

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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July 18, 2025

TA2025-1272

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

Subject: Transmission audit of SDG&E's North Coast District

Ms. Kaminsky:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Jose Lastra of my staff conducted a transmission audit of SDG&E's North Coast District from May 19-23, 2025. The audit included a review of SDG&E's inspection and maintenance records and a field inspection of SDG&E's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). Included with this letter is a copy of the audit findings that itemize the violations discovered during the audit. Please advise me no later than August 18, 2025, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Jose Lastra at (213) 507-1438 or jose.lastra@cpuc.ca.gov.

Sincerely,

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

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

Enclosures: Audit Findings

Cc: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC
Jose Lastra, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Circuit facility inspection records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Tower Structure Analysis Records
- Safety hazard notifications.
- Intrusive test records
- SDG&E's documented inspection program.

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 95, Rule 18-B1, Maintenance Programs, states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...

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

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

SDG&E's records indicated that from July 2021 – April 2025, SDG&E had 4 open overhead work orders that were past SDG&E's scheduled due date for corrective action.

III. Field Inspections

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

No.	Structure ID.	Type of Structure	Location
1	U109146	Vault	Del Mar
2	U108920	Vault	Del Mar
3	P200924S	Engineered Steel Pole	Del Mar
4	Z26863	Wood Pole	Del Mar
5	Z26864	Wood Pole	Del Mar
6	U109040	Vault	Vista
7	U109052	Vault	Vista
8	Z218333	Wood Pole	Vista
9	P207466S	Wood Pole	Vista
10	Z123147	Wood Pole	Vista
11	Z218334	Wood Pole	Vista
12	Z123148	Engineered Steel Pole	Vista
13	Z218335	Engineered Steel Pole	Vista
14	Z123230	Wood Pole	Vista
15	U109309	Vault	Oceanside
16	U109308	Vault	Oceanside
17	U108569	Vault	Oceanside
18	U107570	Vault	Oceanside
19	Z172185	Engineered Steel Pole	Oceanside
20	Z172184	Engineered Steel Pole	Oceanside
21	Z222370, TL 23010	Steel Tower	Oceanside
22	Z222370, TL 23002	Steel Tower	Oceanside
23	Z172242, TL 99905	Steel Tower	Oceanside
24	Z172242, TL 23006	Steel Tower	Oceanside
25	Z172243, TL 23006	Engineered Steel Pole	Oceanside
26	Z172243, TL 99905	Engineered Steel Pole	Oceanside
27	Z226578, TL 23003	Steel Tower	Oceanside
28	Z226578, TL 23011	Steel Tower	Oceanside
29	Z524989, TL 23001	Engineered Steel Pole	Oceanside
30	Z524889, TL 23004	Engineered Steel Pole	Oceanside
31	Z96691, TL 23053	Engineered Steel Pole	San Diego (Rancho Penasquitos)
32	Z96691, TL 23012	Engineered Steel Pole	San Diego (Rancho Penasquitos)
33	Z731179	H-Frame (3-pole)	San Diego (Rancho Penasquitos)
34	Z33171, TL 610	Wood Pole	San Diego (Rancho Penasquitos)
35	Z205038	Wood Pole	San Diego (Rancho Penasquitos)
36	Z90964	Wood Pole	San Diego (Rancho Penasquitos)
37	Z33169	Direct Buried Steel Pole	San Diego (Rancho Penasquitos)
38	Z96006	Wood Pole	San Diego (Rancho Penasquitos)
39	P165641S	Wood Pole	San Diego (Rancho Penasquitos)
40	Z33236	Wood Pole	San Diego (Rancho Penasquitos)

41	Z33233	Wood Pole	San Diego (Rancho Penasquitos)
42	Z102711	Wood Pole	San Diego (Rancho Penasquitos)
43	Z33232	Wood Pole	San Diego (Rancho Penasquitos)
44	Z96012	Wood Pole	San Diego (Rancho Penasquitos)
45	Z96754	Wood Pole	San Diego (Rancho Penasquitos)
46	Z92651, TL 13810	Steel Tower	San Diego (Rancho Penasquitos)
47	Z92651, TL 6959	Steel Tower	San Diego (Rancho Penasquitos)
48	Z96755, TL 6905	Direct Buried Steel Pole	San Diego (Rancho Penasquitos)
49	Z96755, TL 662	Direct Buried Steel Pole	San Diego (Rancho Penasquitos)
50	Z479064, TL 23013	Engineered Steel Pole	San Diego (Rancho Penasquitos)
51	Z479064, TL 23071	Engineered Steel Pole	San Diego (Rancho Penasquitos)
52	Z92650, TL 6959	Steel Tower	San Diego (Rancho Penasquitos)
53	Z92650, TL 13810	Steel Tower	San Diego (Rancho Penasquitos)
54	Z96757, TL 6905	Direct Buried Steel Pole	San Diego (Rancho Penasquitos)
55	Z96757, TL 622	Direct Buried Steel Pole	San Diego (Rancho Penasquitos)
56	Z97249	Direct Buried Steel Pole	San Diego (Rancho Penasquitos)
57	Z96761, TL 13810	Direct Buried Steel Pole	San Diego (Rancho Penasquitos)
58	Z96761, TL 6905	Direct Buried Steel Pole	San Diego (Rancho Penasquitos)
59	Z92648, TL 13810	Steel Tower	San Diego (Rancho Penasquitos)
60	Z92648, TL 6959	Steel Tower	San Diego
61	Z96762, TL 13810	Direct Buried Steel Pole	San Diego
62	Z96762, TL 6905	Direct Buried Steel Pole	San Diego
63	Z479062, TL 23071	Direct Buried Steel Pole	San Diego
64	Z479062, TL 23013	Direct Buried Steel Pole	San Diego
65	Z96763, TL 13810, TL 6905, TL 662	Direct Buried Steel Pole	San Diego
66	Z96760, TL 6905	Direct Buried Steel Pole	San Diego
67	Z96760, TL 662	Direct Buried Steel Pole	San Diego
68	Z92649, TL 13810	Direct Buried Steel Pole	San Diego
69	Z92649, TL 6959	Steel Tower	San Diego
70	Z479063, TL 23013	Steel Tower	San Diego
71	Z479063, TL 23071	Direct Buried Steel Pole	San Diego
72	Z96759, TL 6905	Direct Buried Steel Pole	San Diego
73	Z96759, TL 662	Direct Buried Steel Pole	San Diego
74	Z96758, TL 6905	Direct Buried Steel Pole	San Diego
75	Z96758, TL 662	Direct Buried Steel Pole	San Diego
76	Z95913, TL 13804	Direct Buried Steel Pole	San Diego
77	Z95913, TL 6906	Steel Tower	San Diego
78	Z138156	Steel Tower	San Diego
79	Z138155	H-Frame	San Diego
80	Z95914, TL 13804	H-Frame	San Diego
81	Z95914, TL 6906	Steel Tower	San Diego
82	Z138154, TL 675	Steel Tower	San Diego
83	Z95915, TL 6906	H-Frame	San Diego
84	Z95915, TL 13804	Steel Tower	San Diego

85	Z138153	Steel Tower	San Diego
86	Z135600	H-Frame	San Diego
87	Z135601	H-Frame	Oceanside
88	Z222374	H-Frame	Oceanside
89	Z323706	H-Frame	Oceanside
90	Z29616	H-Frame	Oceanside
91	Z323619	Wood Pole	Oceanside
92	Z222375, TL 23002	Wood Pole	Oceanside
93	Z222375, TL 23010	Steel Tower	Oceanside
94	Z323618	Steel Tower	Oceanside
95	Z122438	Wood Pole	Oceanside
96	Z29615	Direct Buried Steel Pole	Oceanside
97	Z323617	Wood Pole	Oceanside
98	Z122437	Wood Pole	Oceanside
99	Z105032, TL 697	Wood Pole	Oceanside
100	Z105032, TL 6912	Direct Buried Steel Pole	Oceanside
101	Z323616	Direct Buried Steel Pole	Oceanside
102	Z524999	Wood Pole	Oceanside
103	Z223629, TL 23006	Direct Buried Steel Pole (3-pole)	Oceanside

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections portion of the audit.

GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:

(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 10 business days after the discovery.

A third-party down guy anchor next to Pole Z96755 was permanently abandoned. SDG&E did not notify the responsible third-party of the safety hazard.

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

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

The SDG&E facilities on each of the following poles were not maintained for their intended use:

- 729704E – the eye portion of the down guy anchor supporting an SDG&E down guy wire was buried.
- Z323706 – the eye portion of the down guy anchor supporting an SDG&E down guy wire was buried.

GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 18 requires the minimum radial clearance of “Guys passing conductors supported on other poles, or guys approximately parallel to conductors supported on the same poles” from “Communication Conductors (Including Open Wire, Cables and Service Drops)” not supported on the same pole to be 3 inches.

The SDG&E down guy wire supporting Pole Z731179 was contacting a third-party communications conductor span not supported on Pole Z33171.

GO 95, Rule 51.6, Marking and Guarding, High Voltage Marking of Poles, 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. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.

The high voltage signs on each of the following SDG&E poles were missing or damaged:

- Z123230
- Z323619
- Z323618

GO 95, Rule 54.6-B, Ground Wires, states in part:

That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).

The ground moulding attached to each of the following SDG&E poles was damaged:

- Z33233
- Z323706
- Z524999

GO 128, Rule 17.1, 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.

Am unsafe large hole approximately 1-2 feet deep was adjacent to underground vault U109052.