



**Jadwindar Singh, P.E.**  
Manager  
EAM Distribution Compliance

245 Market St., 926  
San Francisco, CA 94105  
415-973-7504  
[J112@pge.com](mailto:J112@pge.com)

June 21, 2013

Mr. Raymond Fugere, P.E.  
Program and Project Supervisor, CPUC, ESRB  
California Public Utilities Commission  
320 W 4th Street, Suite 500  
Los Angeles, CA 90013

Subject: Response to Safety and Enforcement Division (SED) 2013 Electric Audit Report of PG&E's North Bay Division.

Dear Mr. Fugere:

During the week of February 25 through March 1, 2013 staff from SED conducted a records and field audit of PG&E's North Bay Division. The records portion of the audit included a review of 35 overhead and underground maps and associated logs, 73 EC Notifications, and 5 pole loading calculations. The field portion of the audit covered 13 overhead locations and 16 underground locations.

You submitted the SED's audit summary to PG&E on April 13, 2013 which contained three alleged GO 165 violations, two alleged GO 95 violations and one alleged GO 128 violation. You requested that PG&E investigate these alleged violations and respond to you no later than June 21, 2013.

Section I lists the three alleged GO 165 items and one GO 95 item along with PG&E's response and corrective actions taken or planned to address each item. Section II lists the other alleged GO 95 item and the one GO 128 item along with PG&E's response and corrective actions taken or planned to address each item. Section III lists the area of concern along with PG&E's response and corrective actions taken or planned to address each item.

Please contact me at 415-973-7504 if you have any questions regarding this response.

Sincerely,

/x/

Jadwindar Singh, P.E.  
Manager, EAM Distribution Compliance

cc: Ms. Elizaveta Malashenko, Deputy Director, Office of Utility Safety and Reliability  
Mr. Alok Kumar, Sr. Utilities Engineer, CPUC, ESRB  
Mr. Ryan Yamamoto, Senior Utilities Engineer, CPUC, ESRB  
Mr. Ivan Garcia, Utilities Engineer, CPUC, ESRB  
Mr. Raymond Cho, Utilities Engineer, CPUC, ESRB

**Section I – Items Identified During Records Review**

The format used in PG&E’s response is to copy (in black text) the SED’s allegation, using the SED’s format, followed by PG&E’s response in blue font.

<b>A.</b>	<b>Location:</b> PG&E – North Bay Division																			
	<b>Date Visited by CPUC:</b>	2/25/2013-3/1/2013																		
	<b>Explanation of Violation(s):</b>																			
	<p><b><u>GO 165, Section III-B, – Standards for Inspection, States:</u></b></p> <p><i>“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.”</i></p> <p>A pre-audit data request response indicated that the following facilities, from 2008 to 2012, were not inspected as required by GO 165:</p> <ul style="list-style-type: none"> <li>• One facility on the 2009 Underground Inspection (Notification # 104100589)</li> <li>• One facility on the 2009 Underground Inspection (Notification # 104391048)</li> <li>• One facility on the 2009 Underground Inspection (Notification # 104391069)</li> <li>• One facility on the 2009 Underground Inspection (Notification # 104413204)</li> <li>• One facility on the 2010 Underground Inspection (Notification # 104031808)</li> </ul> <p>PG&amp;E Response: PG&amp;E does not agree that the five enclosures not inspected within their respective calendar years constitute any violation of GO 165. GO 165, Table 1 requires underground transformers, switches/protective devices, and regulators/capacitors to be inspected on a three year cycle. The five enclosure referenced in the notifications above did not have any of these equipment types in them. The table below outlines the type of facility represented by each notification. Of note, one enclosure (Notification 104031808) was never installed as planned in the original job and does not exist in the field.</p> <table border="1" data-bbox="228 1402 1005 1667"> <thead> <tr> <th>Notification</th> <th>Plat Map</th> <th>Facility Type</th> </tr> </thead> <tbody> <tr> <td>104100589</td> <td>VV-3404</td> <td>Primary Splice box</td> </tr> <tr> <td>104391048</td> <td>RR-4108</td> <td>J-box (J620)</td> </tr> <tr> <td>104391069</td> <td>RR-4108</td> <td>Primary Splice box</td> </tr> <tr> <td>104413204</td> <td>RR-4205</td> <td>Primary Splice box</td> </tr> <tr> <td>104031808</td> <td>GG-3417</td> <td>Box never installed due to change in original job</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>• One facility on the 2012 Overhead Inspection (Notification # 106657098)</li> <li>• One facility on the 2012 Overhead Inspection (Notification # 106655966)</li> </ul> <p>PG&amp;E Response: PG&amp;E agrees that the two notifications representing two overhead facilities were inspected late. Both notifications were completed on January 10, 2013.</p>		Notification	Plat Map	Facility Type	104100589	VV-3404	Primary Splice box	104391048	RR-4108	J-box (J620)	104391069	RR-4108	Primary Splice box	104413204	RR-4205	Primary Splice box	104031808	GG-3417	Box never installed due to change in original job
Notification	Plat Map	Facility Type																		
104100589	VV-3404	Primary Splice box																		
104391048	RR-4108	J-box (J620)																		
104391069	RR-4108	Primary Splice box																		
104413204	RR-4205	Primary Splice box																		
104031808	GG-3417	Box never installed due to change in original job																		

**Section I – Items Identified During Records Review**

Notification	Plat Map	Due Date	Date Completed
106657098	SS-3306	12/31/2012	1/10/2013
106655966	PP-3321	12/31/2012	1/10/2013

- One facility on the 2010 Underground Inspection of Map HH3402

PG&E Response: PG&E agrees that one facility on the 2010 Underground Inspection Map HH3402 was not highlighted.

- One facility on the 2010 Underground Patrol of Map RR4219

PG&E Response: PG&E agrees that one facility on the 2010 Underground Patrol Map RR4219 was not highlighted.

- One facility on the 2010 Overhead Patrol of Map II42

PG&E Response: PG&E agrees that one facility on the 2010 Overhead Patrol Map II42 was not highlighted.

- One facility on the 2010 Overhead Patrol of Map RR4219

PG&E Response: PG&E agrees that one facility on the 2010 Overhead Patrol Map RR4219 was not highlighted.

- One facility on the 2010 Overhead Patrol of Map II41

PG&E Response: PG&E agrees that one facility on the 2010 Overhead Patrol Map II41 was not highlighted.

- The 2009 Overhead and Underground Patrol for map PP4122 was conducted late

PG&E Response: PG&E agrees that the 2009 Overhead and Underground Patrols for Map PP4122 were conducted late.

- The 2009 Underground Patrol for map QQ4216 was not conducted

PG&E Response: PG&E agrees that the 2009 Underground Patrol for Map QQ4216 was missed. PG&E patrolled this map in 2010, inspected this map in 2011, and patrolled this map again in 2012.

The pre-audit data response Q8b indicated that the following number of maps had issues and didn't meet the requirements of GO 165:

- Eight (8) overhead maps were noted:
  - All eight overhead maps never have been patrolled or missed the patrol cycle (in

**Section I – Items Identified During Records Review**

the previous 10 years)

- Five of the eight overhead maps missed the detail inspection cycle (in the previous 10 years)

PG&E Response: The 8 overhead maps were identified in the comprehensive Maintenance Plan Gap Analysis which PG&E conducted in 2012 and provided to the CPUC in advance of the audit. It is not entirely accurate to claim that all 8 maps were not patrolled during the ten years prior to 2012. As shown in the chart below, 4 of the eight maps were patrolled in 2008 and 4 were inspected in the same time period.

PG&E agrees, however, that five of the eight overhead maps missed the detailed inspection cycle. Seven of the eight total maps were inspected in 2012. One map (OO-38) was patrolled in 2012 because it was inspected in 2009. The graph below shows the previous patrols or inspections in the ten years prior to 2012.

Overhead Map	Inspection in previous 10 years	Patrol in previous 10 years	Action in 2012
EE-3117	2009	2008	Inspection
FF-3009	2009	2008	Inspection
HH-3621	2005	2008	Inspection
LL-4021	2003	None	Inspection
OO-38	2009	2008	Patrol
QQ-4312	2005	None	Inspection
QQ-4313	2005	None	Inspection
QQ-4318	2005	None	Inspection

- 18 underground maps were noted:
  - 16 of the 18 underground maps have never been patrolled or missed the patrol cycle (in the previous 10 years)
  - All 18 of the underground maps have never been inspected or missed the detail inspection cycle (in the previous 10 years)

PG&E Response: The 18 underground maps were identified in the comprehensive Maintenance Plan Gap Analysis which PG&E conducted in 2012 and provided to the CPUC in advance of the audit. It is not entirely accurate to claim that 16 of the 18 maps were never patrolled during the 10 years prior to 2012. As shown in the chart below, four of the eighteen maps were patrolled at some point in the ten years prior to 2012. Of the 14 maps not patrolled, 3 of them were inspected in the same time period.

In all, of the 18 maps, 6 were inspected during the 10 year period prior to 2012 and 10 maps had their oldest facilities installed within the 10 years prior to 2012 (see footnote). All 18 underground maps were inspected in 2012.

Underground Map	Inspection in previous 10 years	Patrol in previous 10 years	Action in 2012
-----------------	---------------------------------	-----------------------------	----------------

## Section I – Items Identified During Records Review

QQ-2621	2005	2006	Inspection
EE-3117	2004	2005	Inspection
LL-4012	2003	None	Inspection
LL-43	2002 <sup>1</sup>	None	Inspection
DD-27	2003 <sup>2</sup>	None	Inspection
OO-32	None	None	Inspection
OO-33	None	2011	Inspection
OO-34	2008	2011	Inspection
OO-36	2004	None	Inspection
OO-3914	2007 <sup>3</sup>	None	Inspection
OO-3920	2006 <sup>4</sup>	None	Inspection
OO-3925	2004 <sup>5</sup>	None	Inspection
FF-3106	2006	None	Inspection
FF-3425	2007 <sup>6</sup>	None	Inspection
PP-4110	2006 <sup>7</sup>	None	Inspection
PP-4115	2006 <sup>8</sup>	None	Inspection
RR-3025	2006 <sup>9</sup>	None	Inspection
RR-3316	2005 <sup>10</sup>	None	Inspection

As stated in PG&E’s Maintenance Plan Initiative Letter dated January 31, 2013 to the CPUC, PG&E has completed implementation of the corrective actions to resolve the identified gaps. For all maps identified as having a missing maintenance plan, the corresponding maintenance plan(s) have been created. In addition, the automated process for identifying facilities on maps without existing maintenance plans has been implemented, the responsibility for monitoring the results has been assigned centrally within PG&E’s Distribution Compliance Department, and the monthly reconciliation and validation process has been established. PG&E believes these corrective actions will eliminate the gaps identified in this initiative.

The below violations are in addition to the violations noted above:

- PG&E did not conduct an overhead inspection on a pole for Map QQ4013 in 2012.

PG&E Response: PG&E agrees that a single pole on the 2012 inspection Map QQ4013 was not highlighted.

- PG&E did not conduct an overhead inspection of a service drop to a private pole for

<sup>1</sup> Oldest facility installed in 2002  
<sup>2</sup> Oldest facility installed in 2003.  
<sup>3</sup> Oldest facility installed in 2007.  
<sup>4</sup> Oldest facility installed in 2006.  
<sup>5</sup> Oldest facility installed in 2004.  
<sup>6</sup> Oldest facility installed in 2007.  
<sup>7</sup> Oldest facility installed in 2006.  
<sup>8</sup> Oldest facility installed in 2006.  
<sup>9</sup> Oldest facility installed in 2006.  
<sup>10</sup> Oldest facility installed in 2005.

**Section I – Items Identified During Records Review**

	<p>Map SS3223 in 2012.</p> <p>PG&amp;E Response: PG&amp;E agrees that the overhead service drop to a private pole was not highlighted. However, PG&amp;E’s inspection process does not require that individual service drops be highlighted, nor does it require that Company personnel inspect and highlight privately owned facilities. Pursuant to CPUC-approved Electric Tariff Rule 16.D.1, the customer is solely responsible for regular inspection and maintenance of customer-owned facilities and equipment.</p>
--	--

<b>B.</b>	<b>Location:</b>	<b>PG&amp;E – North Bay Division</b>
	<b>Date Visited by CPUC:</b>	2/25/2013-3/1/2013
	<b>Explanation of Violation(s):</b>	
	<b><u>GO 165, Section III-C, – Record Keeping, states in part:</u></b>	
	<p><i>“For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.”</i></p> <p>9520 work orders, from January 2008 to February 12, 2013, were completed past their scheduled date of corrective action. Furthermore, 3270 work orders are currently open past their scheduled date of corrective action.</p> <p>Furthermore, an additional 109 work orders were found to be late that were not noted in the pre-audit data request response.</p>	
	<p>PG&amp;E Response: PG&amp;E reviewed its response to CPUC data request #5, which included all EC Notifications not completed by their PG&amp;E-required end date from 1/1/2008 through 10/19/2012, and found that of the 12,790 notifications listed: 9,520 were completed late and are now closed; 3,270 were open and past their scheduled due date for corrective action. The 12,790 include:</p> <ul style="list-style-type: none"> <li>• 8,138 steady state notifications (created on or after 1/1/2010) <ul style="list-style-type: none"> <li>○ 5,299 were completed late</li> <li>○ 2,839 open as of data submission (2,839 of the 3,270)</li> </ul> </li> <li>• 4,652 backlog notifications (created prior to 1/1/2010) <ul style="list-style-type: none"> <li>○ 4,221 were completed late</li> <li>○ 431 open as of data submission (519 of the 3,270)</li> </ul> </li> </ul>	

**Section I – Items Identified During Records Review**

1. Regarding steady state notifications, 5,299 were completed late and an additional 2,839 were still open and late when the data response was provided. As a point of reference, PG&E completed 8,228 steady state notifications in North Bay Division on time during the same period.
  
2. Regarding backlog notifications, PG&E has committed to completing all backlog notifications (notifications created prior to 1/1/2010) by 2014. PG&E has previously shared its plan with SED for eliminating the backlog notifications as follows:
  - On January 29, 2010, prior to deployment of PG&E’s maintenance program changes, PG&E met with the then USBR to discuss the impact of the changes and the creation and management of the backlog.
  
  - On March 11, 2011, PG&E gave a presentation to Mr. Raymond Fugere, SED Program and Project Supervisor, and the entire ESRB Northern California Staff at the San Francisco CPUC offices, which outlined PG&E’s plan to address the backlog.
  
  - PG&E has also shared its backlog reduction plan with the SED in its responses to 2010, 2011 and 2012 audit reports.

We are currently ahead of schedule and anticipate completing this backlog before the end of 2013. Since PG&E no longer reassesses notifications, some backlog notifications may continue to be past due or will go past due.

3. Regarding the additional 109 late work orders that were identified, PG&E researched the data provided in response to question #3 where SED asked for “...A list of EC Notifications closed or completed during the past six months (for the entire division).

PG&E discovered that of the 109 EC notifications, 68 were priority A, 2 priority B, 21 Priority E and 18 Priority F notifications.

- Although priority A notifications do not have a required end date, 47 were completed and closed out in less than 10 days, 11 completed and closed out between 11 to 20 days, 7 completed and closed out between 21 to 30 days and 3 notifications were closed out past 30 days. For the 3 notifications past 30 days, there were discrepancies as two were entered as emergency notifications in error and the third had a typographical error in the “date created” section. The first chart below shows the duration time for the Priority A notifications. The second chart below show the discrepancies with the 3 notifications that were closed out past 30 days.

Priority A Notifications completed (68) and closed within:

0 -10 Days	11 -20 Days	21 - 30 Days	30 + Days
47 Notifications	11 Notifications	7 Notifications	*3 Notifications

**Section I – Items Identified During Records Review**

\*Discrepancies with the 3 Priority A notifications closed past 30 days

EC 106655705	Was identified in the field on 1/28/12 and should not have been entered as an emergency notification into SAP. This was a Priority E notification with a required end of 1/28/2013. The work was completed on 1/22/13 which is within the 12 month period required under Priority E.
EC 106658486	Was identified in the field on 2/1/12 and should not have been entered as an emergency notification into SAP. This was a Priority E notification with a required end of 2/1/2013. The work was completed on 1/25/13 which is within the 12 month period required under Priority E.
EC 106604126	Typographical error. Date created is 12/2/2012, not 12/2/2001. This emergency notification was completed the very same day on 12/2/2012.

- Regarding the 2 Priority B notifications, PG&E discovered that the required end dates that were on these notifications were set in error beyond the 3 months required by Priority B (due within 3 months). This is why these notifications did not show up in the data for question #5 where SED asked for “. . . *A list of all EC Notifications not completed by their PG&E required end date for the time period Jan 2008 to YTD (for the entire division).*
- Regarding the 21 priority E notifications, PG&E discovered that:
  - 2 of the notifications’ required end dates were set in error beyond the 12 months required by Priority E (due within 12 months).
  - 14 notifications were not, in fact, late but were simply reported as 1 day late because the calculation in Excel shows these notifications as being 1 day past 365 days due to the leap year in 2012.
  - 5 notifications were not late but were backlog notifications that were originally created prior to 2010. At some point prior to 2010, these notifications were reassessed with new “required end dates” and the notifications were completed within that timeframe.
- Regarding the 18 Priority F notifications, PG&E discovered that this work was not completed late. These backlog notifications were originally created prior to 2010; at some point prior to 2010, these notifications were reassessed with new “required end dates” and the notifications were completed within that timeframe.

Going forward, PG&E will provide the dates when notifications were reassessed to avoid confusion in the data provided.



**Section I – Items Identified During Records Review**

<b>C.</b>	<b>Location:</b>	<b>PG&amp;E – North Bay Division</b>
	<b>Date Visited by CPUC:</b>	2/25/2013-3/1/2013
	<b>Explanation of Violation(s):</b>	
	<p><b><u>GO 165, Section III-C, – Record Keeping, states in part:</u></b></p> <p><i>“For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.”</i></p> <p>PG&amp;E does not document all items requiring corrective action during an inspection. Specifically, PG&amp;E staff does not document minor work. PG&amp;E staff only marks a tally mark indicating minor work, and does not specify the equipment identified for corrective action in the tally marks.</p>	
	<p>PG&amp;E agrees that it does not provide detailed documentation of minor work performed during inspections and patrols.</p> <p>As described in PG&amp;E’s response to 2012 and 2013 audit reports, PG&amp;E is currently in the design and build phase of an Electric Compliance Mobile Connect application that will expand the documentation of the corrective actions completed during an inspection. Specifically, the new application will allow an inspector to electronically document all minor work that was completed during an inspection. Until Mobile Connect is fully implemented, PG&amp;E will continue to tally (count) minor work and not provide a detailed description of the work done consistent with PG&amp;E’s Electric Distribution Preventative Maintenance Manual.</p>	

<b>D.</b>	<b>Location:</b>	<b>PG&amp;E – North Bay Division</b>
	<b>Date Visited by CPUC:</b>	2/25/2013-3/1/2013
	<b>Explanation of Violation(s):</b>	
	<p><b><u>GO 95, Rule 31.1 – Design, Construction and Maintenance, states in part:</u></b></p> <p><i>“For all particulars not specified in General Order 95, a supply or communications company is in compliance with this rule if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions.”</i></p>	

**Section I – Items Identified During Records Review**

	<p>PG&amp;E’s EDPM manual requires inspectors to complete a Map Correction Form when they find discrepancies on their inspection maps. ESRB considers noting map errors in accordance with the EDPM manual an “accepted good practice”. Map discrepancies that are not noted by inspectors are not compliant with PG&amp;E’s EDPM manual and are therefore violations of GO 95 Rule 31.1. For example, Overhead Map GG3310, contained mapping errors that were not noted by PG&amp;E inspector during the inspection.</p>
	<p>PG&amp;E Response: PG&amp;E does not agree that it failed to follow accepted good practice or our own procedures in this instance. The 2008 Overhead Patrol Map GG3310 noted the poles were removed to prepare the area for an upcoming new business job (Job PM 30466285). The 2009 patrol map noted in pencil the new poles that were installed from the new business job. No map change was necessary and none was submitted for both the 2008 and 2009 maps due to the “whip cloud” on the map which referenced to a designed job to be mapped. The 2010 inspection for this map had the permanent map updates from the new business job.</p> <p>PG&amp;E can make all 3 maps available for review at the request of the SED.</p>

**Section II – Items Identified During Field Review**

The format used in PG&E’s response is to copy and paste (in black text) the SED’s alleged violation, using the SED’s format, followed by PG&E’s response in **blue font**.

<b>F.</b>	<b>Location:</b>	5341 Industrial Way, Benicia (QQ4317)
	<b>Pole No.:</b>	T-3425
	<b>Previous Visit by Utility:</b>	Reassessed Tag (Notification # 106245393) 2/6/13
	<b>Date Visited by CPUC:</b>	2/28/2013
	<b>Explanation of Violation(s):</b>	
	<u>Padmounted Transformer Not Secured in Place</u>	
	<u>GO 128, Rule 34.3-A, Strength, States:</u>	
	<i>“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.”</i>	
	At this location, PG&E’s padmounted transformer case was not secured in place when installed.	
	PG&E Response: PG&E created an EC notification (#106760459) to secure the padmounted transformer in place.	

<b>G.</b>	<b>Location:</b>	57 Ridgewood Drive, San Rafael
	<b>Pole No.:</b>	N/A
	<b>Previous Visit by Utility:</b>	Overhead Inspection Map SS3223 Completed 11/11/12
	<b>Date Visited by CPUC:</b>	3/1/2013
	<b>Explanation of Violation(s):</b>	
	<u>Broken Down Guy Guard</u>	
	GO 95 Rule 56.9, Guy Marker (Guy Guard), States:	
	<i>“A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached</i>	

**Section II – Items Identified During Field Review**

	<p style="text-align: center;"><i>to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.”</i></p> <p>At this location PG&amp;E’s anchor guy guard was broken. This violation was not documented by PG&amp;E staff when the pole was inspected.</p>
	<p>PG&amp;E Response: PG&amp;E does not agree that there is any evidence that the guy guard was broken at the time of the last inspection and purposely ignored. PG&amp;E did make repairs to the broken guy guard during the field portion of the audit.</p>

### **Section III – Items of Concern**

#### **Area of concern:**

##### **A. Inaccurate Patrol and Inspection Data**

A data request response sent to the CPUC by PG&E prior to the audit included inaccurate patrol and inspection data for the years 2003 and 2012. The data inaccuracy made it difficult to verify compliance with GO 165. Furthermore, this raises questions about the integrity of PG&E's GO 165 reports.

PG&E Response: PG&E researched the anomaly extensively at the time the issue was raised and determined that while extracting the 2003 and 2012 patrol and inspection history from an internal Share Point site (to fulfill the pre-audit data request) some of the data became corrupted and inaccurate. We believe the problem to have been a copy-and-paste error where information was copied from one data source and pasted into a spreadsheet for presentation to the CPUC. At the time, PG&E had no reason to question the data as it was intended to be a direct copy of information.

During the audit, PG&E cleared up the discrepancy with the data inaccuracy and provided the SED the accurate information for the 13 patrol and inspection maps in question. Nevertheless, PG&E apologizes for the error.

##### **B. Missing Patrol and Inspection Maps**

During the review of patrol and inspection maps it was discovered that Maps SS3014 and TT3315 were missing patrol and inspection maps and logs.

PG&E Response: PG&E does not agree that the maps and logs are missing for the maps in question. PG&E researched this concern and found the following status for the two maps in question:

Map	Current Status of Maps and Logs	Specific records provided to SED
SS3014	All logs and maps for all patrols and inspections confirmed in folders and available to SED	2010 OH Patrol
TT3315	All logs and maps for all patrols and inspections confirmed in folders and available to SED	2008 UG Patrol

### **Section III – Items of Concern**

#### **C. Equipment Testing Records In Wrong Division**

During the review of equipment testing records it was discovered that Regulator (Operating # 13589) was listed in the North Bay Division but located in the North Coast Division.

PG&E Response: In PG&E's asset database the regulator (# 13589) is located within the boundaries of North Coast Division. However, PG&E's dispatch tool assigns the annual test to the office that is nearest to the equipment in order to assign the work efficiently. In this example, the nearest office is in the neighboring North Bay Division. Regardless of which division completes the test, the tests are performed using the same process. As noted during the audit, the regulator's test was completed on cycle on 3/26/12.

#### **D. Equipment Testing Form Not Correctly Filled Out**

During the review of equipment testing records it was discovered that Capacitor (Operating # 762) was not assigned a COE pin number as required by PG&E procedures.

PG&E Response: PG&E agrees that pin number was not assigned. PG&E is currently developing an update to the mobile app that will ensure COE processes are followed.

PG&E revisited this capacitor on 2/16/2013 for the next scheduled equipment test and a pin number (32) was assigned.

#### **E. Equipment Test Request But No Equipment Exist**

During the review of equipment testing records it was discovered that a SCADA (CE # 106153612) equipment test was manually cancelled due to no SCADA equipment at the location.

PG&E Response: PG&E troubleman visited this switch during the equipment test on 10/8/2012 and found that there was no SCADA equipment on this switch. PG&E troubleman correctly submitted a map change request and cancelled the test. The map change request was completed on 12/3/2012. PG&E procedures were followed precisely in this case.