STATE OF CALIFORNIA GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



January 27, 2023

SA2022-953 / EA2022-1072

Thomas Miller Electric Utility Director Banning Electric Utility City of Banning 99 E. Ramsey Street Banning, CA 92220

Subject: Audit of Banning Electric Utility

Mr. Miller:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC) James Miller of my staff conducted a substation and electric distribution audit of Banning Electric Utility's (Banning) service territory from August 30, 2022 to September 2, 2022. The audit included a review of Banning's inspection and maintenance records and a field inspection of Banning'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 February 27, 2023, by electronic or hard copy, of all corrective measures taken by Banning to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact James Miller at (213) 660-8898 or <u>James.Miller@cpuc.ca.gov</u>.

Sincerely,

Fadi Daye, P.E.

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
Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

Substation Records

- Current Inspection Procedures
- Inspection Records
- Oil and Miscellaneous Testing Results

II. Records Review - Violations List

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

GO 165, Rule III (C), Record Keeping, states in part:

The utility shall maintain records for (1) at least ten (10) years of patrol and detailed inspection activities, and (2) the life of the pole for intrusive inspection activities. Such records shall be made available to parties or pursuant to Commission rules upon 30 days notice. Commission staff shall be permitted to inspect such records consistent with Public Utilities Code Section 314 (a).

Banning Electric Utility was unable to provide the CPUC with any patrol, detailed, or intrusive testing records for the ten years preceding the audit.

III. Field Inspection

My staff inspected the following facilities during the field inspection:

No.	Facility Identification	Facility Type	Location
1	San Gorgonio Substation	Substation	Banning
2	Ivy Substation	Substation	Banning
3	Airport Substation	Substation	Banning
4	Alola Substation	Substation	Banning
5	Stagecoach Substation	Substation	Banning
6	22nd Street Substation	Substation	Banning
7	Midway Substation	Substation	Banning
8	Sunset Substation	Substation	Banning
9	3444	Padmounted Transformer	Banning
10	2062	Switch Cabinet	Banning
11	3421	Padmounted Transformer	Banning
12	2854	Padmounted Transformer	Banning
13	2053	Padmounted Transformer	Banning
14	2472	Padmounted Transformer	Banning
15	COB6156	Utility Pole	Banning
16	COB4808	Utility Pole	Banning
17	GT117193	Utility Pole	Banning
18	COB4810	Utility Pole	Banning
19	COB4811	Utility Pole	Banning
20	COB6165	Utility Pole	Banning
21	COB1794	Utility Pole	Banning
22	COB4403	Utility Pole	Banning
23	COB4803	Utility Pole	Banning
24	COB4806	Utility Pole	Banning
25	COB4481	Utility Pole	Banning
26	COB4482	Utility Pole	Banning
27	COB4488	Utility Pole	Banning
28	COB4483	Utility Pole	Banning
29	COB4486	Utility Pole	Banning
30	GT206703	Utility Pole	Banning
31	GT304195	Utility Pole	Banning
32	COB4487	Utility Pole	Banning
33	COB6068	Utility Pole	Banning
34	COB1824	Utility Pole	Banning
35	COB3111	Utility Pole	Banning
36	COB3603	Utility Pole	Banning
42	COB3604	Utility Pole	Banning
43	COB2688	Utility Pole	Banning

44	Pole S. of COB2688	Utility Pole	Banning
45	COB6854	Utility Pole	Banning
46	COB6069	Utility Pole	Banning
47	Pole S. of COB6069	Utility Pole	Banning
48	COB4923	Utility Pole	Banning
49	COB2692	Utility Pole	Banning
50	COB4922	Utility Pole	Banning
51	Pole S. of COB4922	Utility Pole	Banning
52	COB2694	Utility Pole	Banning
53	COB1625	Utility Pole	Banning
54	COB6086	Utility Pole	Banning
55	COB6087	Utility Pole	Banning
56	COB6085	Utility Pole	Banning
57	COB6096	Utility Pole	Banning
58	COB4753	Utility Pole	Banning
59	COB6533	Utility Pole	Banning
60	COB4617	Utility Pole	Banning
61	Pole N. of COB4617	Utility Pole	Banning
62	COB4615	Utility Pole	Banning
63	COB4614	Utility Pole	Banning
64	COB6752	Utility Pole	Banning
65	COB6872	Utility Pole	Banning
66	COB4611	Utility Pole	Banning
67	COB3372	Utility Pole	Banning
68	COB3173	Utility Pole	Banning
69	COB6772	Utility Pole	Banning
70	Pole E. of COB6772	Utility Pole	Banning
71	Pole two poles E. of COB6772	Utility Pole	Banning
72	COB3170	Utility Pole	Banning
73	COB3169	Utility Pole	Banning
74	COB6767	Utility Pole	Banning
75	COB3251	Utility Pole	Banning
76	Pole E. of COB3251	Utility Pole	Banning

IV. Field Inspection – Violations List

GO 174, Rule 12, General, states in part:

Substations shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service.

Design, construction, and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.

Airport Substation

The Bank 1 Transformer was leaking oil.

Alola Substation

- The Circuit 1 cabinet could not be locked because one of its eyelets had broken off.
- The substation grounds were littered with trash and debris.

22nd Street Substation

The air conditioning in the control building was not operational.

Sunset Substation

- The T1 Transformer nitrogen gas pressure gauge could not be read because its viewing window had become cloudy.
- The southernmost capacitor on the east side of the substation had a very low oil level.

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 ground wire on Pole No. COB3603 was cut.
- The ground wire on Pole No. COB4611 was not securely attached to the pole, and its ground moulding was damaged.

General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be three inches.

A Banning down guy wire and a communications conductor, both attached to Pole No. COB4486, passed each other with less than three inches of radial clearance.

General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column D, Case 19 requires the minimum radial clearance between guys and span wires passing conductors of 0-750 volts supported on the same poles to be three inches.

A Banning secondary conductor was in contact with a down guy wire near the tagless pole north of Pole No. COB4617.

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.

- An unauthorized address sign was attached to Pole No. COB4810.
- An unauthorized "No Trespassing" sign was attached to Pole No. COB4811.
- An unauthorized "Private Property" sign was attached to Pole No. COB4487.
- An unauthorized "Private Property" sign was attached to Pole No. GT206703.
- An unauthorized "Private Property" sign was attached to Pole No. GT304195.
- An unauthorized "No Dumping" sign was attached to Pole No. COB4488.
- An unauthorized "Private Property" sign was attached to the tagless pole south of Pole No. COB2688.
- An unauthorized "Private Property" sign was attached to Pole No. COB6854.
- An unauthorized "Private Property" sign was attached to the tagless pole south of Pole No. COB6854.
- An unauthorized "Private Property" sign and an unauthorized "Area Under Video Surveillance" sign were attached to Pole No. COB2692.
- An unauthorized "Missing Dog" sign was attached to Pole No. COB6087.

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 or bands on each of the following poles was damaged or missing:

- COB4811
- COB3111
- COB6086
- COB6096
- COB3372
- COB3169
- COB6767
- The tagless pole south of Pole No. COB2688
- The tagless pole east of Pole No. COB6772

GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:

The lowest step shall be not 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.

The lowest pole step on the pole east of Pole No. COB3251 was located at a height of less than eight feet.

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 on each of the following poles was damaged:

- COB4611
- COB3603