

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



EA2013-001

March 25, 2013

Barry Fisher  
Construction/Maintenance Supervisor  
City of Lodi, Electric Utility  
1331 South Ham Lane  
Lodi, CA 95242

**SUBJECT:** Audit of the City of Lodi, Electric Utility


Dear Mr. Fisher:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Ivan Garcia, and Ryan Yamamoto of my staff conducted an electric audit of the City of Lodi, Electric Utility from February 4 to February 6, 2013. The audit included a review of the City of Lodi, Electric Utility records and field inspections of the City of Lodi, Electric Utility facilities.

During the audit, we 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 April 30, 2013, by electronic or hard copy, of all corrective measures taken by the City of Lodi, Electric Utility to remedy and prevent such violations.

If you have any questions concerning this audit please contact, Ivan Garcia at (916) 928-5875 or [ivan.garcia@cpuc.ca.gov](mailto:ivan.garcia@cpuc.ca.gov).

Sincerely,



Raymond Fugere, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Consumer Protection and Safety Division

Enclosure: Audit Summary

CC: Ivan Garcia, Utilities Engineer, CPUC  
Ryan Yamamoto, Senior Utilities Engineer, Specialist, CPUC  
Jay Marchesseault, Engineering Manager, City of Lodi, Electric Utility

## AUDIT SUMMARY

Company: City of Lodi, Electric Utility  
 Electric Audit  
 Date: February 4-6, 2013

### Violations

<b>A</b>	<b>Location:</b>	<b>Lodi – City of Lodi, Electric Utility</b>
	<b>Date Visited by CPUC:</b>	2/4/2013-2/6/2013
	<b>Explanation of Violation(s):</b>	
	<p><b><u>GO 165, Section III-B, Standards for Inspection, States:</u></b></p> <p style="text-align: center;"><i>“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.”</i></p> <p><b><u>GO 165, Section III-C, Record Keeping, States in part:</u></b></p> <p style="text-align: center;"><i>“The utility shall maintain records for (1) at least ten (10) years of the patrol and detailed inspection activities, and (2) the life of the pole for intrusive inspection activities.”</i></p> <p>The City of Lodi, Electric Utility did not have sufficient records to demonstrate compliance with the patrol, detailed, and intrusive inspection requirements of GO 165.</p>	

<b>B</b>	<b>Location:</b>	<b>Lodi – City of Lodi, Electric Utility</b>
	<b>Date Visited by CPUC:</b>	2/4/2013-2/6/2013
	<b>Explanation of Violation(s):</b>	
	<p><b><u>GO 165, Section III-C, Record Keeping, States in part:</u></b></p> <p style="text-align: center;"><i>“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.”</i></p> <p>The City of Lodi, Electric Utility did not have documentation to show that all violations found during inspections were scheduled for corrective action.</p>	

<b>C</b>	<b>Location:</b>	<b>Lodi – City of Lodi, Electric Utility</b>
	<b>Date Visited by CPUC:</b>	2/4/2013-2/6/2013
	<b>Explanation of Violation(s):</b>	
	<p><b><u>GO 95, Rule 18-A1a, Resolution of Safety Hazards and GO 95 Nonconformances, States in part:</u></b></p> <p style="text-align: center;"><i>“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.”</i></p> <p>The City of Lodi, Electric Utility did not document, schedule for correction and correct all Safety Hazards received from other companies.</p>	

<b>D</b>	<b>Location:</b>	<b>Lodi – City of Lodi, Electric Utility</b>
	<b>Date Visited by CPUC:</b>	2/4/2013-2/6/2013
	<b>Explanation of Violation(s):</b>	
	<p><b><u>GO 95, Rule 18-A2a, Resolution of Safety Hazards and GO 95 Nonconformances, States in part:</u></b></p> <p style="text-align: center;"><i>“All companies shall establish an auditable maintenance program for their facilities and lines.”</i></p> <p>The City of Lodi, Electric Utility was not able to provide documentation to demonstrate that the company has an auditable maintenance program.</p>	

<b>E</b>	<b>Location:</b>	<b>Lodi – City of Lodi, Electric Utility</b>
	<b>Date Visited by CPUC:</b>	2/4/2013-2/6/2013
	<b>Explanation of Violation(s):</b>	
	<p><b><u>GO 95, Rule 18-A2a, Resolution of Safety Hazards and GO 95 Nonconformances, States in part:</u></b></p> <p style="text-align: center;"><i>“All companies must include a timeline for corrective actions to be taken following the identification of a Safety Hazard or nonconformances with General Orders 95 on the company’s facilities. The auditable maintenance program shall prioritize corrective actions consistent with the priority levels set forth below and based on the following factors, as appropriate.”</i></p> <p>The City of Lodi, Electric Utility does not assign the appropriate time periods for correction of its nonconformances.</p>	

F	<b>Location:</b>	<b>Lodi – City of Lodi, Electric Utility</b>
	<b>Date Visited by CPUC:</b>	2/4/2013-2/6/2013
	<b>Explanation of Violation(s):</b>	
	<p><b><u>GO 95, Rule 18-B, Notification of Safety Hazards, States:</u></b></p> <p><i>“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.”</i></p> <p>The City of Lodi, Electric Utility does not address notification of safety hazards as required by GO 95.</p>	

<b>G</b>	<b>Location:</b>	<b>Lodi – City of Lodi, Electric Utility</b>
	<b>Date Visited by CPUC:</b>	2/4/2013-2/6/2013
<b>Explanation of Violation(s):</b>		
<b><u>GO 165, Section III-D, Reporting, States in part:</u></b>		
<p><i>“By July 1<sup>st</sup> each utility subject to this General Order shall submit an annual report for the previous year under penalty of perjury. The report shall list four categorical types of inspections: Patrols, Overhead Detailed, Underground Detailed and Wood Pole Intrusive. The report shall denote the total units of work by inspection type for the reporting period and the number of outstanding (not completed) inspections within the same reporting period for each of the four categories.”</i></p>		
<p>The City of Lodi, Electric Utility has not submitted any annual reports to the Commission. Annual reports must be submitted to the Commission by July 1.</p>		

<b>H</b>	<b>Location:</b>	<b>Lodi – City of Lodi, Electric Utility</b>
	<b>Date Visited by CPUC:</b>	2/4/2013-2/6/2013
<b>Explanation of Violation(s):</b>		
<b><u>GO 95, Rule 44.2, Additional Construction States:</u></b>		
<p><i>“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.”</i></p>		
<p>The City of Lodi, Electric Utility does not conduct pole load calculations.</p>		

<b>I</b>	<b>Location:</b>	<b>Lodi – City of Lodi, Electric Utility</b>
	<b>Date Visited by CPUC:</b>	2/4/2013-2/6/2013
	<b>Explanation of Violation(s):</b>	
	<b><u>GO 165, Section III-B, Standards for Inspection, States:</u></b>	
	<i>“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.”</i>	
	The City of Lodi, Electric Utility does not conduct diagnostic tests of equipment per this GO.	

<b>J</b>	<b>Location:</b>	412 Washington St., Lodi
	<b>Pole No.:</b>	340380
	<b>Previous Visit by Utility:</b>	Overhead Inspection Map Grid 27 Completed 2/28/2012
	<b>Date Visited by CPUC:</b>	2/5/2013
	<b>Explanation of Violation(s):</b>	
	<b><u>Climbing Space At Communication Level</u></b>	
	<b><u>GO 95, Rule 84.7, Climbing Space, States in part:</u></b>	
	<i>“Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.”</i>	
	At this location, the communication riser infringed in the climbing space of the pole. This violation was not documented by City of Lodi, Electric Utility staff when the pole was inspected.	

K	<b>Location:</b>	309 Flora St., Lodi
	<b>Pole No:</b>	340390
	<b>Previous Visit by Utility:</b>	Overhead Inspection Map Grid 34 Completed 2/28/2012
	<b>Date Visited by CPUC:</b>	2/5/2013
	<b>Explanation of Violation(s):</b>	
	<p data-bbox="261 590 675 625"><b><u>High Voltage Signs Broken</u></b></p> <p data-bbox="261 663 1401 737"><b><u>GO 95 Rule 51.6-A, Marking and Guarding, High Voltage Marking , States in part:</u></b></p> <p data-bbox="391 772 1239 1062"><i>“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. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible.”</i></p> <p data-bbox="261 1104 1382 1205">At this location, the High Voltage Sign on one side of the crossarm was broken. This violation was not documented by City of Lodi, Electric Utility staff when the pole was inspected.</p>	



L	<b>Location:</b>	337 Flora St., Lodi
	<b>Pole No:</b>	340420
	<b>Previous Visit by Utility:</b>	Overhead Inspection Map Grid 34 Completed 2/28/2012
	<b>Date Visited by CPUC:</b>	2/5/2013
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Ground Wire Exposed</u></b></p> <p><b><u>GO 95, Rule 54.6-B, Ground Wires, States in part:</u></b></p> <p><i>“Ground wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.”</i></p> <p>At this location, a ground wire was exposed at the bottom of the pole. This violation was not documented by City of Lodi, Electric Utility staff when the pole was inspected.</p>	

<b>M</b>	<b>Location:</b>	409 Flora St., Lodi
	<b>Pole No.:</b>	340470
	<b>Previous Visit by Utility:</b>	Overhead Inspection Map Grid 34 Completed 2/28/2012
	<b>Date Visited by CPUC:</b>	2/5/2013
	<b>Explanation of Violation(s):</b>	
	<p data-bbox="272 611 613 646"><b><u>Ground Wire Exposed</u></b></p> <p data-bbox="272 684 1019 720"><b><u>GO 95, Rule 54.6-B, Ground Wires, States in part:</u></b></p> <p data-bbox="391 758 1179 863"><i>“Ground wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.”</i></p> <p data-bbox="272 905 1433 1010">At this location, a ground wire was exposed at approximately 10 feet to the bottom of the pole. This violation was not documented by City of Lodi, Electric Utility staff when the pole was inspected.</p>	

N	<b>Location:</b>	417 Flora St., Lodi
	<b>Pole No.:</b>	340490
	<b>Previous Visit by Utility:</b>	Overhead Inspection Map Grid 34 Completed 2/28/2012
	<b>Date Visited by CPUC:</b>	2/5/2013
	<b>Explanation of Violation(s):</b>	
	<p data-bbox="272 604 613 646"><b><u>Ground Wire Exposed</u></b></p> <p data-bbox="272 678 1024 720"><b><u>GO 95, Rule 54.6-B, Ground Wires, States in part:</u></b></p> <p data-bbox="391 751 1182 863"><i>“Ground wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.”</i></p> <p data-bbox="272 898 1446 1010">At this location, a ground wire was exposed at approximately 2 feet and 7 feet from the bottom of the pole. This violation was not documented by City of Lodi, Electric Utility staff when the pole was inspected.</p>	

O	<b>Location:</b>	433 Flora St., Lodi
	<b>Pole No.:</b>	340500
	<b>Previous Visit by Utility:</b>	Overhead Inspection Map Grid 34 Completed 2/28/2012
	<b>Date Visited by CPUC:</b>	2/5/2013
	<b>Explanation of Violation(s):</b>	
	<p data-bbox="272 604 613 646"><b><u>Ground Wire Exposed</u></b></p> <p data-bbox="272 678 1024 720"><b><u>GO 95, Rule 54.6-B, Ground Wires, States in part:</u></b></p> <p data-bbox="391 751 1182 863"><i>“Ground wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.”</i></p> <p data-bbox="272 898 1446 1010">At this location, a ground wire was exposed at approximately 1 foot and 7 feet from the bottom of the pole. This violation was not documented by City of Lodi, Electric Utility staff when the pole was inspected.</p>	

<b>P</b>	<b>Location:</b>	433 Flora St., Lodi
	<b>Pole No.:</b>	340500
	<b>Previous Visit by Utility:</b>	Overhead Inspection Map Grid 40 Completed 3/17/2012
	<b>Date Visited by CPUC:</b>	2/5/2013
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Ground Wire Exposed</u></b></p> <p><b><u>GO 95, Rule 54.6-B, Ground Wires, States in part:</u></b></p> <p><i>“Ground wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.”</i></p> <p>At this location, a ground wire was exposed at approximately 20 feet from the bottom of the pole. This violation was not documented by City of Lodi, Electric Utility staff when the pole was inspected.</p>	

<b>Q</b>	<b>Location:</b>	1533 Stockton St., Lodi
	<b>Pole No.:</b>	490760
	<b>Previous Visit by Utility:</b>	Overhead Inspection Map Grid 49 Unknown
	<b>Date Visited by CPUC:</b>	2/5/2013
<b>Explanation of Violation(s):</b>		
<p data-bbox="272 604 613 646"><b><u>Ground Wire Exposed</u></b></p> <p data-bbox="272 678 1023 720"><b><u>GO 95, Rule 54.6-B, Ground Wires, States in part:</u></b></p> <p data-bbox="391 751 1179 863"><i>“Ground wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.”</i></p> <p data-bbox="272 898 1456 1010">At this location, a ground wire was exposed at approximately 2 feet from the bottom of the pole. This violation was not documented by City of Lodi, Electric Utility staff and it was unknown to the utility as to when the pole was last inspected.</p>		

R	<b>Location:</b>	19 West Tokay St., Lodi
	<b>Pole No.:</b>	331490
	<b>Previous Visit by Utility:</b>	Overhead Inspection Map Grid 33 Unknown
	<b>Date Visited by CPUC:</b>	2/6/2013
	<b>Explanation of Violation(s):</b>	
	<p data-bbox="272 604 613 646"><b><u>Ground Wire Exposed</u></b></p> <p data-bbox="272 678 1024 720"><b><u>GO 95, Rule 54.6-B, Ground Wires, States in part:</u></b></p> <p data-bbox="391 751 1182 863"><i>“Ground wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.”</i></p> <p data-bbox="272 898 1458 1010">At this location, a ground wire was exposed at the bottom and throughout the length of the pole. This violation was not documented by City of Lodi, Electric Utility staff and it was unknown to the utility as to when the pole was last inspected.</p>	

<b>S</b>	<b>Location:</b>	723 West Harney Lane., Lodi
	<b>Switch No.:</b>	56-126
	<b>Previous Visit by Utility:</b>	Underground Inspection Map Grid 56 Unknown
	<b>Date Visited by CPUC:</b>	2/6/2013
<b>Explanation of Violation(s):</b>		
<p data-bbox="272 590 808 625"><b><u>Warning Sticker Not Clearly Visible</u></b></p> <p data-bbox="272 663 911 699"><b><u>GO 128, Rule 35.3, Warning Signs, States:</u></b></p> <p data-bbox="391 737 1252 1100"><i>“Warning signs indicating high voltage shall be installed on an interior surface, or barrier if present, inside the entrance of vaults, manholes, handholes, pad mounted transformer compartments, and other above ground enclosures containing exposed live parts above 750 volts. Such warning signs shall also be installed on an exterior surface of all such pad mounted transformer compartments and other above ground enclosures. Such signs shall be clearly visible to a person in position to open any such access door, other opening, or barrier.”</i></p> <p data-bbox="272 1142 1430 1243">At this switch, the warning sticker on the above ground enclosure was not clearly visible. This violation was not documented by City of Lodi, Electric Utility staff and it was unknown to the utility as to when the switch was last inspected.</p>		



<b>T</b>	<b>Location:</b>	723 West Harney Lane., Lodi
	<b>Padmount No.:</b>	56-128
	<b>Previous Visit by Utility:</b>	Underground Inspection Map Grid 56 Unknown
	<b>Date Visited by CPUC:</b>	2/6/2013
<b>Explanation of Violation(s):</b>		
<b><u>Padmount Not Bolted Onto Pad</u></b>		
<b><u>GO 128, Rule 34.3-A, Self-contained Surface Mounted Equipment, States in part:</u></b>		
<i>“The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.”</i>		
The padmount transformer at this location was not bolted down. This violation was not documented by City of Lodi, Electric Utility staff and it was unknown to the utility as to when the padmount was last inspected.		

<b>U</b>	<b>Location:</b>	2517 Winchester Dr., Lodi
	<b>Padmount No.:</b>	56-156
	<b>Previous Visit by Utility:</b>	Underground Inspection Map Grid 56 Unknown
	<b>Date Visited by CPUC:</b>	2/6/2013
<b>Explanation of Violation(s):</b>		
<b><u>Padmount Enclosure Dislodged From Pad</u></b>		
<b><u>GO 128, Rule 34.3-A, Self-contained Surface Mounted Equipment, States in part:</u></b>		
<i>“The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.”</i>		
At this location, the padmount enclosure was damaged and dislodged from the pad. This violation was not documented by City of Lodi, Electric Utility staff and it was unknown to the utility as to when the padmount was last inspected.		

<b>V</b>	<b>Location:</b>	2501 Winchester Dr., Lodi
	<b>J-Box No.:</b>	56-92
	<b>Previous Visit by Utility:</b>	Underground Inspection Map Grid 56 Unknown
	<b>Date Visited by CPUC:</b>	2/6/2013
<b>Explanation of Violation(s):</b>		
<b><u>Bolt Missing From Underground Enclosure</u></b>		
<b><u>GO 128, Rule 34.3-A, Self-contained Surface Mounted Equipment, States in part:</u></b>		
<i>“Handholes and subsurface equipment enclosures shall be of sufficient size to house safely the required transformers, switches, cables, splices, connectors and associated apparatus. Such equipment shall be so arranged that it can be safely installed, operated and maintained.”</i>		
At this location, the bolt to the underground enclosure was missing. This violation was not documented by City of Lodi, Electric Utility staff and it was unknown to the utility as to when the underground enclosure was last inspected.		

<b>W</b>	<b>Location:</b>	2501 Winchester Dr., Lodi
	<b>Padmount No.:</b>	56-130
	<b>Previous Visit by Utility:</b>	Underground Inspection Map Grid 56 Unknown
	<b>Date Visited by CPUC:</b>	2/6/2013
<b>Explanation of Violation(s):</b>		
<b><u>Bolt Missing From Underground Enclosure</u></b>		
<b><u>GO 128, Rule 34.3-A, Self-contained Surface Mounted Equipment, States in part:</u></b>		
<i>“Handholes and subsurface equipment enclosures shall be of sufficient size to house safely the required transformers, switches, cables, splices, connectors and associated apparatus. Such equipment shall be so arranged that it can be safely installed, operated and maintained.”</i>		
At this location, the bolt to the underground enclosure was missing. This violation was not documented by City of Lodi, Electric Utility staff and it was unknown to the utility as to when the underground enclosure was last inspected.		