PG&E Fresno HQ
Electric Transmission Audit Findings Response
January 13-17, 2025

I. Records Review

During the audit, ESRB staff reviewed the following records:

- PG&E's Electric Transmission Preventive Maintenance (ETPM) Manual, TD-1001M, in effect November 2020 through November 2024.
- PG&E's utility procedures, standards, guidelines, and job aids for electric transmission facility inspections.
- Overhead transmission facilities statistics.
- PG&E Fresno HQ Service Territory Map and list of all transmission facilities owned or jointly owned by PG&E.
- Patrol, detailed, aerial, climbing, infrared, drone, and helicopter inspection records from November 2019 to November 2024.
- Third Party Safety Hazard notifications sent and received from November 2019 to November 2024.
- PG&E's utility procedures, standards, guidelines, and job aids for electric transmission vegetation management.
- A list of vegetation management inspection records and tree work orders for transmission circuits from November 2020 to November 2024.
- PG&E's policies and procedures related to transmission right-of-way maintenance, and associated performance records from November 2020 to November 2024.
- PG&E's policies and procedures for insulator washing, and associated performance records from November 2021 to November 2024.
- PG&E's policies and procedures for pole intrusive tests, foundation tests, and all other tests related to transmissions structure safety, and associated performance records from November 2021 to November 2024.
- A list of non-routine patrols for electric transmission facilities from November 2019 to
- November 2024.
- PG&E's policies and procedures for assigning priority levels to transmission deficiencies from January 2020 to November 2024.
- A list of all open, closed, and canceled notifications from January 2018 to November 2024.
- Pole loading and safety factor calculations completed from November 2023 to November 2024.
- New construction projects completed from November 2023 to November 2024.
- PG&E's utility standard and procedures for transmission work verification and vegetation management quality control (QC) and quality assurance (QA).
- The results of all internal quality management audits from January 2020 to November 2024.
- A list of PG&E inspector training courses from January 2020 to November 2024.

II. Records Violations

ESRB staff found the following violations during the records review portion of the audit:

1. **General Order (GO) 95, Rule 18-B (1), Maintenance Programs** states in part:

"Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165. […]

The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:
- *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*

(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:
- *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District [(HFTD)]; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

(iii) Level 3 -- Any risk of low potential impact to safety or reliability:
- *Take corrective action within 60 months subject to the exception specified below."*

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

"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

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

PG&E's Electric Transmission Preventive Maintenance (ETPM) establishes when corrective actions for problems must be completed. For the time period reviewed in this audit, two versions of the ETPM are relevant. PG&E's last two versions of its ETPM, Revision 4[1] and Revision 5[2], define the priority codes and associated due dates for the corrective actions shown in Table 1 and Table 2. Additionally, PG&E Utility Procedure TD-8123P-103 Rev. 0 and Rev. 1 provide guidance for setting priority codes effective January 3, 2023[3], shown in Table 3.

Table 1. PG&E ETPM TD-1001M Rev 4, Priority Codes through 8/30/2020

Priority Code	Priority Code Priority Description
A[4]	The condition is urgent and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date will be 30 days to allow time for post-construction processes and notification close-out.
B[5]	Corrective action is required within 3 months from the date the condition is identified. The condition must be reported to the transmission line supervisor as soon as practical.
E	Corrective action is required within 12 months from the date the condition is identified.
F	Corrective action is recommended within 24 months from the date the condition is identified, (due beyond 12 months, not to exceed 24 months). Requires Director approval.

[1] Revision date: 11/20/2018
[2] Revision date: 8/31/2020
[3] Rev. 0 published and effective 1/3/2023, Rev. 1 published and effective 1/1/2024.
[4] Qualified Company Representatives (QCRs) must report immediately any "Priority Code A" abnormal condition to the transmission line supervisor and Grid Control Center (GCC).
[5] In addition, QCRs must report any "Priority Code B" condition to the transmission line supervisor as soon as practical, to ensure that correction occurs within the appropriate time.

Table 2. PG&E ETPM TD-1001M Rev 5, Priority Codes through 1/2/2023

Priority Code[6]	Priority Code Priority Description
A[7]	The condition is urgent and requires **immediate** response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date will be 30 days to allow time for post-construction processes and notification close-out.
B[8]	Corrective action is required within **3 months** from the date the condition is identified. The condition must be reported to the transmission line supervisor as soon as practical.
E	Corrective action is required within **12 months** from the date the condition is identified. ***EXCEPT FOR ITEMS WITHIN HFTD TIER 3 ARE REQUIRED WITHIN 6 MONTHS.***[9]
F	Corrective action is recommended within **24 months** from the date the condition is identified, (due beyond 12 months, not to exceed 24 months). ***EXCEPT FOR ITEMS WITHIN HFTD TIER 3 ARE REQUIRED WITHIN 6 MONTHS AND WITHIN HFTD TIER 2 ARE REQUIRED WITHIN 12 MONTHS.***[10]

Table 3. PG&E Utility Procedure TD-8123P-102, Rev. 0 and Rev. 1, Electric Transmission Line Guidance for Setting Priority Codes since 1/3/2023

Priority Code	G.O. 95, Rule 18 Level	Priority Description – Time Frame[11]
A	1	The condition is urgent and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date is 30 days – to allow time for post-construction processes and notification close-out.

[6] Refer to 2.3.5.2, "Priority Code Due Dates for High Fire Risk Conditions within HFTDs" and 2.3.5.3, "Priority Code Due Dates for Non-Fire Risk Conditions within HFTDs."
[7] QCRs must report immediately any "Priority Code A" abnormal condition to the transmission line supervisor, and the transmission supervisor or QCR contacts GCC.
[8] In addition, QCRs must report any "Priority Code B" condition to the transmission line supervisor as soon as practical, to ensure that correction occurs within the appropriate time.
[9] If the condition in the HFTD Tier 3 does NOT create a fire risk (non-threatening) the corrective action is required within 12 months.
[10] If the condition in the HFTD Tier 3 OR Tier 2 does NOT create a fire risk (non-threatening) the corrective action is required within 24 months.
[11] Time frames listed are "Not to Exceed" and QCR/CIRT may define time frames according to site-specific conditions.

Priority Code	G.O. 95, Rule 18 Level	Priority Description – Time Frame[11]
B	-	Not used for maintenance corrective action priority.
E	2	Corrective action is required, as follows: • Within 6 months for HFTD Tier 3[12] • Within 12 months for HFTD Tier 2/HFRA/Zone 1[13] • Within 12 months for potential violations that compromise worker safety • Within 6 months for all other potential violations
F	3	Corrective action is required within 60 months.

a. ESRB staff reviewed work orders created within the Fresno Transmission HQ from January 2018 through November 2024 and determined that PG&E did not address a total of 8,392 of 37,479 work orders (17,686 pending, 13,214 closed, and 6,579 cancelled) by their required assigned due date (22.4%).[14] Table 4 below breaks down the 8,392 late work orders by their given priority, including the total number of late work orders completed, pending, and canceled work orders, which are included in the total.

Table 4. Number of Late Notifications by Priority and Type[15]

Priority Code[16]	Late Closed Notifications	Late Pending Notifications	Late Canceled Notifications	Total Late Notifications
A	6	0	3	9
B	229	0	26	255
E	3484	2553	1137	7174
F	580	90	284	954
Total	**4299**	**2643**	**1450**	**8392**

PG&E Response:

As of June 23, 2025, we find that 4,817 of the 30,900 (17,686 pending and 13,214 closed) notifications provided in the "Open-Closed Notifications" tab of our PADR Question 16

[12] IF the condition in the HFTD Tier 3 OR Tier 2/HFRA/Zone 1 does **not** create a fire risk (non-threatening), THEN the corrective action is required **within 36 months**.
[13] IF the condition in the HFTD Tier 3 OR Tier 2/HFRA/Zone 1 does **not** create a fire risk (non-threatening), THEN the corrective action is required **within 36 months**.
[14] DRU14621_Q16_Atch01_Fresno Master List of Notifications
[15] Calculation based on the Required End Date and Current Priority.
[16] Current Priority Code provided by PG&E.

response, were completed past their established due dates or are currently considered past-due. Please see the individual category responses below:

- 2,723 notifications were completed past their established due dates.
- 2,094 open notifications are considered late based on their established due dates.
- We do not agree with any of the 1450 "Late Canceled Notifications."

Late Closed Notifications

We acknowledge that 2,723 of the cited 4,299 "late closed notifications" were completed past their required end dates. The remaining 1,576 notifications were completed prior to their approved funded repair dates (FRD) per TD-8123P-101 (the procedure in effect when the work was done). Please see the breakdown of these notifications in Table 1PGE.

Table 1PGE

Priority Code	CPUC "Late Closed Notifications"	PG&E Agrees Completed Late	PG&E Disagrees Completed On-Time
A	6	3	3
B	229	42	187
E	3,484	2,428	1,056
F	580	250	330
Total	**4,299**	**2,723**	**1,576**

For the 3 "PG&E Agrees Completed Late" level 1 (priority "A") notifications, please see below for an explanation of each:

- Notification 115760500 was identified on January 25, 2019, as a level 2 (priority "E") notification to repair a tower leg. This notification was upgraded to a level 1 (priority "A") notification on March 6, 2019, and work was immediately performed the same day.
- Notification 128035475 was identified by Osmose on November 21, 2023, for a pole to be stubbed. However, the notification was inadvertently not created until January 12, 2024, and the pole was stubbed the same day.
- Notification 128035479 was identified on December 2, 2023, for a pole to be stubbed. The notification was inadvertently not created until January 12, 2024, and the pole was stubbed the same day.

Late Pending Notifications

We agree that 2,094 of the 2,643 "Late Pending Notifications" provided in the PADR are considered past-due.

- 217 notifications have been completed since the PADR. Of these, 213 notifications were

completed past their established required end dates while 4 notifications were completed on-time based on their current required end dates.

- 1,881 notifications are currently open and past their required end dates, while 65 notifications are open and on-time per their current required end dates.
- 478 notifications have been since been cancelled by CIRT since the PADR.
- 2 notifications have been converted to priority P notifications for programmatic work not tied to specific compliance requirements.

Late Canceled Notifications

We disagree with the above 1,450 records violations for "Late Canceled Notifications" as we do not have a timeline requirement in our guidance documents for canceling notifications that are deemed unnecessary, duplicative, or created in error, after review by the CIRT. These notifications are not late as no corrective actions were performed.

Table 5 shows the most overdue pending notifications for each Priority Code.

Table 5. Most Overdue Pending Notifications

Priority Code	Notification Number	Creation Date	Due Date	Days Late[17]
E	117258629	5/17/2019	11/17/2019	1828
F	118787610	4/7/2020	4/7/2021	1321

PG&E shall provide ESRB with its corrective action plan to complete the 2643 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

PG&E Response:

As stated above, we agree that there are currently 1,881 of the cited 2,643 late pending notifications. While we are executing non-HFTD level 2 and level 3 (priority "E" and "F") notifications as efficiently as possible, due to a backlog of work, notifications are prioritized based on risk. As described in TD-8123-101 "Transmission Line Corrective (LC) Notification Maintenance Strategy", non-HFTD level 2 and level 3 (priority "E" and "F") notifications are prioritized based on public safety risk and bundled for execution efficiency. If non-HFTD notifications are not added into the current year's work plan, they are expected to go past due. Non-HFTD notifications are completed as soon as operationally feasible. See below for an explanation of the two listed above in Table 5. "Most Overdue Pending Notifications".

- Notification 117258629 was created on May 17, 2019, as a level 2 (priority "E") flashed insulator in a non-HFTD. During the L123 conversion to align with GO 95, Rule 18 and per TD-8123P-103, the due date for this notification was May 17, 2022. However, the field safety reassessment (FSR) determined that this work should be completed within the

[17] Days late are determined to be the difference between the Completion Date (or November 18, 2024 if the notification was open) and the Required End Date.

next 6 months. This 6-month timeline was applied against the original notification date (found in field date), hence the due date shown above in ESRB Table 5. This notification is currently in this year's work plan to be completed.

- Notification 118787610 was created on April 7, 2020, as a level 3 (priority "F") for anti-climb guards. On December 7, 2023, during the L123 conversion to align with GO 95, the notification was deemed not required by CIRT. Since the PADR, this notification has been canceled in SAP.

2. **GO 165, Section IV. Transmission Facilities** states in part:

   "Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines.

   Each utility shall maintain records of inspection and maintenance activities. Commission staff shall be permitted to inspect records and procedures consistent with Public Utilities Code Section 314 (a)."

PG&E's Utility Procedure TD-8123P-100 Rev. 2 Transmission Patrols and Enhanced Inspection Frequency Guidelines Rev 2, Section 3.3 provide inspection intervals shown in Table 6.

Table 6. Overhead Enhanced Inspection and Patrol Baseline Frequencies

Voltage (kV)	Inspection Type	Structure Type	Non-HFTD (Years)	HFTD Tier 3, Tier 2, Zone 1, and HFRA (Years)	DCPP/Morro Bay/ WECC Lines (Years)
500	Detail ground and aerial	Steel	3	3	Annually
	Climbing	Steel (critical)	3 (and as triggered)	3	Annually
		Steel (non-critical)	12 (and as triggered)	3	Annually
230 115 70 60	Detailed ground and/or aerial	Steel or wood	5 (at least one method)	3	Annually
	Climbing or aerial lift	Steel or wood	As triggered	As triggered	As triggered
All Voltages	High Water Table Inspection (Bay Waters Foundation)	Steel	5	NA	NA
	Infrared	Steel or wood	5 (and as triggered)	Tier 3 – Annually Tier 2, Zone 1, and HFRA – 3	Annually

Voltage (kV)	Inspection Type	Structure Type	Non-HFTD (Years)	HFTD Tier 3, Tier 2, Zone 1, and HFRA (Years)	DCPP/Morro Bay/ WECC Lines (Years)
	Patrol	Annually, unless enhanced inspected. See Appendix A on Page 10 for DCPP and Morro Bay lines requiring quarterly patrol.			

a. ESRB staff reviewed inspection records from the Fresno Transmission HQ[18] and found 6 circuit inspections conducted past the Inspection Due Date. Note: as these are circuit inspections, the total number of structures inspected after the inspection due date will be the sum of structures for each transmission line. Table 7 lists the late inspection work.

Table 7. Late Inspections

Inspection Year	Inspection Type	Function Location	Due Date	Inspection Date
2022	Enhanced Inspection	003/055 ETL.8580	7/31/2022	10/05/2022
2022	Enhanced Inspection	003/010B ETL.9340	7/31/2022	09/29/2022
2022	Air+	003/010B ETL.9340	7/31/2022	11/05/2022
2023	Air+	AHFTD:WISH ON-SAN JOAQUIN #3	7/31/2023	12/21/2023
2024	Enhanced Inspection	007/085B ETL.4880	7/31/2024	11/01/2024
2024	Enhanced Inspection	000/001 ETL.1890	7/31/2024	10/31/2024

PG&E Response:

We agree that the data provided show these 6 inspections as late, but after further review, none of these inspections were completed past their inspection due dates and therefore not a violation of GO 165. Structure 003/010B was added to SAP on September 16, 2022. Per TD-8124S "Detailed System Inspections Framework", if assets are found near or after July 31st, then they must be inspected within 90 days of identification. These inspections were completed before the 90-day timeframe. All other inspections were completed before the July 31st due date but had

[18] PG&E response to the post audit data request DRU14621, Records-Q06(c), DR07 2019 -2024 Inspections Updated

additional reinspections performed for data corrections. See below Table2PGE for updated inspection completion dates.

Table 2PGE

Inspection Year	Inspection Type	Function Location	Due Date	Inspection Date
2022	Enhanced Inspection	003/055 ETL.8580	7/31/2022	5/23/2022
2022	Enhanced Inspection	003/010B ETL.9340	7/31/2022	09/29/2022
2022	Air+	003/010B ETL.9340	7/31/2022	11/05/2022
2023	Air+	AHFTD:WISH ON-SAN JOAQUIN #3	7/31/2023	2/15/2023
2024	Enhanced Inspection	007/085B ETL.4880	7/31/2024	6/12/2024
2024	Enhanced Inspection	000/001 ETL.1890	7/31/2024	4/12/2024

III. Field Inspections

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

Table 8. Audit Locations

Location	Line	Structure Type	Structure ID	GIS Coordinates
1.	Borden Glass	Wood Pole	20/10	36.923649, -119.994576
2.	Borden Glass	Wood Pole	20/09	36.923575, -119.994402
3.	Borden Glass	Wood Pole	20/08	36.923572, -119.994016
4.	Borden Glass	Wood	20/07	36.923561, -119.993485

Location	Line	Structure Type	Structure ID	GIS Coordinates
		Pole		
5.	Borden Glass	Wood Pole	20/21	36.923628, -120.001764
6.	Borden Glass	Wood Pole	20/22	36.923611, -120.002172
7.	Borden Glass	Wood Pole	20/23	36.92362, -120.003228
8.	Beola Medera	Wood Pole	26/06	36.923857, -120.105731
9.	Beola Medera	Wood Pole	26/05	36.923836, -120.104839
10.	Auberry Tap	Steel Pole	1/7	37.071567, -119.506004
11.	Auberry Tap	Steel Pole	1/6	37.071601, -119.507278
12.	Auberry Tap	Steel Tower	1/5	36.943268, -119.670736
13.	Helm-Gregg #`1	Wood Pole	42/233	36.942538, -119.676256
14.	Helm-Gregg #`1	Steel Tower	42/232	36.94327, -119.670724
15.	Sanger-Malaga	Wood Pole	3/5	36.722274, -119.668653
16.	Sanger-Malaga	Steel Pole	3/4	36.722292, -119.66746
17.	Sanger-Malaga	Wood Pole	3/3	36.722276, -119.666592
18.	Sanger-Malaga	Wood Pole	3/2	36.722314, -119.665723
19.	Malaga-Cotton	Wood Pole	0/4	36.692727, -119.729201

Location	Line	Structure Type	Structure ID	GIS Coordinates
20.	Malaga-Cotton	Wood Pole	0/5	36.692716, -119.730061
21.	Malaga-Cotton	Wood Pole	0/6	36.692723, -119.730974
22.	Malaga-Cotton	Wood Pole	0/7	36.692655, -119.731591
23.	Malaga-KRCD	Wood Pole	0/14	36.692478, -119.731474
24.	Malaga-KRCD	Wood Pole	0/15	36.692524, -119.730444
25.	Malaga-KRCD	Wood Pole	0/16	36.692541, -119.729504
26.	Camden-Kingsburg	Wood Pole	3/2	36.474767, -119.636297
27.	Kingsburg-Lemoore	Wood Pole	3/5	36.474633, -119.636688
28.	Camden-Kingsburg	Wood Pole	3/3	36.474697, -119.637156
29.	Indian Flat- Yosemite	Steel Tower	39/231	37.677674, -119.779967
30.	Indian Flat- Yosemite	Steel Tower	39/232	37.677522, -119.779132
31.	Briceberg Junction-Mariposa	Wood Pole	7/19	37.504758, -120.007638
32.	Briceberg Junction-Mariposa	Steel Pole	7/18	37.505359, -120.006752
33.	Briceberg Junction-Mariposa	Steel Pole	7/17	37.505663, -120.005974
34.	El Capitan-Wilson	Steel Tower	3/21	37.328189, -120.43233

Location	Line	Structure Type	Structure ID	GIS Coordinates
35.	Melones-Wilson	Steel Tower	57/365	37.3283, -120.432206
36.	El Capitan-Wilson	Steel Tower	2/19	37.324897, -120.428617
37.	Melones-Wilson	Steel Tower	58/367	37.325118, -120.428545
38.	El Capitan-Wilson	Steel Tower	2/18	37.32393, -120.427384
39.	Melones-Wilson	Steel Tower	58/368	37.323903, -120.426985
40.	Chevron Pipeline-Kettleman Tap	Wood Pole	0/4	36.005775, -119.972155
41.	Gates-Midway	Steel Tower	13/54	36.005641, -119.97173
42.	Los Banos-Midway #2	Steel Tower	94/392	36.005665, -119.971141
43.	Gates-Midway	Steel Tower	13/53	36.007435, -119.973637
44.	Los Banos-Midway #2	Steel Tower	93/391	36.007537, -119.973664
45.	Gates-Tulare Lake	Wood Pole	16/10	36.007243, -119.974256
46.	Chevron Pipeline-Kettleman Tap	Wood Pole	0/2	36.007136, -119.974082
47.	Coalinga 1- Coalinga 2	Wood Pole	0/25	36.136809, -120.318614
48.	Coalinga 1- Coalinga 2	Wood Pole	0/24	36.136778, -120.320008
49.	Coalinga 1- Coalinga 2	Wood Pole	0/23	36.136743, -120.321188

Location	Line	Structure Type	Structure ID	GIS Coordinates
50.	Jayne Switching Station-Coalinga	Wood Pole	11/0	36.136578, -120.321163
51.	Jayne Switching Station-Coalinga	Steel Pole	10/13	36.136593, -120.320025
52.	Jayne Switching Station-Coalinga	Wood Pole	10/12	36.136617, -120.318989
53.	Gill Ranch Tap	Steel Pole	2/50A	36.836442, -120.309255
54.	Gill Ranch Tap	Wood Pole	2/50	36.836787, -120.309633
55.	Gill Ranch Tap	Wood Pole	2/49	36.836787, -120.309633
56.	Paramount Farms Tap	Wood Pole	0/1	36.836717, -120.309819
57.	Gill Ranch Tap	Wood Pole	2/51	36.836207, -120.308993
58.	Wilson-Oro Loma	Wood Pole	32/9	36.955044, -120.599686
59.	Wilson-Oro Loma	Wood Pole	32/10	36.953607, -120.599687
60.	Wilson-Oro Loma	Steel Pole	33/0	36.952516, -120.599778
61.	Wilson-Oro Loma	Steel Pole	33/1	36.951298, -120.599764
62.	Livingston-Livingston Jct	Wood Pole	21/1	37.098737, -120.834978
63.	Livingston-Livingston Jct	Wood Pole	21/2	37.0978, -120.834962
64.	Livingston-Livingston Jct	Wood Pole	21/3	37.09682, -120.834988

PG&E Response:

We appreciate the insight and feedback provided from the ESRB, as well as the support in

helping us achieve our stand that everyone and everything is always safe. Of the 43 field violations cited by ESRB, we agree with 17, disagree with 23 and acknowledge the 3 associated with safety concerns linked to distribution equipment.

We agree with 17 of the 43 cited field violations listed below. We would like to note that 10 of these 17 non-conformances had pre-existing notifications that were previously identified by our qualified company representative (QCR) and documented within our system of record (SAP), prior to the CPUC field audit. We agree these are violations because they were either completed past the established required end date or currently open and past the established required end dates. The remaining 7 non-conformances were identified by ESRB, with 2 being addressed during the field audit. This work will be completed in accordance with established prioritization protocols and material availability.

We disagree with 23 of 43 cited field inspection violations listed below. These 23 cited field inspection violations either had a pre-existing notification that was identified by our QCR, documented within SAP, and established in our annual work plan prior to the CPUC field audit, or does not require a notification at this time and will be performed as opportunistic maintenance.

The remaining 3 violations are associated with safety concerns linked to distribution equipment. We have acted on these concerns by notifying distribution.

Lastly, the two observations are related to third-party safety concerns. We have also acted on these concerns by notifying the appropriate teams and alerting the third party(s) responsible.

IV. Field Violations

ESRB staff observed the following violations during the field inspection:

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

   "Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

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

Table 9. GO 95, Rule 31.1 Violations

Location	Violation Description
1	Missing bonding on hardware. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of missing bonding on the hardware at Location 1; however, we do not agree that this constitutes a violation of GO 95, Rule 31.1. Our Qualified Electrical Worker (QEW) identified and documented this issue prior to the CPUC field audit under notification 122123397. The work was re-reviewed by our CIRT team, and it was deemed that all required hardware was properly installed based on TD-8123P-103 and TD-	

Location	Violation Description
1001M. This notification has been canceled in SAP.	
3	Missing bonding on hardware. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of missing bonding on the hardware at Location 3; however, we disagree that this is a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 121917246. This work will be completed in accordance with established prioritization protocols and material availability.	
8	Repair switch. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of the switch needing to be repaired at Location 8; however, we disagree that this is a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 129642090. This work will be completed in accordance with established prioritization protocols and material availability.	
13	Cotter key in insulator is unseated. PG&E has an existing notification.
13	Birds nest near conductors.
PG&E Response: We acknowledge the two observations at Location 13; however, we do not agree that either of these constitutes a violation of GO 95, Rule 31.1. Our QEW identified and documented these issues prior to the CPUC field audit under notification 128618987. The birds nest observation is also on this notification and will continue to be monitored during inspections. This work will be completed in accordance with established prioritization protocols and material availability.	
14	Cotter key needed on shield wire. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of the unseated shield wire cotter key at Location 14; however, we disagree that this is a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 128585037 and the work was completed on January 30, 2025.	
15	Loose hi-vis strips. PG&E corrected in the field.
PG&E Response: We agree with the finding of the loose visibility strip at Location 15. The issue was promptly addressed onsite by the PG&E QEW during the field audit by reinforcing the strip to the structure.	
26	Buried down guy anchor. PG&E corrected in the field.
PG&E Response: We agree with the finding of a buried Guy Wire at Location 26. The issue was promptly addressed onsite by the PG&E QEW during the field audit.	
29	Pole needs hardware reset and replaced. Pole is also rusted. PG&E has existing notifications.

Location	Violation Description
PG&E Response: We agree with the observation of missing hanger plate bolts at Location 29. Our QEW identified and documented this issue prior to the CPUC field audit under notification 129142712. However, as this work is currently past due, we agree that it constitutes a violation of GO 95, Rule 31.1.	
34	Tower foundation needs to be repaired. PG&E has an existing notification.
PG&E Response: We agree with the observation of foundation needing mastic at Location 34. Our QEW identified and documented this issue prior to the CPUC field audit under notification 120912823. However, as this work is currently past due, we agree that it constitutes a violation of GO 95, Rule 31.1.	
35	Hardware is missing and needs to be replaced. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of missing hardware at Location 35; however, we disagree that this is a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 124500591. This work will be completed in accordance with established prioritization protocols and material availability.	
36	Tower foundation needs to be repaired. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of foundation needing mastic at Location 36; however, we do not agree that this constitutes a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 129850493. The work was re-reviewed by our CIRT team, and this foundation is up to standard based on TD-8123P-103 and TD-1001M. This notification has been canceled in SAP.	
38	Tower foundation needs to be repaired. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of foundation needing mastic at Location 38; however, we do not agree that this constitutes a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 120912673. The work was re-reviewed by our CIRT team, and this foundation is up to standard based on TD-8123P-103 and TD-1001M. This notification has been canceled in SAP.	
39	Insulators need to be washed. PG&E has an existing past due notification.
PG&E Response: We agree with the observation that the insulators need to be washed at Location 39. Our QEW identified and documented this issue prior to the CPUC field audit under notification 122397438. However, as this work is currently past due, we agree that it constitutes a violation of GO 95, Rule 31.1.	
40	Loose hardware on structure. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of loose hardware at Location 40; however, we disagree that this is a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 125959578. This work will be	

Location	Violation Description
completed in accordance with established prioritization protocols and material availability.	
45	Loose hardware and a switch needs repair. PG&E has existing notifications.
PG&E Response: We acknowledge the observation of loose hardware at Location 45; however, we disagree that this is a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 129657152. This work will be completed in accordance with established prioritization protocols and material availability.	
46	Down guy needs strain insulator. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of fiberglass strain insulators needed at Location 46; however, we disagree that this is a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 125960198. This work will be completed in accordance with established prioritization protocols and material availability.	
53	A switch needs to be repaired. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of the switch needing repair at location 53; however, we disagree that this is a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 129824595. This work will be completed in accordance with established prioritization protocols and material availability.	
56	Loose hardware needs to be corrected. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of loose hardware at Location 56; however, we disagree that this is a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 128271572. This work will be completed in accordance with established prioritization protocols and material availability.	
62	Loose hardware needs to be corrected. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of loose hardware at Location 62; however, we disagree that this is a violation of GO 95, Rule 31.1. Our QEW identified and documented this issue prior to the CPUC field audit under notification 127135112. This work will be completed in accordance with established prioritization protocols and material availability.	

2. **GO 95, Rule 44.3, Replacement** states in part:

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

structure with a safety factor less than one."

Table 6. GO 95, Rule 44.3 Violations

Location	Violation Description
2	Pole needs to be replaced. PG&E has an existing notification.
PG&E Response: We agree with the observation of the pole needing to be replaced at Location 2. Our QEW identified and documented this issue prior to the CPUC field audit under notification 122122430. However, as this work is currently past due, we agree that it constitutes a violation of GO 95, Rule 44.3.	
20	Pole needs to be replaced. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of the pole needing to be replaced at Location 20; however, we disagree that this is a violation of GO 95, Rule 44.3. Our QEW identified and documented this issue prior to the CPUC field audit under notification 129441238. This work will be completed in accordance with established prioritization protocols and material availability.	
28	Pole needs to be replaced. PG&E has an existing past due notification.
PG&E Response: We agree with the observation of the pole needing to be replaced at Location 28. Our QEW identified and documented this issue prior to the CPUC field audit under notification 119508896. However, this work was completed past due on April 29, 2025, and therefore we agree that it constituted a violation of GO 95, Rule 44.3.	
33	Pole needs to be replaced. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of the pole needing to be replaced at Location 33; however, we do not agree that this constitutes a violation of GO 95, Rule 44.3. Our QEW identified and documented this issue prior to the CPUC field audit under notification 125509114. This pole was replaced under PM 35610934 and notification 125509114 was cancelled in SAP.	
35	Insulators need to be replaced. PG&E has an existing past due notification.
PG&E Response: We agree with the observation of insulators needing to be replaced at Location 35. Our QEW identified and documented this issue prior to the CPUC field audit under notification 122378248. However, as this work is currently past due and we agree that it constitutes a violation of GO 95, Rule 44.3.	
36	The structure has damaged tower members. PG&E has an existing past due notification.
PG&E Response: We agree with the observation of damaged tower members at Location 36. Our QEW identified and documented this issue prior to the CPUC field audit under notification	

Location	Violation Description
126944828. However, this work was completed past due on January 22, 2025, and therefore we agree that it constituted a violation of GO 95, Rule 44.3.	
38	Insulators need to be replaced. PG&E has an existing past due notification.
PG&E Response: We agree with the observation of the insulators needing to be replaced at Location 38. Our QEW identified and documented this issue prior to the CPUC field audit under notification 122105539. However, as this work is currently past due, we agree that it constitutes a violation of GO 95, Rule 44.3.	
39	The structure has damaged tower members. PG&E has an existing past due notification.
PG&E Response: We acknowledge the observation of damaged tower members at Location 39; however, we disagree that this is a violation of GO 95, Rule 44.3. Our QEW identified and documented this issue prior to the CPUC field audit under notification 122397436. However, as this work is currently past due and we agree that it constitutes a violation of GO 95, Rule 44.3.	
52	Pole needs to be replaced. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of the pole needing to be replaced at Location 52; however, we disagree that this is a violation of GO 95, Rule 44.3. Our QEW identified and documented this issue prior to the CPUC field audit under notification 129660008. This work will be completed in accordance with established prioritization protocols and material availability.	
52	Guy pole needs to be replaced. PG&E has an existing past due notification.
PG&E Response: We agree with the observation of the guy pole needing to be replaced at Location 52. Our QEW identified and documented this issue prior to the CPUC field audit under notification 121328066. However, as this work is currently past due and we agree that it constitutes a violation of GO 95, Rule 44.3.	
63	Pole needs to be replaced. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of the pole needing to be replaced at Location 63; however, we disagree that this is a violation of GO 95, Rule 44.3. Our QEW identified and documented this issue prior to the CPUC field audit under notification 127135354. This work will be completed in accordance with established prioritization protocols and material availability.	

3. **GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, Use** states in part:

   "Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule

44."

Table 7. GO 95, Rule 56.2 Violation

Location	Violation Description
31	The down guy anchor needs to be replaced. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of the down guy anchor needing replacement at Location 31; however, we do not agree that this constitutes a violation of GO 95, Rule 56.2. Our QEW identified and documented this issue prior to the CPUC field audit under notification 128546057. This work was completed on March 29, 2025.	

4. **GO 95, Rule 51.6-A, Marking and Guarding** states in part:

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

Table 8. GO 95, Rule 51.6-A Violation

Location	Violation Description
4	Missing high voltage sign. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of the missing high voltage sign at Location 4; however, we do not agree that this constitutes a violation of GO 95, Rule 51.6-A. Our QEW identified and documented this issue prior to the CPUC field audit under notification 121913585. This work will be completed in accordance with established prioritization protocols and material availability	

5. **GO 95, Rule 51.6-B, Guarding** states in part:

   "Where the pole or structure is of latticed metal or of similar construction and supports supply conductors in excess of 750 volts and is located in urban districts, or in rural areas adjacent to schools, dwellings, permanent or seasonal camps, or in orchards, or near roads, or trails which are frequently traveled, a barrier shall be so located on the pole or structure as to prevent easy climbing. If the bottom of the barrier is within 12 feet of the ground line, the top shall not be less than 15 feet above the ground line, but in no event shall the barrier be less than 8 feet in length. If the bottom of the barrier is more than 12 feet above the ground line, it shall not be less than 6 feet in length."

Table 9. GO 95, Rule 51.6-B Violations

Location	Violation Description
34	Structure is missing climbing guard

Location	Violation Description
35	Structure is missing climbing guard
36	Structure is missing climbing guard
37	Climbing guard is not the minimum length
PG&E Response: We agree with the observation of the climbing guards not the minimum length at Location 37. Notification 130745050 was created, and work will be completed in accordance with established protocols and material availability.	
38	Structure is missing climbing guard
PG&E Response: We agree with the observation of missing anti-climb guards at Locations 34, 35, 36, and 38. Notifications 130744746, 130744813, 130745042 and 131392678 have been created and work will be completed in accordance with established prioritization protocols and material availability.	
39	Climbing guard is not the minimum length
PG&E Response: We agree with the observation that the climbing guard is not the minimum length at location 39. This work will be bundled under notification 122397436, which was identified and documented prior to the CPUC audit. However, as this work is currently past due and will be completed in accordance with established prioritization protocols and material availability.	
43	Repair climbing guard. PG&E has an existing notification.
PG&E Response: We acknowledge the observation of climb guards needing repair at Location 43; however, we disagree this is a violation of GO 95, Rule 51.6-B. Our QEW identified and documented this issue prior to the CPUC field audit under notification 128191344. This work will be completed in accordance with established prioritization protocols and material availability.	

6. **GO 95, Rule 54.6-I, Attachment of Protective Covering** states in part:

   "Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion–resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position.

   Where such covering consists of wood moulding, rigid plastic moulding, or other suitable protective moulding, the distance between the attachment materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) shall not exceed 36 inches on either side of the moulding."

Table ~~1104~~ 10. GO 95, Rule 54.6-I Violations

Location	Violation Description
19	Ground wire to distribution equipment is exposed.
22	Ground wire to distribution equipment is exposed.
23	Ground wire to distribution equipment is exposed.
PG&E Response: We acknowledge the exposure of ground wire to distribution equipment at Locations 19, 22, and 23. A distribution inspector visited all three locations and made repairs to the exposed grounds on July 10, 2025. No EC notifications were created as repairs were made on site.	

V. Observations

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

> *"For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property..."*

GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

> *"(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.*
>
> *(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95."*

During the field inspection, ESRB observed the following third-party safety concerns.

Table 11. Third-party safety concerns

Location	Utility	Violation Description

Location	Utility	Violation Description
23	AT&T	Missing guy marker
PG&E Response: We acknowledge the observation of the missing guy marker at Location 23. PG&E created a third-party notification 131349428, which was sent to AT&T on June 10, 2025.		
24	AT&T	Comms guy no guard, broken lashing
PG&E Response: We acknowledge the observation of a missing communications guard and broken lashing at Location 24. PG&E created third-party notification 131349527 which was sent to AT&T on June 10, 2025.		