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PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



September 7, 2018

Brian Prusnek
Director of Regulatory Affairs
San Diego Gas & Electric Company (SDG&E)
8316 Century Park Court CP51D
San Diego, CA 92123

SUBJECT: Electric Distribution Audit of SDG&E's Beach Cities District

Mr. Prusnek:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Derek Fong, Howard Huie, James Miller and Eric Ujiiye of my staff conducted an electric distribution audit of San Diego Gas & Electric's (SDG&E's) Beach Cities District from May 7, 2018 to May 11, 2018. The audit included a review of SDG&E's records and field inspections of SDG&E'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 October 8, 2018, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Eric Ujiiye at (213) 620-2598 or eric.ujiiye@cpuc.ca.gov.

Sincerely,

Fadi Daye, P.E.

Program 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 Lee Palmer, Deputy Director, Office of Utility Safety, CPUC Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC Lonny Saldivar, Compliance Management Manager, San Diego Gas & Electric Eric Ujiiye, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- Intrusive test records
- SDG&E's documented inspection program.

II. Field Inspections

My staff inspected the following facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	P831101	Pole	Clairemont
2	P831100	Pole	Clairemont
3	P831099	Pole	Clairemont
4	P164372	Pole	Clairemont
5	P831098	Pole	Clairemont
6	P932055J	Pole	Clairemont
7	P932101	Pole	Clairemont
8	P932100	Pole	Clairemont
9	P932099	Pole	Clairemont
10	P932098	Pole	Clairemont
11	P932097	Pole	Clairemont
12	P932096	Pole	Clairemont
13	P932095	Pole	Clairemont
14	P932044	Pole	Clairemont
15	P932045	Pole	Clairemont
16	P735176J	Pole	Point Loma
17	P2005569310	Pole	Point Loma
18	P931486	Pole	Point Loma
19	P931485	Pole	Point Loma
20	P981484	Pole	Point Loma
21	P832372	Pole	Point Loma
22	P832361	Pole	Point Loma
23	P1997069407	Pole	Point Loma
24	P832343	Pole	Point Loma
25	P832342	Pole	Point Loma
26	P833410	Pole	Pacific Beach
27	P734430J	Pole	Pacific Beach
28	P734429	Pole	Pacific Beach
29	P734428J	Pole	Pacific Beach
30	P734427J	Pole	Pacific Beach
31	P831083	Pole	Clairemont
32	P833890	Pole	Clairemont
33	P836275	Pole	Clairemont
34	P832200	Pole	Clairemont
35	P838315	Pole	Clairemont
36	P836559	Pole	Clairemont
37	P933766	Pole	Clairemont
38	P933769	Pole	Clairemont
39	P933768	Pole	Clairemont
40	P37636	Pole	Clairemont
41	P179642	Pole	Clairemont

42	P670815	Pole	Clairemont
43	P729131	Pole	Clairemont
44	D2403870199	Padmount Transformer	Clairemont
45	D2391070301	Padmount Transformer	Clairemont
46	D2438370802	Padmount Transformer	Clairemont
47	D2425671760	Padmount Transformer	Clairemont
48	D2513270724	Padmount Transformer	University City
49	D103413	Switch	University City
50	U108924	Vault	La Jolla
51	D135389	Switch	San Diego
52	D2024869680	Padmount Transformer	Point Loma
53	D2021369670	Padmount Transformer	Point Loma
54	D2025469642	Padmount Transformer	Point Loma
55	D203056902	Padmount Transformer	Point Loma
56	D132692	Switch	Shelter Island

III. Field Inspection Violations List

My staff observed the following violations during the field inspection portion of the audit:

GO 95, Rule 54.8-C4, Clearances between Supply Service Drops and Other Conductors, states in part:

The radial clearance between supply service drop conductors and communication service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.

An SDG&E service drop on pole number P1997069407 had a radial clearance from a communications cable of less than 12 inches within 15 feet from the attachment point at 427 Silver Gate, Point Loma.

GO 95, Rule 54.7, Climbing and Working Space, states in part:

Climbing space shall be maintained from the ground level.

A communication service drop on pole number P932095 was located in the climbing space.

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.

GO 95, Rule 56.2, Use, states in part:

[Guys] shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.

The guy wires on the following SDG&E poles were detached from the guy anchor:

- P734430J
- P734430J

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 steps on the following SDG&E poles were damaged:

- P932100 Bent pole step
- P932098 Inverted pole step
- P931485 Inverted pole step

GO 95, Rule 38, Table 2, Case 19, Column C, requires the radial clearance of "guys and span wires passing conductors supported on the same poles" from "communication conductors" to be 3 inches.

The down guy wire on SDG&E pole number P735176J was contacting a communications cable.

GO 128, 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.

GO 128, 34.3.A, Strength, states in part:

The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons

The following SDG&E padmounted structures were damaged:

- D2021369670 the enclosure was corroded and damaged to the extent that the facility was unsafe to open to conduct an internal inspection.
- D132692 the enclosure was corroded near the bottom frame of the entry doors.