

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 28, 2020

EA2020-862

Lise Jordan, Sr. Director
Regulatory Compliance and Quality Assurance
Pacific Gas and Electric Company (PG&E)
77 Beale Street
San Francisco, CA 94105

SUBJECT: Record Review Findings- Audit of PG&E's Stockton Division

Dear Ms. Jordan:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez, Rickey Tse, Ogeonye Enyinwa, and Samuel Mandell of ESRB staff conducted the records review part of PG&E Stockton Division's audit and ESRB plans to conduct the field portion of the audit from October 5, 2020 through October 9, 2020.

ESRB's review of PG&E Stockton Division's records identified multiple violations of one or more General Orders (GOs). An itemized copy of the audit findings violations identified by staff is enclosed along with this letter. Please provide an electronic copy of all corrective actions and preventive measures performed by PG&E to remediate and prevent the recurrence of such violations by August 31, 2020.

If you have any questions concerning this audit, please contact Brandon Vazquez at (415) 703-1076 or brandon.vazquez@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: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
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Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC

PG&E STOCKTON DIVISION AUDIT RECORD REVIEW FINDINGS

I. Records Review

During the audit, ESRB staff reviewed the following records:

- Completed work orders with notifications from the past 12 consecutive calendar months, cancelled work orders with notifications from the past 12 consecutive calendar months, and completed late work orders from the last 60 consecutive calendar months.
- Patrol and detailed inspection records from the past 72 consecutive calendar months.
- Feeder reliability metrics and sustained outages in the Division from the last 60 calendar months.
- Master Map displaying approximate locations of the plat maps administered by the Division.
- New Construction (both overhead and underground) projects in the last 12 months not subject to a patrol or detailed inspection.
- Pole loading calculations from the last 12 consecutive calendar months including completion dates.
- Third-party notifications sent in the last 60 consecutive calendar months and received from the last 60 consecutive calendar months.
- List of inspectors and patrolmen active in the Division from 2015 to year to date (YTD).
- Electronic training records for inspectors from 2015 to YTD.
- Completed equipment test records, deferred equipment test records, and temporarily delayed equipment tests during the last three years.

II. Records Violations

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

1. GO 95, Rule 18-B, Maintenance Programs 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.”

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 Stockton Division for the past 60 months (from March 1, 2015 to February 29, 2020). 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).**

Priority H work orders are defined in the following excerpt from PG&E’s 2019 Corrective Tag Execution Approach¹:

“PG&E is forecasting that a significant number of moderate and low priority tags (Priority E and F tags, respectively) will not be completed in accordance with the timelines established in PG&E’s programs to meet General Order requirements.

To address identified Priority E tags efficiently, while also mitigating the most risk system-

¹ PG&E’s 2019 Corrective Tag Execution Approach, Utility Bulletin: TD-8999B-001, Published: November 23, 2019.

wide, PG&E conducted a holistic desktop review of these identified tags for Distribution and Transmission systems.

Together, these identified tags are designated as specific priority (Priority H) – to distinguish from tags requiring individual execution.”

ESRB staff reviewed late work orders and determined that PG&E did not address a total of 12,361 work orders by their assigned due date. Of these 12,361 work orders, 12,256 were classified as “late non-exempt” and 105 were classified as “late-exempt”.

Per GO 95, Rule 18B(1)(b), “Correction times may be extended under reasonable circumstances, such as: third party refusal, customer issue, no access, permits required, system emergencies (e.g. fires, severe weather conditions)”. PG&E classifies work orders under these circumstances as “late-exempt” as they are exempted from completion by their assigned due date.

Table 1 below breaks down the 12,361 late work orders by the given priority, including the total number of late work orders, as well as non-exempt late and cancelled late work orders, which are included in the total.

Table 1: Late Work Orders

Priority Codes	Total Late Work Orders	Non-Exempt Late Work Orders	Cancelled Late Work Orders
B	646	637	9
E	7,843	7,764	79
F	1,248	1,233	15
H	2,624	2,622	2
Total	12,361	12,256	105

Of the 12,256 non-exempt late work orders, PG&E completed one work order nearly three years past its assigned due date. Table 2 below identifies the most overdue non-exempt late work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Order (WO#s)	Number of Days Past Assigned Due Date
B	117508546	218
E	110478226	1,076
F	110647996	410
H	108554329	412

PG&E identified work order #117508546 on June 7, 2019 to trim vegetation with an expected completion date of June 30, 2019. PG&E did not complete the work until February 3, 2020.

PG&E identified work order #110478226 on June 29, 2015 to replace a decayed/rotten pole with an expected completion date of June 28, 2016. PG&E did not complete the work until June 9, 2019.

PG&E identified work order #110647996 on October 31, 2013 to remove idle underground facilities with an expected completion date of October 31, 2016. PG&E did not complete the work until December 15, 2017.

PG&E identified work order #108554329 on June 12, 2014 to trim vegetation contact at/above the anchor guy insulator with an expected completion date of June 12, 2019. PG&E has yet to complete the work order.

ESRB staff also identified an additional 945 unreported late work orders in the requested records for the completed and cancelled work orders from the past 12 consecutive calendar months that PG&E did not address by the required due date. According to PG&E, the required due dates of these 945 unreported late work orders were extended as part of PG&E's past due exemption process, consistent with GO 95, Rule 18B(1)(b), and are not considered late per its procedures. Per PG&E's Past Due Exemption Process for EC Maintenance Procedure, the required due dates of work orders (except Priority A) may be extended under reasonable circumstances, such as third-party refusals, customer issues, no access, unavoidable internal delays, permit delays, and major emergencies.²

Of these 945 unreported late work orders, 516 were classified as exempt and 429 were classified as non-exempt. However, PG&E did not provide a justification for 75 of the 516 exempt work orders; therefore, PG&E did not correctly follow its bulletin TD-2999B-040. Table 3 below breaks down by priority the 75 exempt unreported late work orders which were not given a justification. Additionally, the 429 non-exempt unreported late work orders are broken down in Table 4 by priority.

Table 3: 75 unreported late exempt work orders with no justification by priority.

Priority Code	Number of Work Orders
B	4
E	71
Total	75

Table 4: 429 unreported late non-exempt work orders by priority

Priority Code	Number of Work Orders
B	3
E	410
F	16
Total	429

² PG&E Past Due Exemption Process for EC Maintenance Program, Effective: January 1, 2017. PG&E Past Due Exemption Process for EC Maintenance Program, Utility Bulletin: TD-2999B-040, Published: January 5, 2018.

Table 5 below identifies the most overdue unreported late non-exempt work orders for each priority.

Table 5: Most overdue unreported late non-exempt work orders.

Priority Code	Most Overdue Work Order (WO#s)	Number of Days Past Assigned Due Date
B	117644143	118
E	116971431	144
F	108883821	187

PG&E identified work order #117644143 on July 24, 2019 to replace a broken/damaged pole with an expected completion date of October 24, 2019. PG&E did not complete the work until February 12, 2020.

PG&E identified work order #116971431 on April 6, 2019 to adjust a leaning pole with an expected completion date of October 3, 2019. PG&E cancelled the work order on February 24, 2020.

PG&E identified work order #108883821 on August 21, 2014 to replace a missing high voltage sign with an expected completion date of August 21, 2019. PG&E cancelled the work order on February 24, 2020.

2. 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.”

ESRB noted that PG&E completed overhead inspections for the following maps past their assigned due date:

1. Map KK31 – Inspection was due on July 13, 2017. PG&E completed the inspection on August 18, 2017.
2. Map Q10 – Patrol was due on October 28, 2019. PG&E completed the patrol on December 23, 2019.

3. GO 128, Rule 17.2, Inspection states in part:

“Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in 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.”

ESRB noted that PG&E completed underground inspections for the following maps past their assigned due date:

1. Map Y1211 – Inspection was due on June 30, 2014. PG&E completed the inspection on July 14, 2014.
2. Map S1907 – Patrol was due on May 30, 2015. PG&E completed the patrol on March 15, 2016.