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

November 12, 2026 EA2026-1530

Todd Woolman
Electric Superintendent
401 Grove St.
Healdsburg, CA 95448

Subject: Electric Distribution Audit of City of Healdsburg Electric Department

Mr. Woolman:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Rafael Herranz and Nora Nguyen of ESRB staff conducted an electric distribution audit of the City of Healdsburg Electric Department (CHE) from September 21 through September 25, 2026. During the audit, ESRB staff conducted field inspections of Healdsburg's distribution 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 December 15, 2026, by electronic copy of all corrective actions and preventive measures taken by CHE 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 the audit on the CPUC website. If there is any information in your response that you want 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 Rafael Herranz at (916) 708-6321 or Rafael.herranz@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 Distribution Audit Report for the City of Healdsburg Electric Department

Cc: Koko Tomassian, Director, Safety and Enforcement Division (SED), CPUC
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CITY OF HEALDSBURG
ELECTRIC DISTRIBUTION AUDIT FINDINGS
September 21 – September 25, 2026

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the materials listed below related to the City of Healdsburg Electric (CHE) distribution facilities and assets for the period from June 1, 2023 through June 1, 2026, except where a different review period is specified.

- Maintenance policies, procedures, programs, and job aids for overhead and underground distribution facilities
- Wildfire mitigation plan
- Open, Completed, and Canceled work orders
- Patrol and Detailed inspection lists
- Reliability Metrics
- Statistics and circuit information
- Service Area map
- New construction projects from June 1, 2025 through June 1, 2026
- Pole loading calculations
- Safety Hazard notifications sent to other utilities
- Inspectors list
- Intrusive inspections

II. Records Violations

During the records review portion of the audit, ESRB Staff identified the following violation.

1. **General Order (GO) 95, Rule 18-B1(a), Maintenance Programs** states in part:

> *"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; (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.*

  EXCEPTION – Potential violations specified in Appendix J or subsequently approved through Commission processes, including, but not limited to, a Tier 2 Advice Letter under GO 96B, that can be completed at a future time as opportunity-based maintenance."

ESRB's review of CHE's work orders for the audit period from June 1, 2023 through June 1, 2026, identified 3 out of 12 open works orders (25%) that exceeded the corrective action date established in CHE's *Overhead/Underground Preventative Maintenance /Inspection Program*. All three overdue work orders were classified as Medium priority, which according to page 3 of CHE's maintenance program requires corrective action within six months.

CHE must provide ESRB with a corrective action plan addressing the overdue work orders identified in Table 1, including the status of each work order and estimated completion dates for corrective actions.

Table 1: Late Open Work Orders Summary

Priority	ID	Date Work Order Created	Months Past Due (as of June 2026)
Medium	01454	July 24, 2024	16 months
Medium	01393	May 15, 2024	18 months
Medium	01519	November 1, 2024	13 months

III. Field Inspection

During the field inspection, ESRB Staff inspected the following overhead and underground distribution facilities listed in Table 2.

Table 2: Field Inspection Locations

Locations	Facility Type	Structure /Pole IDs	GPS Coordinates
1	Surface Padmount (Transformer)	I285	38.638378, -122.884725
2	Surface Padmount (Transformer)	J24	38.638913, -122.882848
3	Underground Vault		38.638883, -122.882854
4	Underground Switch		38.639463, -122.880605
5	Surface Padmount (Transformer)	I248	38.638982, -122.879764
6	Surface Padmount (Switch)	232	38.640695, -122.864910
7	Surface Padmount (Switch)	235	38.640690, -122.864905
8	Underground Junction Box		38.636836, -122.865885
9	Surface Padmount (Transformer)	F242	38.638024, -122.867436
10	Surface Padmount (Transformer)	E168	38.639908, -122.869818
11	Underground Switch		38.640860, -122.861447
12	Surface Padmount (Switch)	295	38.641286, -122.860660
13	Surface Padmount (Switch)	292 & 293	38.641298, -122.860653
14	Underground Vault		38.641019, -122.860995
15	Underground Vault		38.640831, -122.861568
16	Surface Junction Box		38.633155, -122.866304
17	Surface Padmount (Transformer)	F8	38.631186, -122.870790
18	Underground Switch		38.631185, -122.870810
19	Surface Padmount (Transformer)	Q34	38.609932, -122.870047
20	Underground Vault		38.609784, -122.870300
21	Underground Vault		38.609894, -122.870337
22	Underground Vault		38.609891, -122.870305
23	Surface Padmount (Transformer)	O18	38.609219, -122.870086
24	Pole	N24-004	38.637569, -122.874367
25	Streetlight		38.637854, -122.874310
26	Pole	N23-026	38.638154, -122.874212

Locations	Facility Type	Structure /Pole IDs	GPS Coordinates
27	Pole	N23-004	38.638796, -122.874015
28	Pole	N23-002	38.639390, -122.873820
29	Pole	N26-008	38.630251, -122.869489
30	Pole	N26-007	38.630232, -122.869740
31	Pole	N26-005	38.630206, -122.870227
32	Pole	N26-016	38.630131, -122.871377
33	Pole	N27-023	38.628745, -122.872512
34	Pole	N27-002	38.629349, -122.872498
35	Pole	N27-014	38.629420, -122.872383
36	Pole	N30-020	38.619244, -122.870197
37	Pole	N30-021	38.619230, -122.870720
38	Pole	N30-028	38.619163, -122.870834
39	Pole	N31-001	38.618810, -122.870850
40	Pole	N31-023	38.618330, -122.870841
41	Pole	N31-014	38.617903, -122.870838
42	Pole	O26-004	38.630339, -122.864339
43	Pole	026-003	38.629983, -122.864766
44	Pole	O27-018	38.629676, -122.865092
45	Pole	P26-004	38.630669, -122.863965
46	Pole	O32-028	38.614122, -122.867608
47	Pole	O32-014	38.614109, -122.867201
48	Pole	O32-026	38.614127, -122.866679
49	Pole	O32-022	38.614218, -122.866700
50	Pole	O32-031	38.614134, -122.866217
51	Pole	R33-001	38.612772, -122.853014
52	Pole	Q33-014	38.612793, -122.853640
53	Pole	Q33-004	38.612729, -122.853944
54	Pole	Q33-016	38.612674, -122.854230
55	Pole	Q33-041	38.612581, -122.854715
56	Pole	R33-019	38.611528, -122.848865

Locations	Facility Type	Structure /Pole IDs	GPS Coordinates
57	Pole	R33-010	38.611111, -122.848868
58	Pole	R34-003	38.610561, -122.848838
59	Pole	R34-001	38.610009, -122.848850
60	Pole	R34-005	38.609563, -122.848800
61	Pole	R34-006	38.609565, -122.848380
62	Pole	R34-002	38.610168, -122.848276
63	Pole	R34-004	38.610481, -122.848223
64	Pole	Q33-013	38.611367, -122.857519
65	Pole	Q33-012	38.611345, -122.857965
66	Pole	P33-039	38.611274, -122.858670
67	Pole	Q29-007	38.622801, -122.853685
68	Pole	R29-019	38.622551, -122.853209
69	Pole	R29-011	38.622539, -122.852727
70	Pole	Q29-006	38.622974, -122.853921
71	Pole	Q30-020	38.620626, -122.856807
72	Pole	Q30–019	38.620596, -122.856142
73	Pole	Q30-017	38.620596, -122.855516
74	Pole	O33-063	38.611746, -122.865743
75	Pole	O33-064	38.611733, -122.866116
76	Pole	O33-065	38.611760, -122.866561
77	Pole	O33-062	38.611715, -122.867045
78	Pole	O33-061	38.612100, -122.867157
79	Pole	O33-050	38.612396, -122.867250
80	Pole	O33-034	38.612422, -122.866777
81	Pole	N28-006	38.626414, -122.872572
82	Pole	N28-013	38.626044, -122.872576
83	Pole	N28-012	38.626090, -122.872809
84	Pole	N28-011	38.626175, -122.873247
85	Pole	N28-010	38.626143, -122.873852
86	Pole	N28-008	38.626154, -122.874070

Locations	Facility Type	Structure /Pole IDs	GPS Coordinates
87	Pole	O34-022	38.609663, -122.865531
88	Pole	O34-008	38.609635, -122.865026
89	Pole	O34-007	38.609469, -122.864832
90	Pole	O34-032	38.609468, -122.864372
91	Pole	O34-028	38.609495, -122.864165
92	Pole	O34-053	38.609500, -122.863885
93	Pole	034-029	38.609622, -122.863799
94	Pole	O34-026	38.609594, -122.864431
95	Pole	O34-044	38.609640, -122.866002
96	Pole	P36-024	38.605136, -122.863021
97	Pole	P36-028	38.605110, -122.863099
98	Pole	P36-002	38.605104, -122.863220
99	Pole	P36-027	38.604942, -122.863101
100	Pole	P36-001	38.604623, -122.863118
101	Pole	P36-017	38.604460, -122.862995
102	Pole	P36-016	38.604359, -122.863086
103	Pole	P36-026	38.604223, -122.863103
104	Pole		38.604021, -122.863102

IV. Field Inspection Violations

ESRB observed the following violations during the field inspections:

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."

   ESRB Staff's finding related to the above rule is listed in Table 3:

Table 3: GO 95, Rule 31.1 Finding

Location	Finding
100	Detached streetlight conduit

2. **GO 95, Rule 34, Foreign Attachments** states in part:

   "Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction."

   ESRB Staff's finding related to the above rule is listed in Table 4:

Table 4: GO 95, Rule 34 Finding

Location	Finding
104	Unauthorized third-party attachment

3. **GO 95, Rule 51.6-A, High Voltage Marking** 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."

   ESRB Staff's findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 51.6-A Findings

Locations	Findings
28	Damaged high voltage sign

38	Missing high voltage sign on opposite side of crossarm
41	Faded high voltage sign
75	Faded high voltage sign
88	Damaged high voltage sign

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

   "That portion of the ground wire 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) […]

   Minor separation, warping, and/or cracking of the protective covering is allowed, provided the ground wire is not exposed"

   ESRB Staff's findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 54.6-B Findings

Locations	Findings
33	Exposed ground wire
35	Missing ground wire protective covering below transformer
44	Exposed ground wire
75	Exposed ground wire
102	Exposed ground wire

5. **GO 95, Rule 54.7-B, Working Space** states:

   "Working spaces, unobstructed by conductors or other equipment except as provided in Rule 54.7–B2, of the dimensions as specified in Rule 54.7–B1, shall be provided between supply conductor levels on all poles and in such positions that the working spaces include the climbing space."

   ESRB Staff's finding related to the above rule is listed in Table 7:

Table 7: GO 95, Rule 54.7-B Finding

Location	Finding
95	Overgrown vegetation obstructing climbing space

6. **GO 95, Rule 56.2, Use** states:

   "Where mechanical loads imposed on poles, towers, or structures are greater than can be supported with safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.

   Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire load, the pole below the point of guy attachment acting merely as a strut.

   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."

   ESRB Staff's finding related to the above rule is listed in Table 8:

Table 8: GO 95, Rule 56.2 Finding

Location	Finding
38	Slack down guy

7. **GO 95, Rule 56.7-B, Anchor Guys** states:

   "…In order to prevent trees, buildings, messengers, metal– sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule."

   ESRB Staff's finding related to the above rule is listed in Table 9:

Table 9: GO 95, Rule 56.7-B Finding

Location	Finding
82	Vegetation contacting down guy above insulator bob

8. **GO 95, Rule 56.9, Guy Marker (Guy Guard)** states:

   "A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker."

   ESRB Staff's finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 56.9 Finding

Location	Finding
35	Damaged guy guard

9. **GO 95, Rule 91.3-C, Stepping** states:

> *"A. Unless otherwise specified in this Order, pole steps used to ascend and descend joint use wood poles are not required. However, occupants on joint use wood poles are not prohibited from installing and maintaining temporary or permanent steps.*
>
> *B. Unless non climbable, joint use nonwood poles shall include provisions for ascending and descending.*
>
> *C. Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps."*

ESRB Staff's findings related to the above rules are listed in Table 11:

Table 11: GO 95, Rule 91.3-C Findings

Locations	Findings
90	Low pole steps
92	Low pole steps

10. **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."*

ESRB Staff's finding related to the above rule is listed in Table 12:

Table 12: GO 128, Rule 17.1 Finding

Location	Finding
17	Transformer oil leaking from bayonet fuse onto cable elbow

V. Observations

1. GO 95, Rule 18-A, Resolution of Potential Violations of GO 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."*

Table 13 lists all third-party observations during the field inspection.

Table 13: GO 95, Rule 18-A Observations

Locations	Observations	Third Party Utility
25	Communication cable in contact with street light	AT&T
27	Slack down guy	PG&E
29	Abandoned service drop	AT&T
29	Missing second guard arm at dead-end	Sonic
30	Vegetation causing strain on communication cable	AT&T
31	Comcast service drop in contact with electric secondary drop Comcast service drop in contact with AT&T service drop	Comcast
32	Sonic down guy causing abrasion to adjacent down guys	Sonic
33	Insufficient clearance between communication cable and streetlight	Unknown
37	Exposed ground wire	Comcast

Locations	Observations	Third Party Utility
39	Abandoned service drop	Comcast
41	Slack down guy	Comcast
42	Vegetation causing strain on communication cable	Comcast
43	Exposed ground wire and damaged ground molding	Comcast
43	Damage/split crossarm attachment block	Sonic
47	Exposed ground wire	Comcast
49	Abandoned service drop	AT&T
53	Broken lashing	AT&T
55	Communication cable in contact with street light	Sonic
66	Loose service drop obstructing climbing space	AT&T
66	Missing riser guard	Comcast
67	Abandoned service drop Vegetation causing strain on communication cable	AT&T
67	Missing riser guard	Sonic
68	Amplifier in contact with down guy due to improper attachment	Comcast
69	Vegetation causing strain on communication cable	AT&T
70	Insufficient midspan clearance	Comcast
71	Low pole steps	PG&E
72	Damage/split crossarm attachment block	Sonic
73	Abandoned service drop	AT&T
73	Damage/split crossarm attachment block	Sonic
74	Missing riser guard	Comcast
74	Missing riser guard	AT&T
74	Missing riser guard	Sonic

Locations	Observations	Third Party Utility
75	Missing riser guard	AT&T
77	Abandoned service drop	AT&T
77	Exposed ground wire Comcast service drop in contact with AT&T service drop	Comcast
78	Missing riser guard	Comcast
79	Comm line in contact with electric down guy	AT&T
79	Comm line in contact with electric down guy	Sonic
80	Slack down guy	Sonic
83	Slack down guy	Comcast
88	Missing riser guard Service drop obstructing climbing space	Sonic
89	Missing riser guard	Sonic
89	Missing riser guard	Comcast
90	Abandoned service drop	AT&T
90	Abandoned service drop	Comcast
92	Abandoned service drop	Comcast
93	Abandoned service drop Vegetation causing strain on communication cable	Comcast
94	Missing riser guard	Sonic
94	Missing riser guard	Comcast
97	Exposed ground wire	Comcast
101	Missing riser guard	AT&T
102	Abandoned service drop	Comcast
102	Communication cable in contact with street light	AT&T
103	Slack down guy	Comcast
103	Abandoned service drop	AT&T