

October 9, 2025

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: Electric Substation Audit of PG&E Martin Headquarters (HQ)

Dear Mr. Tse:

PG&E is committed to adhering to compliance standards, taking immediate corrective actions when issues arise, operating in a manner that prioritizes public and worker safety, and ensuring compliance is deeply embedded in our culture. We take seriously the critical role we play in ensuring the reliability of the grid and our responsibility to maintain our facilities.

We appreciate the California Public Utility Commission's (CPUC) thorough review of our filed maintenance practices, records, and conditions at our Martin Headquarters. We have reviewed and investigated each violation cited in the audit report dated September 11, 2025, and the attached document contains our response. Where we have completed, started, or scheduled corrective actions, we are committed to systemwide implementation of strong controls and oversight to prevent them from reoccurring at Martin headquarters substations or anywhere on our system.

In addition to the individual specific corrective actions described in the attached document, we are taking the following actions to ensure system-wide implementation of improved controls and oversight:

- We acknowledge CPUC's finding regarding the need to improve housekeeping. Substations are required to have a safe and clean work environment in accordance with established procedure TD-3322M-01. PG&E will review our current standard to determine if we need to update our guidelines and identify appropriate controls, if needed, to support adherence:
- Enhancing our tracking and escalation protocols for timely notification completion to ensure alignment with risk and reliability objectives and identifying opportunities to prioritize completions; and



- Assessing potential updates to internal Infrared (IR) processes, including the addition of visible date stamps and indication of thermal anomalies on IR images.

We greatly value our partnership with the CPUC's Electric Safety and Reliability Branch (ESRB). We are committed to keeping you informed of our progress on the actions currently underway and planned. We would appreciate the opportunity to meet with the ESRB to discuss this response, address any outstanding concerns that may exist and ensure we are meeting the highest compliance standards.

Sincerely,

Daniel Kushner, PhD
Senior Director - Electric Risk & Compliance
Pacific Gas & Electric Company (PG&E)

I. Records Violations

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

1. General Order (GO) 174, Rule 12, General states in part:

“Design, construction and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

- a. PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S¹, establishes PG&E’s required end dates and out-of-compliance dates for corrective work as follows:

Table 1: Line Corrective (LC) Due Dates Per Priority Code

Priority Code	Required End Date	Out-of-Compliance Date
A	Within 30 days	Close notifications (after removing the hazard [make safe]) with either permanent or temporary repairs within 30 days. Create a new lower priority notification immediately for any remaining work that will exceed 30 days. Reference the Priority A notification number to ensure a record of temporary repairs is linked to the new notification.
B	Within 90 days	The out-of-compliance date is the 1 st day of the 2 nd month following the month in which the required end date occurs.
E	Within 365 days	The out-of-compliance date is the 1 st day of the year following the year in which the required end date occurs.
F	Greater than 365 days	There is no out-of-compliance date. This work will be completed when it is operationally efficient to perform the work.

Based on Table 1 above, ESRB found a total of 270 late LC notifications.² Out of the 270 late LC notifications, there were 118 late-closed notifications and 152 late-open notifications.³ Therefore, PG&E did not perform maintenance in accordance with accepted good practices as described in Utility Standard TD-3322S. See Table 2 below for a breakdown of the late LC notifications by priority and type.

Table 2: Late LC Notifications

Priority	Late-Closed	Late-Open	Total
A	-	-	-
B	65	101	166
E	53	51	104
Total	118	152	270

¹ PG&E Utility Standard TD-3322S, Effective June 6, 2024, Revision 10, Section 1.3.3.

² This is based on the Out-of-Compliance Date, Priority, Notification Date, and Completion Date provided in PG&E’s April 15, 2025 response to Pre-Audit Data Request - Question 13. See Attachment 1 – Late LC Notifications for ESRB’s Analysis.

³ Late-closed LC notifications are notifications that were completed past their out-of-compliance date based on their priority code, and late-open LC notifications are pending notifications that have not been completed by their assigned out-of-compliance date based on their priority code.

See Table 3 below for the most late LC notifications by priority.

PG&E Response:

Upon review, we disagree with 45 of the cited late LC notifications for the following reasons:

- 2 LC Notifications identified as late-closed (LCs 129478221 and 129518829) were resolved on the actual out-of-compliance (OOC) date meeting the requirements of TD-3322S “Substation Equipment Maintenance Requirements.”
- 30 open LC Notifications have been downgraded since the pre-audit data request. The associated Out of Compliance (OOC) dates have correspondingly changed in accordance with TD-3320P-12 “Substation SAP Work Management System (WMS) Process”. Of these, 23 have been completed, and 7 remain open and pending completion.
- 13 LC Notifications have been canceled since the pre-audit data request.

Table 3: Most Late LC Notifications by Priority

Notification #	Priority	Days Late	Status
123272446	B	491	Closed
117637123	E	455	Closed

PG&E Response:

- LC Notification 123272446 was originally created on April 08, 2022, to address capital battery replacement at Moscone Substation. This LC Notification was classified as a Priority F LC Notification, consistent with the long-term planning and scope of capital work. On May 01, 2023, temporary battery maintenance was added to this pre-existing LC Notification. The addition of the temporary battery maintenance resulted in the reclassification of the LC Notification to Priority B with a revised required end date of August 01, 2023. The battery replacement was completed on November 04, 2023.
 - LC Notification 117637123 was created on July 24, 2019, for the capital replacement of all the insulators on the bus section. However, on April 01, 2022, this LC Notification was closed because capital project order 74027521 was created for the execution of this work.
- b. PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S⁴, also establishes PG&E’s required out-of-compliance dates for preventative maintenance (PM) as follows:

1.3 Compliance

1. For preventive work, determine the out-of-compliance date using the notification required end date in the maintenance plan and the maintenance plan cycle.

- *IF the cycle is 1 year or more, THEN the out-of-compliance date is the 1st day of the year following the year in which the required end date occurs.*
- *IF the cycle is less than 1 year, THEN the out-of-compliance date is the 1st day of the month following the month in which the required end date occurs.*

Based on this excerpt from PG&E’s procedure and out-of-compliance dates provided by PG&E, ESRB found a total of 151 late PM notifications.⁵ Out of the 151 late PM notifications, there were 94

⁴ PG&E Utility Standard TD-3322S, Effective June 6, 2024, Revision 10, Section 1.3.1.

⁵ See Attachment 1 – Late LC Notifications for ESRB’s Analysis.

late-closed notifications and 57 late-open notifications. Therefore, PG&E did not perform maintenance in accordance with the accepted good practices described in Utility Standard TD-3322S. See Table 4 below for the most late PM notifications.

PG&E Response:

Our review determined that 145 of the Preventative Maintenance (PR) Notifications cited, are not violations of GO 174, Rule 12, because of the following:

142 PR notifications cited as violations were deferred in accordance with TD-3322S-Att03, preventative maintenance on equipment and systems covered by TD-3322S are eligible for deferral for any of the following scenarios:

- The equipment is scheduled to be replaced within 1 year, is already funded, and has an order assigned to the job.
- An operational constraint would or does exist (e.g., emergency equipment failure or clearance limitations).
- A deferral is requested by a customer (such as the e.g., Diablo Canyon Power Plant ([DCPP]) or an end-use customer, where outage schedules are coordinated with the customer).

2 PR notifications have been cancelled due to equipment being removed from service.

The remaining maintenance notification was not late; the required end date had generated incorrectly at creation and has been corrected.

Table 4: Most Late PM Notifications

Notification #	Days Late	Status
118981740	1,441	Closed
119701811	1,172	Open

PG&E Response:

- PR Notification 118981740 experienced annual deferrals from 2020 through 2024. This maintenance was completed on December 12, 2024, prior to the approved deferred maintenance date of March 30, 2025.
- PR Notification 119701811 experienced annual deferrals from 2020 through 2024 and is currently scheduled for completion by October 30, 2025.

2. GO 174, Rule 31.1, Inspection Programs, Frequency states:

“Substations shall be inspected as frequently as necessary.

- *Time intervals or other bases shall be specified in the Inspection Program.”*

PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S, establishes the frequency of PG&E’s substation inspection program as follows:

“Substation inspection type - PG&E developed substation inspection types to determine the frequency of inspection. Initially, the categorization of a substation type is based on a PG&E-developed model that considers the risk each substation may have for public and employee safety,

system criticality, security, and environmental risk. Then, field conditions or current activities (e.g., specific equipment or public issues) not represented in the model are considered, and the final substation type categorization is then made. Type 1 substations are inspected monthly and Type 2 substations are inspected on an every-other-month cycle.”⁶

“Substation inspections – PG&E Substation Inspection Program is based on a time-based trigger. Substation Inspections are scheduled to be performed monthly for high criticality substations, and every other month for low criticality substations.”⁷

“The criticality of the substation is based on numerous factors including, but not limited to, voltage class, capacity, NERC CIP jurisdiction, system operation criticality, as well as proximity to waterways, to population, or to environmentally sensitive areas. The methodology, contained in a spreadsheet, is then used to evaluate individual substations and assign a classification (frequency).”⁸

ESRB’s analysis of PG&E’s Substation Inspection List⁹ found that PG&E completed one (1) substation inspection past the Out-of-Compliance Date. See Table 5 below for the late substation inspection.

Table 5: Late San Fran A Substation Inspection

Substation	Description	Notification No	Priority	Completed On	Out of Compliance Date	Days Late
SAN FRAN A (POTRERO PP) SUB	SAN FRAN A (POTRERO PP) SUB;STA INSP OOC	126036915	E	7/5/2023	7/1/2023	4

PG&E Response:

The June inspection was scheduled for completion by the end of the month and was partially performed on June 29, 2023. The remaining inspection data was not collected until July 05, 2023.

3. GO 174, Rule 33, Inspection Programs, Records states:

“33.1 Electronic or hard copy records of completed Inspections shall include, at a minimum:

- Inspector name or identification
- Inspection date
- Brief description of identified discrepancies
- Condition rating (where applicable)
- Scheduled date of corrective action (where applicable)

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

⁶ PG&E Utility Standard TD-3322S, Attachment 11, Revision 3, PG&E Substation Inspection Program Summary, Effective April 7, 2022, Section 2.

⁷ PG&E Utility Standard TD-3322S, Attachment 11, Revision 3, PG&E Substation Inspection Program Summary, Effective April 7, 2022, Section 3.a.

⁸ PG&E Utility Standard TD-3322S, Attachment 5, Revision 7, Station and Headquarters Maintenance Template, Effective May 28, 2021, note following Table 3.

⁹ PG&E Pre-Audit Data Request Response, Question 12 (Dated: April 15, 2025).

SA2025-1313: PG&E Substation Audit, Martin HQ, May 19-23, 2025

PG&E Substation Equipment Maintenance Requirements establish the frequency of PG&E's substation infrared inspection program as follows:

*"Yearly: Conduct infrared surveys on electric substation equipment to detect heat-producing connections and contacts and other thermal patterns that may indicate abnormal conditions or equipment failure"*¹⁰

This standard refers to "TD-3322M, SM&C Manual, Infrared Inspections" and "Form: Substation Infrared Inspection F80". The referenced manual addresses the use of an infrared (IR) camera and recordkeeping requirements.¹¹

"A. General, 1. Purpose, Monitoring the thermal profile of equipment and its components helps determine if the equipment is operating properly or if it needs corrective work. An IR inspection with an IR camera provides a thermal image and the interpretive spot temperature of the target."

"H. Recordkeeping: 1. Substation Infrared Inspection Form; a. When thermal anomalies are identified through an IR inspection, document this information in the APM remote software. During tech down procedures, use Form TD-3322M-F80, "Substation Infrared Inspection." Submit the form with attached images to the substation maintenance supervisor, who schedules the necessary follow-up inspections and repairs."

As stated in the SM&C Manual, an IR camera is the primary tool used in these inspections, and images from the camera are only retained if an image documents a thermal anomaly. In addition, PG&E's April 30, 2025 response to ESRB Pre-Audit Data Request – Question 18 states that PG&E transitioned to using APM for IR data collection

and retention in 2023, except when APM is not accessible during an inspection.¹²

A. Per ESRB's review of the IR records provided in response to Pre-Audit Data Request – Question 18, ESRB determined that PG&E is in violation of GO 174, Rule 33.1 due to the inspection date not being clearly provided. While the APM records appear to provide the information required by Rule 33.1,¹³ a critical element of the inspection are the IR images of thermal anomalies. These images are referenced in the APM data and were provided to ESRB as separate PDF files. However, the PDF files provided inconsistent date information, including no dates, dates added to cover pages, and dates embedded within IR images. This inconsistency prevents ESRB from confirming the initial inspection date entered into APM, and it also prevents PG&E management and ESRB from verifying that re-inspections and any required corrective actions were performed. PG&E should update its Utility Manual TD-3322M, Attachment 9 to require inspectors to activate the IR camera feature to automatically superimpose a date and time stamp on the thermal image.

¹⁰ PG&E Utility Standard TD-3322S, Attachment 5, Revision 7, Station and Headquarters Maintenance Template, Effective May 28, 2021, Table 1, Page 5.

¹¹ PG&E Utility Manual TD-3322M-09, Revision 11, Infrared Inspections, Effective June 6, 2023, Pages 1 and 16.

¹² "In 2023, PG&E transitioned to predominantly using our digital platform, AssetWise Performance Management (APM), for all data collection, phasing out hard copy collection except in infrequent instances. The APM output for infrared tests is available in an Excel file, with each substation on a separate tab. Photographs from the 2023-2025 inspections are included in the PDF files."

¹³ PG&E excel file *DRU15335_Q18_Atch01_MARTIN HQ ETS.12_IR CHECKSHEETS FINAL_CONF*. This assumes that the "Date and Time Collected" field in the APM data provides information for when the inspector entered data during the actual inspection, rather a later date, such as when a clerk entered inspection data in an office.

In response to a similar finding from the San Carlos Substation Audit that ESRB conducted in February 2025, PG&E stated: “We agree that standardizing the IR reports would prevent the issues mentioned above, and that there is an opportunity to improve clarity and consistency in how the infrared imagery is presented. To that end, we have created CAP 131307790 to review and potentially update our infrared internal processes to include a visible date stamp on infrared images.”¹⁴ PG&E should standardize its IR reports to ensure they provide a clear and consistent record of all IR inspections.¹⁵ The reports should provide the following: title page listing the station name and report contents, page numbers, dated images, equipment identification, description of anomalies, and corrective actions taken along with associated LC notifications. Listed below are examples where ESRB noted insufficient and inconsistent IR records:

- **Beach St** – The 2023 and 2024 IR inspection records only provide an IR image of the station sign.
- **Daly City** – The 2023 and 2024 IR inspection records only provide an IR image of the station sign and do not list the inspection date or if thermal anomalies were identified.
- **Moscone** – The 2023 IR inspection record only provides an IR image of the station sign and does not list the inspection date or if thermal anomalies were identified. Additionally, the 2024 IR inspection record only provides an IR image of the station sign.

PG&E Response:

We reaffirm that there are opportunities to enhance consistency in image presentation and address the concerns raised above. CAP 131307790 remains open to review and potentially update our infrared internal processes to include a visible date stamp on infrared images.

- B. Furthermore, ESRB found PG&E in violation of GO 174, Rule 33.2 for failing to retain various IR inspection records and associated thermal anomalies. PG&E stated in response to Pre-Audit Data Request – Question 18 that: “During the initial phase of routinely using APM, we encountered challenges with correctly uploading infrared photographs. Some photos were not properly embedded within APM, making them inaccessible afterward. To address this issue, we created CAP 131152864 to document the problem and ensure that Martin FLIR-trained employees are proficient in uploading photographs to APM.” Table 6 below lists the missing IR inspection records.

Table 6: Missing IR Inspection Records

Substation Name	Missing Infrared Photographs
EAST GRAND	2023 Annual and all associated anomalies
JUDAH	2023 Annual
MILLBRAE	2023 Annual and all associated anomalies
NORIEGA	2023 Annual

¹⁴ PG&E June 18, 2025 Response to the San Carlos HQ Substation Audit Report (SA2025-1308).

¹⁵ Related inspections include: the initial inspection, re-inspections, and re-inspections following any needed repairs. SA2025-1313: PG&E Substation Audit, Martin HQ, May 19-23, 2025

PACIFICA	2023 Annual
PLYMOUTH	2023 Annual
SAN ANDREAS	2023 Annual
SAN FRAN AIRPORT	2023 Annual
SAN FRAN K	2023 Annual, anomalies for K4B REG 6.5.23 and K1C REG 11.18.24
SAN FRAN L SUB	2023 Annual, anomalies for BK2 4KV ARSW 6.5.23 and L 4/12 6.5.23
SAN FRAN P (HUNTERS POINT)	2023 annual, anomalies for 1109 BRKR 7.12.23 and 1109 BRKR 7.20.24
SAN FRAN X (MISSION)	2024 Annual
SAN FRAN Y (LARKIN)	2023 Annual
SERRAMONTE	2023 Annual
WESTLAKE	2023 Annual

PG&E Response:

CAP 131152864 will remain open until all Martin FLIR-trained employees have been retrained on proper procedures for uploading IR photographs to APM.

4. GO 174, Rule 12, General states in part:

“Design, construction and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

PG&E SM&C Manual, Infrared Inspections, Section III.D. Repair Priority Codes states:

“The repair priority codes shown [below] determine the actions required for re-inspection or equipment repair.”

Temperature Rise (ΔT)						
SAP Repair Priority Codes	Action	Direct View Targets Percent of Rated Load			Indirect View Targets	Main Tank compared to LTC
		0–40%	41–80%	81–100%		
A	Immediate repair	> 100°C		> 125°C	> 10°C	> -5°C
A	Repair 30 days	80°–100°C		100°–125°C	NA	
B	Repair 90 days	60°–79°C	NA	80°–99°C	5°–9°C	-4° to -5°C
B	Re-inspect 90 days	15°–59°C	15°–79°C		2°–4°C	-2° to -3°C
NA	No action	< 15°C			< 2°C	≤ -1°C

Note: If 90-day re-inspection conditions dictate a second re-inspection, repairs must be made within 90 days.

ESRB found that PG&E failed to conduct an IR re-inspection of the San Fran F (Marina) Substation following the 2023 annual IR inspection which identified anomalies at the 407 B phase concentric, 403 B phase cable, FY-4 A phase concentric connection, and FY-2 A phase cable. PG&E stated in response that: “No notifications were created for these hotspots. However, the 2024 annual IR performed on June 29, 2024, found no anomalies with any equipment, including these distribution underground cables.”¹⁶ While the 2024 annual IR inspection found no anomalies, ESRB asserts that PG&E must follow its procedures and conduct re-inspections/repairs when anomalies are identified.

PG&E Response:

We acknowledge ESRB’s findings that we did not perform the IR re-inspections following the 2023 annual IR inspection anomalies. We appreciate ESRB’s support in reinforcing our commitment to safety and are committed to improving adherence to internal procedures, including timely re-inspections and repairs when anomalies are identified. We will take appropriate corrective actions to prevent recurrence, including an extent of condition analysis.

5. GO 174, Rule 12, General states in part:

“Design, construction and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

PG&E SM&C Manual, Insulating Oil, Attachment 3, Action Matrix Work Codes¹⁷ lists the following corrective actions for DGA Codes 3 and 4:

¹⁶ PG&E Follow-up Data Request Response, Question 4 (Dated: 7/25/2025).

¹⁷ PG&E Utility Manual TD-3322M-10-Att03, Attachment 3, Revision 0, Insulating Oil, Effective 8/6/2024, Page 1. SA2025-1313: PG&E Substation Audit, Martin HQ, May 19-23, 2025

DGA CODE 3	DGA CODE 4
Work Code = D3	Work Code = D4
<ul style="list-style-type: none"> Electrical testing is required to determine the source of gassing, if possible. The supervisor initiates contact with the specialist; the specialist informs the supervisor of specific testing requirements. If a previous estimated degree of polymerization (EDP) test has not been taken or if a previous EDP test is older than 2 calendar years, a TDA+ oil sample is required before clearance initiation. If identified as economically viable, perform an internal inspection and repair. 	<ul style="list-style-type: none"> If previous electrical testing on a Code 3 was not performed, electrical testing is required to determine the source of gassing, if possible. The supervisor initiates contact with a specialist; the specialist informs the supervisor of specific testing requirements. If a previous EDP test has not been taken or if a previous EDP test is older than 2 calendar years, a TDA+ oil sample is required before clearance initiation. If identified as economically viable, perform an internal inspection and repair. If not viable, the supervisor notifies Asset Management and recommends a just-in-time (JIT) replacement. De-rate to 90% of nameplate in the short term before replacement.

ESRB’s review of PG&E’s Oil Test Records¹⁸ found that PG&E failed to conduct proper oil retests when abnormal results were identified. Listed below are two examples where PG&E failed to conduct the required retests.

- East Grand Substation: 404 B (152) SINGLE PHASE REGULATOR
The June 2024 oil test found a DGA result of “4” which the Oil Test Report noted could be due to: “Severe contact heating. Investigate immediately. Based on limits established in the analysis norms, a potential diagnosis could be a T3 fault.” PG&E stated in response: “Following the TASA completed on June 25, 2024, an LC notification was inadvertently not created to address the DGA code 4 associated with this regulator.”¹⁹
- San Fran H (Martin): Bank 1, 3 PHASE TRANSFORMER (LTC)
The 2020-2024 oil tests found a DGA result of “3” which the Oil Test Reports note: “Recommend retest within 150 days (5 months) for trending. Monitor for increased arcing. Evaluate for worn or damaged components. A slightly abnormal dissipation of energy is noted. This is an early indication of fault or wear activity. Partial discharge is indicated. Heating is indicated. Abnormal arcing is indicated.” PG&E stated in response: “An LC notification was inadvertently not created to address the previously identified DGA code 3 results. However, the 2025 annual TASA was completed on July 13, 2025, under PR 129829992 with results still pending.”²⁰

PG&E Response:

We recognize the importance of procedural compliance for retests and are taking corrective actions, including the exploration of asset identification controls to ensure we are following up when oil testing is required and piloting APM automation to drive oil retesting. For both examples mentioned above, retesting was not performed. The 2025 annual tests were performed, and PG&E is providing the test results below for ESRB awareness.

- Regarding the East Grand Substation: 404 B (152) Single-phase Regulator, on June 25,

¹⁸ PG&E Pre-Audit Data Request Response, Question 19 (Dated: April 30, 2025).

¹⁹ PG&E Follow-up Data Request Response, Question 5 (Dated: 7/25/2025).

²⁰ *I.d.*

2025, the annual TASA was performed, under PR 129829779, resulting in a DGA ‘4’. In response, the regulator was removed from service on July 9, 2025, pending investigation and replacement of associated reactors.

- Regarding the San Fran H (Martin): Bank 1, 3 Phase Transformer (LTC), the 2025 annual TASA, conducted under PR 129829992, resulted in a DGA “2,” not requiring further action.

III. Field Inspection

During the field inspection, ESRB inspected the following 21 substations:

Substation	City
Martin HQ (San Fran H)	Daly City
East Grand	South San Francisco
San Francisco Airport	San Bruno
Millbrae	Millbrae
San Andreas	Millbrae
Serramonte	Daly City
Pacifica	Pacifica
Daly City	Daly City
Westlake	Daly City
Plymouth	San Francisco
Ocean Ave	San Francisco
San Fran L	San Francisco
Noriega	San Francisco
Judah	San Francisco
San Fran K	San Francisco
San Fran F (Marina)	San Francisco
Beach St	San Francisco
San Fran J	San Francisco
San Fran Y (Larkin)	San Francisco
San Fran X (Mission)	San Francisco
San Fran A (Potrero PP)	San Francisco

IV. Field Inspection – Violations List

ESRB observed the following violations of GO 174, Rule 12 during the field inspection:

GO 174, Rule 12, General states in part:

“...Substations shall be designed, constructed and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service.

Design, construction, and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

PG&E Response:

Our substation inspection program is built on a robust framework of monthly and bi-monthly inspections, enhanced inspections (EI), quality verification (QV) audits, and annual infrared (IR) assessments. These multi-tiered visual and technical evaluations are designed to detect abnormal conditions before equipment failure occurs and to help prevent unsafe events. We appreciate the insight and feedback from the ESRB, as well as the support in helping us uphold our stand that everyone and everything is always safe.

We have created new notifications for 46 of the field inspection violations identified by ESRB. Our review indicates that 44 of the field findings cited by ESRB do not constitute violations of GO 174, Rule 12. We have provided additional information for each individual observation below.

1. Martin HQ Substation

- 1.1. There is corrosion on battery cells 45 and 49 in the 230 kV Battery Room. PG&E has an open LC 129520898 to clean the batteries.



PG&E Response:

We disagree the condition represents in a violation of GO 174, Rule 12. Pre-existing LC notification

129520898 was established in our system of record, SAP, prior to the field audit to address the corrosion on battery cells 45 and 49 in the 230 kV Battery Room at Martin Substation. This LC notification was worked in accordance with our maintenance procedures and completed on June 27, 2025.

1.2. Switch 2341 closed semaphore is faded.



PG&E Response:

While we remain committed to maintaining equipment in a condition that promotes safety and adequacy of service, we believe this finding does not reflect a material deficiency under GO 174, Rule 12 because it allows for design and maintenance practices based on local conditions and accepted operational procedures. The semaphore in question is not used to verify switch position. Rather, switchmen confirm the position through direct observation of the switch mechanism itself.

1.3. The bus structure hardware is corroded at the HZ-2 230 kV Cable.



PG&E Response:

We acknowledge the presence of corrosion observed on the potheads located on buss structure HZ-2 at Martin Substation. However, we disagree that this condition violates GO 174, Rule 12, as the affected equipment pertains to transmission underground infrastructure and falls under the scope of GO 128. A pre-existing LC notification 130111917 was established in our system of record, SAP, prior to the field audit to address this condition. The notification has been added to our transmission underground workplan and will be addressed in accordance with current prioritization and material availability.

1.4.San Mateo-Martin bus structure hardware is corroded.



PG&E Response:

We created LC Notification 131841557 to address ESRB's finding regarding the lightening arrestor corrosion, added it to the workplan and will be addressed in accordance with current prioritization and material availability.

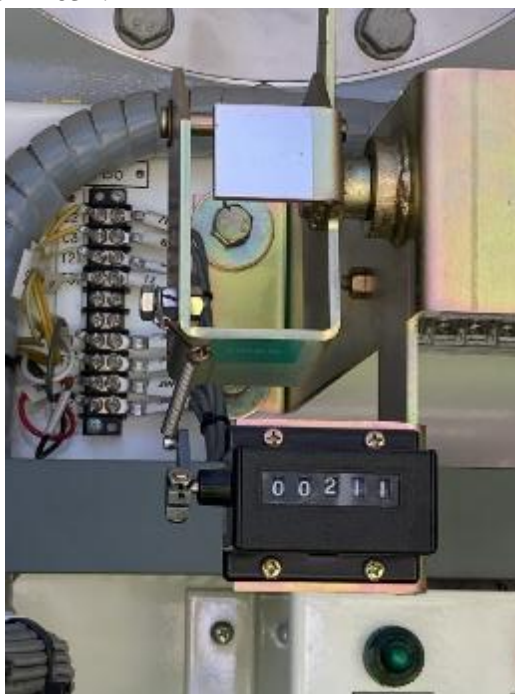
1.5. Faded closed semaphore and faded caution sign at Switch 4335.



PG&E Response:

We disagree that the condition results in a violation of GO 174, Rule 12. Pre-existing LC Notification 129521985 to address the faded caution sign on Switch 4335 at Martin Substation was established in our system of record, SAP, prior to the field audit. The LC notification was completed on time in accordance with our maintenance procedures on July 23, 2025.

1.6. Closed semaphore faded at CB 4632.



PG&E Response:

We created LC Notification 131385178 to address ESRB's finding regarding the faded "closed" semaphore, added it to the workplan and completed it on September 14, 2025.

1.7. HP-3 Pothead structure is corroded.



PG&E Response:

While we acknowledge the presence of corrosion on the HP-3 pothead structure at Martin Substation, we do not agree that this condition constitutes a violation of GO 174, Rule 12. The equipment pertains to our underground infrastructure and falls under the scope of GO 128. However, to address this issue, we created Notification 131813533, which has been added to our Transmission Underground workplan and will be addressed in accordance with current prioritization and material availability.

1.8 HP-3 115 kV Pipe Ground Switch cabinet has significant corrosion.



PG&E Response:

While we acknowledge that there is corrosion on the cabinet for the HP-3 115 kV Pipe Ground Switch at Martin Substation, we do not agree that this condition constitutes a violation of the general orders because this condition had pre-existing LC Notification 129132438 that was established in our system of record, SAP, prior to the field audit. The notification is being actively managed in accordance with our Transmission Underground maintenance procedures and is not past due.

- 1.8. Fire extinguisher is missing the 7/2024, 8/2024, 10/2024, and 3/2025 monthly inspections and another fire extinguisher is missing the 3/2025 monthly inspection in the 12 kV Section E Control Room.



PG&E Response:

We acknowledge that fire extinguishers located in the 12 kV Section E Control Room are missing multiple monthly sign-offs. While these inspections are conducted monthly, we recognize the importance of ensuring that all inspection activities are properly recorded and will reinforce the requirement to document monthly inspections with the local supervisor.

- 1.9. Deteriorated signage at the 12 kV Section E Building. PG&E has an open LC 131234687 to replace the signage.



PG&E Response:

Pre-existing LC Notification 131234687 was established in our system of record, SAP, prior to the field audit to address the deteriorated signage at the 12 kV Section E Building at Martin Substation. This LC notification was carried out in accordance with our maintenance procedures. It was completed on time on June 17, 2025, and therefore we disagree that the condition is a violation of GO 174, Rule 12.

1.10.CB 1132 closed semaphore is faded.



PG&E Response:

We created LC Notification 131385200 to address ESRB's finding regarding the faded closed semaphore on CB1132 at Martin Substation, added it to the workplan, and completed it on September 14, 2025.

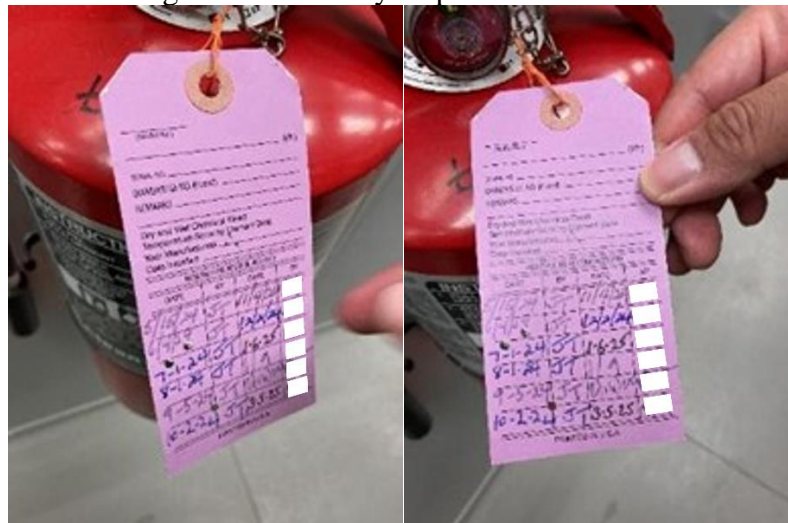
1.11. CB 1102 closed semaphore is faded.



PG&E Response:

We created LC notification 131385201 to address ESRB's finding regarding the faded closed semaphore on CB1102 at Martin Substation, added it to the workplan, and completed it on September 14, 2025.

1.12. Both fire extinguishers missing 4/2025 monthly inspection in the 115 kV MPAC #2 control room.



PG&E Response:

We acknowledge that both fire extinguishers located in the 115 kV MPAC #2 room are missing monthly sign-off for April 2025. While these inspections are conducted monthly, we recognize the importance of ensuring that all inspection activities are properly recorded and will reinforce the requirement to document monthly inspections with the local supervisor.

1.13. CB 1302 has a faded counter. PG&E has an open LC 126035884 to replace the counter.



PG&E Response:

We created LC Notification 131294440 to address ESRB's finding regarding the faded counter on CB1302 at Martin Substation, added it to the workplan, and completed it on June 07, 2025.

1.14. CB 1402 has a faded closed semaphore.



PG&E Response:

We created LC notification 131385202 to address ESRB's finding regarding the faded closed semaphore on CB1402 at Martin Substation, added it to the workplan, and completed it on September 14, 2025.

1.15. Housekeeping needs improvement. Buckets, rags, trash, hardware, etc. observed around substation.



PG&E Response:

We created LC Notification 131234359 to address ESRB's finding regarding the housekeeping issues identified, added it to the workplan, and will complete the LC in accordance with our current work prioritization. Actions to improve substation housekeeping are noted in the introduction.

1.16. Bird nest at TX Bank 7.



PG&E Response:

We created LC Notification 131385203 to address ESRB's finding regarding the bird's nest in Transformer Bank 7 at Martin Substation, added it to the workplan, and completed it on July 13, 2025.

1.17. Switch 4631 closed semaphore is faded.



PG&E Response:

While we remain committed to maintaining equipment in a condition that promotes safety and adequacy of service, we believe this finding does not reflect a material deficiency under GO 174, Rule 12 because it allows for design and maintenance practices based on local conditions and accepted operational procedures. The semaphore in question is not used to verify switch position. Rather, switchmen confirm the position through direct observation of the switch mechanism itself.

1.18. Switch 4531 closed semaphore is faded.



PG&E Response:

While we remain committed to maintaining equipment in a condition that promotes safety and adequacy of service, we believe this finding does not reflect a material deficiency under GO 174, Rule 12 because it allows for design and maintenance practices based on local conditions and accepted operational procedures. The semaphore in question is not used to verify switch position. Rather, switchmen confirm the position through direct observation of the switch mechanism itself.

1.19. CB 92 closed/open semaphore is faded.



PG&E Response:

We created LC Notification 131796240 to address ESRB's finding regarding the faded semaphore on CB92 at Martin Substation, added it to the workplan, and will complete it based on current work prioritization and material availability.

1.20. Bank 6 Digital Voltmeter screen is not working. PG&E has an open LC 131235142 to repair the Voltmeter.



PG&E Response:

Pre-existing LC Notification 131235142 was established in our system of record, SAP, prior to the field audit to address the bank 6 digital voltmeter screen at Martin Substation. This LC notification was completed on time on September 13, 2025 and therefore does not result a violation of GO 174, Rule 12.

1.21. Control cabinets left unlatched in multiple control rooms.



PG&E Response:

Given the absence of any safety or reliability impact, we do not consider the unlatched control cabinets a material deficiency under the scope of GO 174, Rule 12. The issue was promptly corrected onsite by a PG&E Qualified Electrical Worker (QEW) on the day of the field audit.

2. East Grand Substation

2.1. CB 1114/2 has a faded counter. PG&E has an open LC 130774717 to replace the counter.



PG&E Response:

Pre-existing LC notification 130774717 was established in our system of record, SAP, prior to the field audit to address faded counter located in circuit breaker 1114/2 at East Grand Substation. This LC notification is being worked in accordance with our maintenance. The notification is being actively managed in accordance with our maintenance procedures and is not past due. Therefore, this finding does not qualify as a violation of GO 174, Rule 12.

2.2. CB 1113/2 has a faded counter. PG&E has an open LC 129698772 to replace the counter.



PG&E Response:

Pre-existing LC notification 129698772 was established in our system of record, SAP, prior to the field audit to address faded counter located in circuit breaker 1113/2 at East Grand Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on time on June 04, 2025.

2.3. There is corrosion at the base of TX Bank 3.



PG&E Response:

We created LC Notification 131269340 to address ESRB's finding regarding the corrosion on Bank 3 at East Grand Substation, added it to the workplan, and will complete the work based on current work prioritization and material availability.

San Francisco Airport Substation

2.4. AC Panel 120/208 V left open.



PG&E Response:

Given the absence of any impact on safety or reliability, we do not consider the open panel as a deficiency under the scope of GO 174, Rule 12. The issue was immediately corrected onsite by a PG&E Qualified Electrical Worker (QEW) on the day of the field audit.

2.5. CB 112 counter is faded. PG&E has an open LC 129282051 to replace the counter.



PG&E Response:

The LC notification referenced in the finding, 129282051, had been created as a duplicate and was canceled. Pre-existing LC notification 129173320 was established in our system of record, SAP, prior to the field audit to address faded counter located in circuit breaker 112 at San Francisco Airport Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on time on September 14, 2025.

3. Millbrae Substation

3.1. Bird nest at CB 142.



PG&E Response:

We created LC Notification 131417561 to address ESRB's finding regarding the identified bird's nest on CB 142 at Millbrae Substation, added it to the workplan, and completed it on July 20, 2025.

3.2. CB 1106/2 has a faded counter. PG&E has an open LC 131244546 to replace the counter.



PG&E Response:

Pre-existing LC Notification 131244546 was established in our system of record, SAP, prior to the field audit to address the faded counter located in CB 1106/2 at Millbrae Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on time on July 24, 2025.

3.3. Station BK 3 1A bushing is missing half of bird guard.



PG&E Response:

We created LC notification 131419499 to ESRB's finding regarding the replace the animal guard, added it to the workplan, and it will be completed based on current work prioritization and material availability.

3.4. Closed semaphore faded for Auxiliary Tie 2.



PG&E Response:

We created LC Notification 131417569 to address ESRB's finding regarding the faded closed semaphore on Auxiliary Tie 2 breaker at Millbrae Substation, added it to the workplan and completed it on July 20, 2025.

3.5. Station Service BK 4 1A missing half of bird guard on both bushings.



PG&E Response:

We created LC Notification 131419510 to replace ESRB's finding regarding the animal guard, added it to the workplan, and it will be completed based on current work prioritization and material availability.

3.6. Bird nest at CB 122.



PG&E Response:

We created LC Notification 131417632 to address ESRB's finding regarding the bird's nest, added it to the workplan, and completed it on July 20, 2025.

3.7. Bird nest at CB 152.



PG&E Response:

We created LC Notification 131417634 to address ESRB's finding regarding the bird's nest, added it to the workplan, and completed it on July 20, 2025.

3.8. Corrosion at Spare TX Bank 1.



PG&E Response:

We created LC Notification 131417639 to address ESRB's finding regarding the corrosion, added it to the workplan, and completed the repair on July 20, 2025.

3.9. Faded Entry Procedure sign at TX Bank 1.



PG&E Response:

We created LC Notification 131417639 to address ESRB's finding regarding the faded entry procedure on Transformer Bank 1 Spare and completed the repair on July 20, 2025.

3.10. 402 Regulator (4kV) has an elevated gas level.



PG&E Response:

We created LC Notification 131378042 to address ESRB's finding to replace the

regulator, added it to the workplan, and it will be completed based on current work prioritization and material availability.

3.11. Bird nest at C Phase TX Bank 5.



PG&E Response:

We created LC Notification 131419495 to address ESRB's finding regarding the bird's nest, added it to the workplan, and completed it on July 20, 2025.

3.12. Bird nest at Spare TX Bank 5.



PG&E Response:

We created LC Notification 131419496 to address ESRB's finding regarding the bird's nest, added it to the workplan, and completed it on July 20, 2025.

4. San Andreas Substation

4.1. Nitrogen tank pressure gages broken at TX Bank 1.



PG&E Response:

We created LC Notification 131419512 to address ESRB's finding regarding the broken nitrogen gauges on Bank 1 at San Andreas Substation, added it to the workplan, and completed it on September 15, 2025.

4.2. Bank 1 has a deteriorated Entry Procedure sign.



PG&E Response:

We created LC Notification 131419515 to address ESRB's finding regarding the deteriorated Entry Procedure Sign on Bank 1 at San Andreea Substation, added it to the workplan, and completed it on September 15, 2025.

4.3. Bird nest at low side insulator bushing of Bank 1.



PG&E Response:

We created LC Notification 131419589 to address ESRB's finding regarding the bird's nest, added it to our work plan, and completed it on September 15, 2025.

5. Serramonte Substation

5.1. Corrosion on multiple battery cells in Control Room.



PG&E Response:

We created LC notification 131419803 to address ESRB's finding regarding the corrosion on the battery cells in the control room at Serramonte Substation, added it to the workplan, and it will be completed based on current work prioritization and material availability.

5.2. Bank 1 has a leaking gage and low oil level. PG&E has an open LC 129517779 to repair Bank 1.



PG&E Response:

Pre-existing LC Notification 129517779 was established in our system of record, SAP, prior to the field audit to address leaking gauge and low oil at Bank 1 at Serramonte Substation. This LC notification was worked in accordance with our maintenance procedures but was completed past its OOC date on June 07, 2025.

6. Daly City Substation

6.1. Switch 151 semaphore is faded.



PG&E Response:

The semaphore in question is not used to verify switch position. Rather, switchmen confirm the position through direct observation of the switch mechanism itself. We remain committed to maintaining equipment in a condition that promotes safety and adequacy of service and believe this finding does not reflect a material deficiency under the intent of GO 174, Rule 12, because it allows for design and maintenance practices based on local conditions and accepted operational procedures.

6.2. Station Service Bank 2 has two bushings missing half of the bird guard.



PG&E Response:

We created LC Notification 131420000 to address ESRB's finding regarding the missing half of the bird guard at Station Service Bank 2 Daly City Substation, added it to the workplan, and it will be completed based on current work prioritization and material availability.

7. Westlake Substation

7.1. Unit Sub 403 is deteriorated and at end of life. PG&E has an open CAP Order 130709590 to replace the Unit Sub in 1 year.



PG&E Response:

Pre-existing LC Notification 130709590 was established in our system of record, SAP, prior to the field audit to address the identified issue with Unit Sub 403. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

8. Plymouth Substation

8.1. Damaged barbed wire. PG&E has an open LC 129315835 to repair the barbed wire.



PG&E Response:

Pre-existing LC Notification 129315835 was established in our system of record, SAP, prior to the field audit to address the damaged barbed wire at Plymouth Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12, since the LC notification was worked in accordance with our maintenance procedures and completed on time on June 04, 2025.

9. Ocean Ave Substation

9.1. Bank 1 (401) has moderate rust. PG&E has an open LC 129315928 to repaint it.



PG&E Response:

Pre-existing LC notification 129315928 was established in our system of record, SAP, prior to the field audit to address the rust on Bank 1 (401) at Ocean Avenue Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification will be completed based on current work prioritization and material availability and is not past due.

9.2. Bank 2 (402) has moderate rust. PG&E has an open LC 130544674 to repaint it.



PG&E Response:

Pre-existing LC notification 130544674 was established in our system of record, SAP, prior to the field audit to address the rust on Bank 2 (402) at Ocean Avenue Substation.

We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification will be completed based on current work prioritization and material availability and is not past due.

9.3. Distribution riser cover damaged and wrapped with tape.



PG&E Response:

We created LC notification 131809636 to address ESRB's finding regarding the damaged distribution raiser cover at Ocean Avenue Substation, added it to the workplan, and it will be completed based on current work prioritization and material availability.

10. San Fran L Substation

10.1. Bank 2 LTC has a liquid temperature alarm.



PG&E Response:

Pre-existing LC notification 128257849 was established in our system of record, SAP, prior to the field audit to address the temperature alarm on Bank 2 LTC at San Francisco L Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification will be completed based on current work prioritization and material availability and is not past due.

10.2. Insulators dirty at Bank 1 DSC.



PG&E Response:

We created LC Notification 131420151 to address ESRB's finding regarding the dirty insulators on Bank 1 Disconnect, added it to the workplan, and completed it on August 18, 2025.

10.3. Faded Danger signage at Switchgear Building.



PG&E Response:

We created LC Notification 131420158 to address ESRB's finding regarding the faded signage on the switchgear building, added it to the workplan, and it will be completed based on current work prioritization and material availability.

10.4. Third party comms line slacked and low in Substation.



PG&E Response:

We disagree that this condition qualifies as a violation of GO 174, Rule 12, as the line is owned and maintained by a third party and does not impact the safety or reliability of substation operations. Third-party Notifications 131794906 and 131794977 have been created, and resolution will proceed in accordance with established third-party protocols.

10.5. Third party comms line touching abandoned streetlight.



PG&E Response:

We disagree that this condition qualifies as a violation of GO 174, Rule 12, as the line is owned and maintained by a third party and does not impact the safety or reliability of substation operations. Third-party Notifications 131795281 and 131795283 have been created, and resolution will proceed in accordance with established third-party protocols.

10.6. Tree pushing down on comms guy in Substation.



PG&E Response:

We disagree that this condition qualifies as a violation of GO 174, Rule 12, as the line is owned and maintained by a third party and does not impact the safety or reliability of

substation operations. Third-party Notifications 131795310 and 131795318 have been created, and resolution will proceed in accordance with established third-party protocols.

10.7. Minor soil erosion at fence.



PG&E Response:

We created LC Notification 131796160 to address ESRB's finding regarding the minor soil erosion at San Fran L Substation, added it to the workplan, and it will be completed based on current work prioritization.

11. Noriega Substation

11.1. Rust at Switchgear cabinets. PG&E has an open LC 129349625 to repaint them.



PG&E Response:

Pre-existing LC notification 129349625 was established in our system of record, SAP, prior to the field audit to address the rusted switchgear cabinets at Noriega Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and was completed on August 03, 2025.

11.2. Water damage due to condensation buildup in Battery Shed. PG&E has an open LC 129349480 to repair the water damage.



PG&E Response:

Pre-existing LC Notification 129349480 was established in our system of record, SAP, prior to the field audit to address the battery cabinet water damage and condensation buildup at Noriega Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12, since this LC notification was worked in accordance with our maintenance procedures and completed on July 11, 2025.

11.3. Faded identification signage and Danger signage at Bank 2 Unit 402.



PG&E Response:

We created LC Notification 131579009 to address ESRB's finding regarding the faded signage on Bank 2 Unit 402 Noriega Substation, added it to our work plan, and it will be completed based on current work prioritization.

11.4. Rust at CB 401/2. PG&E has an open LC 129350326 to repaint it.

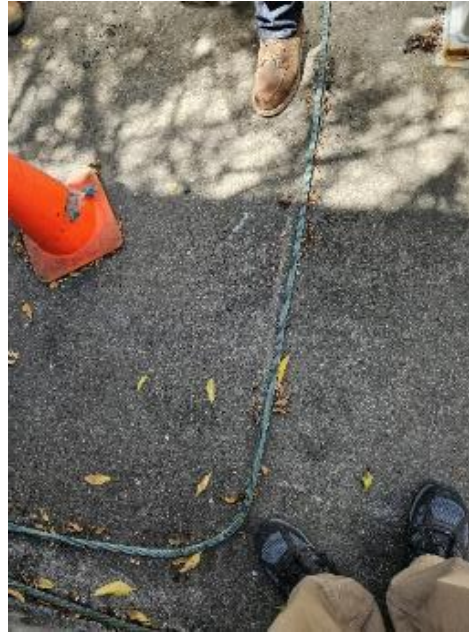


PG&E Response:

Pre-existing LC Notification 129350326 was established in our system of record, SAP,

prior to the field audit to address rust on CB 401 at Noriega Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on August 03, 2025.

11.5. Clamps for ground wire rusted through.



PG&E Response:

Pre-existing LC Notification 129349931 was established in our system of record, SAP, prior to the field audit to address the rusted ground clamps on Bank 1 and Noriega Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12, since this LC notification was worked in accordance with our maintenance procedures and completed on August 03, 2025.

12. Judah Substation

12.1. Significant rust at vault by Switch 3766.



PG&E Response:

Pre-existing EC Notification 122618642 was established in our system of record, SAP, prior to the field audit to address this condition. Although this notification is currently past-due, it will be addressed in accordance with current distribution underground maintenance protocols and material availability. We do not agree that this condition violates GO 174, Rule 12, as the affected equipment pertains to distribution underground infrastructure and falls under the scope of GO 128.

12.2. Pothead riser needs duct seal at Bank 402.



PG&E Response:

We created LC notification 131809637 to address the ESRB's finding regarding the pothead riser missing duct seal at Bank 402 at Judah Substation, added it to the work plan, and it will be completed based on current work prioritization and material availability.

13. San Fran K Substation

13.1. Station batteries are at end of life. PG&E has a Capitol Order 121830140 to replace the batteries.



PG&E Response:

Pre-existing LC Notification 121830140 was established in our system of record, SAP, prior to the field audit to address the end-of-life batteries at San Francisco K Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

13.2. The 205 Regulators require chain/barrier and Danger signage.



PG&E Response:

We created LC Notification 131416938 to address ESRB's finding regarding the chain barrier and signage, added it to the workplan, and completed it on July 12, 2025.

13.3. K-1 C phase Regulator voltmeter not working showing 0 Volts.



PG&E Response:

We created LC Notification 131417052 to address ESRB's finding regarding the voltmeter not working, added it to the workplan, and completed it on August 03, 2025.

14. Beach St Substation

14.1. Fence ground wire is a tripping hazard and needs to be buried and clamped down.



PG&E Response:

We created LC Notification 131416844 to address ESRB's finding regarding the clamp down the fence ground wire at Beach Substation, added it to our work plan, and it will be completed based on current work prioritization.

15. San Fran J Substation

15.1. Bank 1 LTC fluid gauge is broken. There is a sign on the gauge, but PG&E has not created an LC notification to address the issue.



PG&E Response:

We created LC Notification 131417058 to address ESRB's finding regarding the Bank 1 LTC gauge and this was completed on September 12, 2025.

15.2. Bank 2 has an oil leak at the radiator flange. PG&E has an open LC 122446898 to repair the leak.



PG&E Response:

Pre-existing LC Notification 122446898 was established in our system of record, SAP, prior to the field audit to address the oil leak at the radiator flange on Bank 2 at San Francisco J Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12, since this LC notification was worked in accordance with our maintenance procedures and completed on July 18, 2025.

16. Larkin Substation

16.1. CB 192 has an alarm for compressor loss of AC. PG&E has an open LC 129794806 to correct this issue.



PG&E Response:

Pre-existing LC Notification 129794806 was established in our system of record, SAP, prior to the field audit to address the alarm for compressor loss of AC on CB 192 at Larkin Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12, since this LC notification is not past due and will be completed based on current work prioritization and material availability.

16.2. CB 182 has an alarm for compressor loss of AC. PG&E has an open LC 129400819 to correct this issue.



PG&E Response:

Pre-existing LC Notification 129400819 was established in our system of record, SAP, prior to the field audit to address the alarm for compressor loss of AC on CB 182 at Larkin Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12, since this LC notification is not past due and will be completed based on current work prioritization and material availability.

16.3. Minor oil seep at middle pipe near the Bank 1 cooling fans.



PG&E Response:

We created LC Notification, 131417188 to address the ESRB finding regarding the minor oil seep at middle pipe near the Bank 1 cooling fans at Larkin Substation, added it to the workplan, and completed it on July 19, 2025.

16.4. DC Panel 8 cabinet door not attached due to active construction.



PG&E Response:

We disagree that this condition qualifies as a violation of GO 174, Rule 12. The DC Panel 8 cabinet door was not attached at Larkin Substation because of active construction activities, and the open cabinet does not pose a safety or reliability concern.

17. San Fran X (Mission) Substation

17.1. Oil weep at Bank 9 radiator flange.



PG&E Response:

We created LC Notification 131417243 to address the ESRB finding regarding the oil weep at Bank 9 radiator flange at San Francisco X (Mission) Substation, added it to the workplan and completed it on July 18, 2025.

17.2. Alarm Relay C30-ANN-4 has an alarm for FSR 1125 Relay fail at Cell 45 BK4-22.

PG&E Response:

We created LC Notification 131417563 to address the ESRB finding regarding low nitrogen gauge and alarm at Francisco X (Mission) Substation, added it to the workplan, and completed it on July 12, 2025.

18. San Fran A (Potrero PP) Substation

18.1. Ground wire not properly secured at Shunt Reactor 1.



PG&E Response:

Pre-existing LC Notification 129478329 was established in our system of record, SAP, prior to the field audit to secure the ground wire at San Francisco A (Potrero) Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on time on June 10, 2025

18.2. Winding Trip alarm at 230/115 kV Bank 3. PG&E has an open LC 129113085 to correct the issue.



PG&E Response:

Pre-existing LC Notification 129113085 was established in our system of record, SAP, prior to the field audit to address the winding trip alarm at San Francisco A (Potrero) Substation. We disagree that this finding qualifies as a violation of GO 174 Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on time on June 21, 2025.

18.3. Pump motor counter faded at CB 362. PG&E has an open LC 129477721 to replace the counter.



PG&E Response:

Pre-existing LC Notification 129477721 was established in our system of record, SAP, prior to the field audit to address the faded pump motor counter at CB362 at San Francisco A (Potrero) Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on time on September 13, 2025.

18.4. Pump motor counter faded at CB 132.



PG&E Response:

We created LC Notification 131322118 to address the ESRB finding regarding CB 132 faded pump motor counter at San Francisco A (Potrero) Substation, added it to the workplan, and completed it on September 13, 2025.

18.5. Pump motor counter faded at CB 182. PG&E has an open LC 129477720 to replace the counter.



PG&E Response:

Pre-existing LC Notification 129477720 was established in our system of record, SAP, prior to the field audit to address the CB 182 faded pump motor counter at San Francisco A (Potrero). We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on time on September 13, 2025.

18.6. Bird nest under the middle bushing at CB 192. PG&E has an open LC 129477848 for the bird nest.



PG&E Response:

Pre-existing LC Notification 129477848 was established in our system of record, SAP, prior to the field audit to address the bird nest in CB 192 at San Francisco A (Potrero) Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on time on June 10, 2025.

18.7. Faded counter at CB A1115/2. PG&E has an open LC 125983508 to replace the counter.



PG&E Response:

Pre-existing LC Notification 125983508 was established in our system of record, SAP, prior to the field audit to address the faded counter in CB A1115/2 at San Francisco A (Potrero) Substation. This LC notification is currently past due.

18.8. Pump motor counter faded at CB 412.



PG&E Response:

We created LC Notification 131322394 to address the ESRB finding of the faded pump motor counter in CB 412 at San Francisco A (Potrero), added it to the workplan, and completed it on September 13, 2025.

18.9. Faded counters at CB A-1114/2 and CB A1117/2. PG&E has an open LC 128457081 to replace the counters.



PG&E Response:

Pre-existing LC Notification 128457081 was established in our system of record, SAP, prior to the field audit to address the faded counters at CB A-1114/2 and CB A1117/2 at San Francisco A (Potrero) Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on July 19, 2025.

18.10. Faded semaphore at CB 432.



PG&E Response:

We disagree with the ESRB finding that this condition constitutes a violation of GO 174, Rule 12. Per TD-3322M-01 “Substation Inspections,” electricians are responsible for ensuring the circuit breaker’s mechanical position indicator is both visible and accurately reflects the breaker’s position. While the red coloration is slightly faded, the “O” (open) and “C” (closed) markings remain clearly legible and unambiguous. As such, this condition does not rise to the level that requires the creation of an LC notification.

18.11. Corrosion on battery cells 54 and 55 in the Station Battery Room. PG&E has an open LC 130533738 to clean the corrosion.



PG&E Response:

Pre-existing LC Notification, 130533738 was established in our system of record, SAP, prior to the field audit to address the corrosion on battery cells 54 and 55 in the battery room at San Fran A (Potrero PP) Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is not past due and will be completed based on current work prioritization and material availability.

18.12. Faded counter at CB 386. PG&E has an open LC 129477723 to replace the counter.



PG&E Response:

Pre-existing LC Notification 129477723 was established in our system of record, SAP, prior to the field audit to address the faded counter in CB 386 at San Francisco A (Potrero) Substation. We disagree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is not past due and will be completed based on current work prioritization and material availability.