

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 23, 2021

CPUC-ID: 20190531-02

Lise Jordan, Sr. Director
Regulatory Compliance and Quality Assurance
Pacific Gas and Electric Company (PG&E)
77 Beale Street
San Francisco, CA 94105

SUBJECT: Notice of Violation (NOV)

Dear Ms. Jordan:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Charles Mee investigated the Sausalito Emergency Project (SEP).

In March 2019, PG&E started to inspect the Ignacio-Alto-Sausalito transmission lines (IAS Lines) as part of its Wildfire Safety Inspection Program (WSIP). As a result of the WSIP inspections conducted from March through June 2019 for the IAS Lines, PG&E identified a total of 22 Priority Code A safety hazards. These 22 Priority Code A safety hazards significantly risked PG&E's transmission facilities and the electric power supply safety and reliability to City of Sausalito.

PG&E's Electric Transmission Preventive Maintenance Manual (ETPM) defines Priority Code A deficiencies in Table below:

Table 1- PG&E's ETPM Priority Code A Description

Electric Transmission Preventive Maintenance Manual, TD1001M, November 20 th , 2018, Revision 04, Priority Codes	
Priority Code	Priority Description
A	The condition is urgent, and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date will be 30 days to allow time for post-construction processes and notification close-out.

These safety hazards are equivalent to the Level 1 potential violation as described in the General Order (GO) 95, Rule 18.B.(1), which were required to be corrected immediately.

To correct the 22 Priority Code A deficiencies, PG&E initiated the SEP which included the following actions:

1) To replace 10 towers within the Golden Gate National Recreational Area (GGNRA) with two shoo-fly installations.

2) To repair 12 towers outside the GGNRA.

PG&E completed replacing the 10 towers within the GGNRA on September 3, 2019 and completed repairing the 12 towers outside of the GGNRA on April 14, 2020.

ESRB reviewed PG&E's patrol and inspection records for the IAS Lines from 2009 to 2020 and monitored PG&E's construction activities implementing the SEP to correct the 22 Priority Code A deficiencies.

This letter serves as notification to you that our investigation identified the following violations:

GO 95, Rule 18.B.(1) states in part:

“(a) 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.”*

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.”

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.”

1. PG&E failed to thoroughly and properly inspect the IAS Lines from 2009 through 2018. PG&E's WSIP found a total of 22 Priority Code A safety hazards that should have been identified during the previous patrols and detailed inspections conducted prior to 2019. PG&E failed to ensure that the IAS Lines were in good condition through its inspections. Therefore, PG&E is in violation of GO 95, Rule 31.2.
2. The 22 Priority Code A deficiencies significantly risked the IAS Lines and the electric power supply safety and reliability to the City of Sausalito. PG&E failed to maintain the IAS Lines to furnish safe, proper, and adequate service to the City of Sausalito. Therefore, PG&E is in violation of GO 95, Rule 31.1.
3. The 22 Priority Code A deficiencies had immediate risks to safety of the IAS Lines and to electric power supply to the City of Sausalito. PG&E's Priority Code A deficiencies are equivalent to Level 1 potential violations of GO 95, Rule 18 B.(1)(a) (i), which needed to be corrected immediately. However, PG&E failed to correct 16 of the 22

Priority Code A deficiencies within allowed time defined in its ETPM and in GO 95, Rule 18.B.(1)(a)(i).

Table 2 below shows PG&E’s Priority Code A deficiency identification and correction dates along with the number of days that is more than 30 days after they were identified.

Table 2: Correction Days and Number Over Due Days of the Safety Hazards

Tower Number	LC Notification Number	Deficiency Identification Date	Correction Completion Date	Days for Correction	Days Over Due
004/037	117391195	6/4/2019	4/14/2020	315	285
004/038	117394273	6/5/2019	4/14/2020	314	284
009/065	117372276	6/1/2019	9/26/2019	117	87
013/092	117298066	5/21/2019	6/21/2019	31	1
013/092	117307041	5/21/2019	8/7/2019	78	48
013/093	117298064	5/21/2019	6/24/2019	34	4
014/098	117305604	5/23/2019	6/26/2019	34	4
014/099	117305260	5/23/2019	9/3/2019	103	73
014/100	117304876	5/21/2019	9/3/2019	105	75
014/101	117290073	5/20/2019	9/3/2019	106	76
014/102	117288536	5/20/2019	9/3/2019	106	76
015/104	117305651	5/23/2019	9/3/2019	103	73
015/105	117305128	5/23/2019	9/3/2019	103	73
015/106	117305040	5/23/2019	9/3/2019	103	73
015/107	116624078	5/15/2019	9/3/2019	111	81
015/108	117290087	5/20/2019	9/3/2019	106	76

As shown in Table 2, PG&E failed to complete the corrective actions for 16 Priority Code A deficiencies within 30 days. Therefore, PG&E is in violation of GO 95, Rule 18.B.(1)(a)(i).

Please provide a response no later than May 21, 2021 by electronic copy of all corrective actions and preventive measures taken by PG&E to remedy and prevent the recurrence of such violations. If you have any questions concerning this NOV, please contact Charles Mee at (415) 730-7012 or charles.mee@cpuc.ca.gov.

Sincerely,

Banu Acimis, P.E.
 Program and Project Supervisor
 Electric Safety and Reliability Branch

Safety and Enforcement Division
California Public Utilities Commission

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