STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

May 3, 2022 EA2022-992

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 Sonoma Division

Dear Ms. Jordan:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Ogeonye Enyinwa, Dmitriy Lysak, and Amanda Asadi of ESRB staff conducted an electric distribution audit of PG&E's Sonoma Division from February 28 through March 4, 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 (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than May 31, 2022, 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 completed. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Sections II & IV and the observations listed in Section V of the enclosed Audit Findings.

If you have any questions concerning this audit, please contact Ogeonye Enyinwa at (415) 470-3504 or ogeonye.enyinwa@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

Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Rickey Tse, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Ogeonye Enyinwa, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC
Dmitriy Lysak, Utilities Engineer, ESRB, SED, CPUC
Amanda Asadi, Utilities Engineer, ESRB, SED, CPUC

**PG&E SONOMA DIVISION**
**ELECTRIC DISTRIBUTION AUDIT FINDINGS**
**February 28 – March 4, 2022**

## I. Records Review

During the audit, ESRB staff reviewed the following records:

- Completed work orders with notifications from the past 60 consecutive calendar months, cancelled work orders with notifications from the past 60 consecutive calendar months, and late completed work orders from the last 60 consecutive calendar months.
- Patrol and detailed inspection records from the past 60 consecutive calendar months.
- Feeder reliability metrics and sustained outages in the Division from the last 60 calendar months.
- Master Map displaying approximate locations of the plat maps administered by the Division.
- New Construction (both overhead and underground) projects in the last 12 months not subject to a patrol or detailed inspection.
- Pole loading calculations from the last 12 consecutive calendar months including completion dates.
- Third-party notifications sent in the last 60 consecutive calendar months and received from the last 60 consecutive calendar months.
- List of inspectors and patrolmen active in the Division in the last 60 consecutive calendar months.
- Electronic training records for inspectors in the last 60 consecutive calendar months.
- Completed equipment test records, deferred equipment test records, and temporarily delayed equipment tests during the last five years.
- Completed intrusive inspections from the last 12 months.
- Results of internal audits conducted for the distribution facilities in the Division during the last five years.

## II. Records Violations

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

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

   *"Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may*

*maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165."*

*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."*

**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 Sonoma Division for the past 60 months (from January 1, 2017 to January 3, 2022). The late work orders were determined based on the "Completion Date"[1] which represents the date PG&E recorded the status of the work orders in its database. 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:

[1] See PG&E's response to ESRB's Pre-Audit Data Request Question #: 3

- 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 27,192 work orders by their assigned due date. Of these 27,192 work orders, 26,230 of them were classified as "late non-exempt".

Per GO 95, Rule 18-B(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 work orders under these circumstances as "late-exempt" as they are exempted from completion by their assigned due date.

Table 1 a, b, and c below break down the 27,192 late work orders by their given priority. Tables below show the total number of work orders completed late, non-exempt, and cancelled work orders.

Table 1a: Number of Late Work Orders for Geyserville

| Priority Code | Total # of Late Work Orders | # of Non-Exempt Late Work Orders | Total # of Cancelled Late Work Orders |
|---|---|---|---|
| **A** | 780 | 780 | 30 |
| **B** | 664 | 652 | 23 |
| **E** | 4,535 | 4,216 | 873 |
| **F** | 123 | 117 | 10 |
| **Total** | **6,102** | **5,765** | **936** |

Table 1b: Number of Late Work Orders for Santa Rosa

| Priority Code | Total # of Late Work Orders | # of Non-Exempt Late Work Orders | # of Cancelled Late Work Orders |
|---|---|---|---|
| **A** | 7,072 | 7,072 | 713 |
| **B** | 1,481 | 837 | 46 |
| **E** | 10,351 | 10,133 | 2,249 |
| **F** | 560 | 386 | 76 |
| **Total** | **19,464** | **18,428** | **3,084** |

Table 1c: Number of Late Work Orders for Petaluma

| Priority Code | Total # of Late Work Orders | # of Non-Exempt Late Work Orders | # of Cancelled Late Work Orders |
|---|---|---|---|
| **A** | 135 | 19 | 33 |
| **B** | 144 | 32 | 5 |
| **E** | 1,309 | 1,823 | 650 |
| **F** | 38 | 163 | 2 |
| **Total** | **1,626** | **2,037** | **690** |

Tables 2 a, b, and c below identify the most overdue non-exempt work orders that were completed late for each priority.

Table 2a: Most Overdue Work Orders Completed Late for Geyserville

| Priority Code | Most Overdue Work Orders (WO#s) | Number of Days Past Assigned Due Date |
|---|---|---|
| **A** | 113779152 | 901 |
| **B** | 114245924 | 983 |
| **E** | 113249108 | 1,042 |
| **F** | 116746237 | 799 |

PG&E identified work order #113779152 on October 31, 2017, to replace a broken pole with an expected completion date of November 7, 2017. PG&E did not complete the work until April 26, 2020.

PG&E identified work order #114245924 on January 24, 2018, to replace a broken crossarm with an expected completion date of April 28, 2018. PG&E did not complete the work until January 1, 2021.

PG&E identified work order #113249108 on August 28, 2017, to replace a broken switch with an expected completion date of February 24, 2018. PG&E did not complete the work until January 1, 2021.

PG&E identified work order #116746237 on March 15, 2019, to adjust a loose Guy with an expected completion date of September 15, 2019. PG&E did not complete the work until November 22, 2021.

Table 2b: Most Overdue Work Orders Completed Late for Santa Rosa

| Priority Code | Most Overdue Work Order (WO#s) | Number of Days Past Assigned Due Date |
|---|---|---|
| **A** | 116623452 | 1,057 |
| **B** | 117081814 | 827 |
| **E** | 117053249* | 986 |
| **F** | 116733642* | 885 |

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

PG&E identified work order #116623452 on March 1, 2019, to install an underground conductor due to damage from the Tubbs fire. PG&E has not completed review of this job which may have been completed already, but the tag is still open.

PG&E identified work order #117081814 on April 23, 2019, to replace a rotten pole and remove vegetation around pole with an expected completion date of October 10, 2019. PG&E did not complete the work until January 14, 2022.

PG&E identified work order #117053249 on April 15, 2019, to assess a large dead or dying tree with an expected completion date of June 1, 2019. PG&E has not completed the work as of February 11, 2022.

PG&E identified work order #116733642 on March 14, 2019, to test an overloaded pole with an expected completion date of September 10, 2019. PG&E has not completed the work as of February 11, 2022.

Table 2c: Most Overdue Work Orders Completed Late for Petaluma

| Priority Code | Most Overdue Work Order (WO#s)* | Number of Days Past Assigned Due Date |
|---|---|---|
| **A** | 115445783 | 1,147 |
| **B** | 114837913 | 929 |
| **E** | 117535775 | 776 |
| **F** | 112683453 | 701 |

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

PG&E identified work order #115445783 on December 4, 2018 to replace a damage transformer with an expected completion date of December 25, 2018. PG&E has not completed the work as of February 11, 2022.

PG&E identified work order #114837913 on July 31, 2018 to replace a damaged Guy with an expected completion date of July 31, 2019. PG&E has not completed the work as of February 11, 2022.

PG&E identified work order #117535775 on April 9, 2019 to perform some vegetation management to provide ground clearance with an expected completion date of December 31, 2019. PG&E has not completed the work as of February 11, 2022.

PG&E identified work order #112683453 on March 15, 2017 to replace a damaged underground vault lid with an expected completion date of March 15, 2020. PG&E has not completed the work as of February 11, 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 1,697 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 2,697 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 143 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 |
|---|---|---|
| KK3301 | 8/31/2020 | 9/16/2020 |
| KK3313 | 8/31/2020 | 9/16/2020 |
| L31 | 8/31/2020 | 9/29/2020 |
| LL24 | 8/31/2020 | 9/17/2020 |
| LL25 | 8/31/2020 | 9/22/2020 |
| LL26 | 8/31/2020 | 9/22/2020 |
| LL2606 | 8/31/2020 | 9/22/2020 |
| LL27 | 8/31/2020 | 9/23/2020 |
| LL2701 | 8/31/2020 | 9/23/2020 |
| LL2706 | 8/31/2020 | 9/23/2020 |
| LL2707 | 8/31/2020 | 9/23/2020 |
| LL2714 | 8/31/2020 | 9/23/2020 |
| LL2715 | 8/31/2020 | 9/23/2020 |
| LL2719 | 8/31/2020 | 9/23/2020 |
| LL2720 | 8/31/2020 | 9/23/2020 |
| LL2904 | 8/31/2020 | 9/24/2020 |
| LL2905 | 8/31/2020 | 9/24/2020 |
| LL2921 | 8/31/2020 | 9/24/2020 |
| LL30 | 8/31/2020 | 9/29/2020 |
| LL31 | 8/31/2020 | 9/29/2020 |

| | | |
|---|---|---|
| LL32 | 8/31/2020 | 9/29/2020 |
| LL3210 | 8/31/2020 | 9/29/2020 |
| LL3212 | 8/31/2020 | 9/24/2020 |
| LL3217 | 8/31/2020 | 9/29/2020 |
| LL3218 | 8/31/2020 | 9/24/2020 |
| LL3219 | 8/31/2020 | 9/24/2020 |
| LL3222 | 8/31/2020 | 9/29/2020 |
| LL3223 | 8/31/2020 | 9/29/2020 |
| LL3224 | 8/31/2020 | 9/29/2020 |
| LL3225 | 8/31/2020 | 9/29/2020 |
| LL3302 | 8/31/2020 | 9/29/2020 |
| LL3306 | 8/31/2020 | 9/29/2020 |
| LL3307 | 8/31/2020 | 9/29/2020 |
| LL3311 | 8/31/2020 | 9/29/2020 |
| LL3312 | 8/31/2020 | 9/29/2020 |
| LL3316 | 8/31/2020 | 9/29/2020 |
| LL3317 | 8/31/2020 | 9/29/2020 |
| LL3321 | 8/31/2020 | 9/29/2020 |
| LL3322 | 8/31/2020 | 9/29/2020 |
| LL3523 | 8/31/2020 | 9/29/2020 |
| LL3524 | 8/31/2020 | 9/29/2020 |
| LL3525 | 8/31/2020 | 9/29/2020 |
| LL3616 | 8/31/2020 | 9/29/2020 |
| LL3621 | 8/31/2020 | 9/29/2020 |
| MM32 | 8/31/2020 | 9/29/2020 |
| MM3203 | 8/31/2020 | 9/29/2020 |
| MM3205 | 8/31/2020 | 9/29/2020 |
| MM3301 | 8/31/2020 | 9/29/2020 |
| MM3302 | 8/31/2020 | 9/29/2020 |
| MM3311 | 8/31/2020 | 9/29/2020 |
| MM3312 | 8/31/2020 | 9/29/2020 |
| MM3322 | 8/31/2020 | 9/29/2020 |
| MM3503 | 8/31/2020 | 9/29/2020 |
| MM3504 | 8/31/2020 | 9/29/2020 |
| MM3505 | 8/31/2020 | 9/29/2020 |
| MM3509 | 8/31/2020 | 9/29/2020 |
| MM3611 | 8/31/2020 | 9/29/2020 |
| MM3616 | 8/31/2020 | 9/29/2020 |
| MM3617 | 8/31/2020 | 9/29/2020 |
| NN22 | 8/31/2020 | 9/22/2020 |
| NN23 | 8/31/2020 | 9/22/2020 |
| NN24 | 8/31/2020 | 9/18/2020 |
| NN2804 | 8/31/2020 | 9/24/2020 |

| | | |
|---|---|---|
| NN2805 | 8/31/2020 | 9/24/2020 |
| NN2810 | 8/31/2020 | 9/24/2020 |
| NN2920 | 8/31/2020 | 9/24/2020 |
| NN30 | 8/31/2020 | 9/24/2020 |
| NN3016 | 8/31/2020 | 9/24/2020 |
| NN3019 | 8/31/2020 | 9/24/2020 |
| NN3020 | 8/31/2020 | 9/24/2020 |
| NN33 | 8/31/2020 | 10/5/2020 |
| NN34 | 8/31/2020 | 10/6/2020 |
| OO25 | 8/31/2020 | 9/18/2020 |
| OO26 | 8/31/2020 | 9/18/2020 |
| OO27 | 8/31/2020 | 9/21/2020 |
| OO28 | 8/31/2020 | 9/17/2020 |
| OO29 | 8/31/2020 | 9/17/2020 |
| OO2903 | 8/31/2020 | 9/17/2020 |
| OO2904 | 8/31/2020 | 9/17/2020 |
| OO2907 | 8/31/2020 | 9/21/2020 |
| OO2908 | 8/31/2020 | 9/16/2020 |
| OO2909 | 8/31/2020 | 9/16/2020 |
| OO2910 | 8/31/2020 | 9/16/2020 |
| OO2912 | 8/31/2020 | 9/17/2020 |
| OO2913 | 8/31/2020 | 9/17/2020 |
| OO2914 | 8/31/2020 | 9/16/2020 |
| OO2916 | 8/31/2020 | 9/17/2020 |
| OO2917 | 8/31/2020 | 9/17/2020 |
| OO2918 | 8/31/2020 | 9/16/2020 |
| OO2919 | 8/31/2020 | 9/16/2020 |
| OO2921 | 8/31/2020 | 9/17/2020 |
| OO3006 | 8/31/2020 | 9/16/2020 |
| OO3007 | 8/31/2020 | 9/16/2020 |
| OO3009 | 8/31/2020 | 9/17/2020 |
| OO3012 | 8/31/2020 | 9/21/2020 |
| OO3013 | 8/31/2020 | 9/21/2020 |
| PP24 | 8/31/2020 | 10/7/2020 |
| PP25 | 8/31/2020 | 9/16/2020 |
| PP26 | 8/31/2020 | 9/16/2020 |
| PP27 | 8/31/2020 | 9/22/2020 |
| PP28 | 8/31/2020 | 9/22/2020 |
| JJ3207 | 8/31/2020 | 10/2/2020 |
| KK2903 | 8/31/2020 | 9/11/2020 |
| L23 | 8/31/2020 | 9/22/2020 |
| L24 | 8/31/2020 | 9/17/2020 |
| L25 | 8/31/2020 | 9/17/2020 |

| | | |
|---|---|---|
| LL2414 | 8/31/2020 | 9/17/2020 |
| LL2415 | 8/31/2020 | 9/17/2020 |
| N29 | 8/31/2020 | 9/17/2020 |
| N30 | 8/31/2020 | 9/24/2020 |
| N31 | 8/31/2020 | 9/24/2020 |
| EE2417 | 4/8/2021 | 10/13/2021 |
| FF2413 | 5/10/2021 | 10/21/2021 |
| JJ3220 | 5/26/2021 | 10/11/2021 |
| JJ2425 | 4/21/2021 | 5/6/2021 |
| JJ2425 | 4/21/2021 | 5/6/2021 |
| NN3109 | 4/7/2021 | 5/14/2021 |
| NN3114 | 4/7/2021 | 5/14/2021 |
| KK21 | 9/13/2021 | 11/18/2021 |
| NN3006 | 4/9/2021 | 5/5/2021 |
| NN3006 | 4/9/2021 | 5/5/2021 |
| NN3006 | 4/9/2021 | 5/5/2021 |
| NN3006 | 4/9/2021 | 5/5/2021 |
| NN3006 | 4/9/2021 | 5/5/2021 |
| DD2417 | 9/16/2021 | 10/21/2021 |
| DD2419 | 9/16/2021 | 10/21/2021 |
| FF2403 | 4/8/2021 | 10/21/2021 |
| JJ2620 | 9/22/2021 | 10/6/2021 |
| JJ2621 | 9/24/2021 | 10/6/2021 |
| JJ2621 | 9/24/2021 | 10/6/2021 |
| AA2004 | 5/12/2021 | 10/15/2021 |
| BB2114 | 4/7/2021 | 10/15/2021 |
| BB2217 | 9/24/2021 | 10/18/2021 |
| G2525 | 4/9/2021 | 10/21/2021 |
| NN2902 | 5/4/2021 | 10/11/2021 |
| NN2902 | 5/4/2021 | 10/11/2021 |
| NN3115 | 4/7/2021 | 10/12/2021 |
| EE2412 | 4/8/2021 | 10/19/2021 |
| GG2414 | 5/10/2021 | 10/20/2021 |
| FF2516 | 4/6/2021 | 10/15/2021 |
| FF2522 | 4/6/2021 | 10/15/2021 |
| FF2522 | 4/6/2021 | 10/15/2021 |
| JJ3208 | 5/24/2021 | 10/5/2021 |

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 38 underground maps given in Table 4:

Table 4: Underground Patrols Completed Past Due Dates

| Map | Due Date | Completion Date |
|---|---|---|
| LL26 | 12/31/2020 | 2/26/2021 |
| LL27 | 12/31/2020 | 2/26/2021 |
| LL2714 | 12/16/2020 | 2/26/2021 |
| LL3317 | 11/13/2020 | 3/3/2021 |
| MM28 | 11/11/2020 | 3/1/2021 |
| MM2823 | 11/11/2020 | 2/26/2021 |
| CC2316 | 11/12/2020 | 3/1/2021 |
| II2811 | 11/12/2020 | 3/1/2021 |
| II2812 | 11/12/2020 | 3/1/2021 |
| II2817C1 | 11/12/2020 | 3/1/2021 |
| II2817C2 | 11/12/2020 | 3/1/2021 |
| II2824 | 11/12/2020 | 3/1/2021 |
| JJ2802 | 11/11/2020 | 3/1/2021 |
| LL2014 | 12/31/2020 | 2/26/2021 |
| LL2015 | 12/24/2020 | 2/26/2021 |
| LL2019 | 12/17/2020 | 2/26/2021 |
| LL2020 | 12/11/2020 | 2/26/2021 |
| LL21 | 12/10/2020 | 2/26/2021 |
| LL23 | 12/15/2020 | 2/26/2021 |
| LL25 | 12/16/2020 | 2/26/2021 |
| LL2715 | 12/16/2020 | 2/26/2021 |
| LL3306 | 11/13/2020 | 3/1/2021 |
| EE2215 | 9/30/2020 | 10/27/2020 |
| EE2219 | 9/23/2020 | 10/27/2020 |
| EE2220 | 9/23/2020 | 10/27/2020 |
| EE2302 | 9/30/2020 | 10/27/2020 |
| GG2309 | 9/28/2020 | 10/27/2020 |
| GG2314 | 9/28/2020 | 10/27/2020 |
| HH2707 | 9/28/2020 | 10/26/2020 |

| | | |
|---|---|---|
| N26 | 9/3/2020 | 10/29/2020 |
| JJ3017 | 9/12/2020 | 10/8/2020 |
| JJ3023 | 9/9/2020 | 10/8/2020 |
| JJ3024 | 9/10/2020 | 10/8/2020 |
| JJ3025 | 9/10/2020 | 10/9/2020 |
| KK3004 | 9/2/2020 | 10/7/2020 |
| KK3005 | 9/2/2020 | 10/8/2020 |
| L31 | 8/31/2020 | 10/26/2020 |
| LL3407 | 9/10/2020 | 10/9/2020 |

ESRB staff also identified that PG&E failed to complete detailed inspections of the following underground electric facilities located in 53 underground maps shown in Table 5 below:

Table 5: Underground Detailed Inspections Completed Past Due Dates

| Map | Due Date | Completion Date |
|---|---|---|
| II2909 | 3/10/2017 | 12/1/2017 |
| GG2722 | 10/16/2020 | 2/26/2021 |
| FF2511 | 12/31/2020 | 2/26/2021 |
| FF2521 | 12/31/2020 | 2/26/2021 |
| GG2510 | 10/16/2020 | 3/9/2021 |
| GG2515 | 10/16/2020 | 3/3/2021 |
| II3223 | 12/30/2020 | 2/26/2021 |
| II33 | 12/30/2020 | 2/27/2021 |
| GG25 | 9/21/2020 | 10/16/2020 |
| HH3022 | 9/24/2020 | 10/13/2020 |
| JJ3214 | 9/23/2020 | 10/13/2020 |
| MM32 | 9/18/2020 | 10/1/2020 |
| MM33 | 9/21/2020 | 10/28/2020 |
| MM3314 | 10/8/2020 | 11/23/2020 |
| MM3318 | 9/28/2020 | 10/14/2020 |
| MM3425 | 10/8/2020 | 11/23/2020 |
| MM3507 | 9/30/2020 | 10/29/2020 |
| MM3511 | 9/30/2020 | 10/23/2020 |
| MM3512 | 9/30/2020 | 10/29/2020 |
| MM3516 | 9/30/2020 | 10/22/2020 |
| MM3517 | 9/30/2020 | 10/24/2020 |
| MM3518 | 9/30/2020 | 10/30/2020 |
| MM3521 | 9/30/2020 | 11/23/2020 |
| MM36 | 9/24/2020 | 10/14/2020 |
| MM3602 | 9/24/2020 | 10/29/2020 |

| | | |
|---|---|---|
| NN34 | 9/24/2020 | 10/5/2020 |
| NN3405 | 9/24/2020 | 10/3/2020 |
| NN3409 | 9/24/2020 | 10/5/2020 |
| NN3414 | 9/24/2020 | 10/1/2020 |
| NN3419 | 9/24/2020 | 10/5/2020 |
| OO35 | 9/24/2020 | 10/1/2020 |
| GG2503 | 10/12/2020 | 11/4/2020 |
| GG2509 | 10/13/2020 | 11/4/2020 |
| GG2607 | 10/12/2020 | 11/25/2020 |
| HH2801 | 10/7/2020 | 11/2/2020 |
| II3006 | 9/16/2020 | 10/31/2020 |
| II3007 | 9/16/2020 | 10/14/2020 |
| II3009 | 9/15/2020 | 10/13/2020 |
| II3015 | 9/15/2020 | 10/7/2020 |
| II3020 | 10/19/2020 | 11/4/2020 |
| II3124 | 9/15/2020 | 10/12/2020 |
| JJ3109 | 9/16/2020 | 10/13/2020 |
| JJ3110 | 9/23/2020 | 11/2/2020 |
| JJ3117 | 9/23/2020 | 10/28/2020 |
| JJ3118 | 9/23/2020 | 10/14/2020 |
| JJ3119 | 9/16/2020 | 10/29/2020 |
| JJ3120 | 9/16/2020 | 10/28/2020 |
| JJ3122 | 9/23/2020 | 10/14/2020 |
| JJ3123 | 9/23/2020 | 10/14/2020 |
| JJ3211 | 9/28/2020 | 10/13/2020 |
| MM34 | 9/16/2020 | 10/9/2020 |
| MM3509 | 9/30/2020 | 10/28/2020 |
| OO32 | 9/24/2020 | 10/29/2020 |

## III. Field Inspection

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

| Location | SAP/Equipment Number | Type of Structure | Approximate Location | City |
|---|---|---|---|---|
| 1 | 102036090 | Pole | 9651 DRY CREEK RD | Geyserville |
| 2 | 104061001 | Pole | 270' N/W ASTI RD, 1.1MILE S/ EXIT 5 | Geyserville |
| 3 | 102036089 | Pole | 1401 WESTSIDE RD | Geyserville |
| 4 | 103839110 | Pole | 300 Canyon Rd | Geyserville |
| 5 | 102036110 | Pole | 26697 ASTI RD | Geyserville |
| 6 | 101965742 | Pole | 26800 ASTI RD | Geyserville |

| | | | | |
|---|---|---|---|---|
| 7 | 102036109 | Pole | 26697 ASTI RD | Geyserville |
| 8 | 103051959 | Pole | 26697 ASTI RD | Geyserville |
| 9 | 102036106 | Pole | 26697 ASTI RD | Geyserville |
| 10 | 101965738 | Pole | 26697 ASTI | Geyserville |
| 11 | 103839111 | Pole | 300 Canyon Rd | Geyserville |
| 12 | 103839118 | Pole | 26495 ASTI RD/1PNE/3PW | Geyserville |
| 13 | 103959466 | Pole | 1599 HIGHWAY 128 | Geyserville |
| 14 | 101957407 | Pole | 5E/O 2NW/O 1600 HWY 128 | Geyserville |
| 15 | 103959467 | Pole | 6E/O 2NW/O 1600 HWY 128 | Geyserville |
| 16 | 102036410 | Pole | RIVER RD. & 128. NE C/O 4SW | Geyserville |
| 17 | 103121342 | Pole | 1285 CANYON RD | Geyserville |
| 18 | 101956827 | Pole | C/O WALLING RD/CANYON RD CO#10688 | Geyserville |
| 19 | 102034908 | Pole | 1280 CANYON RD CO#2231 | Geyserville |
| 20 | 101956832 | Pole | C/O WALLING RD/CANYON RD CO#10688 | Geyserville |
| 21 | 102034909 | Pole | 1280 CANYON RD | Geyserville |
| 22 | 101956834 | Pole | 1220 CANYON RD | Geyserville |
| 23 | 102034907 | Pole | 1280 CANYON RD CO#2231 | Geyserville |
| 24 | 102034760 | Pole | 10650 HIGHWAY 128 | Geyserville |
| 25 | 101967180 | Pole | 9555 HWY 128 | Geyserville |
| 26 | 102034761 | Pole | 9555 HWY 128 | Geyserville |
| 27 | 103918213 | Pole | 194 WEMBLEY CT | Santa Rosa |
| 28 | 103918186 | Pole | 184 WEMBLEY CT | Santa Rosa |
| 29 | 103917952 | Pole | 3850 ROYAL MANOR | Santa Rosa |
| 30 | 103917951 | Pole | 147 WEMBLEY CT | Santa Rosa |
| 31 | 104013069 | Pole | 150 WEMBERLY CT | Santa Rosa |
| 32 | 102019489 | Pole | 928 SUNSET AV, SANTA ROSA | Santa Rosa |
| 33 | 102019487 | Pole | C/O WEST & SUNSET AVE | Santa Rosa |
| 34 | 101985154 | Pole | 923 WEST AVE | Santa Rosa |
| 35 | 103849077 | Pole | 1409 MCMINN AVE | Santa Rosa |
| 36 | 101985148 | Pole | 1058 WEST AV | Santa Rosa |
| 37 | 101985150 | Pole | 639 GRANDBERG CT | Santa Rosa |
| 38 | 101985151 | Pole | 639 GRANDBERG CT | Santa Rosa |
| 39 | 103928272 | Pole | 698 GRANDBERG CT | Santa Rosa |
| 40 | 101985147 | Pole | 1058 WEST AV | Santa Rosa |
| 41 | 103140535 | Pole | 1075 WEST ST | Santa Rosa |
| 42 | 101985145 | Pole | 1058 WEST AV | Santa Rosa |
| 43 | 102019486 | Pole | C/O WEST & SUNSET AVE | Santa Rosa |
| 44 | 101985144 | Pole | 1058 WEST AV | Santa Rosa |
| 45 | 103904169 | Pole | 1217 WEST AVE | Santa Rosa |
| 46 | 101997400 | Pole | 1058 WEST AV | Santa Rosa |
| 47 | 103949156 | Pole | 1311 WEST AVE | Santa Rosa |

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|---|---|---|---|---|
| 48 | 101988160 | Pole | #1N 2270 CALISTOGA RD W/TRANS | Santa Rosa |
| 49 | 102025159 | Pole | #2N PLUM RANCH RD ON CALISTOGA RD | Santa Rosa |
| 50 | 103383719 | Pole | 2133 CALISTOGA RD | Santa Rosa |
| 51 | 101988157 | Pole | 1N/O PLUM RANCH RD IN CALISTOGA RD | Santa Rosa |
| 52 | 101966499 | Pole | 1023 CALISTOGA RD | Santa Rosa |
| 53 | 102022205 | Pole | 1S/O 1023 CALISTOGA RD | Santa Rosa |
| 54 | 101966497 | Pole | 1023 CALISTOGA RD | Santa Rosa |
| 55 | 102022204 | Pole | 1S/O 1023 CALISTOGA RD | Santa Rosa |
| 56 | 101994316 | Pole | N/O C/O MONTECITO BLD/CALISTOGA RD | Santa Rosa |
| 57 | 101994315 | Pole | N/O C/O MONTECITO BLD/CALISTOGA RD | Santa Rosa |
| 58 | 103141104 | Pole | SW C/O MONTE VERDE DR/CALISTOGA RD | Santa Rosa |
| 59 | 103056869 | Pole | 6 SANDSTONE CT | Santa Rosa |
| 60 | 101966495 | Pole | 1023 CALISTOGA RD | Santa Rosa |
| 61 | 102035338 | Pole | 14603 CAZADERO RD | Santa Rosa |
| 62 | 101974918 | Pole | 14560 OLD CAZADERO RD. | Santa Rosa |
| 63 | 102035339 | Pole | 14550 OLD CAZADERO RD. | Santa Rosa |
| 64 | 101974919 | Pole | 14540 CASADERO RD | Santa Rosa |
| 65 | 101974920 | Pole | 14491 CASADERO RD | Santa Rosa |
| 66 | 104041968 | Pole | 14460 OLD CAZADERO RD | Santa Rosa |
| 67 | 101974921 | Pole | 14446 OLD CAZADERO RD | Santa Rosa |
| 68 | 102035341 | Pole | 14418 CASADERO RD | Santa Rosa |
| 69 | 101974923 | Pole | #1P NW 14308 LOVERS LN | Santa Rosa |
| 70 | 101974815 | Pole | 14330 CASADERO RD | Santa Rosa |
| 71 | 101998667 | Pole | 5960 ANDERSON RD W/TRANS | Santa Rosa |
| 72 | 101998668 | Pole | 5961 ANDERSON RD | Santa Rosa |
| 73 | 101998669 | Pole | 6113 VAN KEPPEL RD | Santa Rosa |
| 74 | 103882475 | Pole | 11000 WOHLER RD. | Santa Rosa |
| 75 | 101998776 | Pole | #1S/O 5895 ANDERSON RD | Santa Rosa |
| 76 | 102029293 | Pole | #2S/O 5895 ANDERSON RD | Santa Rosa |
| 77 | 101998778 | Pole | #1S/O 5895 ANDERSON RD | Santa Rosa |
| 78 | 102030593 | Pole | #1N/O #1E/O 5947 RUSSELL LN | Santa Rosa |
| 79 | 107818207 | Subsurface Transformer | 8071 Hill Dr | Petaluma |
| 80 | 107818213 | Subsurface Transformer | 8071 Hill Dr | Petaluma |
| 81 | 107818225 | Subsurface Transformer | 133 WHITE OAK CIR | Petaluma |

| | | | | |
|---|---|---|---|---|
| 82 | 107695303 | Padmount Transformer | 136 ACORN DR | Petaluma |
| 83 | 107695312 | Padmount Transformer | 120 ACORN DR | Petaluma |
| 84 | 107916182 | Subsurface transformer | 4852 CANYON DR | Petaluma |
| 85 | 107847705 | Junction box | 203 PHOTINIA PL | Petaluma |
| 86 | 107844982 | Splice Box | 409 BLACK OAK DR | Petaluma |
| 87 | 107781745 | Subsurface transformer | 433 BLACK OAK DR | Petaluma |
| 88 | 107916220 | Subsurface transformer | 187 GREVILLIA DR | Petaluma |
| 89 | 107847711 | Junction box | 171 GREVILLIA DR | Petaluma |
| 90 | 107916258 | Subsurface transformer | 161 GREVILLIA DR | Petaluma |
| 91 | 107693214 | Padmount Transformer | 1400 TECHNOLOGY LN | Petaluma |
| 92 | 107693211 | Padmount Transformer | 1401 TECHNOLOGY LN | Petaluma |
| 93 | 107693226 | Padmount Transformer | 1402 TECHNOLOGY LN | Petaluma |
| 94 | 107693170 | Padmount Transformer | 939 LAKEVILLE ST | Petaluma |
| 95 | 107730429 | Padmount Transformer | 981 LAKEVILLE ST | Petaluma |
| 96 | 102004880 | Pole | 1000 LAKEVILLE ST | Petaluma |
| 97 | 103950193 | Pole | 1001 LAKEVILLE ST | Petaluma |
| 98 | 101984508 | Pole | LAKEVILLE ST across from Lucky’s | Petaluma |
| 99 | 102004879 | Pole | 1000 LAKEVILLE ST | Petaluma |
| 100 | 101984502 | Pole | 660 LAKEVILLE ST | Petaluma |
| 101 | 102004875 | Pole | 815 LAKEVILLE ST | Petaluma |
| 102 | 101984501 | Pole | 660 LAKEVILLE ST | Petaluma |
| 103 | 101984500 | Pole | 660 LAKEVILLE ST | Petaluma |
| 104 | 103894004 | Pole | R/O 4990 D ST 3PW | Petaluma |
| 105 | 101984499 | Pole | 660 LAKEVILLE ST | Petaluma |
| 106 | 101984497 | Pole | 660 LAKEVILLE ST | Petaluma |
| 107 | 102004872 | Pole | 815 LAKEVILLE ST | Petaluma |
| 108 | 103140886 | Pole | 540 LAKEVILLE ST | Petaluma |
| 109 | 101984498 | Pole | 660 LAKEVILLE ST | Petaluma |
| 110 | 102010135 | Pole | 450 LAKEVILLE ST | Petaluma |
| 111 | 101984636 | Pole | 451 LAKEVILLE ST | Petaluma |
| 112 | 103870007 | Pole | 452 LAKEVILLE ST | Petaluma |

## 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) The pole at 9651 Dry Creek Rd in Geyserville (Location 1), has a third-party Buddy pole.

1.2) The pole at 270' N/W Asti Rd, 1.1mile S/ Exit 5 in Geyserville (Location 2) had twigs on the hot leg of the primary lines, but PG&E remedied it in the field.

1.3) The pole at 26697 Asti Rd in Geyserville (Location 10) is rotted and needs a replacement. PG&E has an existing notification tag # 117160083.

1.4) The pole at River Rd. & 128. NE C/O 4 SW in Geyserville (Location 16) had some farming equipment left leaning on the pole, but PG&E remedied it in the field.

1.5) The pole at 1285 Canyon Rd in Geyserville (Location 17) has woodpecker damage. PG&E has an existing notification tag # 121323970.

1.6) The pole at C/O Walling Rd/Canyon Rd CO#10688 in Geyserville (Location 20), has a rotted crossarm. PG&E has an existing notification tag # 120952009.

1.7) The pole at 1220 Canyon Rd in Geyserville (Location 22), has woodpecker damage. PG&E has an existing notification tag 121323962. There is also a need for a third-party notification for a communication cable hanging loose on the pole.

1.8) The pole at 10650 Highway 128 in Geyserville (Location 24), has a dangling communications cable. PG&E has an existing notification tag # 122013546.

1.9) The pole at 10650 Highway 128 in Geyserville (Location 26), has improper connector in insulator. PG&E has an existing notification tag # 120834983.

1.10) The pole at C/O West & Sunset Ave in Santa Rosa (Location 33), has faded visibility strips, but PG&E remedied it on the field. PG&E has an existing notification tag # 122308197 for Insulik connectors replacement and a high voltage sign.

1.11) The pole at 923 West Ave in Santa Rosa (Location 34), had a dry tree branch hanging between the secondary crossarm and communication line, but PG&E remedied it in the field.

1.12) The pole at 1075 West St in Santa Rosa (Location 41) is rotted and needs a replacement. PG&E has an existing notification tag # 122311100.

1.14) The pole at 1058 West Av in Santa Rosa (Location 42) has an idle facility leaning on the pole.

1.15) The pole at 1311 West Ave in Santa Rosa (Location 47) has a communications buddy pole and an idle facility.

1.16) The pole at 1N/O Plum Ranch Rd in Calistoga Rd in Santa Rosa (Location 51) is overloaded and has a loose guy wire. PG&E has an existing notification tag # 119087382.

1.17) The pole at 1023 Calistoga Rd in Santa Rosa (Location 52) had a buried anchor, but PG&E remedied it in the field.

1.18) The pole at 1023 Calistoga Rd in Santa Rosa (Location 54) had a damaged Guy marker, but PG&E remedied it in the field.

1.19) The pole at 14330 Casadero Rd in Santa Rosa (Location 70) is damaged and needs a replacement. PG&E has an existing notification tag # 117690421.

1.20) The pole at #2S/O 5895 Anderson Rd in Santa Rosa (Location 76) has a buddy pole that needs to be removed. This pole also had an existing PG&E notification tag # 119575461 for a high voltage sign.

1.21) The pole at 1000 Lakeville St in Petaluma (Location 96) is leaning with a harsh curve at the midpoint.

1.22) The pole at 815 Lakeville St in Petaluma (Location 101) is leaning.

1.23) The pole at 660 Lakeville St in Petaluma (Location 106) had a buried anchor. PG&E has an existing notification tag # 117690421.

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

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

The pole at SW C/O Monte Verde Dr/Calistoga Rd in Santa Rosa (Location 58) had a third-party sign, but PG&E remedied it in the field.

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) The pole located at 26697 Asti Rd in Geyserville (Location 7), was missing high voltage signs. PG&E has an existing notification tag # 117160444.

3.2) The pole located at #1N/O #1E/O 5947 Russell Ln in Geyserville (Location 9), has moss vegetation on its high voltage sign making it illegible.

3.3) The pole located at 1280 Canyon Rd in Geyserville (Location 21), was missing a high voltage sign on one side of the cross-arm. PG&E has an existing notification tag # 113104197.

3.4) The pole located at 639 Grandberg Ct in Santa Rosa (Location 37), was missing high voltage sign. PG&E has an existing notification tag # 122290739.

3.5) The pole located at N/O C/O Montecito Blvd/Calistoga Rd in Santa Rosa (Location 56), has a faded high voltage sign.

3.6) The pole located at 1023 Calistoga Rd in Santa Rosa (Location 60), has a loose high voltage sign.

3.7) The pole located at #1N/O #1E/O 5947 Russell Ln in Santa Rosa (Location 78), has a faded high voltage sign.

3.8) The pole located at 660 Lakeville St in Petaluma (Location 105), was missing a high voltage sign on one side of the cross-arm. This pole also has an existing third-party notification tag # 123052665 for an abandoned communications cable.

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

> *"All portions of guys within both a vertical distance of 8 feet from the level of supply conductors of less than 35,500 volts and a radial distance of 6 feet from the surface of wood poles or structures shall not be grounded, through anchors or otherwise. Where*

*necessary to avoid the grounding of such portions, guys shall be sectionalized by means of insulators installed at locations as specified in Rule 56.7."*

4.1) The pole at 1401 Westside Rd in Geyserville (Location 3), had the communication cable clasp undone and contacting the Guy wire.

4.2) The pole located at (Location 110) Guy wire was contacting the communication line above the Guy bob. A third-party notification tag # 123052847 was created on the field for a buried anchor and a cut or broken old Guy wire sticking out ground.

5. **GO 95, Rule 91.3 – C, Joint Poles or Poles Jointly Use, Stepping** states in part:

   *"Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps."*

   The pole, at 14603 Cazadero Rd in Santa Rosa (Location 61), had its lowest pole step set to less than 8 feet from the ground. PG&E addressed the issue in the field.

6. **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."*

   6.1) The pole at 6 Sandstone Ct in Santa Rosa (Location 59) has a slack guy.

   6.2) The pole at #1S/O 5895 Anderson Rd in Santa Rosa (Location 75) needs a third-party notification for a buried Guy anchor wire. This pole also has an existing notification tag # 119575461 for woodpecker holes assessment.

   6.3) The pole at 660 Lakeville St in Petaluma (Location 100) has a slack guy. PG&E created a notification tag # 123052609 in the field.

7. **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)."*

   7.1) The pole at #2N Plum Ranch Rd on Calistoga Rd in Santa Rosa (Location 49) has an exposed transformer ground wire. PG&E has an existing notification tag # 116836654.

7.2) The pole at 6113 Van Keppel Rd in Santa Rosa (Location 73) has an exposed ground wire. PG&E has an existing notification tag # 110148406.

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

   *"Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s)."*

8.1) The pole, located at N/O C/O Montecito Blvd/Calistoga Rd in Santa Rosa (Location 56), has overgrown vegetation above the bob of the guy. PG&E has an existing notification tag # 121393697.

8.2) The pole, located at 14418 Casadero Rd in Santa Rosa (Location 68), has vegetation contacting the guy above the bob.

9. **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."*

9.1) The subsurface transformer located at 133 White Oak Cir in Petaluma (Location 81) vault wall is caving in and a notification tag # 123049938 was created on the field. The Asset tag was also faded and remedied in the field.

9.2) The subsurface transformer located at 187 Grevillia Dr in Petaluma (Location 88) transformer vent was covered, but PG&E remedied it in the field.

9.3) The subsurface transformer located at 939 Lakeville St in Petaluma (Location 94) has a hole in the transformer enclosure and graffiti, but PG&E remedied it in the field.

## V. Observations

ESRB staff observed the following during the field inspection:

The following locations had potential third-party safety concerns:

1. The pole at 1409 Mcminn Ave in Santa Rosa (Location 35) needs a third-party notification for a slack guy and loose communication cable.

2. The pole at 1058 West Av in Santa Rosa (Location 36) needs a third-party notification for a sectionalizer for a Guy for Communications.

3. The pole at 660 Lakeville St in Petaluma (Location 109), had the communication cable clasp undone and contacting the Guy wire.