PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



November 11, 2022 EA2022-979

Shivani Sidhar Director – Regulatory Affairs San Diego Gas and Electric 8315 Century Park Court, San Diego, CA 92123

Subject: Audit of San Diego Gas & Electric (SDG&E)'s Beach Cities District

Ms. Sidhar:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Mily Vaidya and Joceline Pereira of my staff conducted an electric distribution audit of San Diego Gas & Electric (SDG&E)'s Beach Cities District from August 1, 2022 to August 5, 2022. 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). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than December 14, 2022, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Mily Vaidya at (213) 999 – 8528 or Mily Vaidya@cpuc.ca.gov.

Sincerely,

Fadi Dave, P.E.

Fadi Youze

Program and Project Supervisor Electric Safety and Reliability Branch Safety and Enforcement Division California Public Utilities Commission

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC Nika Kjensli, Program Manager, ESRB, SED, CPUC Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC

Mily Vaidya, Utilities Engineer, ESRB, SED, CPUC

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Pole load calculations
- Intrusive test records
- Safety hazard notifications
- SDG&E's documented inspection program.
- Vegetation/line clearing records

II. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	P733699	Pole	Beach Cities, San Diego
2	P83717	Pole	Beach Cities, San Diego
3	P137155	Pole	Beach Cities, San Diego
4	P837175	Pole	Beach Cities, San Diego
5	P837174	Pole	Beach Cities, San Diego
6	P194103	Pole	Beach Cities, San Diego
7	P257360	Pole	Beach Cities, San Diego
8	P932969	Pole	Beach Cities, San Diego
9	P2302869178	Pole	Beach Cities, San Diego
10	P2302269173	Pole	Beach Cities, San Diego
11	P193362	Pole	Beach Cities, San Diego
12	P4350	Pole	Beach Cities, San Diego
13	P196588	Pole	Beach Cities, San Diego
14	P837180	Pole	Beach Cities, San Diego
15	P837179	Pole	Beach Cities, San Diego
16	P837177	Pole	Beach Cities, San Diego
17	P2300369259	Pole	Beach Cities, San Diego
18	P2300769274	Pole	Beach Cities, San Diego
19	P2300969284	Pole	Beach Cities, San Diego
20	P837182	Pole	Beach Cities, San Diego
21	P2301669314	Pole	Beach Cities, San Diego
22	P837185	Pole	Beach Cities, San Diego
23	P193534	Pole	Beach Cities, San Diego
24	P194089	Pole	Beach Cities, San Diego
25	P193325	Pole	Beach Cities, San Diego
26	P837483	Pole	Beach Cities, San Diego
27	P837482	Pole	Beach Cities, San Diego
28	P193321	Pole	Beach Cities, San Diego
29	P193322	Pole	Beach Cities, San Diego
30	P734571	Pole	Beach Cities, San Diego
31	P194078	Pole	Beach Cities, San Diego
32	P837484	Pole	Beach Cities, San Diego
33	P837187	Pole	Beach Cities, San Diego
34	P733648	Pole	Beach Cities, San Diego
35	P837188	Pole	Beach Cities, San Diego
36	P837186	Pole	Beach Cities, San Diego
37	P108394	Pole	Beach Cities, San Diego
38	P2306069	Pole	Beach Cities, San Diego
39	P833381	Pole	Beach Cities, San Diego

40	P203186	Pole	Beach Cities, San Diego
41	P833378	Pole	Beach Cities, San Diego
42	P833377	Pole	Beach Cities, San Diego
43	P833376	Pole	Beach Cities, San Diego
44	P833375	Pole	Beach Cities, San Diego
45	P833374	Pole	Beach Cities, San Diego
46	P833373	Pole	Beach Cities, San Diego
47	P833372	Pole	Beach Cities, San Diego
48	P838751	Pole	Beach Cities, San Diego
49	P838752	Pole	Beach Cities, San Diego
50	P733054	Pole	Beach Cities, San Diego
51	P733055J	Pole	Beach Cities, San Diego
52	P733056J	Pole	Beach Cities, San Diego
53	P833676	Pole	Beach Cities, San Diego
54	P160850	Pole	Beach Cities, San Diego
55	P833678	Pole	Beach Cities, San Diego
56	P836006	Pole	Beach Cities, San Diego
57	P253521	Pole	Beach Cities, San Diego
58	P836026	Pole	Beach Cities, San Diego
59	P836050	Pole	Beach Cities, San Diego
60	P836504	Pole	Beach Cities, San Diego
61	P836516	Pole	Beach Cities, San Diego
62	P102972	Pole	Beach Cities, San Diego
63	P2281570849	Pole	Beach Cities, San Diego
64	P836505	Pole	Beach Cities, San Diego
65	P836514	Pole	Beach Cities, San Diego
66	P836512	Pole	Beach Cities, San Diego
67	P2278070776	Pole	Beach Cities, San Diego
68	P293840	Pole	Beach Cities, San Diego
69	P2277470775	Pole	Beach Cities, San Diego
70	P836508	Pole	Beach Cities, San Diego
71	P2080269143	Pole	Beach Cities, San Diego
72	P933520	Pole	Beach Cities, San Diego
73	P933519	Pole	Beach Cities, San Diego
74	P933518	Pole	Beach Cities, San Diego
75	P933517	Pole	Beach Cities, San Diego
76	P933516	Pole	Beach Cities, San Diego
77	P931110	Pole	Beach Cities, San Diego
78	P931079	Pole	Beach Cities, San Diego
79	P931078	Pole	Beach Cities, San Diego
80	P931077	Pole	Beach Cities, San Diego
81	P931089	Pole	Beach Cities, San Diego
82	P931061	Pole	Beach Cities, San Diego
83	P931090	Pole	Beach Cities, San Diego
84	P931120	Pole	Beach Cities, San Diego

85	P931081	Pole	Beach Cities, San Diego
86	P931115	Pole	Beach Cities, San Diego
87	P931072	Pole	Beach Cities, San Diego
88	P933527	Pole	Beach Cities, San Diego
89	P933526	Pole	Beach Cities, San Diego
90	P933525	Pole	Beach Cities, San Diego
91	P933524	Pole	Beach Cities, San Diego
92	P933523	Pole	Beach Cities, San Diego
93	P933522	Pole	Beach Cities, San Diego
94	P733329	Pole	Beach Cities, San Diego
95	P933345	Pole	Beach Cities, San Diego
96	P255065	Pole	Beach Cities, San Diego
97	P734078J	Pole	Beach Cities, San Diego
98	P838304	Pole	Beach Cities, San Diego
99	P734079J	Pole	Beach Cities, San Diego
100	P734070J	Pole	Beach Cities, San Diego
101	P734081J	Pole	Beach Cities, San Diego
102	P734082J	Pole	Beach Cities, San Diego
103	P732650	Pole	Beach Cities, San Diego
104	P733092J	Pole	Beach Cities, San Diego
105	P733081J	Pole	Beach Cities, San Diego
106	P733040J	Pole	Beach Cities, San Diego
107	P733083J	Pole	Beach Cities, San Diego
108	P732649J	Pole	Beach Cities, San Diego
109	P734435	Pole	Beach Cities, San Diego
110	P734434	Pole	Beach Cities, San Diego
111	P37257	Pole	Beach Cities, San Diego
112	P932560	Pole	Beach Cities, San Diego
113	P2331865208	Pole	Beach Cities, San Diego
114	P193440	Pole	Beach Cities, San Diego
115	P836505	Pole	Beach Cities, San Diego
116	P933869	Pole	Beach Cities, San Diego
117	P237804	Pole	Beach Cities, San Diego
118	P191251	Pole	Beach Cities, San Diego
119	P2226969259	Pole	Beach Cities, San Diego
120	P734453J	Pole	Beach Cities, San Diego
121	D2416674527	Padmount	Beach Cities, San Diego
122	D2415974539	Padmount	Beach Cities, San Diego
123	D2414974531	Padmount	Beach Cities, San Diego
124	D2414374556	Padmount	Beach Cities, San Diego
125	D2412074576	Padmount	Beach Cities, San Diego
126	H2412174574	Handhole	Beach Cities, San Diego
127	D2411774562	Padmount	Beach Cities, San Diego
128	D2411374585	Padmount	Beach Cities, San Diego
129	D2410774596	Padmount	Beach Cities, San Diego

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130	D2408874578	Padmount	Beach Cities, San Diego
131	D2442972118	Padmount	Beach Cities, San Diego
132	D140661	Padmount	Beach Cities, San Diego
133	W2442272105	Padmount	Beach Cities, San Diego
134	D2442472104	Padmount	Beach Cities, San Diego
135	D2442272102	Padmount	Beach Cities, San Diego
136	D2442472070	Padmount	Beach Cities, San Diego
137	D2442272066	Padmount	Beach Cities, San Diego
138	D2442472071	Padmount	Beach Cities, San Diego
139	D121191	Padmount	Beach Cities, San Diego
140	D105912	Padmount	Beach Cities, San Diego
141	D105913	Padmount	Beach Cities, San Diego
142	D105915	Padmount	Beach Cities, San Diego
143	D2390369302	Padmount	Beach Cities, San Diego
144	D2389168302	Padmount	Beach Cities, San Diego
145	D2387869303	Padmount	Beach Cities, San Diego
146	D2385369373	Padmount	Beach Cities, San Diego
147	D2386369318	Padmount	Beach Cities, San Diego
148	D2388369328	Padmount	Beach Cities, San Diego
149	D2390669323	Padmount	Beach Cities, San Diego
150	D2386169348	Padmount	Beach Cities, San Diego
151	E1576	Tree	Beach Cities, San Diego
152	I3194	Tree	Beach Cities, San Diego
153	PR1057	Tree	Beach Cities, San Diego

III. Field Inspection – Violations List

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

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.

SDG&E facilities on the following poles required maintenance:

- A visibility strip on pole P2302269173 was damaged.
- A visibility strip on pole P837482 was damaged.
- A visibility strip on pole P837484 was damaged.
- A visibility strip on pole P833678 was damaged.
- The ground moulding on pole P836514 was damaged.
- The ground moulding on pole P734079J was damaged.
- The ground moulding on pole P734453J was damaged.
- An abandoned anchor guard near pole P732650 was not removed
- The ground moulding on pole P837180 was damaged.
- An anchor guard on pole P733081J was buried
- Buddy pole associated with pole P931079 is not removed.
- Buddy pole associated with pole P931089 is not removed.
- Buddy pole associated with pole P932560 is not removed.
- Buddy pole associated with pole P193440 is not removed.

GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 19, Column C requires the radial separation between guys and communications conductors supported on the same pole to be not less than 3 inches.

An SDG&E guy wire attached to each of the following poles was contacting a communications conductor:

- Pole P836504
- Pole P193440

GO 95, Rule 38, Minimum Clearances of Wires from other Wires, Table 2, Case 8, Column D requires the vertical separation between secondary and communications conductors supported on the same pole to be not less than 48 inches.

SDG&E service drops supported on the following poles were contacting third-party communications service drops:

- P837177
- P2300369259
- P193325 (two SDG&E service drops were in contact with a third-party communications service drop)
- P837187

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 damaged:

- P108394
- P931090
- P931120
- P933527
- P933525
- P733081J
- P733040J