STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

September 5, 2023 EA2023-1071

Jonathan Connelly, P.E.
Director of Asset Management – Wildfire Safety & Asset Management
PacifiCorp
825 NE Multnomah St Suite 1700
Portland, OR 97232

SUBJECT: Electric Distribution Audit of PacifiCorp – Alturas and Tulelake Divisions

Dear Mr. Connelly:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Monica Hoskins, Emiliano Solorio, Tom Roberts, and Gordon Szeto of ESRB staff conducted an electric distribution audit of PacifiCorp's Alturas and Tulelake Divisions from June 20, 2023 through June 22, 2023. During the audit, ESRB staff conducted field inspections of PacifiCorp'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 October 5, 2023, by electronic copy of all corrective actions and preventive measures taken by PacifiCorp to correct the identified violations and prevent the recurrence of such violations. The response should indicate the date each remedial action and preventive measure was 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 of the enclosed Audit Report. Please also provide records for 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 Monica Hoskins at monica.hoskins@cpuc.ca.gov or (415) 652-1847.

Sincerely,

Rickey Tse, 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 PacifiCorp Alturas and Tulelake Divisions

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
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PACIFICORP ALTURAS AND TULELAKE DIVISIONS
ELECTRIC DISTRIBUTION AUDIT FINDINGS
JUNE 20 – 22, 2023

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for PacifiCorp's Alturas and Tulelake Divisions:

- PacifiCorp's Inspection and Maintenance Procedures
- Open and late work orders from May 2018 to May 2023, completed work orders from May 2022 to May 2023, and cancelled work orders from May 2022 to May 2023
- Patrols and detailed inspections completed January 2018 to May 2023
- Reliability metrics and sustained outages for May 2018 to May 2023
- Statistics on overhead and underground facilities
- Division maps showing approximate locations of the plat maps administered by the divisions
- Outgoing Third-Party Safety Hazard notifications sent May 2018 to May 2023
- List of inspectors and patrolmen active from January 2018 to May 2023
- Records of all equipment tests completed May 2020 to May 2023

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:

   "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."*

ESRB's review of PacifiCorp's Alturas Division work orders from May 2018 to May 2023 found that PacifiCorp had 28 late-pending work orders, 37 late-closed work orders, and 34 late-removed work orders. Late-pending work orders are work orders that have not been completed by their assigned due date based on their hazard level. Late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Late-removed work orders are work orders that are not pending and were not corrected or removed from PacifiCorp's system prior to their assigned due date. Table 1 below breaks down the 99 late work orders in PacifiCorp's Alturas Division by hazard level, including the total number of late work orders, which includes the late-pending, late-removed, and late-closed work orders.

Table 1: Alturas Division Late Work Orders

Hazard Levels	Late-Pending Work Orders	Late-Closed Work Orders	Late-Removed Work Orders	Total Late Work Orders
1	–	7	–	7
2	28	30	34	92
3	–	–	–	–
Total	28	37	34	99

ESRB's review of PacifiCorp's Tulelake Division work orders from May 2018 to May 2023 found that PacifiCorp had 23 late-pending work orders, 135 late-closed work orders, and 73 late-removed work orders. Table 2 below breaks down the 231 late work orders in PacifiCorp's Tulelake Division by hazard level, including the total number of late work orders, which includes the late-pending, late-removed, and late-closed work orders.

Table 2: Tulelake Division Late Work Orders

Hazard Levels	Late-Pending Work Orders	Late-Closed Work Orders	Late-Removed Work Orders	Total Late Work Orders
1	7	63	5	75
2	16	72	68	156
3	–	–	–	–
Total	23	135	73	231

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's review of PacifiCorp's overhead patrols and inspections for the Alturas and Tulelake Divisions identified a total of 6 late overhead patrols and inspections from January 2018 to May 2023. PacifiCorp completed 3 overhead inspections late in the Alturas Division and 3 overhead inspections late in the Tulelake Division.

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's review of PacifiCorp's underground patrols and inspections for the Alturas and Tulelake Divisions identified a total of 13 late underground patrols and inspections from January 2018 to May 2023. PacifiCorp completed 2 underground patrols late and 1 underground inspection late in the Alturas Division and 10 underground patrols late in the Tulelake Division.

III. Field Inspection

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

Location	Division	Structure Type	Equipment Number (FPNO)	Equipment Location (Latitude, Longitude)
1	Alturas	Pole	`06148014.0248811	41.9912669, -120.2979692
2	Alturas	Pole	`06148014.0248812	41.9916867, -120.2979651
3	Alturas	Pole	`06148014.0248900	41.9920691, -120.2979713
4	Alturas	Pole	`06148014.0248904	41.9925261, -120.2979776
5	Alturas	Pole	`06148014.0249602	41.9887591, -120.2953136
6	Alturas	Pole	`06148014.0249603	41.9884871, -120.2954312
7	Alturas	Pole	`06148014.0249604	41.9884375, -120.2947629
8	Alturas	Pole	`06148014.0249600	41.9887679, -120.2947146
9	Alturas	Pole	`06148014.0364702	41.9620998, -120.3040100
10	Alturas	Pole	`06148014.0365701	41.9620585, -120.3031673
11	Alturas	Pole	06148014.0365702	41.9620201, -120.3025661
12	Alturas	Pole	`06147014.0010501	41.9450360, -120.3130279
13	Alturas	Pole	`06147014.0010500	41.9440286, -120.3130276
14	Alturas	Pole	`06147014.0010400	41.9428090, -120.3130081
15	Alturas	Pole	`06147014.0029300	41.9416105, -120.3129913
16	Alturas	Pole	`06142016.0054002	41.5301268, -120.1736757
17	Alturas	Pole	`06142016.0054001	41.5296393, -120.1736738
18	Alturas	Pole	`06142016.0084908	41.5294967, -120.1730699
19	Alturas	Pole	`06142016.0084903	41.5295040, -120.1736752
20	Alturas	Secondary Service Box	`06142016.0051102-A	41.5320977, -120.1783294
21	Alturas	Pole	`06142016.0051102	41.5321054, -120.1783603
22	Alturas	Pole	`06142016.0051103	41.5319830, -120.1785549
23	Alturas	Pole	`06142016.0051100	41.5323847, -120.1785647
24	Alturas	Pole	`06143014.0132002	41.5584805, -120.3068744
25	Alturas	Pole	`06143014.0132001	41.558717575, -120.306525995
26	Alturas	Pole	`06143014.0236800	41.5562787, -120.3188651
27	Alturas	Pole	`06143014.0236803	41.5558975, -120.3191574
28	Alturas	Pole	`06143014.0237700	41.5548954, -120.3163385
29	Tulelake	Pole	`06145006.0223502	41.7268627, -121.2699928
30	Tulelake	Pole	`06145006.0223501	41.7277668, -121.2683566
31	Tulelake	Pole	`06145006.0172600	41.7447069, -121.3089121
32	Tulelake	Pole	`06145006.0173600	41.7449336, -121.3086353
33	Tulelake	Pole	`668005/00 5/045	41.745163392, -121.308354997
34	Tulelake	Pole	`06145006.0173700	41.7454364, -121.3083385
35	Tulelake	Pole	`06145006.0299501	41.7138633, -121.2945784
36	Tulelake	Pole	`06145006.0299500	41.7138363, -121.2949597
37	Tulelake	Pole	`06144006.0109901	41.6763989, -121.2585993
38	Tulelake	Pole	`06144006.0109900	41.6764833, -121.2575114

39	Tulelake	Pole	`668005/00 12/050	41.676521174, -121.257038119
40	Tulelake	Pole	`06144006.0105400	41.6682820, -121.2662767
41	Tulelake	Pole	`06144006.0104301	41.66748, -121.26621
42	Tulelake	Pole	`06144006.0104300	41.6664376, -121.2662357
43	Tulelake	Pole	`06144006.0104200	41.6655110, -121.2662597
44	Tulelake	Pole	`06144006.0163003	41.6483000, -121.2883361
45	Tulelake	Pole	`06144006.0163005	41.6473913, -121.2880521
46	Tulelake	Pole	`06144006.0213901	41.6468931, -121.2878981
47	Tulelake	Pole	`06144006.0213900	41.6468938, -121.2886078
48	Tulelake	Pole	`06144006.0298701	41.6299236, -121.2986729
49	Tulelake	Pole	`06144006.0233300	41.6380804, -121.2489921
50	Tulelake	Pole	`06144006.0234300	41.6377689, -121.2480372
51	Tulelake	Pole	`06144007.0314100	41.6064074, -121.2085420
52	Alturas	Pole	`06143014.0146102	41.5601995, -120.3188545
53	Alturas	Pole	`06143014.0146101	41.5601753, -120.3183169
54	Alturas	Pole	`06143014.0213900	41.5577627, -120.3628062
55	Alturas	Pole	`06143014.0213901	41.5568820, -120.3627315
56	Alturas	Pole	`06143014.0213802	41.5566398, -120.3627511
57	Alturas	Pole	`06142012.0012100	41.5045851, -120.5400819
58	Alturas	Pole	`06142012.0012200	41.5054764, -120.5400964
59	Alturas	Pole	`06142012.0012261	41.505446282, -120.539265704
60	Alturas	Pole	`06142012.0013260	41.50545166, -120.538234741
61	Alturas	Pad mount Transformer	`06142012.0115580	41.4953489, -120.5532077
62	Alturas	Pad mount Transformer	`06142012.0114480	41.493607133, -120.555165479
63	Alturas	Pad mount Transformer	`06142012.0123500	41.4951000, -120.5388716
64	Alturas	Secondary Service Box	`06142012.0123500-A	41.495101006, -120.538858891
65	Alturas	Pole	`06142012.0123501	41.4946975, -120.5388740
66	Alturas	Pole	`06142012.0123407	41.4942249, -120.5388572
67	Alturas	Pole	`06142012.0146804	41.4856786, -120.5525768
68	Alturas	Pole	`06142012.0146803	41.4855248, -120.5525795
69	Alturas	Pole	`06142012.0145803	41.4855174, -120.5529980
70	Alturas	Pole	`06142012.0145804	41.4851687, -120.5529946
71	Alturas	Pole	`06142012.0145807	41.4846725, -120.5529856
72	Alturas	Pole	`06142012.0110401	41.4930598, -120.5626064
73	Alturas	Pole	`06142012.0110402	41.4934036, -120.5626056
74	Alturas	Pole	`06142012.0111403	41.4934020, -120.5618551
75	Alturas	Pole	`06142012.0111404	41.4934004, -120.5613082
76	Alturas	Secondary Service Box	`06143013.0332980-C	41.5291381, -120.4810227
77	Alturas	Pad mount Transformer	`06143013.0332980	41.5285685, -120.4811844

78	Alturas	Pad mount Transformer	`06143013.0332881	41.5272084, -120.4828226
79	Alturas	Pole	`06142012.0124140	41.488410199, -120.536310376
80	Alturas	Pole	`06142012.0123004	41.4882529, -120.5372128
81	Alturas	Pole	`06142012.0123007	41.4882579, -120.5377936
82	Alturas	Pole	`06142012.0123001	41.4886759, -120.5378002
83	Alturas	Pole	`06142012.0122002	41.4886933, -120.5399412
84	Alturas	Pole	`06142012.0122003	41.4885903, -120.5401313
85	Alturas	Pole	`06142012.0122108	41.4890035, -120.5401511
86	Alturas	Pole	`06142012.0122102	41.4891169, -120.5399683
87	Alturas	Pole	`06142012.0125202	41.4909483, -120.5341550
88	Alturas	Pole	`06142012.0125201	41.4909420, -120.5336166
89	Alturas	Pole	`06142012.0125200	41.4909343, -120.5331294
90	Alturas	Pole	`06142012.0130812	41.4850021, -120.5442105
91	Alturas	Pole	`06142012.0130804	41.4850152, -120.5435932
92	Alturas	Pole	`06142012.0131600	41.4818205, -120.5430417
93	Alturas	Pole	`06142012.0130612	41.4819864, -120.5433616
94	Alturas	Pole	`06142012.0130600	41.4819829, -120.5435800
95	Alturas	Pole	`06142012.0130504	41.4808949, -120.5430333
96	Alturas	Pole	`06142012.0130505	41.4808888, -120.5435666

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."

   ESRB's findings related to the above rule are listed in Table 1:

Table 1: GO 95, Rule 31.1 Findings

Location	Finding
2	Pole `06148014.0248812 is missing a facility tag identifying the pole number and owner.
3	The transformer bushing cover and animal guard on Pole `06148014.0248900 is dislodged and needs to be returned to the correct position.
8	Pole `06148014.0249600 is missing a facility tag identifying the pole number and owner.
39	The down guy anchor head for Pole `668005/00 12/050 is partially buried in the ground.
41	Pole `06144006.0104301 is missing a facility tag identifying the pole number and owner.
48	Pole `06144006.0298701 has a blown arrestor that needs to be replaced.

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.)."

ESRB's finding related to the above rule is listed in Table 2:

Table 2: GO 95, Rule 34 Finding

Location	Finding
12	Pole `06147014.0010501 has an unauthorized third-party attachment.

3. **GO 95, Rule 38, Minimum Clearances of Wires from Other Wires** states in part:

"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition, and shall not be held in violation of Table 2, Cases 8–15, inclusive.

The clearances in Table 2 shall in no case be reduced more than 10 percent, except mid-span in Tier 3 of the High Fire-Threat District where they shall be reduced by no more than 5 percent, because of temperature and loading as specified in Rule 43 or because of a difference in size or design of the supporting pins, hardware or insulators. All clearances of less than 5 inches shall be applied between surfaces, and clearances of 5 inches or more shall be applied to the center lines of such items. The utilities of interest (including electric supply and/or communication companies) shall cooperate and provide relevant information for sag calculations for their facilities, upon request."

Table 2, Case 15: Pin spacing of longitudinal conductors, vertical conductors, and service drops on the same cross arm for Supply Conductors 7,500-20,000 Volts must have a minimum separation of at least 17.5 inches."

ESRB's finding related to the above rule is listed in Table 3:

Table 3: GO 95, Rule 38 Finding

Location	Finding
93	Pole `06142012.0130612 has two conductors on the same crossarm that are only 12 inches apart and does not meet the minimum clearance requirement of 17.5 inches.

4. **GO 95, Rule 49.2-C, Crossarms, Strength** states in part:

"Crossarms shall be securely supported by bracing, where necessary, to withstand unbalanced vertical loads and to prevent tipping of any arm sufficiently to decrease clearances below the values specified in Section III. Such bracing shall be securely attached to poles and crossarms. Supports in lieu of crossarms shall have means of resisting rotation in a vertical plane about their attachment to poles or shall be supported by braces as required for crossarms. Metal braces or attachments shall meet the requirements of Rules 48.2 and 49.8."

ESRB's findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 49.2-C Findings

Location	Finding
15	Pole `06147014.0029300 has a crossarm that is not perpendicular to the pole and needs to be realigned to prevent excessive tension on the attached conductors and maintain the required clearances.
41	Pole `06144006.0104301 has a rocked crossarm that needs to be realigned to prevent excessive tension on the attached conductors and maintain the required clearances.

5. **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.

The top of such sign(s) shall be located between the level of the lowest line conductor, energized in excess of 750 volts, on the pole to no more than 40 inches below that conductor level (see Figure51–1).

Poles that support risers of more than 750 volts, which are not supporting line conductors of more than 750 volts, shall be marked with a high voltage sign(s). The top of such sign(s) shall be located between the level of the lowest exposed energized portion of the riser to no more than 40" below that portion of the riser."

ESRB's findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 51.6-A Findings

Location	Finding
4	Pole `06148014.0248904 has a damaged high voltage sign.
8	Pole `06148014.0249600 has a missing high voltage sign.
14	Pole `06147014.0010400 has a missing high voltage sign.
15	Pole `06147014.0029300 has missing high voltage signs.
17	Pole `06142016.0054001 has missing high voltage signs.
22	Pole `06142016.0051103 has a missing high voltage sign.
27	Pole `06143014.0236803 has missing high voltage signs.
32	Pole `06145006.0173600 has a missing high voltage sign.
33	Pole `668005/00 5/045 has a missing high voltage sign.
37	Pole `06144006.0109901 has a damaged high voltage sign.
40	Pole `06144006.0105400 has a damaged high voltage sign.
42	Pole `06144006.0104300 has a damaged high voltage sign.
43	Pole `06144006.0104200 has a damaged high voltage sign.
46	Pole `06144006.0213901 has a missing high voltage sign.
58	Pole `06142012.0012200 has a damaged high voltage sign.
60	Pole `06142012.0013260 has missing high voltage signs.
68	Pole `06142012.0146803 has a damaged high voltage sign.

69	Pole `06142012.0145803 has missing and damaged high voltage signs.
85	Pole `06142012.0122108 has a missing high voltage sign.
86	Pole `06142012.0122102 has a missing high voltage sign.
91	Pole `06142012.0130804 has a missing high voltage sign.
92	Pole `06142012.0131600 has a missing high voltage sign.
93	Pole `06142012.0130612 has missing and damaged high voltage signs.
94	Pole `06142012.0130600 has missing and damaged high voltage signs.

6. **GO 95, Rule 54.6-B, Vertical and Lateral Conductor, 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)."

   ESRB's finding related to the above rule is listed in Table 6:

Table 6: GO 95, Rule 54.6-B Finding

Location	Finding
47	Pole `06144006.0213900 has an exposed ground wire at the base of the pole.

7. **GO 95, Rule 54.6-I, Attachment of Protective Covering** states in part:

   "Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion–resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position.

   Where such covering consists of wood moulding, rigid plastic moulding, or other suitable protective moulding, the distance between the attachment materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) shall not exceed 36 inches on either side of the moulding."

ESRB's finding related to the above rule is listed in Table 7:

Table 7: GO 95, Rule 54.6-I Finding

Location	Finding
80	The vertical ground moulding on Pole `06142012.0123004 is gaping away from the pole and exposing the transformer ground wire.

8. **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."

ESRB's finding related to the above rule is listed in Table 8:

Table 8: GO 95, Rule 56.2 Finding

Location	Finding
95	Pole `06142012.0130504 has a slack secondary down guy.

9. **GO 95, Rule 56.4-G, Clearances, Above Buildings** states:

"The minimum vertical clearance of 8 feet specified for guys above buildings (Table 1, Case 6, Column A) may be reduced over roofs of 3/8 pitch (37 degrees from the horizontal) or greater to a clearance of not less than 2 feet."

ESRB's finding related to the above rule is listed in Table 9:

Table 9: GO 95, Rule 56.4-G Finding

Location	Finding
31	The down guy attached to Pole `06145006.0172600 is obstructing safe access and passing less than 8 feet over the stairs of a platform.

10. **GO 95, Rule 56.4-D(2), Clearances, From Guys or Span Wires** states:

"Passing and Attached to Same Pole: The radial clearance between different guys, different span wires, or different guys and span wires, attached to the same pole shall not be less than 3 inches."

ESRB's finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 56.4-D(2) Finding

Location	Finding
82	Pole `06142012.0123001 has a PacifiCorp down guy that is contacting a communications down guy on the same pole above the guy insulators.

11. 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."

ESRB's finding related to the above rule is listed in Table 11:

Table 11: GO 95, Rule 56.9 Finding

Location	Finding
13	The outermost down guy on Pole `06147014.0010500 has a wooden guy guard that is missing high visibility markers.

12. 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."

ESRB's finding related to the above rule is listed in Table 12:

Table 12: GO 128, Rule 35.3 Finding

Location	Finding
61	Pad Mount Transformer `06142012.0115580 has missing high voltage signs on the interior and exterior of the enclosure.

V. Observations

1. ESRB staff observed the following items during the field portion of the audit, listed in Table 13. ESRB recommends addressing or monitoring the following issues:

Table 13: PacifiCorp Audit Observations

Location	Observations
43	Pole `06144006.0104200 is located along a hillside with signs of possible erosion.
47	Pole `06144006.0213900 is deteriorated and easily shaken, with a rocked cross arm, signs of soil erosion around the pole, and guy wires that are starting to appear slack.

2. 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."*

During the field inspection, ESRB observed the following third-party safety concerns listed in Table 14:

Table 14: Third-Party Audit Observations

Location	Observations
16	Pole `06142016.0054002 has an abandoned communications drop.
19	Pole `06142016.0084903 has an abandoned communications drop.
22	Pole `06142016.0051103 has an abandoned communications drop.
27	Pole `06143014.0236803 has a loose communications down guy.
55	Pole `06143014.0213901 has an exposed communications ground wire and ground rod.
69	Pole `06142012.0145803 has an exposed communications ground wire.
73	Pole `06142012.0110402 has a communications ground that is connected to the transformer ground.
79	The communications service drop between Pole `06142012.0124140 (Location 79) and Pole `06142012.0123004 (Location 80) has strain from excessive vegetation.
85	Pole `06142012.0122108 has a communications wire contacting the down guy above the insulator.
93	Pole `06142012.0130612 has an abandoned communications drop.
95	Pole `06142012.0130504 has an abandoned communications drop.