

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 28, 2015

EA2015-012

Dave Padilla
T&D Division Manager
Silicon Valley Power
1705 Martin Avenue
Santa Clara, CA 95050

SUBJECT: Audit of Silicon Valley Power (SVP) – City of Santa Clara

Dear Mr. Padilla:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Jamie Lau of my staff conducted an electric audit of SVP from July 20 to 23, 2015. The audit included a review of SVP's records and field inspection of its distribution facilities.

During the audit, my staff identified violations of one or more General Orders. A copy of the audit findings itemizing the violation(s) is enclosed. Please advise me no later than October 1, 2015, by electronic or hard copy, of all corrective measures taken by SVP to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Jamie Lau at (415) 703-2233 or jamie.lau@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC
Charlotte TerKeurst, Program Manager, ESRB, CPUC
Alok Kumar, P.E., Senior Utilities Engineer Supervisor, ESRB, CPUC
Jamie Lau, P.E., Utilities Engineer, ESRB, CPUC

Audit Findings

Company: Silicon Valley Power (SVP)

Distribution Audit

Date: July 20 to 23, 2015

A.	Location:	Santa Clara
	Date of CPUC Inspection:	7/20/2015 to 7/23/2015
Explanation of Violation(s):		
<u>Missed and Past-Due Inspections</u>		
<p>GO 165, Section III-B, Standards for Inspection, states:</p> <p style="text-align: center;"><i>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.</i></p> <p>SVP divided its serviced territory to 90 area maps containing overhead, padmount and subsurface facilities.</p> <p>Overhead Facilities</p> <ul style="list-style-type: none"> • Between 2012 and 2013, all overhead facilities in 89 maps missed a patrol inspection. • In 2014, all overhead facilities in 18 maps missed a patrol inspection. <p>Pad-mounted Facilities</p> <ul style="list-style-type: none"> • In 2013, all pad-mounted facilities in 84 maps missed a patrol inspection. • In 2014, all pad-mounted facilities in 37 maps missed a patrol inspection. <p>Subsurface Facilities</p> <ul style="list-style-type: none"> • All subsurface facilities were detailed inspected on 4/29/2010 and subsequently on 12/2/2104. The 2014 detailed inspections were 17 months past due. 		

B.	Location:	Santa Clara
	Date of CPUC Inspection:	7/20/2015 to 7/23/2015
	Explanation of Violation(s):	
	<p data-bbox="250 443 570 478"><u>Past-Due Work Orders</u></p> <p data-bbox="250 516 971 552">GO 165, Section III-C, – Record Keeping, states in part:</p> <p data-bbox="367 590 1265 730"><i>For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.</i></p> <p data-bbox="250 770 1175 806">GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="367 844 1273 987"><i>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.</i></p> <p data-bbox="250 1026 1192 1062">GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="367 1100 1273 1243"><i>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.</i></p> <p data-bbox="250 1283 1382 1425">From July 1, 2010 to June 19, 2015 (time of audit data request), there were 958 work orders open past their scheduled date of corrective action. Furthermore, 4 work orders were completed past their scheduled date of corrective action. The past-due work orders include overhead and underground facilities.</p>	

We observed the following violations during the field inspection:

C.	Location:	390 Winchester Blvd.
	Pole No.:	16B04
	Previous Visit by SVP:	5/18/2015
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<p><u>Missing High-Voltage Sign</u></p> <p>GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p style="text-align: center;"><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs..... Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.</i></p> <p>Half of the High Voltage sign was missing, therefore not legible.</p>		

D.	Circuit:	290 Winchester Blvd.
	Pole No.:	16D13
	Previous Visit by SVP:	5/18/2015
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<p data-bbox="250 611 776 642"><u>Vertical Riser Covering Joint Exposed</u></p> <p data-bbox="250 682 789 714">GO 95, Rule 54.6-E, Risers, states in part:</p> <p data-bbox="354 753 1295 861"><i>(3) Covering Joints: Where two sections of suitable protective covering join together (at joints) they shall be covered to prevent exposing the underground cables or other conductors by:</i></p> <ul style="list-style-type: none"> <li data-bbox="354 903 1052 934"><i>a) The extension of either or both such coverings; or</i> <li data-bbox="354 976 829 1008"><i>b) A coupling of equal material; or</i> <li data-bbox="354 1050 740 1081"><i>c) A strap of equal material.</i> <p data-bbox="250 1123 1360 1188">A riser cover joint was not covered, thus, exposing the underground cable from ground level to 8 feet above ground.</p>		

E.	Location:	315 Saratoga Ave.
	Pole No.:	15C02
	Previous Visit by SVP:	5/13/2015
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<u>Missing High-Voltage Sign</u>		
GO 95, Rule 51.6-A, High Voltage Marking, states in part:		
<p style="text-align: center;"><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs..... Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.</i></p>		
Half of the High Voltage sign was missing, therefore not legible.		

F.	Location:	385 Saratoga Ave.
	Pole No.:	15C04
	Previous Visit by SVP:	5/13/2015
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<u>Missing High-Voltage Sign</u>		
GO 95, Rule 51.6-A, High Voltage Marking, states in part:		
<p style="text-align: center;"><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs..... Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.</i></p>		
Half of the High Voltage sign was missing, therefore not legible.		

G.	Location:	401 Saratoga Ave.
	Pole No.:	15A11
	Previous Visit by SVP:	5/13/2015
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<u>Missing High-Voltage Sign</u>		
GO 95, Rule 51.6-A, High Voltage Marking, states in part:		
<p style="text-align: center;"><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs..... Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.</i></p>		
Half of the High Voltage sign was missing, therefore not legible.		

H.	Location:	832 Pomeroy Ave.
	Pole No.:	22C14
	Previous Visit by SVP:	6/3/2015
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<u>Missing High-Voltage Sign</u>		
GO 95, Rule 51.6-A, High Voltage Marking, states in part:		
<p style="text-align: center;"><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs..... Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.</i></p>		
Half of the High Voltage sign was missing, therefore not legible.		

I.	Location:	850 Pomeroy Ave.
	Pole No.:	22C16
	Previous Visit by SVP:	6/3/2015
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<u>Missing High-Voltage Sign</u>		
GO 95, Rule 51.6-A, High Voltage Marking, states in part:		
<p style="text-align: center;"><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs..... Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.</i></p>		
Half of the High Voltage sign was missing, therefore not legible.		

J.	Location:	850 Pomeroy Ave.
	Pole No.:	22C17
	Previous Visit by SVP:	6/3/2015
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<u>Missing High-Voltage Sign</u>		
GO 95, Rule 51.6-A, High Voltage Marking, states in part:		
<p style="text-align: center;"><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs..... Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.</i></p>		
Three High Voltage signs were missing.		

K.	Location:	2627 Birchtree Lane
	Equipment No.:	Transformer 6826
	Previous Visit by SVP:	12/2/2014
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<p data-bbox="250 611 578 642"><u>Cover Not Bolted Down</u></p> <p data-bbox="250 680 784 714">GO 128, Rule 32.7, Covers, states in part:</p> <p data-bbox="367 753 1300 825"><i>If the cover of a subsurface equipment enclosure is a grate a means shall be provided to prevent tampering with the equipment housed therein.</i></p> <p data-bbox="250 865 1245 898">The cover of the subsurface enclosure (which is a grate) was not bolted down.</p> <p data-bbox="250 938 745 972"><u>Enclosure Ownership Not Identified</u></p> <p data-bbox="250 1012 1406 1083">GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures, states:</p> <p data-bbox="354 1123 1295 1266"><i>Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.</i></p> <p data-bbox="250 1306 699 1339">SVP did not identify the enclosure.</p>		

L.	Location:	2685 Maplewood Lane
	Equipment No.:	Transformer 6824
	Previous Visit by SVP:	12/2/2014
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<p data-bbox="250 611 578 642"><u>Cover Not Bolted Down</u></p> <p data-bbox="250 680 784 714">GO 128, Rule 32.7, Covers, states in part:</p> <p data-bbox="367 753 1300 825"><i>If the cover of a subsurface equipment enclosure is a grate a means shall be provided to prevent tampering with the equipment housed therein.</i></p> <p data-bbox="250 865 1243 898">The cover of the subsurface enclosure (which is a grate) was not bolted down.</p> <p data-bbox="250 938 745 972"><u>Enclosure Ownership Not Identified</u></p> <p data-bbox="250 1012 1406 1083">GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures, states:</p> <p data-bbox="354 1123 1295 1266"><i>Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.</i></p> <p data-bbox="250 1306 699 1339">SVP did not identify the enclosure.</p>		

M.	Location:	2615 Maplewood Lane
	Equipment No.:	Transformer 6825
	Previous Visit by SVP:	12/2/2014
	Date Visited by CPUC:	7/22/2015
Explanation of Violation(s):		
<p data-bbox="250 611 578 642"><u>Cover Not Bolted Down</u></p> <p data-bbox="250 680 784 714">GO 128, Rule 32.7, Covers, states in part:</p> <p data-bbox="367 753 1300 825"><i>If the cover of a subsurface equipment enclosure is a grate a means shall be provided to prevent tampering with the equipment housed therein.</i></p> <p data-bbox="250 865 1243 898">The cover of the subsurface enclosure (which is a grate) was not bolted down.</p> <p data-bbox="250 938 745 972"><u>Enclosure Ownership Not Identified</u></p> <p data-bbox="250 1012 1406 1083">GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures, states:</p> <p data-bbox="354 1123 1294 1266"><i>Manholes, handholes , subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.</i></p> <p data-bbox="250 1306 699 1339">SVP did not identify the enclosure.</p>		

N.	Location:	901 Bing Drive
	Pole No.:	21B5
	Previous Visit by SVP:	6/9/2015
	Date Visited by CPUC:	7/23/2015
Explanation of Violation(s):		
<p data-bbox="250 606 964 642"><u>Vegetation Contact With Guy Wire Above Insulator</u></p> <p data-bbox="250 680 1382 716">GO 95, Rule 56.7-B, Location of Sectionalizing Insulators - Anchor Guys, states in part:</p> <p data-bbox="365 753 1321 898"><i>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.</i></p> <p data-bbox="250 936 1003 972">The guy wire was in contact with a tree above its insulator.</p>		