

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 24, 2012

Casey Kelley
General Foreman
Liberty Utilities
P.O. Box 107
Tahoe Vista, CA 96148

EA2012-013

SUBJECT: Audit of Liberty Utilities

Dear Mr. Kelley:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Paul Penney and Ryan Yamamoto of my staff conducted an audit of Liberty Utilities (LU) from June 4, 2012 to June 7, 2012. The audit included a review of LU's maintenance records and inspections of LU's facilities.

During the audit, my staff identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than September 28, 2012, by electronic or hard copy, of all corrective measures taken by LU to remedy and prevent such violations.

If you have any questions concerning this audit you can contact, Ryan Yamamoto at (415) 703-2192 or ryan.yamamoto@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Stepanian".

Raffy Stepanian, P.E.
Program Manager
Electric Safety and Reliability Branch
Consumer Protection and Safety Division
California Public Utilities Commission

Enclosures: CPUC Audit Summary

CC: Raymond Fugere, Program and Project Supervisor, CPUC
Alok Kumar, Senior Utilities Engineer (Supervisor), CPUC
Paul Penney, Utilities Engineer, CPUC
Ryan Yamamoto, Utilities Engineer, CPUC

Audit Summary

GO 165, Section III-B – Standards for Inspections, 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.”

LU did not have sufficient records to demonstrate compliance with the inspection requirements of GO 165.

GO 165, Section III-C – Record Keeping states in part:

“The utility shall maintain records for (1) at least ten (10) years of patrol and detailed inspection activities, and (2) the life of the pole for intrusive inspection activities. Such records shall be made available to parties or pursuant to Commission rules upon 30 days notice. Commission staff shall be permitted to inspect such records consistent with Public Utilities Code Section 314 (a).”

LU does not have a written inspection program that requires recording keeping as specified in GO 165.

GO 165, Section III-C – Record Keeping states in part:

“For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.”

LU did not document all violations of General Orders 95 and 128 during its inspections. Additionally, all violations that were discovered by the utility were not scheduled for corrective action.

GO 165, Section III-D, - Reporting, states in part:

“By July 1st each each utility subject to this General Order shall submit an annual report for the previous year under penalty of perjury.”

LU has not submitted any annual reports to the Commission. Annual reports must be submitted to the Commission by July 1st.

GO 95, Rule 18-A1a, - Resolution of Safety Hazards and GO 95 Nonconformances, states in part:

“Each company (including utilities and CIPs) is responsible for taking appropriate corrective action to remedy Safety Hazards and GO 95 nonconformances posed by its facilities.”

LU did not document, schedule for correction and correct all Safety Hazards received from other companies.

GO 95, Rule 18-B, - Notification of Safety Hazards, states in part:

“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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery. To the extent the inspecting company cannot determine the facility owner/operator, it shall contact the pole owner(s), who shall be responsible for promptly notifying the company owning/operating the facility with the safety hazard(s), normally not to exceed five business days after being notified of the safety hazard. The notification shall be documented and such documentation must be preserved by all parties for at least ten years.”

LU does not notify other companies of safety hazards as required by GO 95.

GO 95, Rule 44.2, Additional Construction, States:

“Any entity planning the addition of facilities that materially increase vertical, transverse or longitudinal loading on a structure shall perform a loading calculation to ensure that the addition of the facilities will not reduce the safety factors below the values specified by Rule 44.3. Such entity shall maintain these pole loading calculations for ten years and shall provide such information to authorized joint use pole occupants and the Commission upon request.”

LU's pole load calculations did not contain accurate information; specifically, the data used in the calculation did not accurately reflect the facilities in the field. Pole loading calculations need to use accurate information.

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.”

LU needs to update the ownership identification signs on its padmounted equipment. Currently, LU staff is not always documenting this violation when it inspects its facilities.

Field Violations

1.	Location:	7276 Highway 28, Tahoe Vista (Equipment # 244289)
	Previous LU Visit Details:	03/07/12
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Ground Molding Missing</u> GO 95, Rule 54.6-B, states in part:</p> <p style="text-align: center;"><i>“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)”</i></p> <p>At this location, LU’s pole had a ground wire that was exposed. This violation was not documented when LU last visited this location.</p>		

2.	Location:	480 North Ridge Road, Carnelian Bay (Equipment # 96794)
	Previous LU Visit Details:	02/23/11
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Secondary Crossarm Contact Above Insulator On Anchor Guy</u> GO 95, Rule 56.7-B, states in part:</p> <p style="text-align: center;"><i>“In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule.”</i></p> <p>At this location, LU’s anchor guy had secondary crossarm contact above the guy insulator. This violation was not documented when LU last visited this location.</p>		

3.	Location:	620 North Ridge Road, Carnelian Bay (Equipment # 90576)
	Previous LU Visit Details:	03/23/12
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Secondary Crossarm Contact Above Insulator On Anchor Guy</u> GO 95, Rule 56.7-B, states in part:</p> <p style="text-align: center;"><i>“In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule.”</i></p> <p>At this location, LU’s anchor guy had secondary crossarm contact above the guy insulator. This violation was not documented when LU last visited this location.</p>		

4.	Location:	620 North Ridge Road, Carnelian Bay (Equipment # 90575)
	Previous LU Visit Details:	02/23/11
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Anchor Guy Less Than Three (3) Inches From Secondary Conductor</u> GO 95, Rule 38, Table 2 states in part:</p> <p style="text-align: center;"><i>“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.”</i></p> <p>At this location, LU’s anchor guy less than three (3) inches from the secondary conductor. This violation was not documented when LU last visited this location.</p>		

5.	Location:	Woodchuck Drive & North Ridge Road, Carnelian Bay (Equipment # 90568)
Previous LU Visit Details:		02/23/11
Date of CPUC Inspection:		06/06/12
Explanation of Violation(s):		
<p><u>Overhead Conductor Less Than 18 Inches From Tree</u> GO95, Rule 35, states in part:</p> <p><i>“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.”</i></p> <p>At this location, LU’s overhead conductor was less than 18 inches from a tree. This violation was not documented when LU last visited this location.</p>		

6.	Location:	457 Terrace Drive, Carnelian Bay (Equipment # 45303)
Previous LU Visit Details:		03/23/12
Date of CPUC Inspection:		06/06/12
Explanation of Violation(s):		
<p data-bbox="191 562 526 594"><u>Ground Wire Exposed</u></p> <p data-bbox="191 600 678 632">GO 95, Rule 54.6-B, states in part:</p> <p data-bbox="321 674 1455 779"><i>“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).”</i></p> <p data-bbox="191 821 1403 884">At this location, LU’s pole had a ground wire that was exposed. This violation was not documented when LU last visited this location.</p> <p data-bbox="191 926 597 957"><u>Missing High Voltage Sign</u></p> <p data-bbox="191 963 678 995">GO 95, Rule 51.6-A, states in part:</p> <p data-bbox="321 1037 1468 1100"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs....”</i></p> <p data-bbox="191 1142 1338 1205">At this location, LU’s pole was missing a high voltage sign. This violation was not documented when LU last visited this location.</p>		

7.	Location:	5850 Ophir Street, Carnelian Bay (Equipment # 39579)
Previous LU Visit Details:		03/20/12
Date of CPUC Inspection:		06/06/12
Explanation of Violation(s):		
<p data-bbox="191 590 467 621"><u>Slack Anchor Guy</u></p> <p data-bbox="191 625 639 657">GO 95, Rule 56.2 states in part:</p> <p data-bbox="313 699 1427 804"><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 data-bbox="191 846 1442 909">At this location, LU’s anchor guy was slack. This violation was not documented when LU last visited this location.</p> <p data-bbox="191 957 526 989"><u>Ground Wire Exposed</u></p> <p data-bbox="191 993 680 1024">GO 95, Rule 54.6-B, states in part:</p> <p data-bbox="319 1066 1455 1171"><i>“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).”</i></p> <p data-bbox="191 1213 1401 1276">At this location, LU’s pole had a ground wire that was exposed. This violation was not documented when LU last visited this location.</p>		

8.	Location:	Mountain Circle & Wildwood Road, Tahoe Vista (Equipment # 81583)
Previous LU Visit Details:		01/20/11
Date of CPUC Inspection:		06/06/12
Explanation of Violation(s):		
<p data-bbox="191 590 526 621"><u>Ground Wire Exposed</u></p> <p data-bbox="191 625 683 657">GO 95, Rule 54.6-B, states in part:</p> <p data-bbox="321 699 1455 804"><i>“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).”</i></p> <p data-bbox="191 846 1401 911">At this location, LU’s pole had a ground wire that was exposed. This violation was not documented when LU last visited this location.</p>		

9.	Location:	5984 Dodowah Road (Equipment # 85741)
Previous LU Visit Details:		01/13/11
Date of CPUC Inspection:		06/06/12
Explanation of Violation(s):		
<p><u>Slack Anchor Guy</u> GO 95, Rule 56.2 states in part:</p> <p style="text-align: center;"><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>At this location, LU’s anchor guy was slack. This violation was not documented when LU last visited this location.</p> <p><u>Missing High Voltage Sign</u> GO 95, Rule 51.6-A, states in part:</p> <p style="text-align: center;"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs....”</i></p> <p>At this location, LU’s pole was missing a high voltage sign. This violation was not documented when LU last visited this location.</p>		

10.	Location:	6548 North Lake Boulevard, Tahoe Vista (Equipment # 81463)
	Previous LU Visit Details:	01/10/11
	Date of CPUC Inspection:	06/06/12
	Explanation of Violation(s):	
	<p><u>Ground Wire Exposed</u> GO 95, Rule 54.6-B, states in part:</p> <p style="text-align: center;"><i>“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).”</i></p> <p>At this location, LU’s pole had ground wire that was exposed. This violation was not documented when LU last visited this location.</p>	

11.	Location:	8486 Golden Avenue, Kings Beach (Equipment # 81447)
	Previous LU Visit Details:	05/18/11
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Ground Wire Exposed</u> GO 95, Rule 54.6, B, states in part:</p> <p style="padding-left: 40px;"><i>“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).”</i></p> <p>At this location, LU’s pole had a ground wire that was exposed. This violation was not documented when LU last visited this location.</p> <p><u>Foreign Attachment</u> GO 95, Rule 34, states in part:</p> <p style="padding-left: 40px;"><i>“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.</i></p> <p style="padding-left: 40px;"><i>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.”</i></p> <p>At this location, LU’s pole had a foreign attachment. This violation was not documented when LU last visited this location.</p>		

12.	Location:	8434 Loch Levon Avenue, Kings Beach (Equipment # 68531)
	Previous LU Visit Details:	02/23/12
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Ground Rod And Ground Wire Exposed</u> GO 95, Rule 54.6, B, states in part:</p> <p style="text-align: center;"><i>“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).”</i></p> <p>At this location, LU’s ground wire and ground rod was exposed. This violation was not documented when LU last visited this location.</p>		

13.	Location:	Golden Avenue & Deer Street, Kings Beach (Equipment # 81441)
	Previous LU Visit Details:	03/22/12
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Ground Wire Exposed</u> GO 95, Rule 54.6, B, states in part:</p> <p style="padding-left: 40px;"><i>“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).”</i></p> <p>At this location, LU’s ground wire was exposed. This violation was not documented when LU last visited this location.</p> <p><u>Cable Attached To LU’ Ground</u> GO 95, Rule 33.3, B, states in part:</p> <p style="padding-left: 40px;"><i>“Ground connections for equipment of any one of the types listed in Rule 33.3— A shall not be interconnected with ground connections for equipment of any other type listed therein...:”</i></p> <p>At this location, LU’s ground connection has a cable ground wire attached. This violation was not documented when LU last visited this location.</p>		

14.	Location:	8779 Brockway Vista Avenue, Kings Beach (Equipment # 208483)
Previous LU Visit Details:		03/22/12
Date of CPUC Inspection:		06/06/12
Explanation of Violation(s):		
<p data-bbox="191 590 873 625"><u>Anchor Guy Touching Communication Cable</u></p> <p data-bbox="191 625 740 661">GO 95, Rule 38, Table 2 states in part:</p> <p data-bbox="326 699 1481 877"><i>“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.”</i></p> <p data-bbox="191 919 1474 982">At this location, LU’s anchor guy was in contact with a communication cable. This violation was not documented when LU last visited this location.</p>		

15.	Location:	8732 Rainbow Avenue, Kings Beach (Equipment # 92275)
Previous LU Visit Details:		03/20/12
Date of CPUC Inspection:		06/06/12
Explanation of Violation(s):		
<p><u>Ground Wire Exposed</u> GO 95, Rule 54.6, B, states in part:</p> <p style="padding-left: 40px;"><i>“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).”</i></p> <p>At this location, LU’s ground wire was exposed. This violation was not documented when LU last visited this location.</p> <p><u>Anchor Guy Touching Communication Cable</u> GO 95, Rule 38, Table 2 states in part:</p> <p style="padding-left: 40px;"><i>“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.</i> <i>The clearances in Table 2 shall in no case be reduced more than 10 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.”</i></p> <p>At this location, LU’s anchor guy was in contact with a communication cable. This violation was not documented when LU last visited this location.</p>		

16.	Location:	8681 Rainbow Avenue, Kings Beach (Equipment # 81456)
Previous LU Visit Details:		02/08/11
Date of CPUC Inspection:		06/06/12
Explanation of Violation(s):		
<p data-bbox="191 590 532 625"><u>Ground Wire Exposed</u></p> <p data-bbox="191 625 695 661">GO 95, Rule 54.6, B, states in part:</p> <p data-bbox="321 695 1458 808"><i>“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).”</i></p> <p data-bbox="191 842 1458 903">At this location, LU’s ground wire was exposed. This violation was not documented when LU last visited this location.</p>		

17.	Location:	970 Snow Show Road, Tahoe City (Equipment # 109225)
	Previous LU Visit Details:	02/07/12
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Tree Contact and Secondary Crossarm Contact Above Insulator On Anchor Guy</u> GO 95, Rule 56.7-B, Location of Sectionalizing Insulators states in part:</p> <p><i>“In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule.”</i></p> <p>At this location, LU’s anchor guy had tree contact and secondary crossarm contact above the guy insulator. This violation was not documented when LU last visited this location.</p>		

18.	Location:	970 Sky Way, Tahoe City (Equipment # 201316)
	Previous LU Visit Details:	02/07/12
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Anchor Guy Touching Communication Cable</u> GO 95, Rule 38, Table 2 states in part:</p> <p><i>“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..”</i></p> <p>At this location, LU’s anchor guy was in contact with a communication cable. This violation was not documented when LU last visited this location.</p>		

19.	Location:	125 Talmont Circle, Tahoe City (Equipment # 155257)
Previous LU Visit Details:		02/07/12
Date of CPUC Inspection:		06/06/12
Explanation of Violation(s):		
<p><u>Ground Rod And Ground Wire Exposed</u> GO 95, Rule 54.6-B, states in part:</p> <p style="text-align: center;"><i>“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).”</i></p> <p>At this location, LU’s ground wire and ground rod was exposed. This violation was not documented when LU last visited this location.</p> <p><u>Missing High Voltage Sign</u> GO 95, Rule 51.6-A, states in part:</p> <p style="text-align: center;"><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs....”</i></p> <p>At this location, LU’s pole had a damaged a high voltage sign. This violation was not documented when LU last visited this location.</p>		

20.	Location:	445 John Cain Road, Tahoe City (Equipment # 139525)
	Previous LU Visit Details:	02/07/12
	Date of CPUC Inspection:	06/06/12
	Explanation of Violation(s):	
	<p><u>Ground Wire Exposed</u> GO 95, Rule 54.6-B, states in part:</p> <p style="text-align: center;"><i>“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).”</i></p> <p>At this location, LU’s ground wire was exposed. This violation was not documented when LU last visited this location.</p>	

21.	Location:	1975 Silver Tip Drive, Tahoe City (Equipment # 131178)
	Previous LU Visit Details:	02/07/12
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Tree Contact Above Insulator On Anchor Guy</u> GO 95, Rule 56.7-B, Location of Sectionalizing Insulators states in part:</p> <p><i>“In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule.”</i></p> <p>At this location, LU’s anchor guy had tree contact above the guy insulator. This violation was not documented when LU last visited this location.</p> <p><u>Ground Wire Exposed</u> GO 95, Rule 54.6-B, states in part:</p> <p><i>“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).”</i></p> <p>At this location, LU’s ground wire was exposed. This violation was not documented when LU last visited this location.</p> <p><u>Missing High Voltage Sign</u> GO 95, Rule 51.6-A, states in part:</p> <p><i>“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs....”</i></p> <p>At this location, LU’s pole had a damaged high voltage sign. This violation was not documented when LU last visited this location.</p>		

22.	Location:	2090 Woodleigh Road, Tahoe City (Equipment # 180628)
	Previous LU Visit Details:	02/07/12
	Date of CPUC Inspection:	06/06/12
Explanation of Violation(s):		
<p><u>Ground Rod And Ground Wire Exposed</u> GO 95, Rule 54.6-B, states in part:</p> <p style="text-align: center;"><i>“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).”</i></p> <p>At this location, LU’s ground wire and ground rod was exposed. This violation was not documented when LU last visited this location.</p>		