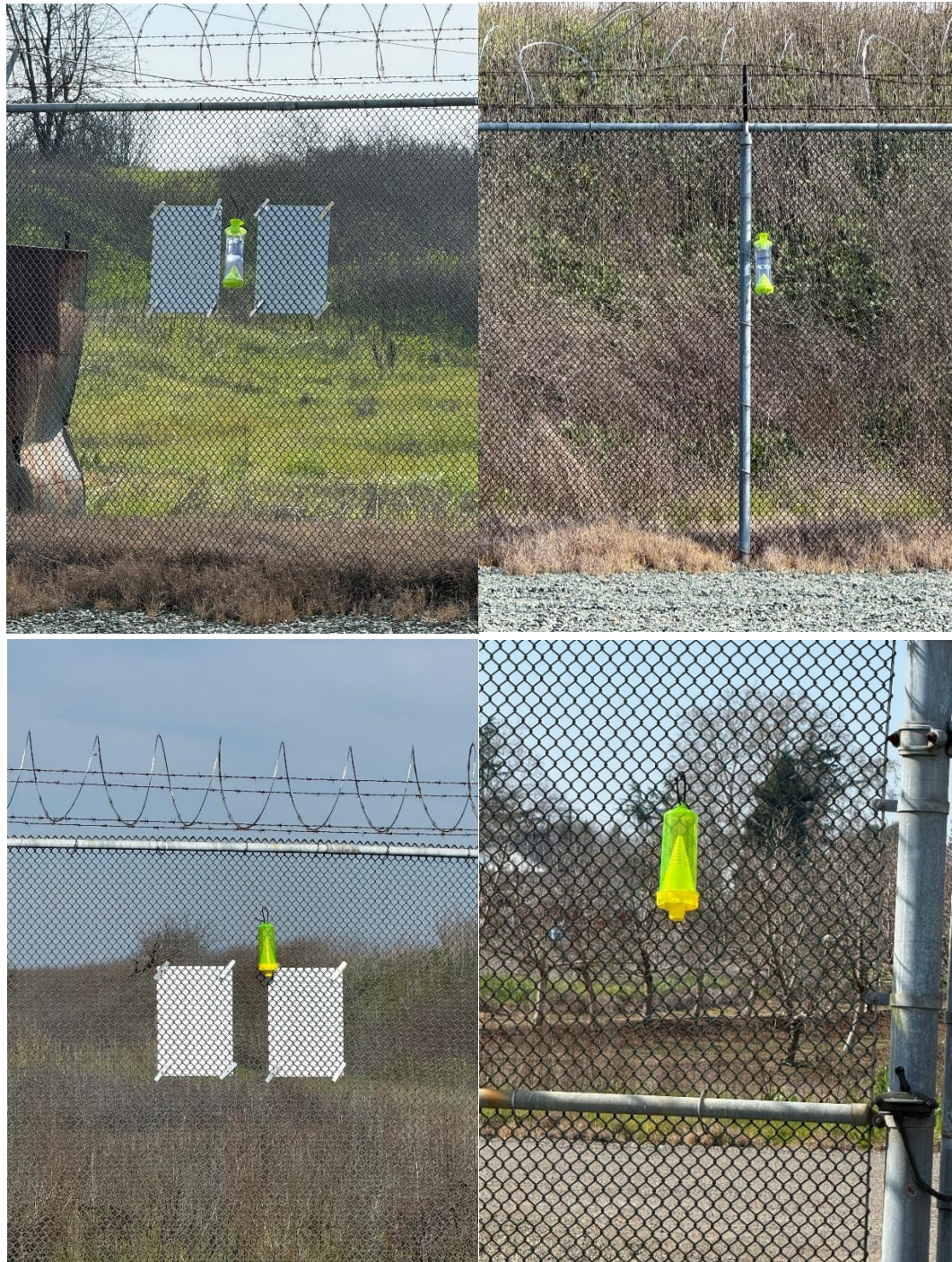
RSS portable eyewash 2.



4. Hood – Franklin Substation

- a. ESRB’s inspection was limited due to wasps within the metal-clad unit enclosure. Regular removal of wasp nests ensures inspection, maintenance, and repair work can be performed unimpeded while safeguarding worker health and safety.

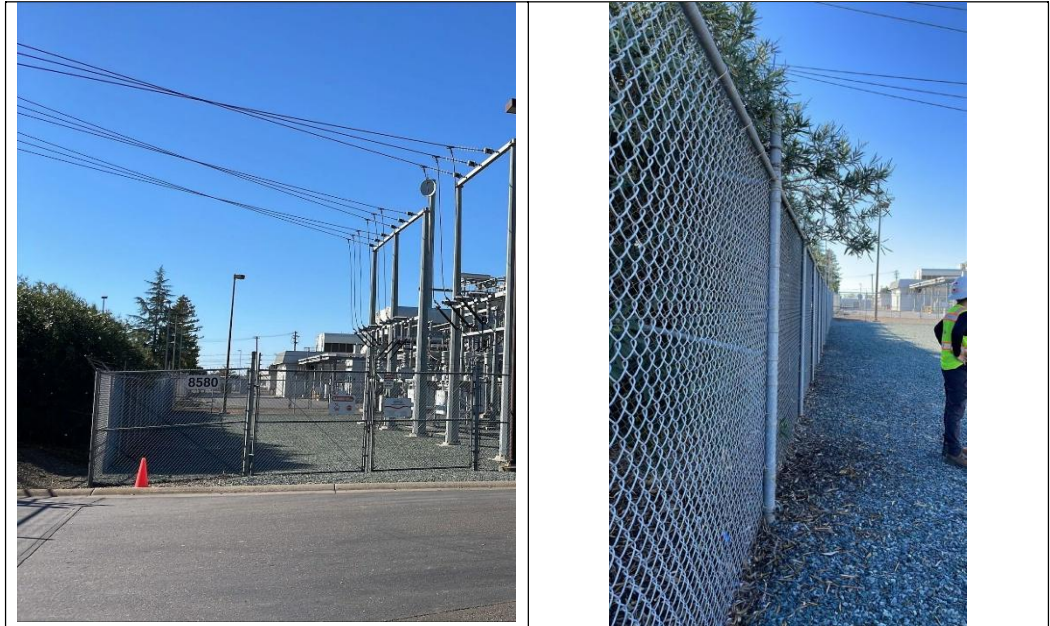
SMUD has set up wasp traps:



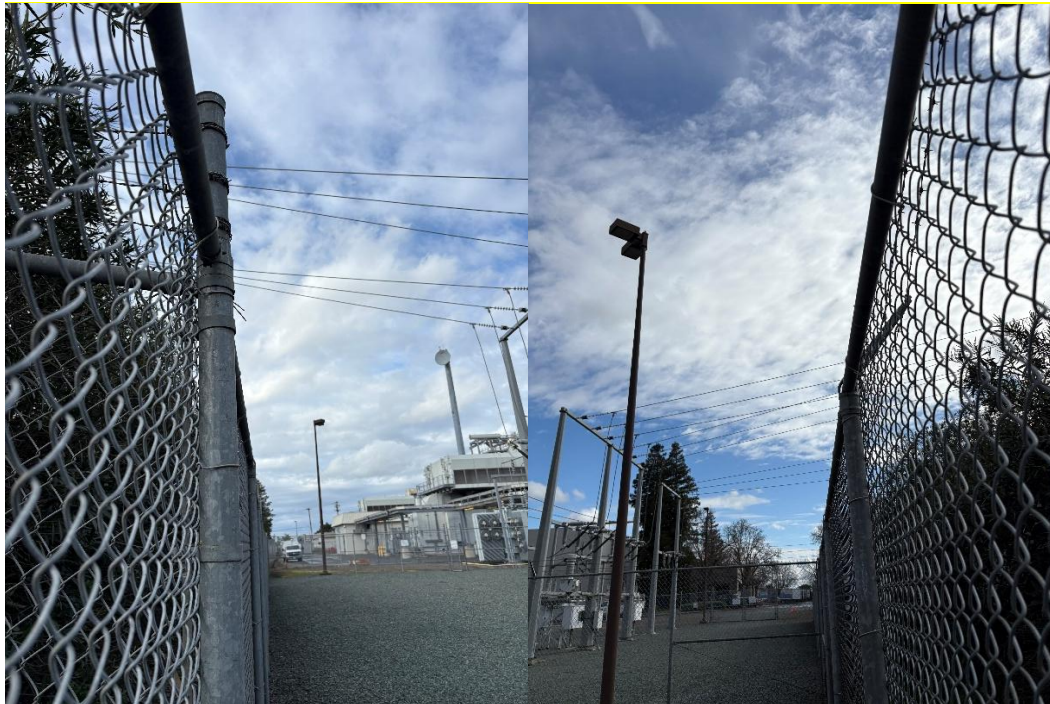
5. CNX Substation

- a. Vegetation is growing over the perimeter fence.

Before:



After:



6. HUR Substation

a. Damaged counter on CB 5880.

Before:



After:

