STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

June 2, 2025 TA2025-1301

Jerrod Meier
Director - Electric Regulatory Compliance
Pacific Gas & Electric Company (PG&E)
300 Lakeside Drive
Oakland, CA 94612

SUBJECT: Electric Transmission Audit of PG&E Fresno Headquarters (HQ)

Mr. Meier:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell, Joe Murphy, and Rafael Herranz of ESRB staff conducted an electric transmission audit of PG&E Fresno HQ from January 13, 2025 through January 17, 2025. During the audit, ESRB staff conducted field inspections of PG&E's transmission facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than July 1, 2025, by electronic copy of all corrective actions and preventive measures taken by PG&E to correct the identified violations and prevent the recurrence of 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 provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Samuel Mandell at (916) 217-8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Electric Transmission Audit Report for PG&E Fresno HQ

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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PG&E Fresno HQ
Electric Transmission Audit Findings
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

[1] Revision date: 11/20/2018
[2] Revision date: 8/31/2020

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.

[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 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]

[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 linesupervisor 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.

Table 3. PG&E Utility Procedure TD-8123P-103, 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.
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**

[11] Time frames listed are "Not to Exceed" and QCR/CIRT may define time frames according to site-specific conditions.
[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.

F	580	90	284	**954**
Total	**4299**	**2643**	**1450**	**8392**

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.

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	Detailed	Steel or	5 (at least	3	Annually

[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.

115 70 60	ground and/or aerial	wood	one method)		
	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
	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

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

III. Field Inspection

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 Pole	20/07	36.923561, -119.993485
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
20	Malaga-Cotton	Wood Pole	0/5	36.692716, -119.730061

Location	Line	Structure Type	Structure ID	GIS Coordinates
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
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

Location	Line	Structure Type	Structure ID	GIS Coordinates
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
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

IV. Field Inspection 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.
3	Missing bonding on hardware. PG&E has an existing notification.
8	Repair switch. PG&E has an existing notification.
13	Cotter key in insulator is unseated. PG&E has an existing notification.
13	Birds nest near conductors.
14	Cotter key needed on shield wire. PG&E has an existing notification.
15	Loose hi-vis strips. PG&E corrected in the field.
26	Buried down guy anchor. PG&E corrected in the field.
29	Pole needs hardware reset and replaced. Pole is also rusted. PG&E has existing notifications.
34	Tower foundation needs to be repaired. PG&E has an existing notification.
35	Hardware is missing and needs to be replaced. PG&E has an existing notification.
36	Tower foundation needs to be repaired. PG&E has an existing notification.
38	Tower foundation needs to be repaired. PG&E has an existing notification.
39	Insulators need to be washed. PG&E has an existing past due notification.
40	Loose hardware on structure. PG&E has an existing notification.
45	Loose hardware and a switch needs repair. PG&E has existing notifications.
46	Down guy needs strain insulator. PG&E has an existing notification.
53	A switch needs to be repaired. PG&E has an existing notification.
56	Loose hardware needs to be corrected. PG&E has an existing notification.
62	Loose hardware needs to be corrected. PG&E has an existing notification.

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.
20	Pole needs to be replaced. PG&E has an existing notification.
28	Pole needs to be replaced. PG&E has an existing past due notification.
33	Pole needs to be replaced. PG&E has an existing notification.
35	Insulators need to be replaced. PG&E has an existing past due notification.
36	The structure has damaged tower members. PG&E has an existing past due notification.
38	Insulators need to be replaced. PG&E has an existing past due notification.
39	The structure has damaged tower members. PG&E has an existing past due notification.
52	Pole needs to be replaced. PG&E has an existing notification.
52	Guy pole needs to be replaced. PG&E has an existing past due notification.
63	Pole needs to be replaced. PG&E has an existing notification.

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.

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.

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
35	Structure is missing climbing guard
36	Structure is missing climbing guard
37	Climbing guard is not the minimum length
38	Structure is missing climbing guard
39	Climbing guard is not the minimum length
43	Repair climbing guard. PG&E has an existing notification.

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. 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.

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
23	AT&T	Missing guy marker
24	AT&T	Comms guy no guard, broken lashing