

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 25, 2018

EA2018-814

Dean McFarren  
Manager – EAM Distribution Compliance  
Pacific Gas and Electric Company (PG&E)  
1850 Gateway Blvd., 5<sup>th</sup> Floor, Room 5053C  
Concord, CA 94520

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

Mr. McFarren:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Ivan Garcia, Chris Lee, Stephen Lee, and Anwar Safvi of ESRB staff conducted an electric distribution audit of PG&E's Los Padres Division from August 20, 2018 to August 23, 2018. During the audit, ESRB staff conducted field inspections of PG&E'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 Ivan Garcia at 916-928-5875 or [ivan.garcia@cpuc.ca.gov](mailto:ivan.garcia@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Banu Acimis".

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  
Rick Tse, Senior Utilities Engineer – Supervisor, ESRB, SED, CPUC  
Ivan Garcia, Utilities Engineer, ESRB, SED, CPUC

## AUDIT FINDINGS

### I. Records Review

During the audit, ESRB staff reviewed the following records:

- Completed, cancelled, and pending late work orders in the last 60 months
- Patrol and detailed inspection records from July 1, 2013 to June 29, 2018
- Reliability metrics and outage report for each feeder in the division from 2013 to 2018
- Sustained outages in the division from 2013 to 2018
- New Construction projects in the last 12 months
- Pole loading calculations in the last 12 months
- Third party notifications sent and received in the last 60 months
- Equipment test records in the last 36 months
- Deferred equipment test records in the last 36 months
- Work verification records in the last 12 months

### II. Records Violations

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

#### 1. GO 95, Rule 18-B, Maintenance Programs states in part:

*“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.”*

#### 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.”*

**GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment.”*

ESRB staff reviewed late work orders and determined that PG&E did not address a total of 285 work orders by the assigned due date. Of these 285 work orders, 239 were classified as “late” and 46 were classified as “late-exempt”.

Per GO 95, Rule 18B(1)(b), *“Correction times may be extended under reasonable circumstances, such as: third party refusal, customer issue, no access, permits required, system emergencies (e.g. fires, severe weather conditions)”*. PG&E classifies work orders under these circumstances as “late-exempt” as they are exempted from completion by their assigned due date.

**2. GO 95, Rule 31.2, Inspection of Lines** states in part:

*“Lines shall be inspected frequently and thoroughly for the purpose of insuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.”*

**GO 165, Section III-B, Standards for Inspection** 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.”*

ESRB staff noted that PG&E completed overhead inspection for the following map past their assigned due date:

1. Map BB29 – Inspection was due on October 23, 2014. PG&E completed the inspection on November 5, 2014.

**3. GO 128, Rule 17.2, Inspection** states in part:

*“Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules.”*

**GO 165, Section III-B, Standards for Inspection** states in part:

*“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.”*

ESRB staff noted that PG&E completed underground inspections for the following map past their assigned due date:

1. Map JJ3408– First detailed inspection was due in 1995. PG&E completed the inspection on June 4, 2014.
2. Map UU3917– Inspection was due on April 24, 2014. PG&E completed the inspection on September 19, 2014.
3. Map TT3922– Inspection was due on April 10, 2014. PG&E completed the inspection on October 8, 2014.
4. Map UU3824– Inspection was due on April 16, 2014. PG&E completed the inspection on October 30, 2014.
5. Map TT3912 – Inspection was due on April 10, 2014. PG&E completed the inspection on November 13, 2014.
6. Map UU3805 – Inspection was due on April 11, 2014. PG&E completed the inspection on November 5, 2014.
7. Map UU3906 – Inspection was due on April 23, 2014. PG&E completed the inspection on November 13, 2014.
8. Map UU3909– Inspection was due on April 23, 2014. PG&E completed the inspection on November 14, 2014.
9. Map UU3911– Inspection was due on April 23, 2014. PG&E completed the inspection on November 14, 2014.
10. Map UU3914– Inspection was due on April 23, 2014. PG&E completed the inspection on November 14, 2014.
11. Map UU3916– Inspection was due on April 25, 2014. PG&E completed the inspection on November 5, 2014.
12. Map UU3921– Inspection was due on April 16, 2014. PG&E completed the inspection on November 14, 2014.
13. Map VV3805– Inspection was due on April 28, 2014. PG&E completed the inspection on November 18, 2014.
14. Map VV3913– Inspection was due on June 3, 2014. PG&E completed the inspection on November 17, 2014.

### III. Field Inspection

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

Structure Type	Structure Number	Address	City
Pole		197 Pacific Avenue	Cayucos
Pole		40 2nd Street	Cayucos
Pole		60 2nd Street	Cayucos
Pole		In front of 60 2nd Street	Cayucos
Pole		51 2nd Street	Cayucos
Pole		200 South Ocean Avenue	Cayucos
Pole		61 North 3rd Street	Cayucos
Pole		182 J Street	Cayucos
Pole		198 J Street	Cayucos
Pole		245 Bakersfield Avenue	Cayucos
Pole		299 Bakersfield Avenue	Cayucos
Pole		191 Park Avenue	Cayucos
Pole		Rear of 183 Park Avenue	Cayucos
Pole		188 I Street	Cayucos
Pole		124 Saint Marry Avenue	Cayucos
Pole		5550 El Camino Real	Atascadero
Pole		5550 El Camino Real (Service Drop)	Atascadero
Pad mounted Transformer	T-2120	1120 Count Fleet Street (T2120)	Santa Ynez
Pad mounted Transformer	T-2119	1120 Count Fleet Street (T2119)	Santa Ynez
Pad mounted Transformer	T-2074	1120 Count Fleet Street (T2074)	Santa Ynez
Subsurface Junction Box	J-11289	1120 Count Fleet Street (J11289)	Santa Ynez
Pole		1120 Count Fleet Street (Pole 11289)	Santa Ynez
Subsurface Splice Box		1890 Westerly	Santa Ynez
Pad mounted Transformer		376 Avenue of the Flags	Santa Ynez
Subsurface Transformer		51 E Hwy 246	Buellton
Pad mounted Transformer	T-2301	51 E Hwy 246	Buellton
Pole		C/O 20611 on Coyote Creek	Buellton
Pad mounted Transformer	T-2059	1301 Cougar Ridge Road (T2059)	Solvang
Pole		R/O 1568 Calle Nueve	Buellton

Structure Type	Structure Number	Address	City
Pole		1458 Calle Marana	Lompoc
Pole		4048 Draco Drive	Lompoc
Pole		4058 Draco Drive	Lompoc
Pole		4068 Draco Drive	Lompoc
Pole		1420 14th Street	Oceano
Pole		1435 14th Street	Oceano
Pole		1447 14th Street	Oceano
Pole		1491 14th Street	Oceano
Pole		1501 14th Street	Oceano
Pole		1523 14th Street	Oceano
Pole		1599 14th Street	Oceano
Pole		1508 Warner Street	Oceano
Pole		1599 15th Street	Oceano
Pole		1531 15th Street	Oceano
Pole		1503 15th Street	Oceano
Pole		1473 15th Street	Oceano
Pole		1447 15th Street	Oceano
Pole		1423 15th Street	Oceano
Pole		Corner of 15th Street and Wilmar Ave	Oceano
Pole		Corner of 14th Street and Wilmar Ave	Oceano
Pole		1375 18th Street	Oceano
Pole		1349 18th Street	Oceano
Pole		1310 18th Street	Oceano
Pole		1800 The Pike	Oceano
Pole		Across from 1800 The Pike	Oceano
Pole		1848 The Pike	Oceano
Pole		Across from 1898 The Pike	Oceano
Pole		Intersection of The Pike and 19th Street	Oceano
Pole		Across from 1310 19th Street	Oceano
Pole		Across from 1330 19th Street	Oceano
Pole		Mid Span 1346 19th Street	Oceano
Pole		Across from 1362 19th Street	Oceano
Pole		1362 19th Street	Oceano
Pole		1372 19th Street	Oceano
Pole		1382 19th Street (Mid Span)	Oceano
Pole		1871 Wilmar Avenue	Oceano
Pole		Intersection of 19th Street and Wilmar Avenue	Oceano
Pole		Across from 1821 Wilmar Avenue	Oceano
Pole		1731 Wilmar Avenue	Oceano

<b>Structure Type</b>	<b>Structure Number</b>	<b>Address</b>	<b>City</b>
Pole		1380 18th Street	Oceano
Pole		1395 18th Street	Oceano
Pole		Rear of 364 Valley View Drive	Santa Maria
Pole		Stowell Road and Victoria Pl.	Santa Maria
Pole		Rear of 1120 Railroad	Santa Maria
Pole	110326169	Rear of 1126 Railroad	Santa Maria
Pad mounted Transformer	T-2821	520 Farnel Road (T2821)	Santa Maria
Pole		520 Farnel Road	Santa Maria
Pole		250 South Ray Road	Santa Maria
Pole		865 Black Road	Santa Maria

#### IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

**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.”*

- The top of a pole located in front of 60 2nd Street, Cayucos was damaged.
- The pole located at the rear of 183 Park Avenue, Cayucos, had both anchor guy anchors buried in the ground.
- The pole located at 4048 Draco Drive, Lompoc, was missing an “under-arm bus” strap on the secondary level.
- The pole located at 1599 15th Street, Oceano, had an anchor guy anchor buried in the ground.
- The pole located at 1531 15th Street, Oceano, had an anchor guy anchor buried in the ground.
- The pole located at 1375 18th Street, Oceano, had an anchor guy anchor buried in the ground.
- The pole across from 1310 19th Street, Oceano, had an anchor guy anchor buried in the ground.
- The pole located at 865 Black Road, Santa Maria, with EC Notification 113809128 was marked as “Completed” to correct a leaning pole. ESRB staff noticed the condition still existed.

**2. 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. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.”*



The following poles had missing, damaged, or missing and damaged “High Voltage” signs:

Missing “High Voltage” Signs	Damaged “High Voltage” Signs	Missing and Damaged “High Voltage” Signs
Pole at 191 Park Avenue, Cayucos Pole across from 1821 Wilmar Avenue, Oceano	Pole at 4048 Draco Drive, Lompoc Pole at 4058 Draco Drive, Lompoc	Pole at 245 Bakersfield Avenue, Cayucos

**3. GO 95, Rule 56.7-B, Location of Sectionalizing Insulators, Anchor Guys** states in part:

*“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.”*

The poles located at the following addresses had vegetation in contact with a section above the sectionalizing insulator of the anchor guy:

- 61 North 3rd Street, Cayucos
- C/O 20611 on Coyote Creek, Buellton
- Across from 1310 19th Street, Oceano

**4. GO 95, Rule 56.9, Guy Marker (Guy Guard)** states in part:

*“A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.”*

The outermost anchor guy located at the intersection of Stowell Rd. and Victoria Pl. did not have a guy marker.

**5. GO 95, Rule 18-A-2, Resolution of Potential Violations of General Order 95 and Safety Hazards** states in part:

*“Where a communications company’s or an electric utility’s (Company A’s) actions result in potential violations of GO 95 for another entity (Company B), that entity’s (Company B’s) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a*

*reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.”*

PG&E did not notify the communications company of the following safety hazards:

- Significant strain caused by vegetation on the communication facilities was observed at 5550 El Camino Real, Atascadero.
- Communication facilities located on an abandoned pole at the corner of 14th Street and Wilmar Avenue, Oceano, have not been transferred to the new joint pole.
- Communication facilities located on an abandoned pole at 1800 The Pike, Oceano, have not been transferred to the new joint pole.

**6. GO 95, Rule 56.4-C-4, Clearances, From Conductors, Passing on Same Poles** states in part:

*“The radial clearances between guys and conductors supported by or attached to the same poles or cross arms shall not be less than as specified in Table 2, Case 19.”*

- The pole located at 1420 14th Street, Oceano, had an anchor guy wire in contact with the communication cable.
- The pole located at 1349 18th Street, Oceano, had an anchor guy wire in contact with the communication cable.

**7. GO 128, Rule 17.1, 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.”*

- The pad mounted transformer at 376 Avenue of the Flags, Santa Ynez, showed heavy corrosion in the oil drip pan under the fuses.
- The pad mounted transformer at 51 E Hwy 246, Buellton, had a swollen elbow and the enclosure required re-caulking.