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

December 30, 2022 EA2022-1012

Vincent Tanguay, Senior Director
Electric Compliance, Electric Engineering
Pacific Gas & Electric Company (PG&E)
300 Lakeside Dr., Oakland, CA 94612

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

Dear Mr. Tanguay:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez, Dmitriy Lysak, and Joe Murphy of ESRB staff conducted an electric distribution audit of PG&E's Fresno Division from November 14 to November 18, 2022. During the audit, ESRB staff conducted field inspections 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 is enclosed. Please provide a response no later than January 30, 2023, 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 each remedial action and preventive measure taken for the violations and observations. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Section II and IV of the enclosed Audit Report. Please also provide records of the third-party notifications for the field observations listed in Section V of the enclosed Audit Report.

If you have any questions concerning this audit, please contact Brandon Vazquez at (415) 703-1076 or brandon.vazquez@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 Report for PG&E Fresno Division

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
Dmitriy Lysak, Utilities Engineer, ESRB, SED, CPUC
Joe Murphy, Utilities Engineer, ESRB, SED, CPUC

PG&E FRESNO DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
November 14-18, 2022

I. Records Review

During the audit, ESRB staff reviewed the following records:

- PG&E's inspection and maintenance procedures.
    - Electric Distribution Preventive Maintenance Manual, April 1, 2016.
- Overhead and underground facilities statistics.
- Completed work orders with notifications, canceled work orders with notifications, and open work orders with notifications from September 2017 to September 2022.
- Patrol and detailed inspection records from September 2017 to September 2022.
- Reliability metrics and sustained outages from September 2017 to September 2022.
- Fresno Division map.
- New Construction projects (both overhead and underground) from September 2021 to September 2022.
- Pole loading and safety factor calculations completed from September 2021 to September 2022.
- Third Party Safety Hazard notifications sent and received from September 2017 to September 2022.
- Inspector list from September 2017 to September 2022 and inspector qualifications.
- Equipment test records from September 2017 to September 2022.
- Intrusive inspection records from September 2021 to September 2022.
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

II. Records Violations

1. **General Order (GO) 95, Rule 18-B(1), Maintenance Programs** states in part:

"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.*

(iii) Level 3 -- Any risk of low potential impact to safety or reliability:

- *Take corrective action within 60 months subject to the exception specified below.*
  EXCEPTION – Potential violations specified in Appendix J or subsequently approved through Commission processes, including…. The condition's record in the auditable maintenance program must indicate the relevant exception and the date of the corrective action."

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 the late Electric Corrective (EC) notifications within the Fresno Division from September 1, 2017 to September 20, 2022. PG&E's Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines priority codes and associated time frames for EC notifications as follows:

- Priority A – Safety / Emergency Immediate Response

  An emergency is defined as any activity in response to an outage to customer(s) or an unsafe condition requiring immediate response or standby to protect the public.

- Priority B – Urgent Compliance (Due within 3 months)
- Priority E – Compliance (Due 3-12 months)
- Priority F – Compliance (For Regulatory Conditions, the Recommended Repair Date is the due date for the next Inspection (UG = 3 years, OH = 5 years).

ESRB staff reviewed the late EC notifications and determined that PG&E did not address a total of 21,821 EC notifications by their assigned due date (required end date). Of these 21,821 EC notifications, 21,551 were classified as "late non-exempt" and 270 were classified as "late-exempt".

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

Table 1 below breaks down the 21,821 late EC notifications by the given priority, including the total number of late EC notifications, non-exempt/exempt late EC notifications, and late canceled EC notifications, which are included in the total.

Table 1: Late EC Notifications

Priority Code	Total # Late EC Notifications	Total # Late Non-Exempt	Total # Late Exempt	Total # Late Canceled[1]
A	2,339	2,339	-	326
B	1,669	1,453	216	98
E	17,326	17,272	54	1,595
F	487	487	-	12
Total	21,821	21,551	270	2,031

Of the 21,551 non-exempt late EC notifications, PG&E completed one priority A notification 4 years past its assigned due date. Table 2 below identifies the most overdue non-exempt EC notifications for each priority.

[1] Total # Late Cancelled is a subset of the late EC notifications and includes items which were exempt, non-exempt, or found already completed.

Table 2: Most Overdue EC Notifications

Priority Code	EC Notification #	Number of Days Past Assigned Due Date
A	114249287	1,477
B	114246497	1,679
E	114246499	1,679
F	116748091	1,079

PG&E identified EC notification #114249287 on January 25, 2018 to remove a tree attachment on a dead tree and install a clearance pole with a required end date of February 15, 2018. PG&E did not complete the work until March 3, 2022.

PG&E identified EC notification #114246497 on January 24, 2018 to remove a tree attachment on a dead tree and install a clearance pole with a required end date of February 14, 2018. EC notification #114246497 was still open as of September 20, 2022.

PG&E identified EC notification #114246499 on January 24, 2018 to remove a tree attachment on a dead tree and install a clearance pole with a required end date of February 14, 2018. EC notification #114246499 was still open as of September 20, 2022.

PG&E identified EC notification #116748091 on March 16, 2019 to replace a broken/damaged pole with a required end date of October 7, 2019. EC notification #116748091 was still open as of September 20, 2022.

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

> *"Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard."*

GO 165, Section III-B, Standards for Inspection states in part:

> *"Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1."*

ESRB identified that PG&E had completed a significant number of overhead patrols and inspections past their assigned due dates. Table 3 below breaks down the late overhead patrols and inspections by year and total structures late.

Table 3: Late Overhead Patrols and Inspections

Year	Inspection Type	Total Structures
2020	Inspection	13,892
2021	Inspection	131,143
2021	Patrol	159,328

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

   "Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules."

   GO 165, Section III-B, Standards for Inspection states in part:

   "Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1."

   ESRB identified that PG&E completed one 2019 underground inspection past its assigned due date:

   - Map 1523273 – Inspection was due on June 10, 2019 per GO 165. PG&E completed the inspection on August 7, 2019.

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities in PG&E's Fresno Division:

Loc #	SAP #	Structure Type	Structure Lat/Long
01	103997861	OH-WOOD POLE	37.08276, -119.33670
02	None	OH-WOOD POLE	37.08273, -119.33623
03	100678280	OH-WOOD POLE	37.08228, -119.33642
04	104048996	OH-WOOD POLE	37.06238, -119.35968
05	103997671	OH-WOOD POLE	37.06077, -119.35792
06	103996826	OH-WOOD POLE	37.06098, -119.35784
07	103997058	OH-WOOD POLE	37.06136, -119.35844
08	100796618	OH-WOOD POLE	36.82709, -119.60948
09	100796598	OH-WOOD POLE	36.82663, -119.60868
10	100796595	OH-WOOD POLE	36.82687, -119.60960
11	103075954	OH-WOOD POLE	36.82662, -119.61019
12	100796628	OH-WOOD POLE	36.82793, -119.60966
13	100796627	OH-WOOD POLE	36.82793, -119.61014
14	100796626	OH-WOOD POLE	36.82791, -119.61026
15	100798225	OH-WOOD POLE	36.82621, -119.70408
16	102310146	OH-WOOD POLE	36.82567, -119.70422
17	100798222	OH-WOOD POLE	36.82521, -119.71151
18	107142936	UG-Junction Box	36.84224, -119.71009
19	107210014	UG-Pad Mounted Transformer	36.84278, -119.71054
20	107213104	UG-Pad Mounted Transformer	36.83895, -119.71011
21	100766786	OH-WOOD POLE	36.18526, -119.56177
22	100766788	OH-WOOD POLE	36.18525, -119.56186
23	100766785	OH-WOOD POLE	36.18521, -119.56293
24	100766784	OH-WOOD POLE	36.18521, -119.56412
25	100766783	OH-WOOD POLE	36.18537, -119.56429
26	100766448	OH-WOOD POLE	36.15288, -119.55874
27	100766449	OH-WOOD POLE	36.15291, -119.55884
28	100766447	OH-WOOD POLE	36.15267, -119.55783
29	100766446	OH-WOOD POLE	36.15215, -119.55682
30	100710766	OH-WOOD POLE	36.27206, -119.76281
31	100710767	OH-WOOD POLE	36.27224, -119.76293
32	100710791	OH-WOOD POLE	36.27156, -119.76302
33	100710796	OH-WOOD POLE	36.27157, -119.76316
34	100710856	OH-WOOD POLE	36.26927, -119.76286
35	103570987	OH-WOOD POLE	36.42984, -120.12139
36	103074367	OH-WOOD POLE	36.42982, -120.12134

Loc #	SAP #	Structure Type	Structure Lat/Long
37	100717299	OH-WOOD POLE	36.43008, -120.12121
38	100717350	OH-WOOD POLE	36.43052, -120.12115
39	100717318	OH-WOOD POLE	36.43126 -120.12114
40	100717327	OH-WOOD POLE	36.43235, -120.12116
41	103243495	OH-WOOD POLE	36.43346, -120.12128
42	100717335	OH-WOOD POLE	36.43453, -120.12114
43	100639947	OH-WOOD POLE	36.67135, -120.02205
44	100639949	OH-WOOD POLE	36.67150, -120.02091
45	100639950	OH-WOOD POLE	36.67129, -120.01955
46	100639951	OH-WOOD POLE	36.67131, -120.01832
47	100639952	OH-WOOD POLE	36.67132, -120.01715
48	100639953	OH-WOOD POLE	36.67132, -120.01711
49	100639955	OH-WOOD POLE	36.67127, -120.01577
50	103143499	OH-WOOD POLE	36.67128, -120.02329
51	100639941	OH-WOOD POLE	36.67132, -120.02454
52	100639962	OH-WOOD POLE	36.67261, -120.02484
53	100639963	OH-WOOD POLE	36.67260, -120.02488
54	100639965	OH-WOOD POLE	36.67265, -120.02491
55	100639969	OH-WOOD POLE	36.67328, -120.02484
56	100639970	OH-WOOD POLE	36.67389, -120.02464
57	100639981	OH-WOOD POLE	36.67481, -120.02486
58	100639204	OH-WOOD POLE	36.67644, -120.00587
59	100639206	OH-WOOD POLE	36.67685, -120.00372
60	100639207	OH-WOOD POLE	36.67678, -120.00242
61	100639209	OH-WOOD POLE	36.67673, -120.00234
62	100639211	OH-WOOD POLE	36.67672, -120.00204
63	100639212	OH-WOOD POLE	36.68825, -120.00218
64	103142197	OH-WOOD POLE	36.68828, -120.00233
65	100640564	OH-WOOD POLE	36.75370, -119.85361
66	100640565	OH-WOOD POLE	36.75378, -119.85368
67	100640566	OH-WOOD POLE	36.75371, -119.85429
68	100640570	OH-WOOD POLE	36.75370, -119.85468
69	103763213	OH-WOOD POLE	36.75374, -119.85489
70	100640575	OH-WOOD POLE	36.75379, -119.85546
71	100640576	OH-WOOD POLE	36.75378, -119.85579
72	100640578	OH-WOOD POLE	36.75369, -119.85586
73	100869559	OH-WOOD POLE	36.75715, -119.71721
74	100869567	OH-WOOD POLE	36.75662, -119.81714
75	103379805	OH-WOOD POLE	36.75644, -119.81718
76	107207523	UG- Subsurface Transformer	36.84786, -119.84389
77	107182737	UG- Subsurface Transformer	36.84789, -119.84448

Loc #	SAP #	Structure Type	Structure Lat/Long
78	107117941	UG- Subsurface Fuse/Switch	36.84850, -119.84358
79	104034265	OH-WOOD POLE	36.85018 -119.83768
80	None	OH-WOOD POLE	36.85019, -119.83776
81	100644877	OH-WOOD POLE	36.85021, -119.83663
82	103273035	OH-WOOD POLE	36.85002, -119.83589

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 SAP # 100796618 (Location 8) at 6254 N McCall Ave Clovis: Buried guy anchor. PG&E corrected during the audit.

1.2. Pole SAP # 100796626 (Location 14) across from 6314 N. McCall Ave Clovis: Loose and angled B-phase insulator (top insulator) due to deterioration at the top of the pole. PG&E created EC 124893136 during the audit and pole replaced overnight per PG&E.

1.3. Pole SAP # 120915540 (Location 16) at rear of 345 Dewitt Ave, Clovis: Service Insulator detached from building, Communications line 'zip-tied' to service drop. PG&E corrected during audit.

1.4. Pole SAP # 100766447 (Location 28) at Lat 36.152667 Long -119.55783, Corcoran: Damaged base of pole. 2 ½ inch section missing from base of pole, needs replacement. PG&E's 2011 intrusive inspection determined reinforcement was required for the pole; however, ESRB staff observed no reinforcement on the pole.[2]

1.5. Pole SAP # 100717299 (Location 37) at Lat 36.43008 Long -120.12121, Five Points: Damaged pole top, notched near cross arm. Frayed middle phase conductor. PG&E created EC 120635999 during audit for pole replacement and added conductor replacement as well.

1.6. Pole SAP # 100639953 (Location 48) at Lat 36.67132 Long -120.01711, Kerman: Rotted cross arm and corroded guy anchor. PG&E already had EC 1222342732 E (11/2021) for cross arm and added the corroded anchor to the notification.

1.7. Pole SAP # 100639965 (Location 54) at Lat 36.43008 Long -120.12121, S. Howard Avenue, Kerman: Damaged insulator on service drop. PG&E created EC 124905034 during audit.

1.8. Pole SAP # 100639204 (Location 58) at 11911 W Central Ave, Kerman:

[2] PG&E Post-Audit Data Request, Question 3a Response.

Splices within 2 ft. of insulators on middle and North phases. PG&E created EC 124905332 during audit.

1.9. Pole SAP # 100640564 (Location 65) at 3421 W Dudley Ave, Fresno: Two splices within 2 ft. of insulators. PG&E had an existing EC 122232601 to replace pole decay. Splices will be repaired when pole is replaced.

1.10. Pole SAP # 100640564 (Location 67) at 3459 W Dudley Ave, Fresno: Loose service drop preform from pole. PG&E created EC 124906822 during audit.

1.11. Pole SAP # 100640564 (Location 68) at 3447 W Dudley Ave, Fresno: Splices within 2 ft. of insulator, middle phase. PG&E created EC 124907121 created during audit.

1.12. Pole SAP # 100640564 (Location 73) at Alley of 423 W Olive Ave, Fresno: Service drop insulator pulled from pulled from building, service drop running across top of building. PG&E created EC 124907553 during audit.

1.13. Pole SAP # 100796595 (Location 10) at Lat 36.82687 Long -119.60960, N. McCall Ave, Clovis: connector incorrectly installed. PG&E previously identified on EC 117340581.

1.14. Pole SAP # 100766786 (Location 21) at Across from 19690 6th Ave, Hanford: Service drop broken, damaged. Anchor needs extension. PG&E previously identified on EC 124495856.

1.15. Pole SAP # 100766448 (Location 26) at Lat 36.15288 Long -119.55874. Corcoran Reservoir: Pole, conductor, and transformer replacement. PG&E previously identified on EC 124484180 B. Missing guy marker and buried anchor identified at site to be remedied when pole is replaced.

1.16. Pole SAP # 100710766 (Location 30) at 13797 17th Ave, Lemoore: Incorrectly installed insulation connector, primary jumper. PG&E previously identified on EC 122392100.

1.17. Pole SAP # 100639947 (Location 43) at Lat 36.67136 Long -120.02205, Kerman: Cross arm rotted, replace. PG&E previously identified on EC 122342382.

1.18. Pole SAP # 100639949 (Location 44) at Lat 36.67150 Long-120.02091, Kerman: Pole rotted/decayed, replace. PG&E previously identified on EC 122342410.

1.19. Pole SAP # 100639950 (Location 45) at Lat 36.67129 Long -120.01955, Kerman: Pole and cross arm rotted, replace. PG&E previously identified on EC 122342461.

1.20. Pole SAP # 100639951 (Location 46) at Lat 36.67131 Long -120.01832, Kerman: Pole rot, woodpecker damage, replace. Previously identified on EC 122342509.

1.21. Pole SAP # 100639952 (Location 47) at Lat 36.67131 Long -120.01715, Kerman: Pole and cross arm rotted, replace. PG&E previously identified on EC 122342564.

1.22. Pole SAP # 100639955 (Location 49) at Lat 36.67129 Long -120.01955, Kerman: Pole and cross arm need replacement. PG&E previously identified on EC 122342694. Slack guy will be corrected when pole is replaced.

1.23. Pole SAP # 103143499 (Location 50) at Lat 36.67128 Long -120.023292, Kerman: Pole and cross arm rotted, replace. PG&E previously identified on EC 122342288.

1.24. Pole SAP # 100639963 (Location 53) at Lat 36.67260 Long -120.02488, Kerman: Damaged cross arm at bottom fuse cutout. PG&E previously identified on EC 122358325

1.25. Pole SAP # 100639206 (Location 59) at Lat 36.67685 Long -120.00372, W Central Ave, Kerman: Pole decay, replace. PG&E previously identified on EC 122362406.

1.26. Pole SAP # 100639207 (Location 60) at Lat 36.67678 Long -120.00242, W Central Ave, Kerman: Splice less than 24 inches from insulator. PG&E previously identified on EC 122362407.

1.27. Pole SAP # 100639212 (Location 63) at Lat 36.68825 Long -120.00218, Muscat Ave, Kerman: Woodpecker damage, needs assessment. PG&E previously identified on EC 122363793.

1.28. Pole SAP # 103142197 (Location 64) at Lat 36.68828 Long -120.00233, W North Ave, Kerman: Plough damage to pole, replace. PG&E previously identified on EC 122363754.

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)."

Pole SAP # 100639941 (Location 51) at Lat 36.67132 Long -120.02454, Kerman: Broken riser molding. PG&E previously identified on EC 122342254.

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. Pole SAP # 100766783 (Location 25) at Lat 36.18537 Long -119.56429 St, Corcoran: Clovis: High Voltage sign is damaged, partially missing.

   3.2. Pole SAP # 103243495 (Location 41) at Lat 36.43346 Long -120.12128, Five Points: High Voltage sign is loose. PG&E corrected during audit.

   3.3. Pole SAP # 103243495 (Location 42) at Lat 36.43453 Long -120.12114, Five Points: High Voltage sign is missing on North side. PG&E replaced during audit.

   3.4. Pole SAP # 103243495 (Location 57) at 4114 S. Howard Ave, Kerman: High Voltage sign is loose/missing. PG&E corrected during audit.

   3.5. Pole SAP # 100639970 (Location 56) at Lat 36.67389 Long -120.024636, Kerman: HV Sign missing. PG&E previously identified on EC 122370953.

4. **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."

   Underground Junction Box SAP # 107142936 (Location 18) at 655 N. Cherry Lane, Clovis: High Voltage warning sign on cover in poor condition (faded). PG&E corrected during audit.

5. **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."*

5.1. Pole SAP # 100639941 (Location 51) at Lat 36.67132 Long -120.02454, Kerman: Guy slack. PG&E previously identified on EC 122342254.

5.2. Pole SAP # 100710791 (Location 32) at 13864 17th Ave, Lemoore: Corroded anchor, loose guy. PG&E previously identified on EC 112163032.

6. **GO 95, Rule 56.9, Guy Marker (Guy Guard)** states:

> *"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 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."*

6.1. Pole SAP # 100710767 (Location 31) at Lat 36.27224 Long -119.76293, Lemoore: Missing high-visibility strips. PG&E corrected during audit.

6.2. Pole SAP # 100710791 (Location 32) at 13864 17th Ave, Lemoore: Faded Guy markers. PG&E previously identified on EC 112163032.

6.3. Pole SAP # 100639211 (Location 62) at Lat 36.67671667 Long -120.0020361, Kerman: Damaged guy marked, attached with rope. PG&E corrected during audit.

7. **GO 95, Rule 31.6, Abandoned Lines** states:

> *"Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use."*

Pole SAP # 100639963 (Location 53) at Lat 36.67260 Long -120.02488, Kerman: Idle facility on backside cross arm. PG&E previously identified on EC 111384949 (Idle facility)

8. **GO 95, Rule 18 Section B (1) iii, Maintenance Programs** states in part:

> *"Level 3 – Any risk of low potential impact to safety or reliability: Take corrective action within 60 months…"*

Pole SAP # 103570987 (Location 35) at W. Mt Whitney Ave/ S. Trinity Ave, Five Points: Corroded anchor. PG&E previously identified on EC 110368856 and

122942899.

9. GO 95, Rule 44.3, Replacement states:

"Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade "C" construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one."

9.1. Pole SAP # 100798222 (Location 17) at 412 4th St, Clovis: Secondary service supported on pole top extension installed in 1985 on AT&T owned pole. Pole top extension is crooked and crossarm brace is bent (See Figure 1).

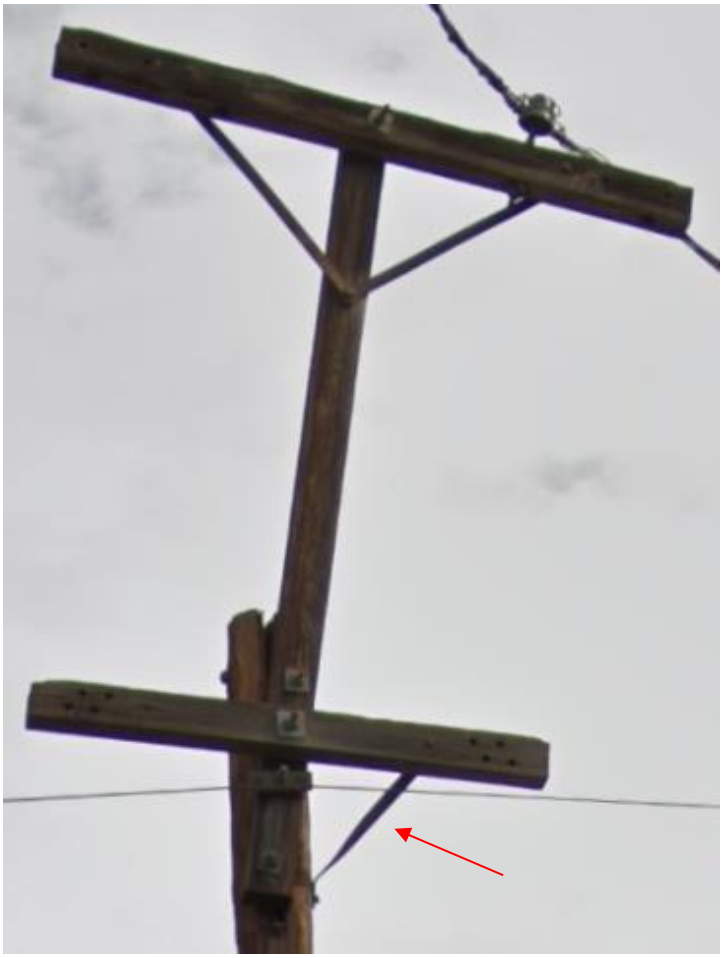

Figure 1: Pole Top Extension

9.2. Pole SAP # 100710856 (Location 34) at Idaho Ave. and 17th Ave, Lemoore:

Overloaded pole. PG&E previously identified on EC 122373580.

10. GO 95, Rule 35, Vegetation Management, Table 1 Case 13 Column E 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.

The minimum allowable radial clearance of vegetation from 750 – 22,500 V conductors not in a High Fire-Threat District (HFTD) is 18 inches."

10.1. Pole SAP # 100710766 (Location 30) at 13797 17th Ave, Lemoore: Vegetation growing up pole. PG&E previously identified on EC 122392101.

10.2. Pole SAP # 100640565 (Location 66) at 3412 W Dudley Ave, Fresno: Vegetation strain on service drop.

11. GO 128, Rule 33.6, Arrangements in Manholes, Vaults, and Enclosures A. Accessibility states:

"Cables and conductors in manholes, handholes, permanent cable trenches, or other similar enclosures shall be reasonably accessible to workmen and working space shall be available at all times."

11.1. Underground Subsurface Transformer SAP # 107207523 (Location 76) at 2784 W Decatur Ave, North Fresno: Tree root damaged access hatch frame, replace. PG&E previously identified on EC 123443147.

11.2. Underground Subsurface Transformer SAP # 107182737 (Location 77) at 2807 W Decatur Ave, North Fresno: Enclosure filled with debris/leaves. PG&E previously identified on EC 123444008 E (4/2021)

V. Observations

1. ESRB staff observed the following third-party potential safety concerns during the field inspection:

GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities states in part:

"For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property…"

GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

"(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.

2.1. The Ponderosa underground communication cable at 3911 Woodland Rd is unsecured on the ground (Location 3).

2.2. The communication ground wire on the pole at Lat 36.82663 Long -119.60868 is exposed with the damaged molding (Location 9). PG&E created Third Party Notification (TPN) 124893214 during audit.

2.3. Idle communications drips hanging off pole and midspan with exposed ground, open splice box at Rear off 317 DeWitt Ave, Clovis (Location 15). PG&E created TPN 124893749 during audit.

2.4. Loose communications drop hanging off crossarm at Rear off 345 DeWitt Ave, Clovis (Location 16). PG&E created TPN 124894436 created during audit.

2.5. Loose/abandoned communications service hanging off pole, broken guy at Idaho Ave and 17th Ave, Lemoore (Location 34). PG&E previously created TPN 122373519.

2.6. Unauthorized attachment (security camera) at 3447 W Dudley Ave, Fresno (Location 67). PG&E created TPN 124906935 during audit.

2.7. The communication ground wire on the pole at 3459 W Dudley Ave, Fresno is exposed with the damaged molding (Location 68).

2.8. Loose communications service hanging midspan at 3490 W Dudley Ave, Fresno (Location 69). PG&E created TPN 124907163 during audit.

2.9. Loose/abandoned communications drops on pole. Loose riser cable on pole at Lat 36.75379 Long -119.85546 (Location 70). PG&E corrected during audit.

2.10. Loose communications drop, low clearance, service box open on building at hanging off crossarm at alley across from 423 W Olive Ave, Fresno (Location 73). PG&E created TPN 124907556 during audit.

2.11. Unauthorized attachment at rear of 1029 N Vagedes Ave, Fresno (Location 74). PG&E removed during audit.

2.12. Unused anchor, communications cable in contact with PG&E service drop at rear of 1021 N Vagedes Ave, Fresno (Location 75). PG&E created TPN 124907623 during audit.

2.13. Communications buddy pole needs removal, service moved to new pole at Lat 36.85019 Long -119.83776, Boy Scout Road, North Fresno (Location 80). PG&E created TPN 124912264 during audit.

2.14. Idle communications line loose on ground, looped over fence, not covered on pole at Lat 36.85002 Long -119.83589, Boy Scout Road, North Fresno (Location 82). PG&E created TPN 124912078 during audit.