

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 13, 2018

EA2018-808

Cort Cortez
Electric Operations Manager
Lassen Municipal Utility District
65 S. Roop St.
Susanville, CA 96130

SUBJECT: Audit of Lassen Municipal Utility District

Mr. Cortez:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Raymond Cho, Matthew Yunge, Andie Biggs, and Anwar Safvi of ESRB staff conducted an electric distribution audit of Lassen Municipal Utility District (LMUD) from May 21 to May 23, 2018. During the audit, ESRB staff conducted field inspections of LMUD's facilities and equipment, and reviewed pertinent documents and records.

During 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 within 30 days of your receipt of this letter indicating all corrective actions and preventive measures, taken or planned, to address the violations to ensure compliance with GO requirements. The response should indicate the date of each remedial action and preventive measure completed within 30 days. For any outstanding items not addressed within 30 days, please provide the projected completion dates of all actions for all violations outlined in Sections II & IV of the enclosed Audit Findings.

If you have any questions concerning this audit, please contact Raymond Cho at (415) 703-2236 or raymond.cho@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Banu Acimis".

Banu Acimis, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC Audit Findings

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC
Lee Palmer, Deputy Director, Office of Utility Safety, SED, CPUC
Charlotte TerKeurst, Program Manager, ESRB, CPUC
Raymond Cho, Senior Utilities Engineer- Specialist, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, ESRB staff reviewed the following records:

- Completed, cancelled, and late work orders for the last 12 months
- Pole loading calculations completed in the last 12 months
- Third party notifications received and sent out in the last 12 months
- Reliability metrics and outage reports from 2012 to 2017
- New construction projects in the last 12 months
- LMUD's circuit map of the region

II. Records Violations

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

1. 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."

ESRB staff noted during its field visit that LMUD did not maintain sufficient records to demonstrate compliance with the patrol, detailed, and intrusive inspection cycles and maximum interval requirements established by GO 165.

2. GO 165, Section III-C, Record Keeping states:

"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).

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."

ESRB staff noted that LMUD did not maintain inspection and patrol records. Therefore, LMUD failed to comply with record keeping requirements for patrol, detailed, and intrusive inspection records established by GO 165.

3. GO 165, Section III-D, Reporting states:

“By July 1st each utility subject to this General Order shall submit an annual report for the previous year under penalty of perjury.

The report shall list four categorical types of inspections: Patrols, Overhead Detailed, Underground Detailed and Wood Pole Intrusive. The report shall denote the total units of work by inspection type for the reporting period and the number of outstanding (not completed) inspections within the same reporting period for each of the four categories.”

ESRB noted that LMUD has not filed the annual report required by GO 165, Section III-D for the last five years.

4. GO 95, Rule 18-A2a, Resolution of Safety Hazards and GO 95 Nonconformances states in part:

“All companies shall establish an auditable maintenance program for their facilities and lines. All companies must include a timeline for corrective actions to be taken following the identification of a Safety Hazard or nonconformances with General Order 95 on the company’s facilities. The auditable maintenance program shall prioritize corrective actions consistent with the priority levels set forth below and based on the following factors, as appropriate:

- *Safety and reliability as specified in the priority levels below;*
- *Type of facility or equipment;*
- *Location, including whether the Safety Hazard or nonconformance is located in High Fire-Threat District;*
- *Accessibility;*
- *Climate;*
- *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.”*

ESRB noted that LMUD does not have an auditable maintenance program for their facilities and lines. ESRB noted that LMUD does not include a timeline for corrective actions to be taken.

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities:

Structure Type	Structure Number	Address	City
Pole	07771	Alley behind 409 Fir Street	Westwood
Pole	09606	Alley behind 409 Fir Street	Westwood
Pole	09627	Alley behind 325 Fir Street	Westwood
Service Drop	N/A	411 Cedar Street	Westwood
Pole	08089	613 Delwood	Westwood
Transmission Pole	1-18-10	Near 692-340 Riverbench, Susanville	Susanville
Transmission Pole	1-18-12	Near 692-340 Riverbench, Susanville	Susanville
Transmission Pole	1-18-13	Near 692-340 Riverbench, Susanville	Susanville
Transmission Pole	1-18-14	Near 692-340 Riverbench, Susanville	Susanville
Transmission Pole	1-18-15	Near 692-340 Riverbench, Susanville	Susanville
Voltage Regulator	172	Highway 139	Susanville
Voltage Regulator	173	Highway 139	Susanville
Voltage Regulator	174	Highway 139	Susanville
Voltage Regulator	170	Highway 139	Susanville
Voltage Regulator	169	Merrillville Road	Susanville
Voltage Regulator	174	Merrillville Road	Susanville
Pole	09609	1719 1 st Street	Susanville
Pole	09628	1106 Mark Street	Susanville
Pole	07529	Alley behind 718 Main Street	Susanville
Pole	CPU 1112	Alley behind 718 Main Street	Susanville
Pole	05709	Near 470 Lambert Lane	Standish
Pole	N/A	470-725 Co Road A3	Standish
Pole	N/A	723-050 Alexander Lane	Standish

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. GO 95, Rule 59.4-A1a, Grounding, Material and Size, Grounding Conductors states:

“The grounding conductor from each ground rod to the base of the pole shall not be less than 1 foot below the surface of the ground.”

ESRB staff noted an exposed grounding rod at ground level when inspecting LMUD pole #08089.

2. 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).

Exception: Ground wires of 0 – 750 volt circuits or equipment are not required to be covered where installed on crossarms supporting 0 – 750 volt conductors.

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

2.1 ESRB staff noted an exposed grounding wire at ground level when inspecting Voltage regulator #170 located on pole #06227.

2.2. ESRB staff noted an exposed grounding wire at ground level when inspecting pole identified as CPU 1112.

3. GO 95, Rule 18B, Notification of Safety Hazards, states in part:

“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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.”

3.1 ESRB staff noted that LMUD installed pole #09628 at 1106 Mark Street in Susanville, CA in order to replace pole T202. However, Frontier and Zito have not transferred their communications facilities from pole T202. Per GO 95, Rule 18B, LMUD must transmit a documented notice to the relevant companies of identified safety hazard.

3.2 ESRB staff noted a communications wire that had been cut and tied onto the pole identified as CPUC 1112. Per GO 95, Rule 18B, LMUD must transmit a documented notice to the relevant entity of identified safety hazard.