

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 25, 2023

EA2023-1144

Meredith Allen, Senior Director
Regulatory Relations
Pacific Gas & Electric Company (PG&E)
300 Lakeside Dr., Oakland, CA 94612

SUBJECT: Electric Distribution Audit of PG&E's Humboldt Division

Ms. Allen:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Thomas Roberts of ESRB staff conducted an electric distribution audit of PG&E's Humboldt Division from July 31 to August 4, 2023. During the audit, ESRB staff conducted field inspections of PG&E'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 October 23, 2023, 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.

The response should indicate the date each remedial action and preventive measure taken for the violations. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Section II and IV of the enclosed Audit Report. Please also provide records of the third-party notifications for the violations listed in Section V of the enclosed Audit Report.

If you have any questions concerning this audit, please contact Emiliano Solorio at (916) 216-0249 or Emiliano.Solorio@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

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 PG&E Humboldt Division

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Robert Thomas, Senior Utilities Engineer, ESRB, SED, CPUC

Vincent Tanguay, Senior Director, Electric Compliance, PG&E
Sidney Dietz, Director, Regulatory Relations, PG&E
Roberto Morales, Senior Manager, Electric Compliance, PG&E
Tripti Uprety, Manager, Electric Compliance, PG&E
Electric Data Requests Mailbox (ElectricDataRequests@pge.com)

**PG&E HUMBOLDT DIVISION ELECTRIC
DISTRIBUTION AUDIT FINDINGS**

July 31 – August 4, 2023

I. Records Review

During the distribution audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for PG&E’s Humboldt Division:

- Electric Distribution Preventive Maintenance Manual, April 1, 2016
- TD-2305M-B006, Revised Distribution Inspection Guidelines, January 24, 2020
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, August 02, 2022
- Distribution facilities statistics and their wildfire risks, including equipment risks and vegetation risks
- Humboldt Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, June 2018 – May 2023
- Electric Corrective Notifications list, June 2018 – May 2023
- Reliability Indexes and Outage list, June 2018 – May 2023
- Humboldt New Projects list, June 2022 – May 2023
- Pole Loading Calculations list, March 2021 – May 2023
- Incoming Third-Party Notifications list, June 2018 – May 2023
- Outgoing Third-Party Notifications list, June 2018 – May 2023
- Inspector training records, June 2018 – May 2023
- Equipment test records, June 2018 – May 2023
- Intrusive Inspections, June 2022 – May 2023
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

II. Records Violations

ESRB staff observed the following violations during the record review portion of the audit:

1. Late Work Orders

General Order (GO) 95, Rule 18-B, Maintenance Programs, (1)(a) 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; (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.”

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.

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 [the] communication or supply lines and equipment.”

ESRB staff reviewed late work orders completed within the Humboldt Division for the past 60 months (June 2018 – May 2023), shown in Table 1. PG&E’s Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines the priority codes and associated time frames for the response/repair action as follows:

- *Priority A – Safety / Emergency Immediate Response An emergency is defined as any activity in response to an outage to customer(s) or an unsafe condition requiring immediate response or standby to protect the public.*
- *Priority B – Urgent Compliance (Due within 3 months)*
- *Priority E – Compliance (Due 3-12 months)*
- *Priority F – Compliance (For Regulatory Conditions, the Recommended Repair Date is the due date for the next Inspection (UG = 3 years, OH = 5 years).*

ESRB staff reviewed late work orders and determined that PG&E did not address a total of 39,736 work orders by their assigned due date. Table 1 below breaks down the 39,736 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 1: Late Work Orders in Humboldt Division

Priority Code	Late Work Orders Completed	Late Work Orders Pending	Late Work Orders Cancelled	Total
A	2,919	67	0	2,986
B	1,799	49	238	2,086
E	8,450	19,561	6,310	34,321
F	93	167	83	343
Total	13,261	19,844	6,631	39,736

PG&E shall provide ESRB with its corrective action plan to complete the 19,844 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Table 2 below identifies the most overdue non-exempt work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
A	114734024	1,318
B	116765415	1,162
E	117070461	1,357
F	117055301	1,328

PG&E identified work order #114734024 on June 27, 2018, to repair a burned pole with a required end date of July 18, 2018. PG&E did not complete the work until February 4, 2022.

PG&E identified work order #116765415 on March 19, 2019, to replace a leaning pole with a required end date of March 19, 2020. PG&E did not complete the work until May 25, 2023.

PG&E identified work order #117070461 on April 20, 2019, to replace a decaying pole with a required end date of July 20, 2019. PG&E did not complete the work until April 7, 2023.

PG&E identified work order #117055301 on April 18, 2019, for replacing a connector with a required end date of October 18, 2019. PG&E did not complete this work until June 7, 2023.

2. Overhead Inspections

GO 95, Rule 31.2, Inspection of Lines states in part:

“Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.”

GO 165, Section III-B, Standards for Inspection states:

“Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1.”

2.1 ESRB staff identified that PG&E completed a total of 10,556 detailed overhead

inspections of electric facilities past their GO 165 required completion date, as shown in the PDF attachment “*LateOHinspections*”.

2.2 Additionally, ESRB staff found that PG&E completed a total of 22,285 overhead patrols past their GO 165 required completion date for the maps shown in the PDF attachment “*LateOHpatrol*”.

3. Underground Inspections

GO 128, Rule 17.2, Inspection states in part:

“Systems shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition and conformance with all applicable requirements of these rules...”

GO 165, Section III-B, Standards for Inspection states:

“Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1.”

3.1 ESRB staff identified that PG&E completed a total of 150 detailed underground inspections of electric facilities past their GO 165 required completion date, as shown in the PDF attachment “*LateUGinspections*”.

3.2 Additionally, ESRB staff found that PG&E completed a total of 28 underground patrols past their GO 165 required completion date for the maps shown in the PDF attachment “*LateUGpatrol*”.

III. Field Inspection- Audit Locations

During the field inspection, ESRB inspected locations listed in Table 3:

Table 3: List of Field Inspection Locations

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
1	107935198	Sub-Surface Secondary Splice Box	1477 Winchester Ave. McKinleyville, CA
2	108067019	Sub-Surface Transformer	3071 Bonanza St. McKinleyville, CA
3	108050094	Sub-Surface Transformer	3111 Bonanza St. McKinleyville, CA
4	107956872	Sub-Surface Transformer	3080 Little Pond St. McKinleyville, CA
5	100966376	Wood Pole	1452 Stromberg Ave. Arcata, CA
6	100966373	Wood Pole	1493 Stromberg Ave. Arcata, CA
7	100966371	Wood Pole	1525 Stromberg Ave. Arcata, CA
8	100966366	Wood Pole	1555 Stromberg Ave. Arcata, CA
9	100966368	Wood Pole	1560 Stromberg Ave. Arcata, CA
10	100965927	Wood Pole	(40.8683934, - 124.1092625)
11	101012123	Wood Pole	2461 Bainbridge St. Eureka, CA
12	101012121	Wood Pole	2437 Bainbridge St. Eureka, CA
13	100977887	Wood Pole	2427 Bainbridge St. Eureka, CA
14	100977886	Wood Pole	3589 Dolbeer St. Eureka, CA
15	100996265	Wood Pole	(40.7294817, - 124.2132406)
16	100996270	Wood Pole	1836 Mesa Ave. Eureka, CA
17	100996272	Wood Pole	1880 Mesa Ave. Eureka, CA

18	1100996273	Wood Pole	1906 Mesa Ave. Eureka, CA
19	100996278	Wood Pole	(40.7295747, - 124.2110003)
20	107747379	Pad-Mount Transformer	1750 Alamar Way, Fortuna, CA
21	107748500	Pad-Mount Transformer	(40.5795032, - 124.1523937)
22	100992200	Wood Pole	(40.5673319, - 124.1265758)
23	100992193	Wood Pole	Naleen Dr. & Rohnerville Rd. Fortuna, CA
24	100992194	Wood Pole	1675 Naleen Dr. Fortuna, CA
25	100992464	Wood Pole	1655 Naleen Dr. Fortuna, CA
26	104054112	Wood Pole	(40.1191623, - 123.8232578)
27	104054113	Wood Pole	(40.1195020, - 123.8234432)
28	100985893	Wood Pole	(40.1197832, - 123.8237520)
29	100985894	Wood Pole	(40.1202547, - 123.8242754)
30	100985729	Wood Pole	170 Empire Ave, Redway, CA
31	100985819	Wood Pole	79 Oak Ave, Redway, CA
32	103943972	Wood Pole	145 Oak Ave, Redway, CA
33	100985817	Wood Pole	281 Redway Drive, Redway, CA
34	100985816	Wood Pole	286 Redway Drive, Redway, CA
35	100985815	Wood Pole	358 Redway Drive, Redway, CA
36	100985803	Wood Pole	380 Redway Drive, Redway, CA
37	103157334	Wood Pole	(40.0982455, - 123.7975351)
38	100989040	Wood Pole	291 Sprowl Creek Rd, Garberville, CA

39	100989037	Wood Pole	277 Sprowl Creek Rd, Garberville, CA
40	102171767	Wood Pole	(39.4126709, - 123.3413289)
41	102170583	Wood Pole	(39.4125831, - 123.3422600)
42	102170585	Wood Pole	(39.4127004, - 123.3428725)
43	102170586	Wood Pole	(39.4126722, - 123.3433416)
44	102170588	Wood Pole	(39.4126870,- 123.3439055)
45	102170589	Wood Pole	(39.4126738, - 123.3443658)
46	102171722	Wood Pole	393 Redwood Ave, Willits, CA
47	102171721	Wood Pole	353 Redwood Ave, Willits, CA
48	102171720	Wood Pole	307 Redwood Ave, Willits, CA
49	102171718	Wood Pole	297 Redwood Ave, Willits, CA
50	102171716	Wood Pole	229 Redwood Ave, Willits, CA
51	102171712	Wood Pole	237 North Street, Willits, CA
52	102145218	Wood Pole	5355 5th St, Kelseyville, CA
53	102145220	Wood Pole	5335 5th St, Kelseyville, CA
54	104087899	Wood Pole	(38.9769306, - 122.8357577)
55	45175188	Wood Pole	5330 5th St, Kelseyville, CA
56	102144878	Wood Pole	(38.9770555, - 122.8368802)
57	102144881	Wood Pole	(38.9771894, - 122.8377029)
58	102144882	Wood Pole	(38.9772695, - 122.8379541)
59	102144889	Wood Pole	(38.9774626, - 122.8380007)

60	107701693	Pad-Mount Transformer	3860 Walnut Way Kelseyville, CA
61	107679947	Pedestal Secondary Splice Box	3855 Walnut Way Kelseyville, CA
62	107699315	Pedestal Secondary Splice Box	(38.9734726, - 122.8400425)
63	102144251	Wood Pole	(39.0103508, - 122.8475416)
64	102144250	Wood Pole	(39.0108103, - 122.8476033)
65	102144245	Wood Pole	(39.0112360, - 122.8475389)
66	102144246	Wood Pole	(39.0118712, - 122.8475305)
67	102202334	Wood Pole	(39.2773168, - 123.2053211)
68	102170404	Wood Pole	(39.2652116, - 123.2040776)
69	102170403	Wood Pole	(39.2653294, - 123.2036555)
70	103384702	Wood Pole	(39.2659633, - 123.2042127)
71	102170414	Wood Pole	(39.2660669, - 123.2036541)
72	102170419	Wood Pole	(39.2664581, - 123.2043143)
73	102169809	Wood Pole	(39.2647547, - 123.2179362)
74	102169832	Wood Pole	(39.2647825, - 123.2169814)
75	107816761	Sub-Surface Transformer	(39.1964489, - 123.1985071)
76	107693557	Pad-Mount Transformer	461 Beltrami Dr, Ukiah, CA
77	107872466	Pedestal Secondary Splice Box	459 Beltrami Dr, Ukiah, CA
78	107872461	Pedestal Secondary Splice Box	449 Beltrami Dr, Ukiah, CA
79	107693566	Pad-Mount Transformer	(39.1934236, - 123.2007852)
80	107693563	Pad-Mount Junction Box	(39.1934763, - 123.2008328)
81	103949858	Wood Pole	240 Zinfandel Dr, Ukiah, CA

82	102172271	Wood Pole	211 Zinfandel Dr, Ukiah, CA
83	102172269	Wood Pole	251 Zinfandel Dr, Ukiah, CA
84	102172263	Wood Pole	301 Zinfandel Dr, Ukiah, CA
85	102172259	Wood Pole	311 Zinfandel Dr, Ukiah, CA
86	102172255	Wood Pole	351 Zinfandel Dr, Ukiah, CA
87	102194702	Wood Pole	(38.9732247, - 123.1168780)
88	102194703	Wood Pole	(38.9732672, - 123.1170573)
89	103609490	Wood Pole	(38.9733790, - 123.1169869)
90	102194704	Wood Pole	(38.9734257, - 123.1176280)
91	102194705	Wood Pole	13251 Spring St, Hopland, CA

IV. Field Inspection – Violations List

ESRB observed the following violations during the field inspection:

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

"Electrical supply and communications 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’s findings are listed in Table 4.

Table 4: GO 95, Rule 31.1 Findings

Location	Finding	Notes
5	Ground wire was exposed. Pole and crossarm are rotten/decayed.	PG&E corrected the exposed ground wire in the field. PG&E has existing EC notification 119860964 to replace the pole and crossarm.
13	Ground wire was exposed.	PG&E corrected the finding in the field.
16	Guy wire anchor is broken/damaged. Pole has woodpecker damage.	PG&E has existing EC notification 121545326 to repair anchor and pole.
19	Vegetation is surrounding the entire pole.	PG&E has existing EC notification 126197223 to trim vegetation.
30	Vegetation ground clearance requires a 10 ft. radius.	PG&E has existing EC notification 126630874 to trim vegetation.
31	Pole was rotten/decayed.	PG&E has existing EC notification 121115076 to replace the pole.
32	Woodpecker hole was found near the top of the pole.	
33	Pole has woodpecker damage.	PG&E has existing EC notification 121115079 to repair the pole.
34	Pole has woodpecker damage.	PG&E has existing EC notification 121117779 to repair the pole.

46	Pole has woodpecker damage.	PG&E has existing EC notification 123447324 to repair the pole.
52	Pole was rotten/decayed.	PG&E has existing EC notification 119043208 to replace the pole.
53	Slack was found on down guy wire.	
58	Pole was rotten/decayed.	PG&E has existing EC notification 119094064 to replace the pole.
59	Broken riser boot was found on the pole.	PG&E corrected the finding in the field.
69	Woodpecker holes were found near the top of the pole.	
72	Pole is rotten/decayed.	PG&E has existing EC notification 116810917 to replace the pole.
82	Pole is rotten/decayed.	PG&E has existing EC notification 124225360 to replace the pole.
84	Guy anchor is eroded.	PG&E has existing EC notification 113025496 to repair the anchor.
91	Pole is rotten/decayed.	PG&E has existing EC notification 121639206 to replace the pole.

2. General Order 95, Rule 34 – Foreign Attachments states:

“Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight 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.

Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner’s or owners’ consent.”

ESRB’s findings are listed in Table 5:

Table 5: GO 95, Rule 34 Findings

Location	Finding	Notes
16	Foreign attachment found on pole.	PG&E corrected the finding in the field.
54	Foreign attachment found on pole.	PG&E corrected the finding in the field.
55	Foreign attachment found on pole.	PG&E corrected the finding in the field.
68	Foreign attachment found on pole.	PG&E corrected the finding in the field.

3. General Order 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’s findings are listed in Table 6:

Table 6: GO 95, Rule 51.6-A Findings

Location	Finding	Notes
27	High Voltage sign was broken.	PG&E has existing EC notification 126631328 for repair.
34	High Voltage sign was broken.	
35	High Voltage sign was broken.	PG&E has existing EC notification 121117773 for repair.
36	High Voltage sign was broken.	
39	High Voltage sign was broken.	PG&E has existing EC notification 123580857 to repair.
48	High Voltage sign was missing.	PG&E has existing EC notification 114367058 to install a new sign.

53	High Voltage sign was missing.	PG&E has existing EC notification 119043361 to install a new sign.
58	High Voltage sign was missing.	PG&E has existing EC notification 119094064 to install a new sign.

4. General Order 95, Rule 35 – Vegetation Management states in part:

"Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained. (Also see Appendix E for tree trimming guidelines.) These requirements apply to all overhead electrical supply and communication facilities that are covered by this General Order, including facilities on lands owned and maintained by California state and local agencies."

ESRB’s finding is listed in Table 7:

Table 7: GO 95, Rule 35 Finding

Location	Finding	Notes
49	Tree causing strain on service drops.	PG&E has existing EC notification 123446804 to correct vegetation strain.

5. General Order 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’s finding is listed in Table 8:

Table 8: GO 95, Rule 56.9 Finding

Location	Finding	Notes
63	Guy marker was missing.	PG&E has existing EC notification 119047931 to install new guy marker. PG&E corrected the finding in the field.

6. GO 128, Rule 17.1, Design, Construction and Maintenance states:

“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’s findings are listed in Table 9:

Table 9: GO 128, Rule 17.1 Findings

Location	Finding	Notes
3	Fault indicator sight glass broken on vault lid.	PG&E has existing EC notification 124358092 to repair the lid.
20	Pad mount transformer was corroded.	PG&E has existing EC notification 122128419 to replace the transformer.
21	Pad mount transformer was corroded.	PG&E has existing EC notification 122129641 to replace the transformer.

V. Observations

1. 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.”

ESRB's findings are listed in Table 10:

Table 10: GO 95, Rule 18-A Findings

Location	Finding	Notes
16	There was an abandoned communications service drop. Communications service drop was in contact with PG&E service drop.	
24	There was an abandoned communication service drop.	
30	There was an abandoned communication service drop.	
31	There was an abandoned communication service drop.	
32	Communications service drop was in contact with PG&E service drop.	
33	There was an abandoned communication service drop.	
39	There was an abandoned communication service drop.	PG&E has existing third-party notification 123580869 sent to responsible utility.
48	Communications service drop was hanging low.	
67	Communications line has no riser guard and is not attached to the pole.	
68	Communications ground wire is exposed.	
81	Communication guy wire had a bent guy guard.	PG&E removed the guy guard in field.