

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 15, 2018

EA2018-809

Dennis Reed
Line Superintendent
Surprise Valley Electrification Corp.
516 U.S. Hwy 395 E
Alturas, CA 96101

SUBJECT: Audit of Surprise Valley Electrification Corp.

Dear Mr. Reed:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Raymond Cho, Stephen Lee, and Andie Biggs of my staff conducted an electric distribution audit of Surprise Valley Electrification Corp. (SVEC) from May 23, 2018 to May 24, 2018. During the audit, ESRB staff conducted field inspections of SVEC'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, you can contact Raymond Cho at (415) 703-2236 or raymond.cho@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue 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, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, ESRB staff reviewed the following records:

- Overhead and underground line inspection and maintenance log sheets from 2012 to 2018
- Maintenance, unscheduled, and retirement replacement work orders in the last 12 months
- General work orders in the last 12 months
- New construction work orders in the last 12 months
- Diagnostic meter test results from 2015 to 2016
- Third-party safety hazard notifications from 2012 to 2015
- Right-of-way clearing and maintenance guidelines for vegetation management
- Fire prevention plans and procedures
- Emergency restoration plans and emergency response procedures
- Material safety data sheet for chemicals used to preserve poles

II. Records Violations

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

1. **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 Orders 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.”

ESRB staff noted that SVEC does not possess documented procedures or standards for the maintenance and inspection cycles of its facilities. Therefore, SVEC does not have an auditable maintenance program.

2. 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.”

ESRB staff reviewed late work orders and determined that SVEC did not address a total of 226 overhead repair work orders by the assigned due date. ESRB staff also noted that 152 of those work orders were still open as of June 18, 2018.

3. GO 95, Rule 44.1 Installation and Reconstruction, states in part:

“Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term “planned” applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.

The entity responsible for performing the loading calculation(s) for an installation or reconstruction shall maintain records of these calculations for the service life of the pole or other structure for which the a(sic) loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.”

SVEC could not provide pole loading calculations for its facilities upon request.

III. Field Inspection

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

Structure Type	Structure Number	City
Pole	107-02W	Adin
Pole	252-02S	Adin
Pole	253-02S	Adin
Pole	255-02S	Adin
Pole	227-02S	Adin
Pole	709-11W	Lookout
Pole	364-11E	Lookout
Pole	076-11E	Adin, West
Pole	552-01W	Alturas
Pole	554-01W	Alturas
Pole	53-16S	Modoc
Pole	52-16S	Modoc
Pole	94-16N	Modoc
Pole	1163-01S	Alturas, Parker Creek Rd.
Pole	1218-01S	Alturas, Parker Creek Rd.

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. GO 95, Rule 18-B, 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.”

Communication service drops connected to pole number 107-02W were hanging down and lying on the ground. SVEC was not aware of this situation; therefore, it did not document and notify the communication company of this condition before our visit.

2. 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.”

Insulators on pole number 227-02S were damaged.

3. GO 95, Rule 51.6-A, 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. 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 the following SVEC poles were damaged:

- 709-11W
- 364-11E
- 94-16N

4. GO 95, Rule 54.6-B, Vertical and Lateral Conductors, 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 molding on pole number 107-02W was missing a section at three feet above the ground line.

5. GO 95, Rule 59.4-A1a, Grounding, Material and Size, Grounding Conductors, states in part:

“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.”

GO 95, Rule 59.4-A2c, Grounding, Material and Size, Ground Rods (Ground Electrodes), states in part:

“Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground.”

Both the grounding conductor and ground rod on pole number 076-11E were exposed above ground.