STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

August 4, 2022 EA2022-1014

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 Central Coast Division

Dear Ms. Jordan:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Charles Mee and Dmitriy Lysak of ESRB staff conducted an electric distribution audit of PG&E's Central Coast Division from June 13 through June 17, 2022. 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 (GO). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than September 1, 2022, via 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 and observations. The response should indicate the date of 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 Sections II & IV of the enclosed Audit Findings.

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
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Charles Mee, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC
Rickey Tse, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Dmitriy Lysak, Utilities Engineer, ESRB, SED, CPUC

PG&E CENTRAL COAST DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
June 13 – 17, 2022

I. Records Review

During the distribution audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for PG&E's Central Coast Division:

- Electric Distribution Preventive Maintenance Manual, April 1, 2016
- TD-2302B-006, Distribution Line Equipment Inspection and Testing Cycles, November 15, 2017
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, December 15, 2010
- Distribution facilities statistics and their wildfire risks, including equipment risks and vegetation risks
- Central Coast Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, April 2017 – March 2022
- Electric Corrective Notifications list, April 2017 – April 2022
- Reliability Indexes and Outage list, April 2017 – March 2022
- Central Coast New Projects list, April 2021 – April 2022
- Pole Loading Calculations list, March 2020 – May 2022
- Incoming Third-Party Notifications list, June 2018 – March 2022
- Outgoing Third-Party Notifications list, April 2017 – April 2022
- Inspector training records, January 2017 – May 2022
- Equipment test records, April 2017 – April 2022
- Intrusive Inspections, April 2021 – March 2022
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

II. Records Violations

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

1. **General Order (GO) 95, Rule 18-B, Maintenance Programs, (1)(a)** 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 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."*

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 late work orders completed within the Central Coast Division for the past 60 months (April 2017 – April 2022) shown in Table 1. PG&E's Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines the priority codes and associated time frames for the response/repair action 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 late work orders and determined that PG&E did not address a total of 31,877 work orders by their assigned due date. Table 1 below breaks down the 31,877 late work orders by their given priority, including the total number of late work orders completed, pending, and cancelled work orders, which are included in the total.

Table 1: Late Work Orders in Central Coast Division

Priority Code	Late Work Orders Completed	Late Work Orders Pending	Late Work Orders Cancelled	Total
B	2,380	293	158	**2,831**
E	10,524	13,974	3,801	**28,299**
F	293	368	86	**747**
Total	**13,197**	**14,635**	**4,045**	**31,877**

PG&E needs to provide ESRB with its corrective action plan to complete the 14,635 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Table 2 below identifies the most overdue non-exempt work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Order (WO#s)	Number of Days Past Assigned Due Date
A	113239357	1502
B	117730754	1034*
E	117221374	1067*
F	116977700	940*

*At the time of the record review, the work has not been completed.

PG&E identified work order #113239357 on September 11, 2017, to replace a broken transformer with an expected completion date of October 2, 2017. PG&E did not complete the work until November 12, 2021.

PG&E identified work order #117730754 on July 3, 2019, to replace a broken conductor with an expected completion date of October 3, 2019. PG&E has not completed the work as of May 2, 2022.

PG&E identified work order # 117221374 on April 20, 2019, to remove a tree ground with an expected completion date of May 31, 2019. PG&E has not completed the work as of May 2, 2022.

PG&E identified work order # 116977700 on April 8, 2019, to install a missing anchor with an expected completion date of October 5, 2019. PG&E has not completed the work as of May 2, 2022.

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

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

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

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

ESRB staff noted that PG&E completed a total of 1,691 overhead detailed inspections of electric facilities past an internal PG&E assigned due date of August 31, 2020 for all overhead High Fire Threat District (HFTD) as shown in the first worksheet of Attachment 1.

ESRB staff also identified that PG&E completed a total of 11,575 overhead detailed inspections of electric facilities past their GO 165 required completion date for non-HFTD as shown in the second worksheet of Attachment 1.

Additionally, ESRB staff found that PG&E completed a total of 338 overhead patrols past their GO 165 required completion date for the following maps:

Table 3: Overhead Patrols Completed Past Due Dates

Map	Due Date	Completion Date
D0701	4/4/2021	11/2/2021
B1613	4/7/2021	10/2/2021
O1508C	4/7/2021	8/11/2021
O1508D	4/7/2021	8/11/2021
H0222	4/8/2021	10/19/2021
O1506	4/8/2021	8/21/2021
O26	4/9/2021	11/8/2021
H0223	4/9/2021	10/19/2021
H0224	4/9/2021	10/19/2021
H0904	4/9/2021	11/10/2021
O1509C	4/9/2021	9/3/2021
O1509D	4/9/2021	9/3/2021
O1511	4/9/2021	9/21/2021
B1615	4/10/2021	10/3/2021
B1617	4/10/2021	10/3/2021
C0721	4/10/2021	11/2/2021
D0622	4/10/2021	9/12/2021
O1512	4/10/2021	9/17/2021
O1513	4/10/2021	9/16/2021
C0825	4/13/2021	11/2/2021
D0708	4/13/2021	9/12/2021
D0710	4/13/2021	9/12/2021
D0715	4/13/2021	9/12/2021
H0905	4/13/2021	11/12/2021
H0907	4/13/2021	11/4/2021
H0906	4/14/2021	11/10/2021
H0908A	4/14/2021	11/10/2021
H0909	4/14/2021	11/20/2021
H0911	4/14/2021	11/9/2021
M13	4/15/2021	11/24/2021
B1619	4/16/2021	10/5/2021

B1621	4/16/2021	10/3/2021
B1624	4/16/2021	10/3/2021
L1622	4/16/2021	11/16/2021
L1623	4/16/2021	11/16/2021
K1424	4/17/2021	11/11/2021
K1425	4/17/2021	11/12/2021
K1504	4/17/2021	11/11/2021
K1509	4/17/2021	11/11/2021
K1516	4/17/2021	11/11/2021
H0917	4/21/2021	11/8/2021
H1001	4/21/2021	11/22/2021
K15	4/21/2021	11/11/2021
L1616	4/21/2021	11/16/2021
L1617	4/21/2021	11/16/2021
L1621	4/21/2021	11/16/2021
P1502	4/21/2021	9/8/2021
H1002	4/22/2021	11/23/2021
H1003	4/22/2021	11/23/2021
O1516	4/22/2021	9/7/2021
O1517	4/22/2021	9/21/2021
P1501	4/22/2021	9/8/2021
H1004	4/23/2021	11/20/2021
H1005	4/23/2021	11/19/2021
H1006	4/23/2021	11/22/2021
H1007	4/23/2021	11/23/2021
L1405	4/23/2021	11/9/2021
L1501	4/23/2021	11/9/2021
B1719	4/24/2021	10/4/2021
B1722	4/24/2021	10/4/2021
H0908	4/24/2021	11/10/2021
H0912	4/24/2021	11/9/2021
H0915	4/24/2021	11/9/2021
H1008	4/24/2021	11/20/2021
N24	4/27/2021	11/8/2021
N26	4/27/2021	11/8/2021
S2206	4/27/2021	11/9/2021
H10	4/27/2021	11/19/2021
H0913	4/28/2021	11/9/2021
H0914	4/28/2021	11/9/2021
B1706	4/30/2021	10/3/2021
Q23	4/30/2021	11/9/2021

Q24	4/30/2021	11/9/2021
H0903D	4/30/2021	11/4/2021
H0907D	4/30/2021	11/24/2021
H0910	4/30/2021	11/20/2021
H0916	4/30/2021	11/9/2021
B17	5/5/2021	10/3/2021
B1708	5/5/2021	10/3/2021
H0901	5/5/2021	11/3/2021
B1712	5/6/2021	10/4/2021
H0902	5/11/2021	11/4/2021
H0903A	5/11/2021	11/10/2021
H0903B	5/11/2021	9/28/2021
H0903C	5/11/2021	11/10/2021
B1717	5/14/2021	10/4/2021
O1513A	5/14/2021	9/16/2021
O1514	5/14/2021	9/22/2021
O1515	5/14/2021	9/16/2021
O1518	5/18/2021	9/22/2021
O1520	5/18/2021	9/17/2021
H07	5/19/2021	7/30/2021
O1519	5/24/2021	9/22/2021
O1519D	5/24/2021	9/1/2021
O1521	5/24/2021	8/30/2021
D0804	5/25/2021	9/12/2021
D0805	5/25/2021	11/3/2021
O1522	5/25/2021	8/30/2021
B1714	5/27/2021	10/4/2021
J30	5/28/2021	11/15/2021
O1223	5/28/2021	6/2/2021
O1224	5/28/2021	6/2/2021
O1225	5/28/2021	6/2/2021
O1523	5/28/2021	8/30/2021
T09	6/3/2021	7/20/2021
D0825	6/3/2021	11/3/2021
D0901	6/3/2021	11/3/2021
D0807	6/9/2021	11/19/2021
L25	6/10/2021	11/19/2021
O1718	6/12/2021	11/9/2021
O1722	6/13/2021	11/20/2021
O1721	6/13/2021	11/9/2021
G0621	6/26/2021	9/30/2021

O1612	6/29/2021	9/1/2021
O1617	6/29/2021	9/1/2021
O1619	7/4/2021	9/1/2021
O1611	7/5/2021	9/1/2021
O1618	7/5/2021	9/1/2021
O1625	7/6/2021	8/31/2021
D1011	7/8/2021	11/9/2021
F1018	7/8/2021	11/23/2021
F1019	7/8/2021	11/23/2021
F1020	7/8/2021	11/23/2021
F1022	7/8/2021	11/23/2021
F1023	7/8/2021	11/23/2021
D1023	7/9/2021	9/15/2021
G0601	7/9/2021	8/30/2021
D1021	7/10/2021	11/9/2021
J12	7/11/2021	11/12/2021
P12	7/12/2021	9/17/2021
P1204	7/12/2021	9/8/2021
P1205	7/12/2021	9/8/2021
O2123	7/12/2021	11/20/2021
P17	7/12/2021	11/9/2021
P1709	7/12/2021	11/9/2021
P1710	7/12/2021	11/9/2021
P1715	7/12/2021	11/14/2021
M33	7/13/2021	11/19/2021
E0602	7/13/2021	9/16/2021
E0604	7/13/2021	9/15/2021
E0605	7/13/2021	9/15/2021
E06	7/14/2021	9/15/2021
E0612	7/14/2021	9/15/2021
E0613	7/14/2021	9/15/2021
E0617	7/14/2021	9/19/2021
E0619	7/14/2021	9/19/2021
E0620	7/14/2021	9/19/2021
E0621	7/14/2021	9/15/2021
E0624	7/14/2021	9/16/2021
E0625	7/14/2021	9/16/2021
F17	7/15/2021	11/18/2021
D1016	7/15/2021	11/5/2021
E1605	7/19/2021	11/9/2021
E1708	7/19/2021	11/15/2021

E1716	7/19/2021	11/8/2021
E1722	7/19/2021	11/16/2021
O2006	7/19/2021	11/8/2021
D1701	7/21/2021	10/28/2021
D1706	7/21/2021	10/28/2021
D1721	7/21/2021	10/28/2021
D1711	7/22/2021	10/28/2021
D1716	7/22/2021	10/28/2021
D1718	7/26/2021	10/28/2021
D1722	7/26/2021	11/23/2021
D18	7/26/2021	10/26/2021
E1709	7/26/2021	11/15/2021
I0204D	7/26/2021	10/20/2021
D20	7/27/2021	11/16/2021
E17	7/27/2021	11/23/2021
E1713	7/27/2021	11/15/2021
E18	7/27/2021	11/30/2021
E1811	7/27/2021	11/13/2021
E1816	7/27/2021	11/13/2021
E1822	7/27/2021	11/12/2021
E19	7/27/2021	11/12/2021
F1803	7/27/2021	11/18/2021
G0611	7/27/2021	9/27/2021
G0616	7/27/2021	9/30/2021
G0617	7/27/2021	9/26/2021
H0217	7/27/2021	10/18/2021
H0218	7/27/2021	10/19/2021
H0219	7/27/2021	10/19/2021
I0206	7/27/2021	10/28/2021
E1715	7/28/2021	11/16/2021
I0202	7/28/2021	10/20/2021
I0203	7/28/2021	10/21/2021
I0204	7/28/2021	10/23/2021
I0214	7/28/2021	11/26/2021
R2106	7/28/2021	11/17/2021
R2110	7/28/2021	11/17/2021
R2120	7/28/2021	11/17/2021
R2206	7/28/2021	11/18/2021
I0205	7/29/2021	11/24/2021
I0209	7/29/2021	10/27/2021
I0301	7/29/2021	10/22/2021

R2011	7/29/2021	11/17/2021
R2017	7/29/2021	11/16/2021
R21	7/29/2021	11/16/2021
R2203	7/29/2021	11/17/2021
R2211	7/29/2021	11/18/2021
R2213	7/29/2021	11/18/2021
R2406	7/29/2021	11/19/2021
I0120	7/30/2021	10/19/2021
I0210	7/30/2021	11/18/2021
R1907	7/30/2021	11/16/2021
R1912	7/30/2021	11/16/2021
R1914	7/30/2021	11/17/2021
R1918	7/30/2021	11/17/2021
R2002	7/30/2021	11/17/2021
R2003	7/30/2021	11/17/2021
R2007	7/30/2021	11/17/2021
R2009	7/30/2021	11/15/2021
R2104	7/30/2021	11/17/2021
R2201	7/30/2021	11/17/2021
I0114	8/1/2021	10/18/2021
I0115	8/1/2021	10/18/2021
I0122	8/1/2021	10/20/2021
I0306	8/1/2021	11/18/2021
Q2212	8/1/2021	11/17/2021
Q2217	8/1/2021	11/17/2021
Q2223	8/1/2021	11/17/2021
R1901	8/1/2021	11/16/2021
R1903	8/1/2021	11/16/2021
R1904	8/1/2021	11/16/2021
R1920	8/1/2021	11/17/2021
R1925	8/1/2021	11/17/2021
R2023	8/1/2021	11/16/2021
I0119	8/2/2021	10/19/2021
P1811	8/2/2021	11/20/2021
P1812	8/2/2021	11/14/2021
Q2306	8/2/2021	11/8/2021
P1807	8/5/2021	11/21/2021
O1524	8/6/2021	9/1/2021
O2012	8/10/2021	11/8/2021
O2014	8/10/2021	11/9/2021
O2016	8/10/2021	11/8/2021

O2116	8/10/2021	11/14/2021
B1604	9/2/2021	10/2/2021
F1921	9/2/2021	11/22/2021
F1923	9/2/2021	11/22/2021
G19	9/2/2021	11/13/2021
G1902	9/2/2021	11/15/2021
G1904	9/2/2021	11/15/2021
U25	9/2/2021	11/10/2021
V35	9/2/2021	11/10/2021
B1503	9/3/2021	10/1/2021
B1504	9/3/2021	10/1/2021
B1606	9/3/2021	10/2/2021
B1608	9/3/2021	10/2/2021
B1724	9/3/2021	10/4/2021
F1809	9/3/2021	11/18/2021
F1815	9/3/2021	11/18/2021
I0312	9/3/2021	11/18/2021
I0312C	9/3/2021	11/15/2021
I0317A	9/3/2021	11/15/2021
I0317B	9/3/2021	11/18/2021
I0411	9/3/2021	10/26/2021
I0412	9/3/2021	10/26/2021
I0413	9/3/2021	10/26/2021
I0318	9/4/2021	11/15/2021
I0318	9/4/2021	11/15/2021
I0319	9/4/2021	11/16/2021
I0320	9/4/2021	11/16/2021
I0322	9/4/2021	11/16/2021
I0410	9/4/2021	10/26/2021
I0414	9/4/2021	11/1/2021
I0416	9/4/2021	10/30/2021
E0722	9/4/2021	10/4/2021
E0723	9/4/2021	10/4/2021
I29	9/5/2021	11/15/2021
V27	9/5/2021	11/10/2021
I0323	9/5/2021	11/16/2021
I0415	9/5/2021	11/1/2021
P1702	9/6/2021	11/9/2021
P1703	9/6/2021	11/12/2021
P1704	9/6/2021	11/12/2021
I0417	9/8/2021	11/2/2021

I0418	9/8/2021	11/2/2021
I0420	9/8/2021	11/3/2021
H09	9/8/2021	11/23/2021
I1102	9/8/2021	10/29/2021
I1104	9/8/2021	10/29/2021
I1105	9/8/2021	10/29/2021
I1110	9/8/2021	10/29/2021
I1115	9/8/2021	10/29/2021
I0403	9/9/2021	10/20/2021
I0404	9/9/2021	10/20/2021
I0405	9/9/2021	10/20/2021
I0407	9/9/2021	10/20/2021
I0408	9/9/2021	10/20/2021
E0721	9/9/2021	10/4/2021
E0725	9/9/2021	10/1/2021
I1114	9/9/2021	10/29/2021
I12	9/9/2021	11/13/2021
I1209	9/9/2021	11/15/2021
I1210	9/9/2021	11/15/2021
I1215	9/9/2021	11/16/2021
I0419	9/10/2021	11/3/2021
I0422	9/10/2021	11/3/2021
I0423	9/10/2021	11/2/2021
J32	9/11/2021	11/15/2021
L32	9/11/2021	11/19/2021
I0307	9/11/2021	11/18/2021
I0312B	9/11/2021	11/15/2021
I0312D	9/11/2021	11/15/2021
I0313	9/11/2021	11/12/2021
I0409	9/11/2021	10/21/2021
I0424	9/11/2021	11/2/2021
I0313C	9/12/2021	11/12/2021
I0314	9/12/2021	11/12/2021
I0315	9/12/2021	11/12/2021
I0317	9/12/2021	11/13/2021
I1201	9/12/2021	11/13/2021
I1204	9/12/2021	11/15/2021
I1206	9/12/2021	11/15/2021
I1207	9/12/2021	11/15/2021
I1208	9/12/2021	11/15/2021
I1212	9/12/2021	11/15/2021

I1214	9/12/2021	11/15/2021
D0920	9/15/2021	11/5/2021
D0918	9/16/2021	11/9/2021
D0912	9/17/2021	11/4/2021
F1003	9/22/2021	11/22/2021
F1007	9/22/2021	11/22/2021
F20	9/27/2021	11/22/2021
D0907	9/27/2021	11/4/2021
D0914	9/27/2021	11/4/2021
F1010	9/27/2021	11/22/2021
F1011	9/27/2021	11/22/2021
F1012	9/27/2021	11/22/2021
F1014	9/27/2021	11/22/2021
F1017	9/27/2021	11/22/2021
P1816	10/15/2021	11/14/2021
P2018C	10/17/2021	11/16/2021
Z29	10/19/2021	11/10/2021
P1924	10/23/2021	11/4/2021
P1925	10/23/2021	11/4/2021
R2004	10/24/2021	11/17/2021

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 staff noted that PG&E failed to complete patrols of underground electric facilities located in 13 underground maps given in Table 4:

Table 4: Underground Patrols Completed Past Due Dates

Map	Due Date	Completion Date
R1805	6/17/2020	7/7/2020
R1908	6/25/2020	7/6/2020
R1915	6/25/2020	7/6/2020

R2001	6/30/2020	7/6/2020
R2002	6/13/2020	7/6/2020
R2003	6/14/2020	7/6/2020
R2102	6/17/2020	7/5/2020
R2103	6/19/2020	7/5/2020
R23	6/22/2020	7/5/2020
R2315	6/19/2020	7/7/2020
R2320	6/18/2020	7/7/2020
R24	6/18/2020	7/7/2020
R2407	6/19/2020	7/7/2020

ESRB staff also identified that PG&E failed to complete detailed inspections of the following underground electric facilities located in 11 underground maps shown in Table 5 below:

Table 5: Underground Detailed Inspections Completed Past Due Dates

Map	Due Date	Completion Date
C1113	6/24/2020	7/8/2020
F10	6/4/2020	7/12/2020
J0710	6/9/2020	7/10/2020
J0712	6/4/2020	7/10/2020
J0721	6/9/2020	7/13/2020
O1317	10/19/2020	11/19/2020
P1710	8/3/2020	12/22/2020
O1316	10/20/2020	11/17/2020
K0406	7/23/2021	8/5/2021
K0504	7/27/2021	8/2/2021
D1611	10/21/2021	11/10/2021

III. Field Inspection

During the field inspection, ESRB inspected locations listed in Table 6:

Table 6: List of Field Inspection Locations

Location #	SAP #	Structure Type
1	101718760	Wood pole
2	101718761	Wood pole
3	107299478	Vault
4	107299458	Vault
5	107299455	Pad mount

Location #	SAP #	Structure Type
6	101718767	Wood pole
7	101718765	Wood pole
8	101718768	Wood pole
9	101718770	Wood pole
10	101718775	Steel pole
11	101735526	Wood pole
12	101735765	Wood pole
13	101735763	Wood pole
14	101735767	Wood pole
15	103792869	Wood pole
16	101735570	Wood pole
17	101735572	Wood pole
18	101738607	Wood pole
19	101738595	Wood pole
20	101767316	Wood pole
21	101738669	Wood pole
22	101738675	Wood pole
23	101738678	Wood pole
24	101738681	Wood pole
25	101738696	Wood pole
26	101738692	Wood pole
27	101738641	Wood pole
28	101669662	Wood pole
29	101776672	Wood pole
30	101669663	Wood pole
31	101669664	Wood pole
32	101776673	Wood pole
33	101669665	Wood pole
34	101776674	Wood pole
35	103836474	Wood pole
36	107337371	Pad mount
37	108212496	Vault
38	101746947	Wood pole
39	101746946	Wood pole
40	101776951	Wood pole
41	101698766	Wood pole
42	103830848	Wood pole
43	101698771	Wood pole
44	101698765	Wood pole

Location #	SAP #	Structure Type
45	101791728	Wood pole
46	107424193	Vault
47	107322866	Vault
48	107438735	Vault
49	101771416	Wood pole
50	103939242	Wood pole
51	108219522	Vault
52	103409760	Wood pole
53	101771414	Wood pole
54	101743033	Wood pole
55	101743039	Wood pole
56	101743031	Wood pole
57	101743027	Wood pole
58	101743025	Wood pole
59	101743024	Wood pole
60	101771406	Wood pole
61	101743020	Wood pole
62	101743015	Wood pole
63	103160804	Wood pole
64	101771410	Wood pole
65	101771411	Wood pole
66	101771413	Wood pole
67	101743038	Wood pole
68	101721633	Wood pole
69	101721629	Wood pole
70	101721624	Wood pole
71	101721618	Wood pole
72	101784923	Wood pole
73	101722961	Wood pole
74	101722966	Wood pole
75	101784925	Wood pole
76	101677511	Wood pole
77	103841831	Wood pole
78	101677510	Wood pole
79	101795280	Wood pole
80	101795279	Wood pole
81	101677508	Wood pole
82	101682916	Wood pole
83	103822069	Wood pole
84	101796903	Wood pole
85	101683181	Wood pole

Location #	SAP #	Structure Type
86	103933042	Wood pole
87	101683171	Wood pole

IV. Field Inspection – Violations List

ESRB 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."

ESRB's findings are listed in the Table 7:

Table 7: GO 95, Rule 31.1 Findings

Location	Finding	Notes
9	A wood packer hole within 6" from the pole top.	PG&E created Electric Corrective (EC) 123838654.
11	This pole is 43' high and leans 4'5", more than 10%. Needs to be adjusted.	PG&E created EC 123839175 to correct the lean pole.
16	A splice needs to be replaced.	PG&E created EC 123839912 to replace the splice.
22	This pole is too weak to support the equipment and conductors.	PG&E has EC 120018916 to replace the pole.
25	This pole is too weak to support the equipment and conductors.	PG&E has EC 120018718 to replace the pole.
27	On the pole at Palm Ave & 3rd St, a jumper at the primary line is disconnected.	PG&E created a Priority A EC 123842564. After the field inspection, PG&E corrected this issue on June 16, 2022.

Location	Finding	Notes
28	The pole top transformer is not grounded.	PG&E created EC 123845966 to ground the transformer. Third Party's communication cables are exposed and abandoned; PG&E issued Notification 123845872 to the third party.
31	PG&E's guy wire is loose and touching vegetation.	PG&E created EC 120880617 to correct the loose guy wire and to clean up the vegetation. PG&E created EC 123846381 to issue a third-party notification for the exposed communication cable.
35	Vegetation touching the guy wire.	PG&E cut the tree branches on site. PG&E also placed a guard between PG&E's guy wire and the communication cables.
36	The 2021 inspection label is missing.	After the field inspection, PG&E explained that it missed this inspection in 2021 but planned to complete it in 2022. PG&E will also report any other missed 2021 inspections as a self-report if identified.
38	PG&E has completed EC 110433770 to replace ground molding, but record has not been closed yet.	PG&E closed this EC.
42	Guy anchor is below the grade.	PG&E has EC 119817869 to correct the issue.
53	The crossarm is rotten.	PG&E has EC 121803762 to replace the rotten crossarm.
69	Service drop's clearance above driveway is less than 12'.	PG&E raised the service drop to be 12' above the driveway; however, raising the service drop increased tension pulling the secondary wires and the pole to one side. ESRB recommends PG&E to install a pole reinforcement steel truss. The first step is about 7'10", PG&E removed the first step.

Location	Finding	Notes
73	PG&E has EC 117654440 to replace the pole; however, based on field observation, the pole is fine.	PG&E cancelled EC 117654440.
80	The secondary guy wire is loose.	PG&E created EC 123863178 to tight up the secondary guy wire. PG&E created EC 123863031 to issue a third-party notification to communications company for their loose guy wire.
83	The transformer is corroded.	1. PG&E has EC 121787323 to correct the corroded transformer. 2. The communication cables intertwined with the power line; PG&E created EC 123863685 to issue a third-party notification to separate the communication cables from the power line. 3. The communication cables are 13’6” above thoroughfare, PG&E raised the communication cables to 16' above the thoroughfare.
84	An abandoned guy anchor is a tripping hazard.	PG&E created EC 123864009 to remove the abandoned guy anchor.
85	Crossarm is corroded.	PG&E created EC 123864223 to issue a third-party notification to replace the corroded crossarm.
88	Erosion at base of secondary underground cables, Mailboxes attached to the pole.	PG&E needs to correct the erosion. PG&E created EC 12364980 to issue third-party notification to detach the mail from the pole.

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's finding is listed in Table 8:

Table 8: GO 95, Rule 51.6 Findings

Location	Finding	Notes
23	Missing "High Voltage" on one side of the pole.	PG&E has EC 120018856 to install the "High Voltage" sign.
68	"High Voltage" sign missing.	PG&E has EC 119811651 to install a "High Voltage" 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."

ESRB's findings are listed in Table 9:

Table 9: GO 95, Rule 35 Findings

Location	Finding	Notes
32	Guy wires are touching vegetation.	PG&E will update EC120880618 to include the vegetation issue.
33	Service drops deflected by tree branches.	PG&E has EC 120880614 for trimming the tree branches.
34	Secondary wires deflected by tree branches.	PG&E has EC 120880652 to trim the tree branches and created EC 123846604 to issue third-party notification for the exposed communications cables.
43	Vegetation interacts with the pole.	PG&E has EC 119817838 to manage the vegetation.

Location	Finding	Notes
44	Vegetation overgrown to guy wire.	PG&E has a Priority E, EC 119817804. ESRB concerned that vegetation may grow fast during the summer. After the field inspection, PG&E explained that its Field Compliance is working with Maintenance & Construction to complete the work.
81	Service drop to a customer is interacting with vegetation.	PG&E created EC 123863367 to issue a third-party notification.
86	Vegetation impacting secondary lines and the service drop.	PG&E created EC 123864533 to correct the vegetation issues.

4. PG&E's TD-2305M-JA02, Job Aid: Overhead Inspection, February 2021, Conductor Broken/Damaged, General Guidance states in part

"Does conductor have splices tied in or within 2' of insulator preventing free movement of splice with conductor? Guidance: Create EC Notification to replace conductor in order to relocate splice."

ESRB's findings are listed in Table 10:

Table 10: Splice Clearance Findings

Location	Finding	Notes
29	There is a conductor splice that is within 2' of the hardware.	PG&E created EC 120880613 to relocate the splice.
32	A splice is within 2' of the hardware.	PG&E has EC 120880618 to relocate the splice.
34	A splice is within 2' of the hardware.	PG&E has EC 120880652 to relocate the splice and created EC 123846604 to issue third-party notification for the exposed communications cables.
43	Conductor splice within 2' of the hardware.	PG&E has EC 119817838 to relocate the splice.
84	A splice is within 2' of hardware.	PG&E has EC 123964171 to relocate the splice.

V. Observations

During field inspection, ESRB staff also observed the following:

Location	Observations	Notes
45	The pole is leaning but less than 10%.	PG&E needs to monitor the condition of this pole.
48	It is a switch, but the label shows it is a transformer.	PG&E needs to change the label.