PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 14, 2020 EA2020-874

Mr. Andy Lethbridge
Electric Superintendent
Trinity Public Utilities District
P.O. Box 1216
Weaverville, CA 96093

SUBJECT: Audit of Trinity Public Utilities District

Dear Mr. Lethbridge:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez and Samuel Mandell of ESRB conducted an electric distribution audit of Trinity Public Utilities District (TPUD) from August 03, 2020 through August 07, 2020. During the audit, ESRB staff conducted field inspections of TPUD's facilities and equipment and reviewed pertinent documents and records.

As a result 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 October 12, 2020 by electronic or hard copy of all corrective actions and preventive measures taken by TPUD 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 October 12, 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 and responses to Section V.

If you have any questions concerning this audit, please contact Samuel Mandell at (916) 217-8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

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
Rickey Tse, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Brandon Vazquez, Utilities Engineer, ESRB, SED, CPUC
Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC

TRINITY PUBLIC UTILITIES DISTRICT (TPUD)
ELECTRIC DISTRIBUTION AUDIT FINDINGS
AUGUST 3-7, 2020

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC) 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 Trinity Public Utilities District (TPUD) from the last 60 calendar months.
- Master Map displaying the service area administered by the TPUD.
- 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 TPUD 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) 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 completed and cancelled/abandoned work orders from the last 12 months (July 2019- July 2020); however, TPUD could not produce any late work orders from the last 60 months as requested.

TPUD's *Preventative Maintenance Plan* defines the priority codes and associated time frames for the response/repair action as follows:

- **Priority # 1 – Immediate Hazard**
  Conditions that may affect the integrity of the system or present a hazard to workers or the general public. All Priority #1 Tags will be responded to **immediately,** and appropriate action taken until the hazardous condition is remedied.

- **Priority # 2 – Non-emergency repair condition:**
  Condition that require maintenance that can be scheduled to maintain the integrity of the system. Priority # 2 tags will be prioritized by urgency and will be scheduled to have appropriate repairs made to correct the condition within six months; where practicable.

- **Priority # 3 & #4– Non-emergency repair condition:**
  Conditions that do not present a situation that could jeopardize the safety of the system, line workers and the general public. Priority #3 and #4 tags will be submitted by the inspector with the time interval recommended. In the judgment of the inspector, work will be scheduled to be completed either in 1 year for Priority # 3 tags or 3 years for Priority # 4 tags.

ESRB determined the following deficiencies in TPUD's maintenance records:

1.1) TPUD failed to assign priorities and required completion dates to the provided work orders.

1.2) TPUD was unable to provide work orders completed prior to July 2019 despite TPUD's *Preventative Maintenance Plan* stating, "completed maintenance tags will be kept in a file for five years."

1.3) TPUD was unable to provide safety and reliability metrics as well as sustained outage data. TPUD is unable to confirm it is furnishing safe, proper, and adequate service without the data.

2. **GO 95, Rule 31.2, Inspection of Lines** states in part:

> *"Lines shall be inspected frequently and thoroughly for the purpose of insuring 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 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 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."*

GO 165, Section III-C, Record Keeping states in part:

> *"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)."*

ESRB reviewed the inspection records provided by TPUD and found the following:

2.1) TPUD's inspection records do not show a complete overhead inspection cycle. TPUD provided system statistics that show 12,330 poles. In the Electronic Inspection List provided, TPUD logged inspections on approximately 9078 overhead poles in six years. TPUD's *Preventative Maintenance Plan* says a full overhead inspection cycle takes place over 5 years, so ESRB would expect to see at a minimum all 12,330 poles inspected. Additionally, it is reasonable to expect another 20% of the poles inspected for the sixth year, bringing the total number of expected pole inspections to 14,769.

2.2) TPUD failed to provide any records showing that the underground inspections are being performed every 3 years.

2.3) TPUD failed to provide any records showing that the yearly patrols are being performed.

2.4) TPUD also failed to provide training procedures and qualification records of its personnel who perform inspections, patrols, and maintenance.

III. Field Inspection

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

Location	Equipment Number	Equipment Type	Approximate Location	City
1	012312	Pole	30615 Fawn Ln	Junction City
2		Midspan	100' W of Loc 1	Junction City
3	012311	Pole	1 pole W of Loc 1	Junction City
4	012231	Pole	Canyon Creek Rd	Junction City
5	012232	Pole	1 span down of Loc 4	Junction City
6	012233	Pole	7401 Canyon Creek Rd	Junction City
7	011941	Pole	80 River Acres Rd	Junction City
8	011940	Pole	Adjacent to 80 River Acres Rd	Junction City
9	011942	Pole	31 River Acres Rd	Junction City
10	011943	Pole	Lake Rd and River Acres Rd	Junction City
11	009620	Pole	795 Main St	Weaverville
12	009621	Pole	30 Brann N St	Weaverville
13	009622	Pole	Brannon St and Center St	Weaverville
14	009623	Pole	1 span from Loc 13	Weaverville
15	009624	Pole	281 Center St	Weaverville
16	012932	Pole	70 Roundy Rd	Weaverville
17	000933	Junction Box	70 Roundy Rd	Weaverville
18	012931	Pole	1 span from Loc 17	Weaverville
19	003248	Junction Box	Behind Holiday Market	Weaverville
20	000780	Padmount Transformer	Behind Holiday Market	Weaverville

21	000932	Padmount Transformer	Behind Holiday Market	Weaverville
22	004481	Junction Box	Behind Holiday Market	Weaverville
23	004482	Padmount Transformer	Behind Holiday Market	Weaverville
24	012768	Padmount Transformer	In front of CVS	Weaverville
25	003259	Junction Box	In front of CVS	Weaverville
26	013466	Pole	Between Main St and Loomis Ln	Weaverville
27	013467	Pole	Between Main St and Loomis Ln	Weaverville
28	010850	Pole	W. Weaver Creek and Mill St	Weaverville
29	011180	Pole	Firehouse Rd	Big Bar
30	015754	Pole	1 span S of Loc 29	Big Bar
31	011181	Pole	1 span E of Loc 29	Big Bar
32	011183	Pole	2 spans E of Loc 29	Big Bar
33	011184	Pole	3 spans E of Loc 29	Big Bar
34	006923	Pole	702 Price Creek Rd	Big Bar
35	010524	Pole	702 Price Creek Rd	Big Bar
36	010602	Pole	Hyampom and Corral Bottom	Hyampom
37	015893	Pole	1 span W of Hyampom and Corral Bottom	Hyampom
38	010603	Pole	2 spans W of Hyampom and Corral Bottom	Hyampom
39	010604	Pole	3 spans W of Hyampom and Corral Bottom	Hyampom
40	011333	Pole	1 span S of Hyampom and Corral Bottom	Hyampom
41	011334	Pole	1 span E of Hyampom and Corral Bottom	Hyampom

42	011335	Pole	2 spans E of Hyampom and Corral Bottom	Hyampom
43	010723	Pole	320 Corral Bottom Rd	Hyampom
44	010724	Pole	341 Corral Bottom Rd	Hyampom
45	010725	Pole	1 span N of Loc 44	Hyampom
46	010726	Pole	2 spans N of Loc 44	Hyampom
47	016045	Secondary Pole	340 Lower S Fork Rd	Hyampom
48	011325	Pole	340 Lower S Fork Rd	Hyampom
49	011324	Pole	340 Lower S Fork Rd	Hyampom
50	011410	Pole	340 Lower S Fork Rd	Hyampom
51	009154	Pole	1391 Brady Rd.	Hayfork
52	009153	Pole	1 span S of Loc 51	Hayfork
53	009152	Pole	Brady Rd and Laurel Dr	Hayfork
54	009155	Pole	1 span W of Loc 54	Hayfork
55	009185	Pole	1851 Brady Rd	Hayfork
56	009184	Pole	1850 Brady Rd	Hayfork
57	009183	Pole	1 span S of Olivia Dr and Brady Rd	Hayfork
58	008275	Pole	7590 Hwy 3	Hayfork
59	008272	Pole	Hwy 3 and Manzanita Ave	Hayfork
60	008269	Pole	7610 Hwy 3	Hayfork
61	006389	Pole	391 Jordan Rd	Douglas City
62	006388	Pole	1 span E of Loc 61	Douglas City
63	006387	Pole	2 spans NE of Loc 61	Douglas City
64	006386	Pole	3 spans NE of Loc 61	Douglas City
65	007835	Pole	3497 Reading Creek	Douglas City

66	006391	Pole	Across street from Loc 65	Douglas City
67	007923	Pole	1141 Knowlton Ln	Douglas City
68	007924	Pole	1 span E of Loc 67	Douglas City
69	007922	Pole	1 span W of Loc 67	Douglas City
70	006175	Pole	2490 Goose Ranch Rd	Lewiston
71	006174	Pole	Across street of 2411 Goose Ranch Rd	Lewiston
72	006173	Pole	2 spans E of Loc 70	Lewiston
73	006172	Pole	2424 Goose Ranch Rd	Lewiston
74	005787	Pole	2774 Goose Ranch Rd	Lewiston
75	006183	Pole	Across street from Loc 74	Lewiston
76	009844	Pole	Trinity Dam near Padmount	Trinity Dam
77	015885	Pole	Trinity Dam near Padmount	Trinity Dam
78	014479	Pole	Trinity Dam near Padmount	Trinity Dam
79	009843	Pole	Trinity Dam near Padmount	Trinity Dam

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."*

1.1) Pole 11180 located at Firehouse Rd (Location 29) near the substation has a split and decaying pole top.

1.2) Pole 11183 located 2 spans east of Firehouse Rd (Location 32) has multiple woodpecker holes on the tree. There is a large woodpecker hole a couple feet below the cross arm.

1.3) Pole 11184 located 3 spans east of Firehouse Rd (Location 33) has multiple woodpecker holes on the tree. There is a large woodpecker hole on the pole top.

1.4) Pole 15893 located 1 span west of Hyampom Rd and Corral Bottom Rd (Location 37) has a split and decayed pole top.

1.5) Pole 11333 located 1 span south of Hyampom Rd and Corral Bottom Rd (Location 40) has a loose insulator bracket on the center phase.

1.6) Pole 11333 located 1 span south of Hyampom Rd and Corral Bottom Rd (Location 40) has a loose ground wire not attached to the middle of the pole.

1.7) Pole 11334 located 1 span east of Hyampom Rd and Corral Bottom Rd (Location 41) has a split and decayed pole top.

1.8) Pole 10724 located at 341 Corral Bottom Rd (Location 44) has a split and decayed pole top.

1.9) Pole 9183 located 1 span south of Olivia Dr and Brady Rd (Location 57) has multiple woodpecker holes on the pole top.

1.10) Pole 8272 located at Highway 3 and Manzanita Ave (Location 59) has its grounding wire coming off the pole below the communication layer.

1.11) Pole 7835 located at 3497 Reading Creek (Location 65) has a substantial amount of woodpecker holes on the pole. Trinity PUD identified the issue during an inspection on 08/07/2019 and assigned a 6-month priority to the pole. However, as of 08/05/2020, the work was not completed.

1.12) Pole 7922 located 1 span west of 1141 Knowlton Ln (Location 67) has a split and decayed pole top.

1.13) Pole 7922 located 1 span west of 1141 Knowlton Rd (Location 69) has a loose ground wire that has unattached from the pole.

1.14) Pole 6174 located 2 spans east of 2490 Goose Ranch Rd (Location 70) has a loose ground wire that is not attached to the pole near the base.

1.15) Pole 6173 located across from 2411 Goose Ranch Rd (Location 71) has a loose ground wire that is not attached to the pole near the base.

1.16) Pole 15885 located near the Trinity Dam (Location 77) has multiple large woodpecker holes near the top of the risers.

1.17) **Public Resources Code Chapter 3 Mountainous, Forest-, Brush- and Grass-Covered Lands 4292**

states in part:

> *"Any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or forest-covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or the agency which has primary responsibility for fire protection of such areas, maintain around and adjacent to any pole or tower which supports a switch, fuse, transformer, lightning arrester, line junction, or dead end or corner pole, a firebreak which consists of a clearing of not less than 10 feet in each direction from the outer circumference of such pole or tower."*

1.17.1) Pole 12312 located at 30615 Fawn Ln. in Junction City (Location 1) has non-exempt fuses with brush growing within 10' of the pole.

1.17.2) Pole 12233 located near 7401 Canyon Creek Rd (Location 6) has non-exempt fuses with brush and debris within 10' of the pole.

1.17.3) Pole 11941 at 80 River Acres Rd (Location 7) has non-exempt fuses with brush and a charred pole within 10' of the pole.

1.17.4) Pole 11942 located at 31 River Acres Rd (Location 9) has non-exempt fuses with brush and debris within 10' of the base of the pole.

1.17.5) Pole 9623 located 1 span from the intersection of Brannan St and Center St (Location 14) has non-exempt fuses with tall dead grass growing within 10' of the base of the pole.

1.17.6) Pole 9624 located at 281 Center St. (Location 15) has non-exempt fuses with dead grass and wood debris within 10' of the base of the pole.

1.17.7) Pole 12932 located at 70 Roundy Rd (Location 16) has non-exempt fuses with tall dead grass growing within 10’ of the pole.

1.17.8) Pole 10524 located at 702 Price Creek Rd (Location 35) has non-exempt fuses with vegetation within 10’ of the pole.

1.17.9) Pole 15893 located 1 span west of the intersection of Hyampom Rd and Corral Bottom Rd (Location 37) has non-exempt fuses with dead grasses and brush within 10’ of the pole.

1.17.10) Pole 10604 located 3 spans west of the intersection of Hyampom Rd and Corral Bottom Rd (Location 39) has non-exempt fuses with wood debris left within 10’ of the pole.

1.17.11) Pole 11333 located 1 span south of the intersection of Hyampom Rd and Corral Bottom Rd (Location 40) has non-exempt fuses with large amount of dead brush within 10’ of pole.

1.17.12) Pole 10726 located 2 spans north of 341 Corral Bottom Rd (Location 46) has non-exempt fuses with tall dead grass within 10’ of pole.

1.17.13) Pole 11325 located at 340 Lower S. Fork Rd (Location 48) has non-exempt fuses with vegetation growing within 10’ of the pole.

1.17.14) Pole 11410 located at 340 Lower S. Fork Rd (Location 50) has non-exempt fuses with vegetation within 10’ of the pole.

1.17.15) Pole 9155 located 1 span west of the intersection of Brady Rd and Laurel Dr (Location 53) has non-exempt fuses with brush growing within 10’ of the pole.

1.17.16) Pole 6389 located at 391 Jordan Rd (Location 61) has non-exempt fuses with brush and trees growing within 10’ of the pole.

1.17.17) Pole 6386 located 3 spans north east of 391 Jordan Rd (Location 64) has non-exempt fuses with brush growing within 10’ of the pole.

1.17.18) Pole 6391 located across the street from 3497 Reading Creek Rd (Location 66) has non-exempt fuses with brush growing within 10’ of the pole.

1.17.19) Pole 6174 located at 2411 Goose Ranch Rd (Location 71) has non-exempt fuses with brush and dead grass within 10’ of pole.

1.17.20) Pole 5787 located at 2774 Goose Ranch Rd (Location 74) has non-exempt fuses with dead grass and wood debris within 10’ of the pole.

2. **GO 95, Rule 34, Foreign Attachments** states in part:

> *"Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*
> *Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner's or owners' consent."*

2.1) Pole 11180 located at Firehouse Rd near the substation (Location 29) has a no trespassing sign attached to the pole.

2.2) Pole 11181 located 1 span east of Firehouse Rd (Location 31) has a no trespassing sign attached to the pole.

2.3) Pole 10726 located 2 spans north of 341 Corral Bottom Rd (Location 46) has a no trespassing sign attached to the pole.

3. **GO 95, Rule 35, Vegetation Management** states in part:

> *"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)."*

3.1) Pole 11941 located at 80 River Acres Rd (Location 7) has a service drop going through trees and being deflected. TPUD has an open work order address the issue.

3.2) Pole 10524 located at 702 Price Creek Rd (Location 35) has a service drop with multiple points of deflection and abrasion.

4. **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."

4.1) Pole 12232 located on Canyon Creek Rd (Location 5) is missing the high voltage sign on cross arm.

4.2) Pole 12233 located at 7401 Canyon Creek Rd (Location 6) is missing high voltage signs on the cross arm.

4.3) Pole 9623 located 1 span from the intersection of Brannan St and Center St (Location 14) is missing high voltage signs on the cross arm.

4.4) Pole 10602 located at the intersection of Hyampom Rd and Corral Bottom Rd (Location 36) is missing high voltage signs.

4.4) Pole 9843 located near the Trinity Dam (Location 79) is missing high voltage signs on the lower cross arm.

5. **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)."

5.1) Pole 13467 located between Main St and Loomis Ln (Location 27) is missing the bottom 8' of its ground cover.

5.2) Pole 10725 located 1 span north of 341 Corral Bottom Rd (Location 45) has a broken ground cover in the middle of the pole.

6. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 14E** states in part:

"The basic minimum allowable radial clearance of bare line supply conductors of 750 V to 22,500 V from vegetation in the Fire-Threat District is 48 inches"

6.1) The span between poles 12312 and 12311 located at 30615 Fawn Ln (Location 2) has vegetation within 4' of the primary conductors.

6.2) Pole 13467 located between Main St and Loomis Ln (Location 27) has vegetation growing within 4' of its primary conductors.

6.3) Pole 10524 located at 702 Price Creek Rd (Location 35) has vegetation growing within 4' of its primary conductors.

6.4) The span between poles 10602 and 11333 (Location 36) has vegetation growing within 4' of the primary conductors.

6.5) The span between poles 11334 and 11335 (Location 41) has vegetation growing within 4' of the primary conductors.

6.6) The span south of pole 9153 located one pole south of 1391 Brady Rd (Location 52) has multiple points of vegetation growing within 4' of the primary conductors.

6.7) Pole 9152 located at Brady Rd and Laurel Dr. (Location 53) has vegetation approaching the 4' minimum.

6.8) The span east of pole 6172 located near 2424 Goose Ranch Rd (Location 73) has vegetation growing within 4' of the primary conductors.

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

> *"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) Pole 11943 located at Lake Rd and River Acres Rd (Location 10) has vegetation contacting the anchor guy above the guy bob.

7.2) Pole 15893 located 1 span west of Hyampom Rd and Corral Bottom Rd (Location 37) has vegetation contacting the anchor guy above the guy bob.

7.3) Pole 11335 located 2 spans to the east of Hyampom Rd and Corral Bottom Rd (Location 42) has vegetation contacting the anchor guy above the guy bob.

7.4) Pole 10724 located at 341 Corral Bottom Rd (Location 44) has vegetation contacting the anchor guy above the guy bob.

7.5) pole 10726 located 2 spans to the north of 341 Corral Bottom Rd (Location 46) has vegetation contacting the anchor guy above the guy bob.

7.6) Pole 7835 located at 3497 Reading Creek (Location 65) has vegetation contacting the anchor guy above the guy bob.

7.7) Pole 6391 located across the road from 3497 Reading Creek (Location 66) has vegetation contacting the anchor guy above the guy bob.

8. **GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, 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."*

8.1) Pole 10850 located at W. Weaver Creek and Mill St (Location 28) has a slack primary anchor guy.

8.2) Pole 10602 located at Hyampom Rd and Corral Bottom Rd (Location 36) has a slack secondary anchor guy.

8.3) Pole 10723 located at 320 Corral Bottom Rd (Location 43) has a slack primary anchor guy.

8.4) Pole 11410 located at 340 Lower S. Fork Rd (Location 50) has a slack primary anchor guy.

8.5) Pole 9153 located 1 span south of 1391 Brady Rd (Location 52) has a slack primary anchor guy.

8.6) Pole 6386 located 3 spans north east of 391 Jordan Rd (Location 64) has a slack secondary anchor guy.

8.7) Pole 7922 located 1 span west of 1141 Knowlton Ln (Location 69) has a slack primary anchor guy.

V. Observations

ESRB staff observed the following during the field inspection:

1. The following location had potential third-party safety concerns:

   There are two slack span guys in the communication layer between poles 5787 and 6183 located at 2774 Goose Ranch Rd (Location 74).