PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

December 15, 2017



EA2017-767

Heide Caswell Director-T&D Asset Performance PacifiCorp 825 NE Multnomah, Suite 1500 Portland, OR 97232

SUBJECT: Audit of PacifiCorp, Modoc County

Ms. Caswell:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Wilson Tsai of ESRB staff conducted an electric distribution audit of PacifiCorp, Modoc County from September 18, 2017 to September 21, 2017. During the audit, ESRB staff conducted field inspections of PacifiCorp's facilities and equipment, and reviewed pertinent documents and records.

During the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response within 30 days of your receipt of this letter indicating all corrective actions and preventive measures, taken or planned, to address the violations to ensure compliance with GO requirements. The response should indicate the date of each remedial action and preventive measure completed within 30 days. For any outstanding items not addressed within 30 days, please provide the projected completion dates of all actions for all violations outlined in Sections II & IV of the enclosed Audit Findings.

If you have any questions concerning this audit, please contact Wilson Tsai at (415) 703-1359 or wilson.tsai@cpuc.ca.gov.

Sincerely,

Banu Acimis, P.E.

Program and Project Supervisor

Electric Safety and Reliability Branch

Safety and Enforcement Division

California Public Utilities Commission

Enclosure: CPUC Audit Findings

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC

Lee Palmer, Deputy Director, Office of Utility Safety, SED, CPUC

Charlotte TerKeurst, Program Manager, ESRB, CPUC

Ryan Yamamoto, Senior Utilities Engineer- Supervisor, ESRB, CPUC

Wilson Tsai, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, ESRB staff reviewed the following records:

- PacifiCorp's 2016 GO 165 Annual Report filing
- Completed, cancelled, and late work orders in the last 12 months
- Survey (Patrol) and detailed inspection records from 2012 to 2017
- Pole loading calculations in the last 12 months
- 3rd party notifications received and sent out in the last 12 months
- Reliability metrics (SAIDI, SAIFI, CAIDI) and outage report for each circuit in the region from 2012 to 2017
- New Construction projects in the last 12 months
- PacifiCorp's circuit map of the region

II. Records Violations

ESRB staff observed the following violations during the record review portion of the audit:

1. GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:

"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.

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 communication or supply lines and equipment."

ESRB staff reviewed work orders and noted that PacifiCorp did not complete the following work order by the assigned due date:

1. A work order for Pole #135400 was due on September 5, 2012. At the time of the audit, PacifiCorp has still not completed the work order.

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities:

Structure Type	Structure Number	Address	City
Pole	242800	449 Cougar Lane	Alturas
Pole	243802	449 Cougar Lane	Alturas
Pole	243700	1 pole S/O 243802	Alturas
Pole	243602	In front of 321 Cougar Lane	Alturas
Pole	243600	Rear of 321 Cougar Lane	Alturas
Pole		1 Pole S/O 243600	Alturas
Pole	239304	Rear of 276 Steelhead Lane	Alturas
Pole	239305	In front of 276 Steelhead Lane	Alturas
Pole	258300	41.535485, -120.528906	Alturas
Pole	149804	Across from 313 2 nd Street	Alturas
Pole	149808	400 2 nd Street	Alturas
Pole	148809	404 2 nd Street	Alturas
Pole	148810	408 2 nd Street	Alturas
Pole	148808	412 2 nd Street	Alturas
Pole	148807	I/O N West B & 2 nd Street	Alturas
Pole	148811	N West B Street	Alturas
Pole	119505	Alley Between Oak & Spruce	Alturas
Pole	119507	Alley 1 span down from 119505	Alturas
Pole	119600	Alley 2 span down from 119505	Alturas
Pole	119601	I/O Alley & 14 th Street	Alturas
Padmounted Transformer	123780	402 Archer Avenue	Alturas
Padmounted Transformer	124881	412 Archer Avenue	Alturas
Padmounted Transformer	124882	418 Archer Avenue	Alturas
Pole	149881	Across from 209 N West A Street	Alturas
Pole	149880	Rear of 209 N West A Street	Alturas
Pole	142801	Across from 208 Warner Avenue	Alturas
Pole	142803	Across from 210 Warner Avenue	Alturas
Pole	140902	Alturas Municipal Airport	Alturas
Padmounted Transformer	140980	Alturas Municipal Airport	Alturas
Pole	140920	Alturas Municipal Airport	Alturas
Pole	140901	Alturas Municipal Airport	Alturas

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. GO 95, Rule 51.6-A, Marking and Guarding, High Voltage Marking of Poles, states in part:

"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. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion—resisting material, solid or with letters cut out therefrom and clearly legible..."

PacifiCorp Pole #149808 did not have a high voltage sign, located at 400 2nd Street.

2. GO 95, Rule 54.6-B, Vertical and Lateral Conductors, Ground Wires, states in part:

"... That portion of the ground wire attached on the face or back of wood cross arms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8)..."

PacifiCorp Pole #119601 had exposed ground wire, located at the intersection of 14th Street and an alley.