STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

June 22, 2023 EA2023-1077

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

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

Dear Mr. Tanguay:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Joseph Murphy of ESRB staff conducted an electric distribution audit of PG&E's Diablo Division from May 1 to May 5, 2023. During the audit, ESRB staff conducted field inspections of PG&E's distribution facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than July 20, 2023, by electronic copy of all corrective actions and preventive measures taken by PG&E to correct the identified violations and prevent the recurrence of such violations.

The response should indicate the date each remedial action and preventive measure taken for the violations. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Section II and IV of the enclosed Audit Report. Please also provide records of the third-party notifications for the violations listed in Section IV.4 of the enclosed Audit Report.

If you have any questions concerning this audit, please contact Emiliano Solorio at (916) 216-0249 or Emiliano.Solorio@cpuc.ca.gov.

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 PG&E Diablo Division

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Joseph Murphy, Utilities Engineer, ESRB, SED, CPUC

PG&E DIABLO DIVISION ELECTRIC
DISTRIBUTION AUDIT FINDINGS

May 1 – May 5, 2023

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 Diablo Division:

- Electric Distribution Preventive Maintenance Manual, April 1, 2016
- TD-2305M-B006, Revised Distribution Inspection Guidelines, January 24, 2020
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, August 02, 2022
- Distribution facilities statistics and their wildfire risks, including equipment risks and vegetation risks
- Diablo Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, February 2018 – February 2023
- Electric Corrective Notifications list, March 2018 – March 2023
- Reliability Indexes and Outage list, March 2018 – March 2023
- Diablo New Projects list, March 2022 – March 2023
- Pole Loading Calculations list, January 2022 – December 2022
- Incoming Third-Party Notifications list, March 2018 – March 2023
- Outgoing Third-Party Notifications list, March 2018 – March 2023
- Inspector training records, March 2018 – March 2023
- Equipment test records, February 2018 – February 2023
- Intrusive Inspections, February 2022 – February 2023
- 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 Diablo Division for the past 60 months (March 2018 – March 2023), 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 18,319 work orders by their assigned due date. Table 1 below breaks down the 18,319 late work orders by their given priority, including the total number of late work orders completed, pending, and canceled work orders, which are included in the total.

Table 1: Late Work Orders in Diablo Division

Priority Code	Late Work Orders Completed	Late Work Orders Pending	Late Work Orders Cancelled	Total
A	1,021	0	0	**1,021**
B	586	52	376	**1,014**
E	4,095	8,843	2,749	**15,687**
F	93	442	62	**597**
Total	5,795	9,337	3,187	**18,319**

PG&E shall provide ESRB with its corrective action plan to complete the 9,337 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 Orders (WO#s)	Number of Days Past Assigned Due Date
A	117476796	1,054
B	114673465	1,270
E	116862612	1,176
F	116804567	857

PG&E identified work order #117476796 on June 20, 2019, to repair a damaged conductor with a required end date of July 11, 2019. PG&E did not complete the work until May 10, 2022.

PG&E identified work order #114673465 on June 7, 2018, to replace a broken conductor with a required end date of December 31, 2018. PG&E did not complete the work until June 23, 2022.

PG&E identified work order #116862612 on March 29, 2019, to replace a decaying pole with a required end date of September 25, 2019. PG&E did not complete the work until December 14, 2022.

PG&E identified work order #116804567 on March 21, 2019, to trim overgrown vegetation on the guy wire with a required end date of March 21, 2020. PG&E did not complete this work until July 26, 2022.

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

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

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

"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."

2.1 ESRB staff identified that PG&E completed a total of 50 detailed overhead inspections in non-HFTD of electric facilities past their GO 165 required completion date, as shown in the worksheet of Attachment 1.

2.2 Additionally, ESRB staff found that PG&E completed a total of 910 overhead patrols past their GO 165 required completion date for the following maps:

Table 3: Maps of Overhead Patrol Completed Past Due Dates

Map	Due Date	Completion Date
B0923	4/9/2021	8/6/2021
C1105	4/10/2021	11/23/2021
B2125	4/12/2021	10/20/2021
B0922	4/13/2021	11/2/2021
C1218	4/13/2021	10/22/2021
B1916	4/15/2021	11/2/2021
B1923	4/16/2021	10/29/2021
C1219	4/16/2021	10/27/2021
C1201	4/21/2021	11/24/2021
E0707	5/19/2021	10/29/2021
C1009	6/6/2021	11/2/2021

III. Field Inspection

During the field inspection, ESRB inspected locations listed in Table 4:

Table 4: List of Field Inspection Locations

Location #	SAP #	Structure Type	Structure Location/Address
1	100459057	Wood Pole	5455 Alhambra Valley Rd. Martinez, CA
2	100458167	Wood Pole	5451 Alhambra Valley Rd. Martinez, CA
3	100459171	Wood Pole	5440 Alhambra Valley Rd. Martinez, CA
4	107936133	Splice Box	5225 Alhambra Valley Rd. Martinez, CA
5	103039967	Wood Pole	5225 Alhambra Valley Rd. Martinez, CA
6	100459268	Wood Pole	5225 Alhambra Valley Rd. Martinez, CA
7	100459266	Wood Pole	5231 Alhambra Valley Rd. Martinez, CA
8	100447582	Wood Pole	204 Riley Dr. Pacheco, CA
9	100447570	Wood Pole	208 Riley Dr. Pacheco, CA
10	100447557	Wood Pole	212 Riley Dr. Pacheco, CA
11	107892693	Splice box	1539 N. Main St. Walnut Creek, CA
12	107892693	Sub-Surface Junction box	1535 N. Main St. Walnut Creek, CA
13	107874493	Sub-Surface Switch & Transformer	1515 N. Main St. Walnut Creek, CA
14	107947086	Sub-Surface Transformer	1516 Bonanza St. Walnut Creek, CA
15	107943371	Sub-Surface Switch & Interrupter	2103 N. Main St. Walnut Creek, CA
16	107986592	Sub-Surface Switch	2103 N. Main St. Walnut Creek, CA
17	108227552	Pad mount Transformer	2050 N. Main St. Walnut Creek, CA
18	107902719	Sub-Surface Transformer	2050 N. Main St. Walnut Creek, CA

Location #	SAP #	Structure Type	Structure Location/Address
19	107910150	Sub-Surface Switch	2050 N. Main St. Walnut Creek, CA
20	108227551	Sub-Surface Switch & Interrupter	2050 N. Main St. Walnut Creek, CA
21	107900262	Sub-Surface Switch	2050 N. Main St. Walnut Creek, CA
22	100477776	Wood Pole	1035 Hook Ave. Pleasant Hill, CA
23	100477777	Splice Box	1029 Hook Ave. Pleasant Hill, CA
24	100477778	Wood Pole	1027 Hook Ave. Pleasant Hill, CA
25	100477780	Wood Pole	1023 Hook Ave. Pleasant Hill, CA
26	100477782	Wood Pole	1017 Hook Ave. Pleasant Hill, CA
27	100477783	Wood Pole	1013 Hook Ave. Pleasant Hill, CA
28	100477775	Wood Pole	1008 Hook Ave. Pleasant Hill, CA
29	100477786	Wood Pole	1006 Hook Ave. Pleasant Hill, CA
30	100462007	Wood Pole	1537 N. Marta Dr. Pleasant Hill, CA
31	100462013	Wood Pole	1543 N. Marta Dr. Pleasant Hill, CA
32	100462015	Wood Pole	1613 N. Marta Dr. Pleasant Hill, CA
33	100462018	Wood Pole	1619 N. Marta Dr. Pleasant Hill, CA
34	100462017	Wood Pole	1637 N. Marta Dr. Pleasant Hill, CA
35	103812662	Wood Pole	70 La Encinal Orinda, CA
36	100486737	Wood Pole	66 La Encinal Orinda, CA
37	103978429	Wood Pole	64 La Encinal Orinda, CA
38	103978430	Wood Pole	65 La Encinal Orinda, CA

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
39	103978431	Wood Pole	54 La Encinal Orinda, CA
40	103978432	Wood Pole	41 La Encinal Orinda, CA
41	103978433	Wood Pole	50 La Encinal Orinda, CA
42	100505002	Wood Pole	153 Ardilla Rd. Orinda, CA
43	100487221	Wood Pole	1 Ardilla Rd. Orinda, CA
44	100487218	Wood Pole	7 Ardilla Rd. Orinda, CA
45	103775026	Wood Pole	7 Ardilla Rd. Orinda, CA
46	104137698	Wood Pole	15 Ardilla Rd. Orinda, CA
47	107987313	Sub-Surface Switch	23 Altarinda Rd. Orinda, CA
48	107913139	Sub-Surface Transformer	102 Ravenhill Rd. Orinda, CA
49	107818323	Sub-Surface Transformer	126 Ravenhill Rd. Orinda, CA
50	107858677	Sub-Surface Junction Box	151 Ravenhill Rd. Orinda, CA
51	107868797	Sub-Surface Transformer	157 Ravenhill Rd. Orinda, CA
52	107957486	Sub-Surface Transformer	174 Ravenhill Rd. Orinda, CA
53	100496053	Wood Pole	518 Morgan Territory Rd. Clayton, CA
54	100496047	Wood Pole	(37.87208056, -121.8563528)
55	100496072	Wood Pole	(37.87105278, -121.8568417)
56	103778292	Wood Pole	(37.87104444, -121.8569111)
57	100496067	Wood Pole	(37.87083056, -121.8570417)
58	100496061	Wood Pole	(37.87034167, -121.8578556)

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
59	100469320	Wood Pole	5577 Morningside Dr. Clayton, CA
60	100469307	Wood Pole	5571 Morningside Dr. Clayton, CA
61	100469289	Wood Pole	5567 Morningside Dr. Clayton, CA
62	100469044	Wood Pole	5567 Morningside Dr. Clayton, CA
63	100451473	Wood Pole	160 Army St. Pittsburg, CA
64	100451468	Wood Pole	178 Army St. Pittsburg, CA
65	100451567	Wood Pole	190 Army St. Pittsburg, CA
66	100451464	Wood Pole	380 Mac Arthur Ave. Pittsburg, CA
67	100451458	Wood Pole	364 Mac Arthur Ave. Pittsburg, CA
68	100451476	Wood Pole	154 Army St. Pittsburg, CA
69	103768117	Wood Pole	136 Army St. Pittsburg, CA
70	100451495	Wood Pole	130 Army St. Pittsburg, CA
71	107917281	Sub-Surface Transformer	1731 Fairhaven Ct. Oakley, CA
72	107974661	Sub-Surface Transformer	1773 Fairhaven Ct. Oakley, CA
73	107882083	Sub-Surface Transformer	1813 Fairhaven Way Oakley, CA
74	107928566	Splice Box	75 Thyme Ct. Oakley, CA
75	107894852	Splice Box	55 Thyme Ct. Oakley, CA
76	107740192	Splice Box	45 Thyme Ct. Oakley, CA
77	107815605	Splice Box	15 Thyme Ct. Oakley, CA

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
78	100470977	Wood Pole	121 Amador Ct. Oakley, CA
79	100470978	Wood Pole	(37.97948889, -121.6891778)
80	103035964	Wood Pole	(37.97964444, -121.6891861)
81	103763455	Wood Pole	463 Honey Ln. Oakley, CA
82	100470968	Wood Pole	(37.979775, -121.6898722)
83	100470965	Wood Pole	(37.97975278, -121.6901944)
84	103763469	Wood Pole	(37.97976944, -121.6905972)

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 Table 5.

Table 5: GO 95, Rule 31.1 Findings

Location	Finding	Notes
7	Pole had a loose visibility strip on the pole.	PG&E corrected the finding in the field.
8	Ground wire was exposed. Ground molding was missing. The anchor for guy wire was buried. Loose guy wire.	
9	There was an abandoned communication service drop.	

26	Ground wire was exposed.	PG&E corrected the finding in the field.
27	There was vegetation contact found above the insulator on down guy wire. Pole had a broken visibility strip.	PG&E corrected the findings in the field.
29	There was vegetation contact found above the insulator on down guy wire.	PG&E has existing EC notification 121802909 to correct the vegetation contact found above the insulator on down guy wire.
30	The pole had a significant lean.	PG&E has existing EC notification 123994674 to replace the pole.
31	The crossarm was rotten/decayed.	PG&E has existing EC notification 123994287 to replace the crossarm.
32	The anchor for guy wire was buried.	PG&E has existing EC notification 123994179 to replace the guy wire anchor.
33	The crossarm was rotten/decayed.	PG&E has existing EC notification 123994114 to replace the crossarm.
34	The pole had a significant lean. The crossarm was rotten/decayed. The pole was missing visibility strips.	PG&E has existing EC notification 123994166 to replace the pole.
43	The anchor for guy wire was buried. The guy wire was loose.	PG&E has existing EC notification 123971511 to correct the guy wire.
44	Pole was leaning.	PG&E has existing EC notification 121549379 to adjust the lean.
54	Pole was broken/damaged.	PG&E has existing EC notification 117133169 to replace the pole.
55	Pole was broken/damaged.	PG&E has existing EC notification 117129897 to replace the pole.
57	The anchor for guy wire was buried. Pole was decayed.	PG&E has existing EC notification 117129892 to replace the pole.
61	There was a low pole step on the pole.	PG&E corrected the finding in the field.
62	Guy marker was not on outer guy wire. Woodpecker holes were found near the top of the pole.	

66	The crossarm was rotten/decayed. Insulator on crossarm was broken.	PG&E has existing EC notification 124686310 for replacement.
67	The crossarm was rotten/decayed. Pole was rotten/decayed.	PG&E has existing EC notification 124686118 for replacement.
69	Service drop was not meeting roof clearance requirements.	
70	Guy wire was loose. Guy wire was corroded.	PG&E has existing EC notification 124687920 for replacement.
77	Street light cover at base was not on.	PG&E corrected the finding in the field.
78	The anchor for guy wire was buried. There was a low pole step on the pole.	PG&E has existing EC notification 119711124 for corrections.
79	There was a low pole step on the pole.	PG&E has existing EC notification 119711091 for correction.
82	The anchor for guy wire was buried.	PG&E corrected the finding in the field.

2. **General Order 95, Rule 31.6 – Abandoned Lines** states:

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

ESRB's findings are listed in Table 6:

Table 6: GO 95, Rule 31.6 Findings

Location	Finding	Notes
2	There are abandoned service drops coming out of the transformer.	

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

"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 7:

Table 7: GO 95, Rule 35 Findings

Location	Finding	Notes
36	Tree causing strain on service drops.	PG&E has existing EC notification 121620123 to correct vegetation strain.
44	Tree causing strain on service drops.	PG&E has existing EC notification 121549379 to correct vegetation strain.
45	Tree causing strain on service drops.	PG&E has existing EC notification 121549173 to correct vegetation strain.
61	Vegetation strain on guy wire.	PG&E has existing EC notification 111649233 to correct vegetation strain.
63	Vegetation strain on guy wire.	PG&E has existing EC notification 124687151 to correct vegetation strain.
68	Vegetation strain on messenger wire.	PG&E has existing EC notification 124687275 to correct vegetation strain.
69	Vegetation was overgrown on messenger wire.	

4. **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."

ESRB's findings are listed in Table 8:

Table 8: GO 95, Rule 18-A Findings

Location	Finding	Notes
3	Broken communication ground wire and molding.	
5	Loose communication conductor found on the pole. Communication riser is damaged.	
29	Communications ground wire was exposed. Communications ground molding was broken.	
34	There was an abandoned communication service drop.	
35	Communications service drop needs a riser. Communications service drop was not secured to the pole.	
38	Communications needs to transfer services to new pole.	
40	Communications box was dangling on the communications line. Communications needs to transfer services to new pole.	
41	Communications needs to transfer services to new pole.	
46	Communications guy was wrapped around pole. Communications needs to	

	transfer services to new pole.	
58	Communications service drop was not secured to the pole.	
59	There was an abandoned communication service drop.	
60	Communications service drop was not secured to the pole. Communications equipment was laying on the ground near pole.	
69	Communications service drop in contact with guy wire and guy wire insulator. Communications service drop is attached to the electrical weatherhead.	
70	Communications service drop is attached to the electrical weatherhead.	
79	There was an abandoned communication service drop.	
80	Communications service drop was loose on line. Communications riser was loose.	
82	The communications guy wire anchor was buried.	

5. GO 128, Rule 17.1, Design, Construction and Maintenance states:

"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 are listed in Table 9:

Table 9: GO 128, Rule 17.1 Findings

Location	Finding	Notes
13	Cracked insulation found on secondary conductors. Cracked insulation found on bus bars.	
15	Capacitor caps were missing on elbow connections.	PG&E corrected the finding in the field.
16	Foreign object was found on elbow connection.	PG&E corrected the finding in the field.
47	Lid frame was broken. Lid frame was not secured upon arrival. Top cap had an opening and needs replacement.	
48	The transformer oil level was high. A primary phase conductor was missing a voltage indicator tag.	
50	A primary phase conductor was missing a voltage indicator tag.	

6. **GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures** states:

"Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity."

ESRB's findings are listed in Table 10:

Table 10: GO 128, Rule 17.8 Findings

Location	Finding	Notes
14	No mark of ownership found on vault cover.	PG&E corrected the finding in the field.