

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 5, 2020

EA2020-864

Ms. Heide Caswell, P.E.
Director-T&D Asset Performance/Wildfire Mitigation
PacifiCorp
825 NE Multnomah St Suite 1700
Portland, OR 97232

SUBJECT: Audit of PacifiCorp's Yreka Distribution Division

Dear Ms. Caswell:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Andie Biggs, Ivan Garcia, Nathan Sarina, and Matthew Yunge of ESRB conducted an electric distribution audit of PacifiCorp's Yreka Distribution Division. During the field portion of the audit performed from June 27, 2020 through June 31, 2020, ESRB staff conducted field inspections of PacifiCorp's overhead and underground facilities and equipment and reviewed pertinent documents and records.

As a result of the record review and field inspection of 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 no later than November 2, 2020, by electronic copy of all corrective actions and preventive measures taken by PacifiCorp to correct the identified violations and prevent the recurrence of such violations. The response should indicate the date of each remedial action and preventive measure completed by November 2, 2020. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Sections II & IV of the enclosed Audit Findings.

If you have any questions concerning this audit, please contact Andie Biggs at (415) 703-3305 or andie.biggs@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

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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Andie Biggs, Utilities Engineer, ESRB, SED, CPUC
Ivan Garcia, Utilities Engineer, ESRB, SED, CPUC
Matthew Yunge, Utilities Engineer, ESRB, SED, CPUC

CPUC AUDIT FINDINGS OF PACIFICORP YREKA DISTRIBUTION DIVISION

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 late completed 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. General Order (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

ESRB staff noted that PacifiCorp completed three underground inspections past their required due date for the following maps:

Table 1: Past Due Underground Inspections

Map	Required Due Date	Completion
06242009.0067900-A	9/30/2018	5/22/2019
06242009.0068101-A	9/30/2018	6/10/2019
06242005.0359080-C	8/31/2018	6/10/2019

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.”

PacifiCorp’s 2U.3-3.2 Pole Strength states in part:

“The company requires loading to be less than 80% of pole’s strength due to wood pole deterioration”

ESRB staff reviewed the pole loading calculations from the last 12 months and found that PacifiCorp failed to follow its Procedure 2U.3-3/2 by allowing other utilities to install additional equipment that loaded eight poles past the 80% capacity, as shown by the pole loading calculations in Table 2.

Table 2: Pole Loading Calculations

Pole #	Pole ID	Pole Capacity	From File
345200	Cal-Ore_61857_03_345200	99.6%	2020-01-28 JAA 562837475 Loading.pdf
227013		89.2%	2019-12-04 JAA 829813815 Capacity Summary.pdf
345301	Cal-Ore_61857_01_345301	89.1%	2020-01-28 JAA 562837475 Loading.pdf
227012		84.8%	2019-12-04 JAA 829813815 Capacity Summary.pdf

133501	Cal-Ore_71903_08_133501	84.6%	2019-10-14 JAA 037911030 Loading.pdf
227004		81.4%	2019-12-04 JAA 829813815 Capacity Summary.pdf
133500	Cal-Ore_71903_14_133500	80.6%	2019-10-14 JAA 037911030 Loading.pdf
035806	Cal-Ore_61857_11_035806	80.1%	2020-01-28 JAA 562837475 Loading.pdf

3. **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.”

3.1) ESRB staff found a total of 51 work orders that were completed after the required correction date, or are pending past the required completion date, as seen in Table 3. The cumulative total days overdue for these work orders is 4,001 days, based on the date that ESRB staff received PacifiCorp’s response. The majority of overdue days are for open Priority B work orders. PacifiCorp mentioned that eight of its open work orders involve 3rd

party-owned poles that PacifiCorp does not have the responsibility to correct. The work orders involving 3rd-party-owned poles account for 2,355 overdue days, which is the majority of the overdue days.

Table 3: Overdue Work Orders

Status	Priority A Tags		Priority B Tags	
	# of Late Work Orders	Sum of Overdue Days	# of Late Work Orders	Sum of Overdue Days
Corrected	36	883	5	634
Pending (Open)	1	18	9	2466
TOTAL	37	901	14	3100

GO 95, Rule 18.B(1) Notification of Safety Hazards states:

- “(a) The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:*
- (i) Level 1 -- An immediate risk of high potential impact to safety or reliability:

 - Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
 - (ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:

 - Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*
 - (iii) Level 3 -- Any risk of low potential impact to safety or reliability: I-11 May 2018 Rule 18-B2 • Take corrective action within 60 months subject to the exception specified below.”*

3.2) PacifiCorp notes in Procedure 192-R5 that *“PacifiCorp uses the terms Priority A, B & C for the GO 95 terms Level 1, 2, & 3 respectively.”* However, ESRB staff notes that in the records provided by PacifiCorp, most of the Priority B work orders have “required correction dates” that are over the 36 month time frame permitted by GO 95, as seen in Table 4.¹ This applies to 1643 of 1692 work orders with “Inspection Dates” after June 30, 2019. Table 4 below shows some examples of Priority B work orders with 60 months allowed required corrective action date from the discovery date which is violation of GO 95, Rule 18, Level 2 requirement as per PacifiCorp’s Procedure 192-R5.

¹ This only applies to work orders with inspection dates after June 30, 2019. GO 95 was revised in May 2018 to reduce the correction time for Level 2 risks from 59 months to 36 months. The implementation date for that revision was June 30, 2019.

Table 4: Examples of Priority B Work Orders

FACILITY POINT NAME (Unique location)	INSPECTION_DATE	PRIORITY (As per procedure 069 to align with GO95)	REQUIRED CORRECTION DATE (Date the corrective maintenance was/is due)
`06243006.0090100	3/23/2020	B	2/28/2025
`06243006.0090201	3/23/2020	B	2/28/2025
`06243006.0092001	3/23/2020	B	2/28/2025
`06243006.0092200	3/23/2020	B	2/28/2025
`06243006.0092201	3/23/2020	B	2/28/2025
`06243006.0094100	3/23/2020	B	2/28/2025
`06243006.0094203	3/23/2020	B	2/28/2025
`06243006.0094204	3/23/2020	B	2/28/2025
`06243006.0096002	3/23/2020	B	2/28/2025
`06243006.0097600	3/23/2020	B	2/28/2025
`06243006.0097601	3/23/2020	B	2/28/2025
`06243006.0100800	3/23/2020	B	2/28/2025
`06243006.0163801	3/23/2020	B	2/28/2025
`06243006.0167900	3/23/2020	B	2/28/2025
`06243006.0094140	3/23/2020	B	2/28/2025
`06243006.0097940	3/23/2020	B	2/28/2025
`06243006.0105001	3/19/2020	B	2/28/2025
`06243006.0105001	3/19/2020	B	2/28/2025
`06243006.0150401	3/19/2020	B	2/28/2025
`06243006.0152401	3/19/2020	B	2/28/2025
`06243006.0152401	3/19/2020	B	2/28/2025
`06243006.0153400	3/19/2020	B	2/28/2025
`06243006.0154401	3/19/2020	B	2/28/2025
`06243006.0154500	3/19/2020	B	2/28/2025
`06243006.0154500	3/19/2020	B	2/28/2025

III. Field Inspection

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

Location	Equipment Number	Type of Structure	Approximate Location	City
1	277812	Pole	700 S Main	Yreka
2	357500	Pole	1615 Sandpiper Ct	Yreka
3	357401	Pole	1711 Sandpiper Ct	Yreka
4	357541	Pole	1610 Sandpiper Ct	Yreka
5	357440	Pole	1711 Sandpiper Ct	Yreka
6	037301	Pole	2939 Fairlane Rd	Yreka
7	037302	Pole	2939 Fairlane Rd	Yreka
8	037304	Pole	2933 Fairlane Rd	Yreka
9	035001	Pole	734 Dewitt Park Rd	Yreka
10	035003	Pole	734 Dewitt Park Rd	Yreka
11	035005	Pole	722 Dewitt Park Rd	Yreka
12	133402	Pole	Across from 6108 Memory Ln	Yreka
13	133300	Pole	6124 Memory Ln	Yreka
14	133301	Pole	6108 Memory Ln	Yreka
15	138001	Pole	6531 Melinda Way	Yreka
16	139100	Pole	6531 Melinda Way	Yreka
17	139101	Pole	6486 Melinda Way	Yreka
18	139103	Pole	6435 Melinda Way	Yreka
19	307700	Pole	8535 Guys Gulch Rd	Yreka
20	308740	Pole	8535 Guys Gulch Rd	Yreka
21	308741	Pole	8522 Guys Gulch Rd	Yreka
22	276903	Pole	6509 Siskiyou Blvd	Grenada
23	226004	Pole	6441 Siskiyou Blvd	Grenada
24	276602	Pole	6817 Siskiyou Blvd	Grenada

25	126605	Pole	8688 Perimeter Rd	Montague
26	127601	Pole	8688 Perimeter Rd	Montague
27	127604	Pole	Lower Hangar Rd	Montague
28	126604	Pole	8819 Perimeter Rd	Montague
29	301701	Pole	800 S Phillipe Ln	Montague
30	301702	Pole	900 S Phillipe Ln	Montague
31	345200	Pole	2007 Fairlane Rd	Yreka
32	345004	Pole	2125 Fairlane Rd	Yreka
33	175300	Pole	2221 N State Hwy 3	Etna
34	175301	Pole	2221 N State Hwy 3	Etna
35	813929	Pole	Across from 735 Valley Pines Dr	Etna
36	813937	Pole	612 Valley Pines Dr	Etna
37	812079	Pole	Across from 616 N Kidder Creek Rd	Etna
38	292401	Pole	616 N Kidder Creek Rd	Etna
39	034401	Pole	804 Pumphouse Rd	Grenada
40	034501	Pole	Across from 804 Pumphouse Rd	Grenada
41	022501	Pole	Intersection of Pumphouse Rd and Slough Rd	Grenada
42	118501	Pole	543 S Weed Blvd	Weed
43	118502	Pole	501 S Weed Blvd	Weed
44	119500	Pole	559 S Weed Blvd	Weed
45	153103	Pole	8832 N Old Stage Rd	Weed
46	154220	Pole	8832 N Old Stage Rd	Weed
47	235680	Pole	7831 Sugar Pine Rd	Weed
48	361880	Padmount Transformer	710 Quail Meadows Dr	Mt Shasta
49	361880-A	Secondary Box	733 Quail Meadows Dr	Mt Shasta
50	360780-C	Secondary Box	933 Quail Meadows Dr	Mt Shasta
51	360780	Padmount Transformer	922 Quail Meadows Dr	Mt Shasta

52	063102	Pole	2601 N Old Stage Rd	Mt Shasta
53	063103	Pole	2601 N Old Stage Rd	Mt Shasta
54	063104	Pole	2601 N Old Stage Rd	Mt Shasta
55	063205	Pole	2601 N Old Stage Rd	Mt Shasta
56	063206	Pole	2601 N Old Stage Rd	Mt Shasta
57	051002	Pole	2424 Pine Grove Dr	Mt Shasta
58	051001	Pole	2424 Pine Grove Dr	Mt Shasta
59	051003	Pole	2424 Pine Grove Dr	Mt Shasta
60	090180	Padmount Transformer	173 Margie Ct	Mt Shasta
61	090080	Padmount Transformer	625 Marjorie St	Mt Shasta
62	154400	Pole	1104 McCloud Ave	Mt Shasta
63	154404	Pole	Intersection of McCloud Ave and Jefferson Dr	Mt Shasta
64	154482	Subsurface Mount	1002 McCloud Ave	Mt Shasta
65	154481	Padmount Transformer	1004 McCloud Ave	Mt Shasta
66	320900	Pole	Lake Siskiyou Resort & Camp	Mt Shasta
67	319901	Pole	Lake Siskiyou Resort & Camp	Mt Shasta
68	319900	Pole	Lake Siskiyou Resort & Camp	Mt Shasta
69	063700	Pole	548 Shasta Ave	McCloud
70	063607	Pole	544 Shasta Ave	McCloud
71	063606	Pole	540 Shasta Ave	McCloud
72	063605	Pole	526 Shasta Ave	McCloud
73	063603	Pole	522 Shasta Ave	McCloud
74	063602	Pole	512 Shasta Ave	McCloud
75	063501	Pole	504 Shasta Ave	McCloud
76	063501	Pole	500 Shasta Ave	McCloud
77	248980	Padmount Transformer	651 Shasta Pines Dr	McCloud
78	248981	Padmount Sectionalizer	651 Shasta Pines Dr	McCloud

79	247980	Padmount Transformer	639 Shasta Pines Dr	McCloud
80	183480	Padmount Transformer	1701 Spring Meadows	McCloud
81	133501	Pole	1488 Mary's Dr	Weed
82	133500	Pole	1488 Mary's Dr	Weed
83	134501	Pole	1458 Mary's Dr	Weed
84	134500	Pole	1458 Mary's Dr	Weed
85	135502	Pole	1448 Mary's Dr	Weed
86	135501	Pole	1448 Mary's Dr	Weed
87	135500	Pole	1438 Mary's Dr	Weed
88	227013	Pole	508 S Main St	Yreka
89	227106	Pole	314 S Broadway	Yreka

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. 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.”

There is a crack along the crossarm at the intersection of Pumphouse Rd and Slough Rd in Grenada (Location 41).

2. GO 95, Rule 54.6-B, Vertical and Lateral Conductors, 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).”

2.1) The ground molding on the pole located at 6817 Siskiyou Blvd in Grenada (Location 24) is exposed about two feet up the pole and again about seven to ten feet up the pole.

2.2) The ground molding on the pole located at 2221 N State Hwy 3 in Etna (Location 34) is exposed about eight to ten feet up the pole.

2.3) The ground molding on the pole located at 8832 N Old Stage Rd in Weed (Location 46) is missing a section about nine feet up the pole.

2.4) The ground molding on the pole located within Lake Siskiyou Resort & Camp in Mt Shasta (Location 68) has a gap exposing the ground at the bottom of the pole.

2.5) The ground molding on the pole located at 544 Shasta Ave in McCloud (Location 70) has exposed grounding about six feet up the pole.

2.6) The ground molding on the pole located at 1488 Mary's Dr in Weed (Location 81) has a gap between the molding and the pole, exposing the ground wire.

3. GO 95, Rule 51.6-A, High Voltage Marking 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.”

3.1) The pole located at 2933 Fairlane Rd in Yreka (Location 8) is missing High Voltage signs on both sides of the crossarm.

3.2) The pole located at 734 Dewitt Park Rd in Yreka (Location 10) is missing a High Voltage sign on one side of the crossarm.

3.3) The pole located at 6108 Memory Ln in Yreka (Location 14) is missing High Voltage signs on both sides of the crossarm.

3.4) The pole located at 6486 Melinda Way in Yreka (Location 17) is missing a High Voltage sign on one side of the crossarm.

3.5) The pole located at 6435 Melinda Way in Yreka (Location 18) is missing a High Voltage sign on one side of the crossarm.

3.6) The pole located at 8522 Guys Gulch Rd in Yreka (Location 21) is missing High Voltage signs on both sides of the crossarm.

3.7) The pole located at 8688 Perimeter Rd in Montague (Location 25) is missing High Voltage signs on both sides of the crossarm.

3.8) The pole located at 8688 Perimeter Rd in Montague (Location 26) is missing a High Voltage sign on one side of the crossarm.

3.9) The pole located at 8819 Perimeter Rd in Montague (Location 28) is missing High Voltage signs on both sides of the crossarm.

3.10) The pole located at 900 S Phillipe Ln in Montague (Location 30) is missing High Voltage signs on both sides of the crossarm.

- 3.11) The pole located at 2007 Fairlane Rd in Yreka (Location 31) is missing a High Voltage sign on one side of the crossarm.
- 3.12) The pole located at 2125 Fairlane Rd in Yreka (Location 32) has a damaged High Voltage sign on one side of the crossarm.
- 3.13) The pole located at 501 S Weed Blvd in Weed (Location 43) is missing a High Voltage sign on one side of the crossarm.
- 3.14) The pole located at 559 S Weed Blvd in Weed (Location 44) has a damaged High Voltage sign on one side of the crossarm.
- 3.15) The pole located at 8832 N Old Stage Rd in Mt Shasta (Location 45) is missing High Voltage signs on both sides of the crossarm.
- 3.16) The pole located at 2601 N Old Stage Rd in Mt Shasta (Location 56) is missing a High Voltage sign on one side of the crossarm.
- 3.17) The pole located at 2424 Pine Grove Rd in Mt Shasta (Location 58) is missing a High Voltage sign on one side of the crossarm.
- 3.18) The pole located at 2424 Pine Grove Rd in Mt Shasta (Location 59) is missing High Voltage signs on both sides of the crossarm.
- 3.19) The pole located at the intersection of McCloud Ave and Jefferson Dr in Mt Shasta (Location 63) is missing a High Voltage sign on one side of the crossarm.
- 3.20) The pole located at 512 Shasta Ave in McCloud (Location 74) is missing a High Voltage sign on one side of the top crossarm.
- 3.21) The pole located at 1488 Mary's Dr in Weed (Location 82) is missing High Voltage signs on both sides of the crossarm.
- 3.22) The pole located near 1458 Mary's Dr in Weed (Location 83) is missing High Voltage signs on both sides of the crossarm.
- 3.23) The pole located near 1458 Mary's Dr in Weed (Location 84) is missing High Voltage signs on both sides of the crossarm.
- 3.24) The pole located near 1448 Mary's Dr in Weed (Location 85) is missing High Voltage signs on both sides of the crossarm.
- 3.25) The pole located near 1448 Mary's Dr in Weed (Location 86) is missing High Voltage signs on both sides of the crossarm.
- 3.26) The pole located at 1438 Mary's Dr in Weed (Location 87) is missing High Voltage signs on both sides of the crossarm.

3.27) The pole located at 508 S Main St in Yreka (Location 88) is missing a High Voltage sign on one side of the crossarm.

4. GO 95 Rule 54.10-B, Conductor Arrangement and Clearances states in part:

“Bare neutral multiconductor cables may have clearances less than 15 inches from centerline and 3 inches from surface of pole, as specified in Table 1, Column D, Cases 8 and 9, respectively, but shall have a clearance of not less than 2.5 inches from the surface of pole and shall be supported on an insulator.”

4.1) The drip loop off of the transformer is within three inches from the pole located at 2939 Fairlane Rd in Yreka (Location 6).

4.2) The service line is within three inches from the pole located at 6509 Siskiyou Blvd in Grenada (Location 22)

4.3) The jumpers are within three inches from the pole located at 2601 N Stage Rd in Mt Shasta (Location 53).

4.4) The drip loop off of the transformer is within three inches from the pole located within Lake Siskiyou Resort & Camp (Location 68).

5. GO 95 Rule 35 Vegetation Management states in part:

“Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).”

5.1) The service drop located at 2933 Fairlane Rd in Yreka (Location 8) shows signs of deflection due to contact with nearby vegetation.

5.2) The service line located at 734 Dewitt Park Rd in Yreka between poles 035001 and 035003 (Locations 9 and 10) shows signs of deflection due to contact with nearby vegetation.

5.3) The service line located at 6509 Siskiyou Blvd in Grenada (Location 22) shows signs of deflection due to contact with nearby vegetation.

5.4) The service line located at 2221 N State Hwy 3 in Etna (Location 33) shows signs of deflection due to contact with nearby vegetation.

6. GO 95 Rule 54.7-A(3) Allowable Climbing Space Obstructions states in part:

“Bolts and their washers. However, bolts bonded to or used for the attachment of deadend hardware of circuits above 750 volts in wood crossarm configuration that project into the climbing space shall be covered with a non-conducting material as specified in Rule 22.8-C. If such bolts are bonded, a positive electrical contact shall be made.”

6.1) There are two loose transformer bolt covers at 6531 Melinda Way in Yreka (Location 15).

6.2) The bolt covers for the transformer are missing on the pole located at 900 S Phillippe Ln in Montague (Location 29).

7. GO 95 Rule 56.6-A, Guys in Proximity to Supply Conductors of Less than 35,500 Volts states:

“All portions of guys within both a vertical distance of 8 feet from the level of supply conductors of less than 35,500 volts and a radial distance of 6 feet from the surface of wood poles or structures shall not be grounded, through anchors or otherwise. Where necessary to avoid the grounding of such portions, guys shall be sectionalized by means of insulators installed at locations as specified in Rule 56.7.”

7.1) The insulator on the guy at the pole located at 8819 Perimeter Rd in Montague (Location 28) is in contact with nearby vegetation.

7.2) Vegetation is in contact with the guy above the insulator at the pole located at 2221 N State Hwy 3 in Etna (Location 33).

8. GO 95 Rule 54.8-B(1) Clearances Above Ground, Buildings, Etc. states in part:

“Service drop conductors shall have a vertical clearance of not less than 18 feet above public thoroughfares, except that this clearance may grade from 18 feet at a position not more than 12 feet horizontally from the curb line to a clearance of not less than 16 feet at the curb line, provided the clearance at the centerline of any public thoroughfare shall in no case be less than 18 feet. Where there are no curbs the foregoing provisions shall apply using the outer limits of possible vehicular movement in lieu of a curb line.”

The service drop located at 844 Pumphouse Rd in Grenada (Location 39) only had a clearance of 11’11” at the curb line and 13’5” in the middle of the road.

9. 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.”

9.1) The padmount transformer located at 171 Margie Ct in Mt Shasta (Location 60) is filled with dirt and needs to be cleaned.

9.2) The padmount transformer located at 1004 McCloud Ave in Mt Shasta (Location 65) is filled with dirt and weeds and needs to be cleaned.

10. GO 128 Rule 17.2 Inspections 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.”

The surface padmount located at 1002 McCloud Ave in Mt Shasta (Location 64) is paved over, making it impossible to inspect.

11. GO 128 Rule 35.3 Warning Signs states:

“Warning signs indicating high voltage shall be installed on an interior surface, or barrier if present, inside the entrance of vaults, manholes, handholes, pad mounted transformer compartments, and other above ground enclosures containing exposed live parts above 750 volts. Such warning signs shall also be installed on an exterior surface of all such pad mounted transformer compartments and other above ground enclosures. Such signs shall be clearly visible to a person in position to open any such access door, other opening, or barrier.”

ESRB staff identified missing high voltage signs during the field inspection of the following underground facilities. PacifiCorp completed corrective actions by installing the missing warning signs during the inspections.

11.1) The padmount transformer located at 651 Shasta Pines Dr in McCloud (Location 77) was missing a high voltage warning sign.

11.2) The padmount sectionalizer located at 651 Shasta Pines Dr in McCloud (Location 78) was missing a high voltage warning sign.

11.3) The padmount transformer located at 639 Shasta Pines Dr in McCloud (Location 79) was missing a high voltage warning sign.

V. Observations

ESRB staff observed the following during the field inspection:

1. The following locations had potential third-party safety concerns:
 - a. There are abandoned communications lines located at 1610 Sandpiper Ct in Yreka (Location 4).
 - b. The communications lines located at 722 Dewitt Park Rd in Yreka (Location 11) need to be transferred from the buddy pole.

- c. The communications lines located at 6441 Siskiyou Blvd in Grenada (Location 23) need to be transferred from the buddy pole.
- d. The communications lines located at 8688 Perimeter Rd in Montague (Location 25) are in contact with one another.
- e. The communications lines at 2125 Fairlane Rd in Yreka (Location 32) have a clearance issue at the pole.
- f. There is an abandoned communication line located at 804 Pumphouse Rd in Grenada (Location 40).
- g. The communications lines located at 804 Pumphouse Rd in Grenada (Location 40) need to be transferred from the buddy pole.
- h. The communications lines at 543 S Weed Blvd in Weed (Location 42) have a midspan clearance issue.
- i. The communications lines at 2601 N Old Stage Rd in Mt Shasta (Location 54) have a clearance issue.
- j. The communications lines at 2601 N Old Stage Rd in Mt Shasta (Location 55) need to be transferred from the buddy pole.
- k. The communications line at 2424 Pine Grove Rd in Mt Shasta (Location 58) is in contact with the guy wire.
- l. The communications lines at 1104 McCloud Ave in Mt Shasta (Location 62) need to be transferred from the buddy pole.