

February 15, 2024

Rickey Tse, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Re: City of Palo Alto Utilities Electric Facilities Audit Response

Dear Mr. Tse:

The City of Palo Alto Utilities (CPAU) is committed to the safe and reliable operation of the City's Electric Utility, and follows practices and procedures that mirror relevant safety guidelines in the California Public Utilities Commission (CPUC) General Orders (GOs), 95, 128, and 165. Although the City of Palo Alto Utilities is not subject to CPUC jurisdiction, as a locally owned municipal utility operated within the Charter City of Palo Alto, we appreciate the feedback from your staff to help us provide safe and reliable services and to ensure that we continue to operate in a safe manner to protect the public and our workers.

CPAU's Response:

## II. Records Violations

### 1. General Order (GO) 95, Rule 18-B, Maintenance Programs GO 165, Section III-C, Record Keeping

- a. CPAU will specify the scheduled due dates of corrective actions in work orders tracked in our internal online maintenance system.
- b. CPAU will update its *Inspections and Maintenance Program* to provide a timeframe for completing Priority Level 3 repairs to ensure all issues are completed within 60 months, subject to any applicable GO 95 Rule, 18-B exceptions.

### 2. GO 95, Rule 31.2, Inspection of Lines GO 165, Section III-B, Standards for Inspection

CPAU routinely inspects its distribution facilities in accord with its *Inspections and Maintenance Program* and tracks those inspections using a calendar year method. CPAU has successfully achieved GO 165's 16-month inspection due date timeframe for overhead inspections using that method, with no missed inspections. However, CPAU will modify the *Inspections and Maintenance Program* to organize inspection intervals and implement due dates to provide additional assurance that they will continue to occur on time.

With regard to the 74 underground inspections identified as late in the audit report, we self-reported these underground patrols and inspections on July 27, 2023, before the August 7, 2023 on-site audit. The underground inspections require a 2-person unit and our organization has experienced severe staffing shortages, particularly during the COVID-19 pandemic. Even with the staffing shortages, our staff completed all underground inspections to the best of our ability and within a reasonable timeframe as shown in the report; there were no pending inspections at the time of the audit. To mitigate the ongoing staffing shortages and supplement our internal

staff, in September 2023 the CPAU executed a 3-year contract for external inspection services to complete all inspections on schedule.

**3. GO 165, Section III-D, Reporting**

GO 165 does not formally apply to the City of Palo Alto, since the CPAU is non-jurisdictional to the CPUC.<sup>1</sup> While the CPAU follows practices and procedures that closely mirror relevant safety practices of GO 165, 128 and 95 as part of the CPAU’s longstanding commitment to safety and reliability, we do not dedicate staffing resources to annual reporting.

**IV. Field Inspection Violations**

The attached document is responsive to the field violations noted in the audit report. Upon review of the identified violations, we examined the locations and found that 31 out of 91 were maintenance/repair/replace-related corrective actions and 9 were vegetation-related corrective actions. Nine of the items identified within the 31 maintenance/repair/replace-related category actually had no violations and required no corrective action. Our staff identified 14 of the remaining 21 maintenance/repair/replace-related issues prior to the audit and included them in our internal maintenance system for correction. The attached document summarizes the violations, status of corrective actions taken, and any pending items that have been scheduled to be resolved.

**V. Observations**

The audit report noted various observations related to third-party attachments to CPAU poles. When CPAU notices a hazardous condition in the space controlled by telecommunications operators, we notify the responsible party of the condition, as described in the applicable General Orders. 48 out of 91 field violations were in the telecommunications space, and we have notified the third party responsible for each of them, as shown in the attached document. CPAU does not, however, have regulatory authority over attachments in the space owned by communications providers.

In conclusion, we would like to thank you for your timely response and comments regarding the audit Monica Hoskins and Gordon Szeto staff of the Electric Safety and Reliability Branch of the CPUC performed of the CPAU electric facilities from August 7 to August 11, 2023. CPAU enjoyed working with your team and appreciates the team’s time spent performing the electric facilities audit by examining standards, procedures, records we provided, and by conducting field inspections. The feedback we’ve received from your staff during this audit has assisted us in improving our processes and procedures and overall compliance program.

Sincerely,

DocuSigned by:



7C0097E94DAE492  
Dean Batchelor, Director of Utilities

City of Palo Alto

Enclosure: CPUC Audit August 7-11, 2023 Corrective Actions Summary

---

<sup>1</sup> See Section II, Applicability: “This General Order applies to all electric distribution and transmission facilities (excluding those facilities contained in a substation) that come within the jurisdiction of this Commission, located outside of buildings, including electric distribution and transmission facilities that belong to non-electric utilities.”

Location	Equipment Identifier	Structure Type	GO/Rule/Observations	Finding(s)	Finding(s) Type	Corrective Action Status	Additional Data
1	2168	Pole	GO 95, Rule 31.1	Pole 2168 is located along a paved road and has missing visibility strips, which are a required item on CPAU's OH inspection form.	Maintenance/Repair/Replace	Completed	
1	2168	Pole	GO 95, Rule 56.2	Pole 2168 has a slack span guy to the pole across San Antonio Road.	Maintenance/Repair/Replace	Completed	Previously Identified
1	2168/2169	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	The communication lines between Pole 2168 and Pole 2169 have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
2	2169	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 2169 has a slack communications anchor down guy.	Observations	Notified 3rd Party	
2	2169	Pole	GO 95, Rule 56.2	Pole 2169 has a slack span guy to the pole across San Antonio Road.	Maintenance/Repair/Replace	Completed	Previously Identified
2	2169	Pole	GO 95, 56.7-B	Pole 2169 has vegetation above the down guy insulator that is contacting and grounding the anchor guy.	Tree Trimming/Vegetation	Completed	
3	2016	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 2016 has slack communications anchor down guys and the communications lines have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
3	2016	Pole	GO 95, Rule 31.1	Pole 2016 is located along a paved road and has missing visibility strips, which are a required item on CPAU's OH inspection form.	Maintenance/Repair/Replace	Completed	No Violation Found
3	2016	Pole	GO 95, Rule 54.6-B	Pole 2016 has an exposed transformer ground wire.	Maintenance/Repair/Replace	Completed	Previously Identified
3	2016	Pole	GO 95, 56.7-B	Pole 2016 has insufficient vegetation guards and vegetation above the down guy insulator that is contacting and grounding the anchor guy.	Tree Trimming/Vegetation	Completed	
4	2015	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 2015 has communications ground moulding gaping and exposing the ground wire.	Observations	Notified 3rd Party	
5	1987	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 1987 has a slack communications anchor down guy.	Observations	Notified 3rd Party	
5	1987	Pole	GO 95, Rule 56.2	Pole 1987 has a slack span anchor down guy.	Maintenance/Repair/Replace	Completed	Previously Identified
7	3583	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	The Pole at 3583 South Court has communications conductors that are in contact.	Observations	Notified 3rd Party	
8	3601/3583	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	The communications lines between Pole at 3601 South Court and the Pole at 3583 South Court have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
9	3617/3601	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	The communications lines between Pole at 3617 South Court and the Pole at 3601 South Court have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
10	2244	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 2244 has an incomplete communications pole transfer that is leading to low hanging communications drops.	Observations	Notified 3rd Party	
10	2244	Pole	GO 95, Rule 54.6-B	Pole 2244 has an exposed ground wire.	Maintenance/Repair/Replace	Completed	Previously Identified
11	3641	Pole	GO 95, Rule 51.6-A	The Pole at 3641 South Court has damaged high voltage signs.	Maintenance/Repair/Replace	Completed	Previously Identified
15	3954	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 3954 has an exposed communications ground wire and communication lines with strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
15	3954	Pole	GO 95, Rule 31.1	Pole 3954 is located along a paved road and has missing visibility strips, which are a required item on CPAU's OH inspection form.	Maintenance/Repair/Replace	Completed	
15	3954	Pole	GO 95, 56.7-B	Pole 3954 has insufficient vegetation guards and vegetation above the down guy insulator that is contacting and grounding the anchor guy.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
16	3953	Pole	GO 95, Rule 51.6-A	Pole 3953 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	No Violation Found
16	3953	Pole	GO 95, 56.7-B	Pole 3953 has vegetation above the down guy insulator that is contacting and grounding the anchor guy.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	

Location	Equipment Identifier	Structure Type	GO/Rule/Observations	Finding(s)	Finding(s) Type	Corrective Action Status	Additional Data
17	2659	Pole	GO 95, Rule 31.1	Pole 2659 is located along a paved road and has missing visibility strips, which are a required item on CPAU's OH inspection form.	Maintenance/Repair/Replace	Completed	
18	2658	Pole	GO 95, Rule 51.6-A	Pole 2658 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	No Violation Found
19	2660	Pole	GO 95, Rule 51.6-A	Pole 2660 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	Previously Identified
20	2552	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 2552 has loose communications drops that are unsecured to the pole and excessive communications drops hanging on the ground.	Observations	Notified 3rd Party	
21	2551	Pole	GO 95, Rule 34	Pole 2551 has an unauthorized third-party attachment.	Removed	Completed	Back up driving mirror attached to pole.
21	2551	Pole	GO 95, Rule 51.6-A	Pole 2551 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	
21	2551	Pole	GO 95, Rule 54.6-B	Pole 2551 has an exposed ground wire	Maintenance/Repair/Replace	Completed	Previously Identified
21	2551	Pole	GO 95, Rule 54.8-B(3)	Pole 2551 has a low service drop to 2895 Waverly Street that has less than the required clearance and can be touched from the ground.	Maintenance/Repair/Replace	Completed	Previously Identified
21	2551	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 2551 has a loose communications lashing wire.	Observations	Notified 3rd Party	
23	5065	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 5065 has an incomplete communications pole transfer.	Observations	Notified 3rd Party	
24	1174	Pole	GO 95, Rule 51.6-A	The Pole at 1174 Stanley Way has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	No Violation Found
25	5073	Pole	GO 95, Rule 51.6-A	Pole 5073 has a missing high voltage sign.	Maintenance/Repair/Replace	Completed	No Violation Found
26	5162	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 5162 has a communications drop attached to a tree and loose communications drops that are unsecured to the pole and coming out of the moulding.	Observations	Notified 3rd Party	
27	Secondary Riser Box	Underground Secondary Service Box	GO 128, Rule 32.7	The underground secondary service box at 1120 Newell Road has a damaged lid and is accessible by the public.	Maintenance/Repair/Replace	Completed	
28	5163	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 5163 has a slack communications anchor down guy and the communications lines between Pole 5163 and Pole 5162 have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
30	5164	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 5164 has loose communications drops that are unsecured to the pole.	Observations	Notified 3rd Party	
31	5166	Guy Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Guy Pole 5166 has vegetation above the insulator on the communications anchor down guy.	Observations	Notified 3rd Party	
33	5183/5165	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	The communications lines between Pole 5183 and Pole 5165 have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
36	1034	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 1034 has broken and abandoned communications equipment.	Observations	Notified 3rd Party	
37	1033	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 1033 has a broken communications riser moulding and the communications lines between Pole 1033 and Pole 1034 have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
38	1032	Pole	GO 95, Rule 51.6-A	Pole 1032 has missing high voltage signs.	Maintenance/Repair/Replace	Completed	No Violation Found
39	4681	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 4681 has loose communications drops that are unsecured to the pole.	Observations	Notified 3rd Party	
40	4682	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 4682 has loose communications drops that are unsecured to the pole.	Observations	Notified 3rd Party	
41	4683	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 4683 has loose communications drops that are unsecured to the pole.	Observations	Notified 3rd Party	
43	4653	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 4653 has an abandoned communications line.	Observations	Notified 3rd Party	
44	4652	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 4652 has loose communications equipment hanging off the conductors.	Observations	Notified 3rd Party	

Location	Equipment Identifier	Structure Type	GO/Rule/Observations	Finding(s)	Finding(s) Type	Corrective Action Status	Additional Data
46	4649	Pole	GO 95, Rule 35	Excessive vegetation is surrounding the service drop to 420 Tennyson Street from Pole 4649 and causing possible strain and abrasion.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
46	4649	Pole	GO 95, Rule 51.6-A	Pole 4649 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	No Violation Found
46	4649	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 4649 has loose communications drops that are unsecured to the pole and strain and abrasion from excessive vegetation on the drop going to 420 Tennyson Street.	Observations	Notified 3rd Party	
47	5612	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 5612 has communications lines hanging low over a pedestrian thoroughfare.	Observations	Notified 3rd Party	
48	5613	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Service Pole 5613 has loose communications equipment hanging off the conductors.	Observations	Notified 3rd Party	
48	5613	Pole	GO 95, Rule 35	Excessive vegetation is surrounding the service drop to 1450 Bryant Street from Service Pole 5613 and causing possible strain and abrasion.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
49	5613/5614	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	The communications lines between Pole 5614 and Pole 5613 have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
50	5615	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 5615 has abandoned broken phone equipment hanging off the conductors.	Observations	Notified 3rd Party	
52	5413	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 5413 has strain and abrasion from excessive vegetation on the drop going to 320 Kellogg Avenue.	Observations	Notified 3rd Party/CPA will correct Vegetation	
55	5894	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 5894 has a loose communications drop unsecured to the pole.	Observations	Notified 3rd Party	
71	PM 3402	Pole	GO 128, Rule 17.1	Pad Mount Load Break 3402 has a corroded fault indicator on one of the C Phase load break elbows.	Maintenance/Repair/Replace	Completed	No Violation Found
90	6601	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 6601 has loose communications drops that are unsecured.	Observations	Notified 3rd Party	
91	6602	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 6602 has an incomplete communications pole transfer leading to a buddy pole with loose guy wires.	Observations	Notified 3rd Party	
94	6690	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 6690 has a communications anchor down guy with missing insulators.	Observations	Notified 3rd Party	
95	7051/6693	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	The communications lines between Pole 7051 and Pole 6693 have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
96	6693	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 6693 has a communications anchor down guy with missing insulators and a communications riser with a broken C clamp.	Observations	Notified 3rd Party	
97	37.3460, -122.1759	Pole	GO 95, Rule 51.6-A	The Pole on Page Mill Road at 37.3460, -122.1759 has a damaged high voltage sign.	Not a CPAU Pole	Not a CPAU Pole	CPUC only provided GPS Coordinates, no pole number was listed in audit report and we deemed this pole not City owned per field check.
97	37.3460, -122.1759	Pole	GO 95, Rule 56.2	The Pole on Page Mill Road at 37.3460, -122.1759 has a slack anchor down guy.	Not a CPAU Pole	Not a CPAU Pole	CPUC only provided GPS Coordinates, no pole number was listed in audit report and we deemed this pole not City owned per field check.
98	6594	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 6594 has a loose communications drop that is unsecured.	Observations	Notified 3rd Party	



Location	Equipment Identifier	Structure Type	GO/Rule/Observations	Finding(s)	Finding(s) Type	Corrective Action Status	Additional Data
100	6591	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 6591 has a slack communications anchor down guy, a slack phone anchor down guy, loose communications equipment hanging off the conductors, and the communications lines between Pole 6591 and Pole 6593 have strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
101	6592	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 6592 has a broken communications riser moulding.	Observations	Notified 3rd Party	
101	6592	Pole	GO 95, Rule 31.1	Pole 6592 has an abandoned buddy pole that needs to be removed.	Observations	Notified 3rd Party	
101 (not 105 as listed)	6592	Pole	GO 95, Rule 31.1	Pole 6592 has an abandoned buddy pole that needs to be removed (Pole 7046).	Observations	Notified 3rd Party	Duplicate item
103	6538	Pole	GO 95, Rule 56.2	Pole 6538 has a slack anchor down guy.	Maintenance/Repair/Replace	Completed	
103	6538	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 6538 has communications lines with strain and abrasion from excessive vegetation.	Observations	Notified 3rd Party	
106	377	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 0377 has an abandoned communications line.	Observations	Notified 3rd Party	
109	250	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 0250 has a slack communications anchor down guy and vegetation above the insulator on the phone anchor down guy.	Observations	Notified 3rd Party	
110	249	Pole	GO 95, Rule 54.6-B	Pole 0249 has an exposed ground wire.	Maintenance/Repair/Replace	Completed	Previously Identified
110	249	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 0249 has a slack communications anchor down guy that is contacting the phone anchor down guy.	Observations	Notified 3rd Party	
111	7035	Pole	GO 95, Rule 35	Excessive vegetation is surrounding the service drop to 742 Josina Avenue from Pole 7035 and causing possible strain and abrasion.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
114	4464	Pole	GO 95, Rule 54.6-B	Pole 4464 has an exposed transformer ground wire.	Maintenance/Repair/Replace	Completed	Previously Identified
115	4465	Pole	GO 95, Rule 31.1	Pole 4465 is located along a paved road and has missing visibility strips, which are a required item on CPAU's OH inspection form..	Maintenance/Repair/Replace	Completed	Previously Identified
117	4468	Pole	GO 95, Rule 56.2	Pole 4468 has a slack span guy.	Maintenance/Repair/Replace	Completed	Previously Identified
118	4471	Pole	GO 95, Rule 51.6-A	Pole 4471 has missing high voltage signs.	Maintenance/Repair/Replace	Completed	No Violation Found
119	4471	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 4474 has a loose communications drop that is unsecured to the pole and an abandoned communications line.	Observations	Notified 3rd Party	
120	2400	Pole	GO 95, Rule 51.6-A	Pole 2400 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	
124	2914/2403	Pole	GO 95, Rule 35	Excessive vegetation is surrounding the service drop to 2914 Sandra Place from Pole 2403 and causing possible strain and abrasion.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
125	2405	Pole	GO 95, Rule 51.6-A	Pole 2405 has a damaged high voltage sign.	Maintenance/Repair/Replace	Completed	
133	1657	Pole	GO 95, Rule 35	Excessive vegetation is surrounding the service on Pole 1657 and causing possible strain and abrasion.	Tree Trimming/Vegetation	Scheduled for Completion < 3 months	
134	2168/1659/1657	Pole	GO 95, Rule 56.2	Pole 2168 has a slack span guy to Pole 1659 and a slack span guy to Pole 1657.	Maintenance/Repair/Replace	Completed	Previously Identified
135	5516	Pole	GO 95, Rule 18 (Third-Party Audit Observations)	Pole 5516 has a loose communications drop that is unsecured to the pole.	Observations	Notified 3rd Party	