

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 4, 2013

EA2013-007

Jadwindar Singh
Manager, Distribution Compliance
Pacific Gas and Electric Company
245 Market St, #926
San Francisco, CA 94105

SUBJECT: Audit of PG&E's Los Padres Division

Dear Mr. Singh:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Ivan Garcia, Yusef Collins and Ryan Yamamoto of my staff conducted an electric audit of PG&E's Los Padres Division from June 10 to 14, 2013. The audit included a review of PG&E's records and field inspections of PG&E's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations, a list area of concerns and additional question is enclosed. Please advise me no later than November 15, 2013 by electronic or hard copy, of all corrective measures taken by PG&E to remedy and prevent such violations.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Raymond Fugere", written over a horizontal line.

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

Enclosure: Audit Summary

CC: Ryan Yamamoto, Senior Utilities Engineer, CPUC
Ivan Garcia, Utilities Engineer, CPUC
Yusef Collins, Utilities Engineer, CPUC
Curtis Todd Ryan, Supervisor, PG&E Gas & Electric
Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division

AUDIT SUMMARY

Company: PG&E – Los Padres Division

Electric Audit

Date: June 10 to June 14, 2013

Violations

A.	Location:	PG&E – Los Padres Division
	Date Visited by CPUC:	6/10/2013-6/14/2013
	Explanation of Violation(s):	
	<u>GO 165, Section III-B, – Standards for Inspection, states:</u>	
	<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>	
	A pre-audit data request response indicated that the following facilities, from 2008 to 2012, were not inspected as required by GO 165:	
	<ul style="list-style-type: none"> • 181 facilities on the 2009 Overhead Inspection of Map CC35 	
	The pre-audit data response Q8b indicated that the following number of maps had issues and didn't meet the requirements of GO 165:	
	<ul style="list-style-type: none"> • Three (3) overhead maps were noted. • 102 underground maps were noted. 	

B.	Location:	PG&E – Los Padres Division
	Date Visited by CPUC:	6/10/2013-6/14/2013
	Explanation of Violation(s):	
	<p><u>GO 165, Section III-C, – Record Keeping, states in part:</u></p> <p><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>6098 work orders, from January 2008 to May 8, 2013, were completed past their scheduled date of corrective action. Furthermore, 1302 work orders are currently open past their scheduled date of corrective action.</p> <p>Furthermore, an additional 29 work orders were found to be late that were not noted in the pre-audit data request response.</p>	

C.	Location:	PG&E – Los Padres Division
	Date Visited by CPUC:	6/10/2013-6/14/2013
	Explanation of Violation(s):	
	<p data-bbox="250 464 1081 495"><u>GO 165, Section III-C, – Record Keeping, states in part:</u></p> <p data-bbox="347 533 1305 678"><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 data-bbox="250 716 1409 861">PG&E does not document all items requiring corrective action during an inspection. Specifically, PG&E staff does not document minor work. PG&E staff only marks a tally mark indicating minor work, and does not specify the equipment identified for corrective action in the tally marks.</p>	

The following violations that ESRB engineers discovered during the field audit and were not documented and addressed by PG&E during its last detailed inspection as required by General Order 165:

D.	Location:	720 Aerovista Park, San Luis Obispo
	Transformer No.:	T-1960
	Previous Visit by Utility:	Reassessed Tag (Notification # 102913145) 1/31/12
	Date Visited by CPUC:	6/12/13
Explanation of Violation(s):		
<p><u>Padmounted Transformer Low Oil and Temperature Differential</u></p> <p>GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</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>At this location, PG&E has a padmounted transformer that was noted in March 2008 of a hot elbow and low oil level. It was revisited in December 2008 and noted that “not deteriorated, deferring work does not create a Safety or Reliability Hazard. DATE DUE: 07/30/09.”. In January 2010, it was noted “Updated to Priority F, due date to be validated at a later date.”. In May 2010, the tag was validated still showing hot elbow and low oil level. The open tag was visited by the CPUC and PG&E in July 2013. We found that the elbow is still hot and oil level is still low. Also, no scheduled corrective action date for this issue after being validated.</p>		

E.	Location:	Chaparral Circle, San Luis Obispo
	Equipment No:	T3786
	Previous Visit by Utility:	Underground Inspection Map NN 3412 Completed 4/20/2013
	Date Visited by CPUC:	6/12/2013
Explanation of Violation(s):		
<p data-bbox="250 590 623 625"><u>Missing Inspection Sticker</u></p> <p data-bbox="250 663 1295 699">GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="344 737 1312 919"><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 data-bbox="250 957 1422 1100">At this location, PG&E’s underground facility was missing a 2013 inspection sticker and required to be installed by PG&E’s procedures. ESRB considers installing inspection stickers in accordance with PG&E’s procedures an “accepted good practice”.</p>		

F.	Location:	2470 Edgeview Lane, Arroyo Grande
	Equipment No:	T3117
	Previous Visit by Utility:	Underground Inspection Map RR3513/Open EC Notification (EC# 106964941) Completed 5/24/13
	Date Visited by CPUC:	6/13/2013
Explanation of Violation(s):		
<p data-bbox="250 646 625 680"><u>Incorrect Assigned Priority</u></p> <p data-bbox="344 718 1065 751">GO 128, Rule 32.3, Materials and Strength, States:</p> <p data-bbox="344 793 1308 1155"><i>“The materials, design and construction of manholes, handholes, subsurface equipment enclosures, and other underground boxes shall be such as to provide sufficient strength to sustain, with a suitable margin of safety, the loads which may reasonably be imposed on them. Manholes, handholes, and subsurface equipment enclosures in street areas which are subject to vehicular traffic shall be constructed to withstand H-20-44 highway loading as designated by the American Association of State Highway Officials. Floors of manholes shall meet the requirements of Public Utilities Code, Sec. 8054. (Also see Appendix B, Figure 9, and Appendix D.)”</i></p> <p data-bbox="250 1197 1399 1411">At this location, PG&E’s underground transformer enclosure had an open EC notification (Priority F, Required End Date: 5/25/15) for a rusted lid. During the CPUC’s field visit it was stated to us to be careful not to step on the lid because it may collapse. The enclosure location is in the front yard of a customer and is exposing the public to a safety hazard. ESRB considers PG&E’s Priority F as the incorrect priority for this violation.</p>		

G.	Location:	Off of Oso Flaco Road, Nipomo
	Equipment No:	N/A
	Previous Visit by Utility:	Overhead Inspection Map SS3616 Completed 10/25/12
	Date Visited by CPUC:	6/13/2013
	Explanation of Violation(s):	
	<p><u>Corroded and Pitted Transformer</u></p> <p>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p style="padding-left: 40px;">“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.”</p> <p>At this location, PG&E’s overhead transformer case had visible corrosion and pitting. PG&E staff did not document this violation when the overhead facility was inspected.</p>	

AREA OF CONCERN

A. Inaccurate Patrol and Inspection Data

A data request response sent to the CPUC by PG&E prior to the audit included inaccurate patrol and inspection data for the years 2003 and 2012. The data inaccuracy made it difficult to verify compliance with GO 165. Furthermore, this raises questions about the integrity of PG&E's GO 165 reports.

B. Mass Printing EC Notifications

When EC Notifications are mass printed an error occurs in that the long text in the mass printed EC Notifications are incorrect. When would PG&E do a mass print job for EC Notifications? Was it only an issue at Los Padres Division? Has PG&E address this issue?

ADDITIONAL QUESTION

1. Are the underground maps listed in the table below missing previous patrol and/or inspections? And are they to be included in the map gap list?

Map #	Listed Inspections
AA3705	2012
NN3301D	2012
NN3302B	2011 & 2012
OO3220	2012
SS36	2011 & 2012
UU41	2012
CC2807	2011 & 2012
CC34	2011 & 2012
CC4609C	2011 & 2012
CC4609D	2011 & 2012
FF2824	2007
MM3318D	2011 & 2012
MM3319C	2011 & 2012
MM3322D	2011 & 2012
MM3323B	2011 & 2012
MM3324A	2011 & 2012
NN3322	2008
PP3613	2012
RR3719	2012
SS3614	2010 & 2012
SS3618	2010 & 2012