

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 19, 2011

EA2011-004

Ms. Eleanor Joyce Pefferman, Manager
EO SR&S Sustainable Reliability
Pacific Gas and Electric Company
245 Market Street, N14
San Francisco, CA 94105

Subject: PG&E Central Coast Division Electric Audit

Dear Ms. Pefferman:

On behalf of the Utilities Safety and Reliability Branch (USRB) of the California Public Utilities Commission, Kenneth How and I conducted an electric audit of PG&E's Central Coast Division from April 4-8, 2011. The audit included a review of the division's records for the period of January 2003-April 2011.

During the audit, we identified violations of one or more General Orders. I have enclosed a copy of our audit summary itemizing those violations. By June 19, 2011, PG&E must send me a response to this letter detailing its plan to address those violations and when PG&E expects to complete them. You may email an electronic copy of the response to ryan.yamamoto@cpuc.ca.gov or send a hard copy to:

Attn: Ryan T. Yamamoto
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Should you have any questions concerning this letter, please contact me by telephone at (916) 928-2109 or by email at ryan.yamamoto@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan T. Yamamoto".

Ryan T. Yamamoto, P.E.
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division
California Public Utilities Commission

Enclosures: Audit Summary

CC: Kenneth How, Utilities Engineer, CPUC
Curtis Todd Ryan, Supervisor, PG&E

AUDIT SUMMARY

I. Record Violations

This section summarizes the General Order (GO) violations found during the review of PG&E Central Coast Division maintenance records.

A. Late/Missed Inspections

GO 165 Section IV: Standards for Inspection, Record-keeping, and Reporting states in part:

Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to assure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in the attached table.

PG&E must inspect its facilities per the timeframes outlined in GO 165. PG&E tracks these inspections by highlighting inspected facilities on inspection maps.

The following records contained facilities that were not inspected as required by GO 165:

Record	Explanation of Violation
Overhead Inspection Map L-14-2 Completed on 8/4/2010	PG&E did not highlight/inspect eight (8) poles on 5/31/2005.
Overhead Inspection Map D-12-9 Completed on 4/20/2010	PG&E did not update the map from 2005 inspection which resulted in four (4) poles not being inspected on 4/20/2010.
Overhead Inspection Map C-11-11 Completed on 8/31/2010	PG&E did not highlight/inspect a pole on 8/31/2010.
Overhead Inspection Map N-17-6 Completed on 12/24/2010	PG&E did not highlight/inspect a pole on 9/9/2005.
Overhead Inspection Map J-2-24 Completed on 10/1/2010	PG&E did not highlight/inspect a pole on 9/2/2005.
Overhead Inspection Map I-2-10 Completed on 6/9/2009	PG&E did not highlight/inspect a pole on 6/9/2009
Overhead Inspection Map O-15-10SC Completed on 8/24/2009	PG&E did not highlight/inspect three (3) poles on 8/24/2009.
Overhead Inspection Map O-15-13SC Completed on 8/28/2009	PG&E did not highlight/inspect a pole on 8/28/2009. Map was not updated from 2004 inspection indicating a pole stub on the map.
Overhead Inspection Map O-15-15SC Completed on 7/29/2009	PG&E did not highlight/inspect a conductor to a streetlight and a guy stub on 7/29/2009.
Overhead Inspection Map O-15-23SC Completed on 9/1/2009	PG&E did not highlight/inspect a guy stub and three (3) poles. Map was not updated from 2004 inspection indicating two (2) missing pole stubs on the map, and a pole was a joint pole but not indicated that way on the map.
Overhead Inspection Map O-15-19D Completed on 8/17/2009	PG&E did not update the map from 2004 inspection for two (2) street lights.
Overhead Inspection Map O-16-11SC Completed on 9/11/2009	PG&E did not highlight/inspect two (2) poles and conductors to streets lights on 9/11/2009.
Overhead Inspection Map O-16-14 Completed on 9/18/2009	PG&E did not highlight/inspect five (5) poles on 9/18/2009.
Overhead Inspection Map O-14-13 Completed on 11/1/2010	PG&E did not highlight/inspect two (2) poles on 11/1/2010
Underground Inspection Map K-3-3 Completed on 3/4/2009	PG&E did not highlight/inspect an enclosure on 3/4/2009.
Underground Inspection Map P-20-18 Completed 8/20/2009	PG&E did not highlight/inspect an enclosure on 8/20/2009.
Underground Inspection Map K-15-14 Completed on 7/20/2009	PG&E did not highlight/inspect an enclosure on 7/20/2009.

Underground Inspection Map I-4-10 Completed on 8/3/2009	PG&E did not highlight/inspect three (3) enclosures on 8/3/2009.
Patrol Map D-6-22 Completed on 2/2/11	PG&E missed the 2010 patrol because the master plan had mistakenly removed the map from its plan.

CPUC reviewed 74 of the 94 requested inspection maps. 18 of the 74 reviewed inspection maps had missed facilities.

Records in the table below were provided by PG&E.

Notification Number and Work Center	Explanation of Violation
104016300 -- Monterey* Completed on 7/30/2010	Required end date on 11/14/2009. Could not locate enclosure.
103962830 -- Monterey* Completed on 2/4/2010	Required end date on 11/21/2009. Could not locate enclosure.
103918435 -- Monterey* Completed on 2/26/2010	Required end date on 8/17/2009. Could not locate enclosure.
103723908 -- Monterey* Completed on 4/26/2010	Required end date on 5/19/2009. Could not locate enclosure.
104001038 -- Watsonville* Completed on 4/14/2010	Required end date on 10/2/2009. Barrier posts prohibited inspection of padmount transformer.

*PG&E stated in an email dated 10/6/2010 that there were no late inspections or patrols in 2008 or 2009. PG&E provided a second data request response dated 3/22/2011 stating there were five (5) late inspections in 2009. Please provide explanation of this error.

B. Equipment testing (GO 165, Section IV)

King City district had four (4) capacitor banks in 2008, one (1) regulator in 2009, and one (1) capacitor bank and one (1) reclosure in 2010 not inspected.

Salinas district had 11 capacitor banks and one (1) reclosure in 2008, nine (9) regulators in 2009, and one (1) reclosure in 2010 not inspected.

C. Missed schedule correction work orders/tags (GO 165, Section IV)

PG&E records showed that 1573 work orders/tags not corrected by scheduled due date.

II. Field Violations

This section lists the GO 95 and 128 violations that were identified during the field portion of the audit. The locations that were audited were recently inspected by PG&E. The following violations should have either been identified or corrected by PG&E staff during their inspections.

A.	Location:	1	Address:	Paraiso Road, Soledad, CA 93960	
	Facility Number:	N/A			
	PG&E Previous Inspection Date:	January 31, 2011			
	Date of CPUC Field Visit:	April 7, 2011			
	Explanation of Violation(s):				
	<p><u>Slack down guy</u></p> <p>GO 95, Rule 56.2, Use:</p> <p><i>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.</i></p> <p>Slack down guy.</p>				

B.	Location:	8	Address:	Panziera Road, Soledad, CA 93960	
	Facility Number:	N/A			
	PG&E Previous Inspection Date:	January 31, 2011			
	Date of CPUC Field Visit:	April 7, 2011			
	Explanation of Violation(s):				
	<p><u>Map error</u></p> <p>GO 95, Rule 31.1, Design, Construction and Maintenance:</p> <p><i>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.</i></p> <p><i>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.</i></p> <p>PG&E's map showed a transformer on the pole that was not present in the field.</p>				

C.	Location:	9	Address:	Paraiso Road, Soledad, CA 93960	
	Facility Number:	N/A			
	PG&E Previous Inspection Date:	January 31, 2011			
	Date of CPUC Field Visit:	April 7, 2011			
	Explanation of Violation(s):				
	<p><u>Missing High Voltage Sign</u></p> <p>GO 95, Rule 51.6 A, High Voltage Marking of Poles:</p> <p><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.</i></p> <p>High voltage sign(s) missing.</p>				

D.	Location:	10	Address:	Paraiso Road, Soledad, CA 93960
Facility Number:			N/A	
PG&E Previous Inspection Date:			January 31, 2011	
Date of CPUC Field Visit:			April 7, 2011	
Explanation of Violation(s):				
<p><u>Missing High Voltage Sign</u></p> <p>GO 95, Rule 51.6 A, High Voltage Marking of Poles:</p> <p><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.</i></p> <p>High voltage sign(s) missing.</p>				

E.	Location:	21	Address:	135 2nd Street, Salinas, CA 93906
Facility Number:			N/A	
PG&E Previous Inspection Date:			January 11, 2010	
Date of CPUC Field Visit:			April 7, 2011	
Explanation of Violation(s):				
<p><u>Service drop has signs of abrasion</u></p> <p>GO 95, Rule 35, Vegetation Management states:</p> <p><i>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 utility has actual knowledge, obtained either through normal operating practices or notification to the utility, that any 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).</i></p> <p>A service drop that show signs of abrasion.</p>				

F.	Location:	22	Address:	301 Boeing Street, Salinas, CA 93906
Facility Number:			N/A	
PG&E Previous Inspection Date:			January 11, 2010	
Date of CPUC Field Visit:			April 7, 2011	
Explanation of Violation(s):				
<p><u>Missing High Voltage Sign</u></p> <p>GO 95, Rule 51.6 A, High Voltage Marking of Poles:</p> <p><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage <u>signs</u>.</i></p> <p>High voltage sign missing.</p>				

III. Comment

A. Record error

PG&E had two maps (P-20-11 and P-20-20) which were switched in the system from urban area to rural area.