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

October 8, 2021 EA2021-920

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

SUBJECT: Electric Distribution Audit of PG&E's East Bay Division

Dear Ms. Jordan:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Charles Mee and Emiliano Solorio of ESRB staff conducted an electric distribution audit of PG&E's East Bay Division from June 21, 2021 through June 25, 2021. During the audit, ESRB staff conducted field inspection of PG&E's distribution 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 and observations is enclosed. Please provide a response no later than November 5, 2021, by electronic copy of all corrective actions and preventive measures taken by PG&E 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 taken for the violations outlined in Sections II & V of the enclosed Audit Findings and responses to the Observations listed in Sections III & VI. For any outstanding items not addressed, please provide the projected completion dates of PG&E's corrective actions.

If you have any questions concerning this audit, please contact Charles Mee at (415) 730-7012 or charles.mee@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 Electric Distribution Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
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PG&E EAST BAY DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
June 21-25, 2021

I. Records Review

During the record review portion of the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records and documents provided by Pacific Gas and Electric (PG&E) for its East Bay Division (EBD):

- Electric Distribution Preventive Maintenance Manual (EDPM), 4/1/2016
- California Power Line Fire Prevention Field Guide
- 2018 GO165 High Fire Threat District (HFTD) Guidance
- Utility Bulletin: GO165 Inspections and Patrols for High Fire Threat Districts (HFTD), TD-2305B-002, 05/15/2018
- Utility Bulletin: GO165 Inspections and Patrols for Padmounts, TD-2305B-003, 05/15/2018
- Utility Bulletin: GO165 Inspections and Patrols for Enclosures with No Oil-filled or Operating Equipment, TD-2305B-004, 05/15/2018
- Job Aid: Overhead Inspection, TD-2305M-JA02, February 2021
- Job Aid: Underground Inspection, TD-2305M-JA03, January 2020
- Enhanced Vegetation Management Pre-Inspection Procedure, TD-7106P-01 05/12/2020
- PG&E's Responses in Wildfire Mitigation Plan Rulemaking 18-10-007
- Distribution Routine Patrol Procedure, TD-7102P-01, 10/27/2015
- Infrared (IR) Inspections of Electric Distribution Facilities, TD-2022P-01, 05/15/2018
- Notification of Conditions to Third-Party Utility, TD-2014P-01, 06/24/2019
- Roles and Responsibilities, Centralized Gatekeeper
- Electric Corrective (EC) Notifications/Tags Procedure, TD-7102P-13, 08/25/2015
- Vegetation Management Priority Tag Procedure, TD-7102P-17, 02/24/2021
- Management of Idle Electric Distribution Lines, TD-2459S, 05/15/2018
- Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, TD-2302S, 12/15/2010
- EBD Asset Count

- EBD Plats
- EBD Facilities Geographic Locations Master Map
- EBD Facilities include Antennas, Capacitor Banks, Dynamic Protective Devices, Fault Indicators, Fuses, Smart Meter Network, Step Down Transformers, Street Lights, Substations, Subsurface Structures, Support Structures, Transformers, Vault Polys, Voltage Regulators.
- EBD Late Patrol and Detail Inspections from 2016 through 2020
- EBD Pre-Audit EC Notifications Raw Data from 1/1/2016 through 4/30/2021
- EBD New Constructions Order List
- Pole Loading Calculations for work order numbers: 31234874, 31365846, 31495612, 31503692
- PG&E's Three Safety Hazards Notifications to Third Party Utilities
- PG&E's EBD Pre-Audit Preliminary Analysis
- Quality Assurance Process Audit Procedure, RISK-6301P-01
- Quality Management Audit Manual, TD-2036M
- Quality Verification Distribution - 2020 EBD Results
- EBD Inspector List and Training Record, from 2016 through 2021

II. Records Violations

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

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.

The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities.

(1) *Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.*

Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate:

- *Type of facility or equipment;*
- *Location, including whether the Safety Hazard or potential violation is located in the High Fire-Threat District;*
- *Accessibility;*
- *Climate;*
- *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.*

(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."*

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."

Before ESRB's audit, PG&E conducted a Pre-Audit (Pilot) Process and found a total of 6,025 late Electric Corrective (EC) tags in the EBD from May 1, 2016 through April 30, 2021. Table 1 below shows the breakdown:

Table 1: Late EC Tags Found During PG&E's Pre-Audit

Priority Code	Late EC Tags Completed	Late Non-Exempt EC Tags Open	Late EC Tags Cancelled	Total Late EC Tags
A	461	2	0	463
B	406	18	62	486
E	1,222	2,296	731	4,249
F	104	650	73	827
Total	**2,193**	**2,966**	**866**	**6,025**

1. Regarding the 461 late Priority A EC tags, PG&E stated the following:

   "Emergency Priority - A notifications are created when "an outage to customers or an unsafe condition requiring immediate response and standby to protect the public" occurs. PG&E meets the requirements of GO 95, Rule 18 for these Level 1 Safety Hazards by acting immediately to address the condition (either by PG&E crews or by other resources). The results of the immediate action are captured in the creation of an Emergency (Priority A) Notification (nature of the work, the date the work was performed, and the identity of the persons performing the work). The data pull for this analysis identified 461 notifications, that were considered "late" based on the completion date (date closed in SAP), not lack of immediate corrective actions taken."

   When ESRB staff asked PG&E how the "Past Due for Required End Date" is applied for "Priority A notifications. PG&E stated the following:

   "PGE meets the requirements of GO 95, Rule 18, for Level 1 Safety Hazards by taking action immediately to address the condition (either by our crews or by other resources). The results of the immediate action are captured in the creation of an Emergency notification (nature of the work, the date the work was performed, and the identity of the persons performing the work). As such, the "Past Due" or the 'Required End Date' field in SAP for these Emergency notifications does not reflect an accurate deadline and is not applicable for "Priority-A" EC notifications."

   ESRB noted that if the 461 Priority A tags were completed on time, PG&E's SAP system needed to be updated to show that the 461 Priority A tags were completed timely. However, PG&E's SAP shows that the 461 Priority A EC tags are late and

PG&E did not provide detailed supportive records to demonstrate that the 461 Priority A tags should not be considered late. For example, PG&E did not provide any supportive data showing that PG&E took the "immediate correction actions". Not being able to review detailed supportive data, ESRB determined, based on PG&E's SAP records, that the above 461 Priority A tags were completed late. Therefore, PG&E is in violation of GO 95, Rules 18.B.(1).(a)(i) and Rule 31.1, and GO 128, Rule 17.1.

PG&E is required to track the progress of its corrective actions by managing the EC tags in its SAP database. PG&E is also required to correct the identified deficiencies within the allowed timeframe as required in GO 95, Rules 18.B.(1).(a).(i) and 31.1, and GO 128, Rule 17.1 to mitigate the associated safety and reliability risks and hazards.

2. Regarding the 406 Priority B EC notifications completed late and the pending 18 Priority B EC tags that are late, PG&E stated that:

   "Priority-B notifications are considered "late" based on the completion date (date closed in SAP) being later than the Required End Date."

   Based on the above statement, ESRB found that PG&E is in violation of GO 95, Rules 18.B.(1).(a).(ii), and 31.1, and GO 128, Rule 17.1.

III. Record Review Observations and Recommendations:

ESRB staff identified the following observations during the record review portion of the audit:

1. ESRB staff had a question regarding Section 4.2 of "*GO165 Inspections and Patrols for Enclosures with No Oil-filled or Operating Equipment, TD-2305B-004, 05/15/2018*" (Inspections and Patrols for Enclosures). Section 4.2 stated as following:

"If the enclosure contains no oil-filled or operating equipment, then Do not inspect, do not install inspection sticker, do not highlight, and do not count."

During a teleconference, PG&E clarified that the "GO165 Inspections and Patrols for Enclosures with No Oil-filled or Operating Equipment, TD-2305B-004, 05/15/2018" is not effective anymore. PG&E stated that it is currently inspecting all facilities including the enclosures contains no oil-filled or no operating equipment.

ESRB noted that PG&E needs to improve by updating its distribution system inspection and patrol procedures to reflect its actual inspection and patrol practices in the field.

ESRB recommends PG&E to inspect all its distribution facilities, including 1) enclosures contain no oil-filled or no operating equipment, 2) idle facilities, and 3) underground service facilities. In addition, for distribution facilities that are not owned

by PG&E, but are part of the distribution system, ESRB recommends PG&E to communicate with the owners of those facilities to make sure that they are inspected and maintained properly.

2. On June 14, 2021, PG&E provided a document titled *"Q18 Pre-Audit Preliminary Analysis_EastBayDistribution_Audit",* which stated that PG&E conducted a Pre-Audit (Pilot) Process. PG&E analyzed its data for inspections and corrective actions for the time period from May 1, 2016 through April 30, 2021 for the EBD and identified 463 late Priority A EC tags and 486 late Priority B EC tags.

   On September 20, 2021, PG&E provided an updated spreadsheet titled *"Q14East Bay Division - PreAudit_Raw_Data_EB_Division_as_of_052721_kpm5_v2"* (Raw Data). This Raw Data covers the time period from January 1, 2016 through April 30, 2021 for the EBD. ESRB staff analyzed this Raw Data and identified 448 late Priority A EC tags and 580 late Priority B EC tags.

   Comparing the above two results, ESRB staff discovered that:

   a) While the Raw Data covers data from January 1, 2016 through April 30, 2021, the Pre-Audit process covers data from May 1, 2016 through April 30, 2021. The time-periods did not match.

   b) Compared to the Pre-Audit Data, the Raw Data covers a longer time period, so the number of Priority A Late EC tags from the Raw Data should be more than that from the Pre-Audit Data. However, the result is otherwise.

   Please see the following Table 2 for the comparison.

   Table 2: Comparison between Data Sources

Data Source	Pre-Audit Data	Raw Data
Data Time Period	5/1/2016 - 4/30/2021	1/1/2016 - 4/30/2021
Priority A Late EC Tags	463	448
Priority B Late EC Tags	486	580

   Based on the above comparison, ESRB noted that PG&E's data has quality issues. ESRB recommends PG&E to improve its data quality and to better coordinate with ESRB's data requests and audit process.

3. Some of PG&E's responses to ESRB's data request either did not provide requested data or provided data that was not requested. PG&E also used one set of data to answer several questions. After several rounds of discussions with PG&E, PG&E still did not provide all the requested data.

For example, in response to ESRB's Question #13, PG&E provided *"Late Patrol and Inspection"* as shown in the following Table 3. While PG&E provided names for the eight late patrol and inspection circuits in year 2020, PG&E did not provide names for the three late patrol and inspection circuits in 2016. PG&E only provided notes to explain the missing data.

Table 3: Late Patrol and Detailed Inspections

YEAR	Type	Circuit Name
2016 [1)]	Inspect	TBD
	Inspect	TBD
	Inspect	TBD
2020 [2)]	Inspect	OAKLAND X 1106
	Inspect	OAKLAND K 1104
	Inspect	OAKLAND K 1101
	Inspect	OAKLAND K 1103
	Inspect	OAKLAND K 1101
	Inspect	OAKLAND K 1101
	Inspect	OAKLAND K 1101
	Inspect	MORAGA 1101
1) Per 2016 GO 165 Annual Report submitted on July 1, 2017: Three (3) UG detailed inspection in PG&E's North Valley Division were not inspected on time due to human error. The transfer of department responsibilities from Transmission Operations to Distribution Operations resulted in the missed inspection. This gap was identified during the risk assessment on February 22, 2017. Once the error was discovered, PG&E updated maintenance plans and inspected by May 24, 2017.		
2) PG&E has not yet submitted the 2020 GO 165 annual report to the CPUC which is due by July 1, 2021. There were a few external events (Lightning strikes/fires and PSPS) that took place from Mid-August 2020 through end of October 2020 which impacted resources to complete work on time. These numbers have not been fully vetted, but are being provided as requested for the upcoming CPUC audit.		

ESRB recommends PG&E provide complete answers to ESRB's pre-audit requests and follow-up questions. If there are any reasons that PG&E cannot respond to ESRB's questions, then PG&E needs to explain the reasons for not being able to provide complete answers and communicate effectively and timely regarding incomplete responses.

IV. Field Inspection List

During the field inspection, ESRB staff inspected the following distribution facilities listed in Table 4:

Table 4: Inspected Distribution Facilities

Location #	Facility	SAP #
101	UGMH 912	107698267
102	PMT 5478	107797923
103	Pole 110119087	101343049
104	Pole 110119088	101343048
105	UGT 5334	107797900
106	UGJB 8027	108148089
107	Pole 110147728	101358163
108	Pole 110147732	101358162
109	Pole 110147731	101358182
110	Pole 110147729	101358225
111	Pole 120173702	103894384
112	Pole 110137848	101358183
201	Pole 110132090	101347366
202	Pole 110513639	104014487
203	Pole 110132089	101342064
204	Pole 110132087	101347364
205	Pole 110132086	101347363
206	Pole 110132082	101347360
207	Pole 110132079	101347359
208	Pole 110384815	101347356
209	Pole 110132077	101347352
210	Pole 110142650	101347353
211	Pole 110132080	101347358
212	UGSW 7518	108134280
213	UGT 4173	108119954
214	UGSB from T4173	108129648
215	UGT 4172	108070382
216	Pole 120844970	103963832
217	Pole 110113015	102298295
218	Pole 110113018	102298296
219	Pole 110113025	102298254
220	Pole 110113195	102298256
221	UGT 5212	108153264

Location #	Facility	SAP #
222	UGT 5211	107788746
301	Pole 110248628	101441392
302	Pole 110248629	101441391
303	Pole 110217801	101440547
304	Pole 110217815	101440546
305	Pole 110217814	101440545
306	Pole 110217802	101440544
307	Pole 110217813	101440543
308	Pole 110248510	101441390
309	Pole 110248512	101441440
310	Pole 110306377	101441439
311	Pole 110306378	101441438
312	Pole 110248520	101441437
313	Pole 120795291	103996690
314	Pole 110280325	101449249
315	Pole 110280324	101449289
316	Pole 110249856	103049739
317	Pole 120856943	104043991
318	Pole 120126048	103816735
319	Pole 110237409	101449292
320	Pole 110237407	103049756
321	Pole 110140189	102299106
322	Pole 110140188	102299107
323	Pole 110140187	102299108
324	Pole 110140186	102299109
325	Pole 110141090	102299110
401	Pole 110458156	101425242
402	Pole 110458155	101425277
403	Pole 110458154	101425277
404	Pole 110458151	101425280
405	Pole 110458250	101425281
406	Pole 110458249	101425282
407	Pole 110458248	101425283
408	UGT 6250	108064537
409	UGSB from T6250	108122061
410	UGSB from T6250	108133758
411	UGSB from T6250	108133763
412	PMT 7669	107787503

Location #	Facility	SAP #
413	UGJB 945	108138328
414	Pole 110295021	101434031
415	Pole 110295022	103773373
416	Pole 110431316	103773340
417	Pole 110295020	101434030
418	Pole 110295011	101434029
419	Pole 110314293	103773372
420	UGT 6746	107787592
421	Pole 110295226	101431384
422	Pole 110314298	103773341
423	UGT 7612	107787521
424	UGT 7628	107787515
501	Pole 110408739	110408739
502	Pole 110408557	101423266
503	Pole 110408563	101423267
504	Pole 110408565	101423265
505	Pole 110408740	101423455
506	Pole 110477448	101423454
507	Pole 110408568	101423261
508	Pole 110408569	101423262
509	Pole 110408570	101423260
510	Pole 110408572	101423259
511	Pole 110408573	101443687
512	Pole 110408567	101423263
513	Pole 110408566	101423264
514	Pole 110255387	101374334
515	UGT 8238	108148524
516	UGPB for UGT 8238	108151677

V. Field 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 communications 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."

Table 5 shows PG&E's violations of GO 95, Rule 31.1:

Table 5: PG&E's violations of GO 95, Rule 31.1

Location #	Conditions Found	Requested Actions
209	Street light line is twisted	Needs to correct the line
211	Pole has cracks Crossarm is deteriorated	Needs to do an intrusive test or to replace the pole, Needs to repair or replace the crossarm
312	Crossarm for secondary wires is deteriorated	Needs to replace the crossarm
314	Pole leans more than 10%	Needs to adjust the pole
321	Pole leans more than 10%	Needs to adjust the pole
324	Pole leans more than 10% Guywire is loose and on the wrong side of the pole	Needs to adjust the pole and the guywire
422	Pole leans more than 10% Heavy transformers on the pole top Six thick secondary wires from this pole cross a main street. Guy wires pulling the pole to a wrong angle	Needs to adjust or replace the pole
501	Loose span Extra attachment to the pole	Needs to adjust the loose span Needs to remove the extra attachment

2. **General Order 95, Rule 51.6 – Marking and Guarding, High Voltage Marking** states:

"A. High Voltage Marking

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."

ESRB identified that PG&E failed to maintain required signage and markings. Table 6 shows PG&E's violation of GO 95, Rule 51.6:

Table 6: PG&E's violation of GO 95, Rule 51.6

Location #	Conditions Found	Requested Actions
205	HV Sign is broken	Needs to repair the HV sign
309	HV sign broken	Needs to repair the HV sign
310	HV sign faded	Needs to repair the HV sign Needs to trim the tree limbs
311	HV sign missing letters	Needs to repair the HV sign
415	"HIGH VOLTAGE" sign is missing the letter "E"	Needs to repair the HV sign
419	HV Sign is broken	Needs to repair the HV sign

3. **General Order 95, Rule 35 – Vegetation Management states:**

"Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained. (Also see Appendix E for tree trimming guidelines.) These requirements apply to all overhead electrical supply and communication facilities that are covered by this General Order, including facilities on lands owned and maintained by California state and local agencies."

PG&E failed to conduct vegetation management listed in Table 7:

Table 7: PG&E's violation of GO 95, Rule 35

Location #	Conditions Found	Requested Actions
203	Vegetation issue at the service drop	Needs to manage the vegetation
205	Tree branches touching service drop	Needs to manage the vegetation
303	Tree limbs touching conductors	Needs to manage the vegetation
306	Vegetation concerns	Needs to manage the vegetation
310	Service drop is bended by tree limbs	Needs to manage the vegetation
312	Tree branch is bending the service drop	Needs to manage the vegetation
315	Branch putting strain on conductor	Needs to manage the vegetation
323	Tree branched touching the service drop and caused service drop deflection	Needs to manage the vegetation
325	Guywire was hit by a fallen tree	Needs to manage the vegetation
407	Service drop covered by vegetation	Needs to manage the vegetation
421	Vege strips on overhead pole	Needs to manage the vegetation

4. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc. Table 1, Case No 5 for Column D** states that for supply conductors with voltage 0—750 V, above ground in areas accessible to pedestrians only, the clearance needs to be 12 feet.

   PG&E failed to maintain clearance between power supply wires and other wires listed in Table 8:

Table 8: PG&E's violation of GO 95, Rule 37

Location #	Conditions Found	Requested Actions
315	One of the service drops is less than 12' above the ground.	Needs to correct the service drop clearance above the ground

5. **GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires, Table 2, Column C Case No.'s 9, 10, 11, 12, and 13** provides the minimum allowable clearances between power supply wires and communication wires. The minimum clearance between supply wires and communication conductors is 48", with a greater minimum value with increased supply conductor's voltage.

   PG&E failed to maintain clearance between power supply wires and other wires listed in Table 9:

Table 9: PG&E's violation of GO 95, Rule 38

Location #	Conditions Found	Requested Actions
207	Clearance between power lines and communication line is less than 48"	Needs to correct the clearance
402	Clearance between power lines and communication lines is less than 48"	Needs to correct the clearance
403	Clearance between power lines and communication lines is less than 48"	Needs to correct the clearance

6. **GO 95, Rule 18.A – Resolution of Potential Violations of General Order 95 and Safety Hazards** states in part:

> *"(2) Where a communications company's or an electric utility's (Company A's) actions result in potential violations of GO 95 for another entity (Company B), that entity's (Company B's) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.*
>
> *(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.*
>
> *(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95.*
>
> *(5) A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at least ten (10) years, the documentation of the notice shall be maintained by both the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party."*

PG&E failed to issue third party notices for potential violations. The following Table 10 shows PG&E's violation of GO 95, Rule 18.A:

Table 10: PG&E's violation of GO 95, Rule 18.A

Location #	Conditions Found	Requested Actions
219	Some abandoned communication slack on pole	Needs to issue a third-party notice
414	Third party span was sagging.	Needs to issue a third-party notice
416	Dangling 3rd party wire	Needs to issue a third-party notice
513	Idle fire alarm circuit	Needs to issue a third-party notice

VI. Field Observations:

During the field inspection, ESRB staff recorded the findings listed in Table 11. PG&E corrected some of them on site.

Table 11: ESRB staff's field observations

Location #	Conditions Observed	Recommendations
101	This manhole is full of water, and the cables were submerged in the water. PG&E pumped the water out on site. PG&E asserted that it is OK for the water to be in the manhole.	To pump out the water after a raining season.
110	Guy marker faded. PG&E replaced the guy marker.	
111	Reflective visibility tape is peeling off.	To repair the portion that is peeling off.
212	The lid hook was elevated above ground, which is a tripping hazard. PG&E corrected this condition on site.	
218	The grounding guard was broken. PG&E corrected this condition on site.	
302	HV sign faded. PG&E replaced the HV sign.	
317	Third party guy marker not entirely visible. PG&E corrected the third-party guy marker.	

Location #	Conditions Observed	Recommendations
319	Vegetation needs to be removed. PG&E removed the vegetation.	
407	Clearance between power lines and communication lines not enough. PG&E adjusted the lines to restore the clearance.	
408	Missing a nut on the lid. PG&E corrected this condition on site.	
411	This is a secondary box. Customer replaced the lid for this box, so it is hard for inspectors to open this box. PG&E asserted that PG&E does not need to check the service cables inside the box.	To check the service cables inside the box to make sure the service cables are not deteriorated due to overloading or other impacts.
417	The lowest step is less than 8' high above the ground. PG&E corrected this condition on site.	
418	The lowest step is less than 8' high above the ground. PG&E corrected the low step condition on site. There is an idle crossarm.	To remove the idle crossarm.
424	The transformer ID # was faded. PG&E corrected this condition on site.	
501	An abnormal molding. PG&E corrected this condition on site.	
501	An abnormal molding. PG&E corrected this condition on site.	
502	Fire alarm riser needs to be removed. PG&E removed the fire alarm riser.	
503	HV sign is loose and needs to be secured. PG&E replaced the HV sign.	
504	HV sign is missing from one side of the pole, Under-arm Bus (UAB) straps no good. PG&E replaced the HV sign and repaired the UAB straps	
513	Service line touches communication line. PG&E compliance inspector raised service line.	