

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 21, 2014

EA2014-018

Adeel Babar
Supervisor, Regulatory Compliance
Pacific Gas and Electric Company
3401 Crow Canyon Road, #221E
San Ramon, CA 94583

SUBJECT: Audit of PG&E's San Francisco Division

Dear Mr. Babar:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Jamie Lau, Derek Fong, and Raymond Cho of my staff conducted an electric audit of PG&E's San Francisco Division from July 21-25, 2014. The audit included a review of PG&E's records and field inspections of the San Francisco Division's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than December 31, 2014 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 Raymond Cho at (415) 703-2236 or raymond.cho@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Audit Findings

CC: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC
Charlotte TerKeurst, Program Manager, Safety and Enforcement Division, CPUC
Alok Kumar, Senior Utilities Engineer (Supervisor), ESRB, CPUC
Jamie Lau, Utilities Engineer, ESRB, CPUC
Derek Fong, Utilities Engineer, ESRB, CPUC
Raymond Cho, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

Company: PG&E San Francisco Division
 Electric Audit
 Date: July 21-25, 2014

A.	Location:	PG&E San Francisco Division
	Date Visited by CPUC:	7/21/2014 – 7/25/2014
Explanation of Violation(s):		
<p><u>Minor Work</u></p> <p>GO 165, Section III-C, – Record Keeping, states:</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>PG&E does not document all items requiring corrective action when conducting inspections of its facilities. PG&E staff only marks a “tally mark” indicating “minor work”, and does not specify the equipment identified for corrective actions in the tally marks.</p>		

B.	Location:	PG&E San Francisco Division
	Date Visited by CPUC:	7/21/2014 – 7/25/2014
	Explanation of Violation(s):	
	<p><u>Late Work Orders</u></p> <p>GO 165, Section III-C, – Record Keeping, states in part:</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>GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p>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>There were 3,413 work orders, from January 2009 to July 18, 2014, completed past their scheduled date of corrective action. Furthermore, 24 work orders are currently pending past their required correction date.</p>	

The following GO 95 and GO 128 violations were identified during the field inspection and were not documented and/or addressed by PG&E during its last detailed inspection as required by General Order 165:

C.	Location:	930 Innes Avenue
Equipment No.:		N/A
Previous Visit by PG&E:		6/13/14
Date Visited by CPUC:		7/22/14
Explanation of Violation(s):		
<p><u>Service Drop Radial Clearance</u></p> <p>GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p>The service drop was in contact with a communication service drop.</p>		

D.	Location:	939 Innes Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	6/13/14
	Date Visited by CPUC:	7/22/14
	Explanation of Violation(s):	
	<p data-bbox="250 653 716 688"><u>Service Drop Radial Clearance</u></p> <p data-bbox="250 726 1317 869">GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p data-bbox="250 947 1208 982">The service drop was in contact with a communication service drop.</p>	

E.	Location:	Crisp Road and Griffith Street
	Equipment No.:	Four poles East on Crisp Road
	Previous Visit by PG&E:	6/13/14
	Date Visited by CPUC:	7/22/14
	Explanation of Violation(s):	
	<p><u>Abandoned Facilities</u></p> <p>GO 95, Rule 31.6, Abandoned Lines, states in part:</p> <p><i>Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.</i></p> <p>A vacant pole was abandoned at the above location.</p>	

F.	Location:	1419 16 th Avenue
Equipment No.:		N/A
Previous Visit by PG&E:		1/3/14
Date Visited by CPUC:		7/22/14
Explanation of Violation(s):		
<p><u>Service Drop Radial Clearance</u></p> <p>GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p>The service drop was in contact with a communication service drop.</p>		

G.	Location:	1402 16 th Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E	1/3/14
	Date Visited by CPUC:	7/22/14
	Explanation of Violation(s):	
	<p data-bbox="250 653 716 688"><u>Service Drop Radial Clearance</u></p> <p data-bbox="250 726 1317 869">GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p data-bbox="250 909 1208 945">The service drop was in contact with a communication service drop.</p>	

H.	Location:	1326 15 th Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	1/3/14
	Date Visited by CPUC:	7/22/14
	Explanation of Violation(s):	
	<p data-bbox="248 653 716 688"><u>Service Drop Radial Clearance</u></p> <p data-bbox="248 726 1312 869">GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p data-bbox="248 947 1203 982">The service drop was in contact with a communication service drop.</p>	

I.	Location:	1338 15 th Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	1/3/14
	Date Visited by CPUC:	7/22/14
	Explanation of Violation(s):	
	<p data-bbox="248 653 716 688"><u>Service Drop Radial Clearance</u></p> <p data-bbox="248 726 1317 869">GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p data-bbox="248 947 1208 982">The service drop was in contact with a communication service drop.</p>	

J.	Location:	1359 15 th Avenue
Equipment No.:		N/A
Previous Visit by PG&E:		1/3/14
Date Visited by CPUC:		7/22/14
Explanation of Violation(s):		
<p><u>Ground Wire Exposed</u></p> <p>GO 95, Rule 22.8-A, Protective Covering, requires ground wires to be covered with protective covering.</p> <p>A portion of ground wire on this pole was not covered.</p>		

K.	Location:	1431 15 th Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	1/3/14
	Date Visited by CPUC:	7/22/14
	Explanation of Violation(s):	
	<p><u>Service Drop Radial Clearance</u></p> <p>GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p>The service drop was in contact with a communication service drop.</p>	

L.	Location:	1471 15 th Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	1/3/14
	Date Visited by CPUC:	7/22/14
Explanation of Violation(s):		
<p><u>Service Drop Radial Clearance</u></p> <p>GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p>The service drop was in contact with a communication service drop.</p>		

M.	Location:	483 Joost Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	2/4/14
	Date Visited by CPUC:	7/22/14
Explanation of Violation(s):		
<p><u>Service Drop Radial Clearance</u></p> <p>GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p>The service drop was in contact with a communication service drop.</p>		

N.	Location:	447 Joost Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	2/4/14
	Date Visited by CPUC:	7/22/14
	Explanation of Violation(s):	
	<p data-bbox="248 653 716 688"><u>Service Drop Radial Clearance</u></p> <p data-bbox="248 726 1312 869">GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p data-bbox="248 947 1203 982">The service drop was in contact with a communication service drop.</p>	

O.	Location:	401 Joost Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	2/4/14
	Date Visited by CPUC:	7/22/14
	Explanation of Violation(s):	
	<p data-bbox="248 653 711 688"><u>Service Drop Radial Clearance</u></p> <p data-bbox="248 726 1312 869">GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p data-bbox="248 947 1203 982">The service drop was in contact with a communication service drop.</p>	

P.	Location:	415 Joost Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	2/4/14
	Date Visited by CPUC:	7/22/14
	Explanation of Violation(s):	
	<p data-bbox="245 653 711 688"><u>Service Drop Radial Clearance</u></p> <p data-bbox="245 726 1312 869">GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p data-bbox="245 947 1203 982">The service drop was in contact with a communication service drop.</p>	

Q.	Location:	329 Mangels Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	2/4/14
	Date Visited by CPUC:	7/22/14
Explanation of Violation(s):		
<p data-bbox="250 653 716 688"><u>Service Drop Radial Clearance</u></p> <p data-bbox="250 726 1317 869">GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p data-bbox="250 911 1208 947">The service drop was in contact with a communication service drop.</p>		

R.	Location:	385 Mangels Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	2/4/14
	Date Visited by CPUC:	7/22/14
Explanation of Violation(s):		
<p data-bbox="245 653 643 688"><u>Ground Moulding Warped</u></p> <p data-bbox="245 726 1354 800">GO 95, Rule 22.8-A, Protective Covering, requires ground wires to be covered with protective covering.</p> <p data-bbox="245 837 1211 873">A portion of ground moulding was warped exposing the ground wire.</p>		

S.	Location:	397 Mangels Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	2/4/14
	Date Visited by CPUC:	7/22/14
Explanation of Violation(s):		
<p><u>Service Drop Radial Clearance</u></p> <p>GO 95, Rule 54.8-C, Clearances between Supply Service Drops and other Conductors, states that the clearance between a supply service drop and a communication service drop shall not be less than twelve (12) inches within 15 feet from point of attachment.</p> <p>The service drop was in contact with a communication service drop.</p>		

T.	Location:	481 Mangels Avenue
Equipment No.:		N/A
Previous Visit by PG&E:		2/4/14
Date Visited by CPUC:		7/22/14
Explanation of Violation(s):		
<p><u>Visibility Strip Damaged</u></p> <p>PG&E Electric Distribution Preventative Maintenance, Closing EC Notifications, states in part:</p> <p style="padding-left: 40px;"><i>... The crew should also repair minor/incidental maintenance conditions (that may not have been recorded on the notification) at the jobsite. Examples of these conditions include the following:</i></p> <ul style="list-style-type: none"> - Missing or illegible high voltage signs - Missing or damaged visibility strips... <p>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p style="padding-left: 40px;"><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>A visibility strip was damaged.</p>		

U.	Location:	915 Capitol Avenue
	Equipment No.:	N/A
	Previous Visit by PG&E:	6/30/14
	Date Visited by CPUC:	7/23/14
Explanation of Violation(s):		
<p><u>Down Guy Contact Above Insulator</u></p> <p>GO 95, Rule 56.7-B, Location of Sectionalizing Insulators - Anchor Guys, 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>The anchor guy above the insulator contacted a tree.</p>		