

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 16, 2024

EA2023-1102

Daniel Honeyfield  
Assistant General Manager – Energy Delivery  
Riverside Public Utilities  
2911 Adams Street  
Riverside, CA 92504

Subject: Electric Distribution Audit of Riverside Public Utilities

Mr. Honeyfield:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), James Miller of my staff conducted an electric distribution audit of Riverside Public Utilities (RPU) from November 13, 2023 to November 17, 2023. The audit included a review of RPU's records and field inspections of RPU's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than March 18, 2024, by electronic or hard copy, of all corrective measures taken by RPU to remedy and prevent such violations. Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact James Miller at (213) 660-8898 or [James.Miller@cpuc.ca.gov](mailto:James.Miller@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, ESRB, SED, CPUC  
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC  
James Miller, Utilities Engineer, ESRB, SED, CPUC

## AUDIT FINDINGS

### I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records.
- Work Orders Created from Inspections
- Repair Work Orders
- Intrusive Testing Records
- Third Party Notifications
- Pole Loading Calculation Records

### II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

**GO 165, Section III-B, Distribution Facilities, 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.*

**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.*

RPU's records indicated at the time of the audit that 13,339 of RPU's overhead facilities were overdue for a detailed inspection per RPU's inspection schedule. The records also indicated that 7,254 RPU utility poles were overdue for intrusive testing.

**GO 165, Section III-B, Distribution Facilities, 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.*

**GO 128, Rule 17.2, Inspection**, states:

*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 of these rules.*

RPU's records indicated at the time of the audit that 8,334 of RPU's underground and padmounted facilities were overdue for a detailed inspection per RPU's inspection schedule.

### III. Field Inspections

My staff inspected the following structures during the field inspection portion of the audit:

No.	Facility Identification	Facility Type	Location
1	18060J	Pole	Riverside
2	18061J	Pole	Riverside
3	18062J	Pole	Riverside
4	18063J	Pole	Riverside
5	18064J	Pole	Riverside
6	18065J	Pole	Riverside
7	5489J	Pole	Riverside
8	J38277	Pole	Riverside
9	J38276	Pole	Riverside
10	41679J	Pole	Riverside
11	25483J	Pole	Riverside
12	16009J	Pole	Riverside
13	16134J	Pole	Riverside
14	16133J	Pole	Riverside
15	17038J	Pole	Riverside
16	16131J	Pole	Riverside
17	16130J	Pole	Riverside
18	161129J	Pole	Riverside
19	16128J	Pole	Riverside
20	15977J	Pole	Riverside
21	J34775	Pole	Arlanza
22	J34714	Pole	Arlanza
23	30412J	Pole	Arlanza
24	6298 Crest Avenue	Pole	Arlanza
25	27244J	Pole	Arlanza
26	27243J	Pole	Arlanza
27	2724J	Pole	Arlanza
28	6074 Crest Avenue	Pole	Arlanza
29	27240J	Pole	Arlanza
30	40613J	Pole	Arlanza
31	40614J	Pole	Arlanza
32	28175J	Pole	Arlanza
33	28176J	Pole	Arlanza
34	28177J	Pole	Arlanza
35	28178J	Pole	Arlanza
36	28179J	Pole	Arlanza
37	28612J	Pole	Arlanza
38	28610J	Pole	Arlanza

39	23923J	Pole	Arlanza
40	28605J	Pole	Arlanza
41	28604J	Pole	Arlanza
42	25899J	Pole	Arlanza
43	31940J	Pole	Arlanza
44	29166J	Pole	Arlanza
45	4941 Bushnell Avenue	Pole	Arlanza
46	835314H	Pole	Arlanza
47	29132J	Pole	Arlanza
48	J37956	Pole	Arlanza
49	29161J	Pole	Arlanza
50	29160J	Pole	Arlanza
51	24861J	Pole	Arlanza
52	29157J	Pole	Arlanza
53	10957	Pole	Arlanza
54	41018J	Pole	Alessandro Heights
55	41019J	Pole	Alessandro Heights
56	J38602	Pole	Alessandro Heights
57	J38603	Pole	Alessandro Heights
58	13891J	Pole	Alessandro Heights
59	J39557	Pole	Alessandro Heights
60	J39518	Pole	Alessandro Heights
61	13892J	Pole	Alessandro Heights
62	13894J	Pole	Alessandro Heights
63	J38731	Pole	Alessandro Heights
64	638728H	Pole	Alessandro Heights
65	638727H	Pole	Alessandro Heights
66	J36924	Pole	Alessandro Heights
67	J36923	Pole	Alessandro Heights
68	15342J	Pole	Alessandro Heights
69	42040J	Pole	Alessandro Heights
70	26524J	Pole	Arlington
71	25910J	Pole	Arlington
72	26523J	Pole	Arlington
73	26522J	Pole	Arlington
74	26521J	Pole	Arlington
75	26520J	Pole	Arlington
76	26519J	Pole	Arlington
77	26518J	Pole	Arlington
78	18743J	Pole	Arlington
79	581533H	Pole	Arlington
80	12263J	Pole	Arlington
81	12265J	Pole	Arlington

82	661855H	Pole	Arlington
83	12266J	Pole	Arlington
84	661854H	Pole	Arlington
85	12267J	Pole	Arlington
86	815342H	Pole	Arlington
87	15618J	Pole	Arlington
88	661852H	Pole	Arlington
89	PM10067	Padmounted Transformer	Riverside
90	P8683	Padmounted Transformer	Riverside
91	PSE9033	Gas Switch	Riverside
92	M7482	Vault	Riverside
93	PJC9398	Junction Cabinet	Riverside
94	PJC9397	Junction Cabinet	Riverside
95	W/O PJC9397	Pole Box	Riverside
96	PSE7488	Padmounted Switch	Riverside
97	18136B	Commercial Subsurface Transformer	Riverside
98	19573 Rotterdam Street	Pole Box	Riverside
99	B-13217	BURD Transformer	Riverside
100	8242 Plainview Street	Pole Box	Riverside
101	17209B	BURD Transformer	Riverside
102	B-13219	BURD Transformer	Riverside
103	B-13220	BURD Transformer	Riverside
104	19530 Fortunello Avenue	Pole Box	Riverside
105	B13221	BURD Transformer	Riverside
106	8360 Manhassen Street	Commercial Subsurface Transformer	Riverside
107	8380 Manhassen Street	Commercial Subsurface Transformer	Riverside

#### IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection:

**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 .*

The down guy wire attached to each of the following poles was not taut:

- 25483J
- 17038J
- J34775
- 27240J

**GO 95, Rule 91.3 Stepping, B. Location of Steps**, states in part:

*The lowest step shall be not 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 lowest pole step on each of the following poles was located at a height of less than 8 feet:

- 29160J
- 29157J
- 26523J
- 12267J
- 161129J
- The pole at 6298 Crest Avenue

**GO 95, Rule 51.6, Marking and Guarding, High Voltage Marking of Poles**, 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. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.*

“High Voltage” signs on each of the following poles were missing or damaged:

- 18065J
- 16134J

- 2724J
- 28175J
- 28176J
- 28177J
- 28610J
- 23923J
- 31940J
- 29132J
- 29161J
- 24861J
- 29157J
- 13892J
- 638727H
- 25910J
- 26523J
- 26522J
- 26521J
- 26520J
- 26519J
- 26518J
- 18743J
- 581533H
- 12263J
- 12265J
- 12266J
- The pole at 6298 Crest Avenue
- The pole at 6074 Crest Avenue

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

*Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light 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.*

Unauthorized signs were attached to the following poles:

- Pole No. 13892J had an unauthorized address sign.
- Pole No. 27243J had an unauthorized “Se Lee Las Cartas” sign.
- Pole No. 13894J had two unauthorized signs; one read “Private Property,” and the other “Children at Play.”

**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.*

The following RPU overhead facilities were in need of maintenance:

- Damaged visibility strips were observed on a pole with no identification number at 4941 Bushnell Avenue.
- The ground moulding was damaged on poles 18063J, 16009J, 16131J, and 28612J.

The ground wires on the following poles has been cut and sections removed:

- J34714
- 27244J
- 2724J
- 28176J

- 28177J
- 29166J
- 638728H
- The pole at 6298 Crest Avenue
- The pole at 6074 Crest Avenue

**GO 95, Rule 56.4, Clearances §C(4), states in part:**

*The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall not be less than as specified in Table 2, Case 19.*

Table 2, Column C, Case 19 requires a radial clearance of three inches between guys and conductors supported on the same pole. The clearance between the guy wire and conductors supported on each of the following poles was less than 3 inches:

- Two RPU down guy wires attached to Pole No. J34775 were in contact with a third-party communications conductor supported on the same pole.
- An RPU down guy wire attached to Pole No. J38603 was in contact with a third-party communications conductor supported on the same pole.
- An RPU down guy wire attached to Pole No. 638727H was in contact with an RPU power service drop supported on the same pole.
- An RPU power service drop attached to Pole No. 26524J was in contact with a third-party messenger guy wire supported on the same pole.

**GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:**

*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.*

The locking mechanism for Padmounted Transformer PM10067 was malfunctioning or damaged.