PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 17, 2024 EA2023-1150

Chris Karwick
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1705 Martin Avenue
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SUBJECT: Electric Audit of Silicon Valley Power

Mr. Karwick:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Matthew Yunge and Thomas Roberts of ESRB staff conducted an electric audit of Silicon Valley Power (SVP) from September 25 through September 29, 2023. During the audit, ESRB staff conducted a field inspection of SVP's distribution, transmission, and substation facilities and equipment and reviewed pertinent documents and records. ESRB staff, however, conducted its records review onsite as SVP failed to submit copies of its records. Further, ESRB staff were restricted from taking photos of substation and/or enclosed equipment during its field inspection. ESRB's issuance of this report does not indicate agreement with these imposed restrictions, but rather the intent to effect corrective actions on its observed findings in a timely manner.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. In addition, please respond no later than February 14, 2024, by electronic copy of all corrective actions and preventive measures taken by SVP to correct the identified violations and prevent the recurrence of such violations. Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Matthew Yunge at (415) 603-9828 or matthew.yunge@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Electric Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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SILICON VALLEY POWER
ELECTRIC DISTRIBUTION AUDIT FINDINGS
September 25- 29, 2023

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Silicon Valley Power (SVP):

- Pole Testing LWP-002
- S0018 Txmn and Dist Line Inspection and Patrol
- T&D Inspections LWP-001
- Overhead detailed inspection Excel workbook
- Patrol Work orders Excel workbook
- Underground Detailed Inspections Excel workbook
- Patrol Inspections Excel workbook
- 2021-2022 Reliability metrics Excel workbook
- Block Maps Detailed Inspection Index with Areas
- Estimating Releases 2022-2023
- O-Calc Spreadsheet
- Inspector List_Job Title
- SVP Substations List
- SY-E-0-C-2 REV 24 EXISTING
- S0019 Substation Inspections
- SWP-004 Substation Inspection
- S0043 Protection System Maintenance Program
- 2021-2022 substation inspection records
- Substation detailed inspection records
- ROI_Substation_PdM_List_Overview_230404
- Substation Work Orders
- STN EQUIPMENT DB
- SY-E-0-C-35 R15.1 APPROVED
- 2023 infrared tests

- 2023 oil test reports
- Workforce Development RP3 Log

II. Records Review Violations

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

1. **GO 165, Rule 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."

General Order 165, Table 1

	Patrol		Detailed		Intrusive	
Urban	**Rural**		**Urban**	**Rural**	**Urban**	**Rural**
Transformers						
Overhead	1	2	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Switching/Protective Devices						
Overhead	1	2	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Regulators/Capacitors						
Overhead	1	2	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Overhead Conductor and Cables	1	2	5	5	---	---
Streetlighting	1	2	x	X	---	---
Wood Poles under 15 years	1	2	x	X	---	---
Wood Poles over 15 years which have not been subject to intrusive inspection	1	2	x	X	10	10
Wood poles which passed intrusive inspection	---	---	---	---	20	20

2. **GO 95, Rule 18-B.(1), 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.

   The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities."

3. **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."

4. **GO 128, Rule 17.2, Inspection** states:

   "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 of these rules."

5. **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."

SVP's *Preventative Inspection Program* for overhead and underground facilities outlines the priority codes and associated time frames for response as follows:

- **Priority 1 – Immediate Hazard:**
  Conditions that immediately affect the integrity of the system or present a hazard to workers or the public. Work orders will be responded to immediately and appropriate action taken until the hazardous condition is remedied.
- **Priority 2 – Non-emergency repair condition:**
  Conditions that require maintenance or repair, but that can be scheduled. Work orders will be prioritized by urgency and will be scheduled to have appropriate action taken correct the condition within 1 year.

SVP currently uses two platforms to generate and track work orders. One system is Lucity and the other is Sharepoint. All work orders are logged in at least one of the two systems, but not all work orders are recorded in both systems. A review of SVP's Lucity-generated work orders revealed that SVP uses priority levels other than "1" or "2". Substation generated work orders have the priority codes:

1. 1sub
2. 2sub
3. 3sub
4. 4sub

Non-substation work orders had the following priority levels:

1. Low
2. Medium
3. High
4. Immediate
5. 1 week
6. 2 week
7. 3 months

However, SVP's *Preventative Inspection Manual* only outlines two priority codes for staff to use during patrols and inspections. A discussion with SVP staff revealed that for substation corrective work orders, SVP now uses the priority codes listed above. Further, SVP's current practice in managing work orders does not include a required due date associated with those priority levels. Instead, the priority codes only designate the importance of each work order relative to the other work orders. Similarly, there is no mechanism that communicates which work orders with the same priority level need to be resolved first.

Based on the above information, ESRB finds that SVP is in violation of General Order 95, Rule 18.B and General Order 128 Rule 17.1 for failing to assign priority levels to its own work orders in accordance with its own maintenance program.

Sharepoint Work Orders:

SVP's Sharepoint-generated information on work orders from overhead detailed inspections indicates that all of the 365 work orders associated with the inspections that were scheduled for 2020 are overdue per SVP's own internal standards. All 365 of those work orders were initiated between June 16, 2020 and July 26, 2021. Those 365 work orders are all designated as open as of September 14, 2023. Similarly, all 32 of the overhead detailed inspection work orders associated with detailed inspections scheduled for 2021 are overdue.[1] Per SVP's standards, the required due date applicable for work orders is one year at the latest.

Regarding the Sharepoint-generated patrol work order data, eight of the ten "2020" patrol work orders are overdue and still open.[2] Those work orders were made between October 23, 2020 and November 2, 2020. One of those work orders is listed as Priority 1 and was the only work order on its respective worksheet that has a priority associated with it. That work order was made on October 29, 2020 and is presumably still open.[3]

Regarding the patrol work order data for patrols originally scheduled for 2021, 25 of 41 work orders are still open and of those, one work order has no priority level listed and another work order is a priority level 1. Of the 16 "2021" work orders that were completed, there is no indication of when those repairs were completed. Therefore, ESRB cannot determine if those work orders were completed late or not. Lastly, the worksheet that SVP provided for "2022" patrol work orders is blank, so those inspections did not occur by the time of the audit.

Regarding the underground (UG) detailed inspection work order data for "2020", only one work order out of 37 was marked as repaired. For "2021" UG detailed inspection work orders, only four out of 26 are marked as repaired, of which one work order did not have a priority level assigned. The "2022" UG detailed inspection worksheet was blank, so those inspections did not occur by the time of the audit.

Lucity Work Orders:

Regarding Lucity-generated work orders, the year 2023 has 1797 work orders, of which 423 were marked as immediate or high. Of those work orders marked as immediate or high priority, 149 took over 7 days to resolve. As SVP did not adhere to its own standards, ESRB cannot determine what the appropriate timeframe is for resolving "high" priority work orders.

For Lucity-generated 2022 work orders, one work order took over a year to resolve and was listed as "1Sub" priority. Of the 284 work orders that were marked as high or immediate, 111 took over seven days to resolve.

[1] All but one of those tags were made in July and August of 2022.
[2] This is a total count of all tags in the sheet provided by SVP. This convention is used throughout this report.
[3] SVP staff informed ESRB that if a work order does not have a positive indication of being completed, it is presumed open.

Based on the above information, ESRB finds that SVP is in violation of General Order 95, Rule 18.B for failing to assign priority levels to its own work orders in accordance with its own maintenance program.

ESRB finds that SVP is in violation of General Order 95, Rule 31.1 for failing to complete its work orders in accordance with its own maintenance programs.

Inspections:

ESRB reviewed documentation and records of Block 5 and Block 30 of SVP's service territory. The completion dates for Block 5's overhead inspection were 3/18/2015 and 3/30/2021, which is an interval of approximately six years. The completion dates for Block 5's underground inspections were 11/12/2015 and 10/15/2022, which is an interval of almost seven years.

Block 30's overhead inspection dates were 2/23/2016 and 8/8/2022, which is approximately six and a half years. The completion dates for Block 30's underground inspections were 1/24/2017 and 8/7/2022, which is approximately five and a half years.

Additionally, ESRB finds that SVP is behind its scheduled inspection plan. For inspections scheduled for 2021, 37 patrols, 17 overhead detailed inspections, and 10 underground detailed inspections were not completed. For inspections scheduled for 2022, SVP's records showed that no inspection maps were checked out by SVP staff for inspections, therefore no inspections scheduled for 2022 were completed. Per SVP, SVP's service territory is divided into five regions, with one region to receive a detailed inspection per year to create a 5-year inspection cycle. SVP's late inspections is a violation of General Order 165 Table 1 Distribution Inspection Cycles.

Per Table 1 of General Order 165, detailed inspections are required every 5 years for overhead assets and every three years for underground assets. Therefore, ESRB finds SVP in violation of General Order 165, Rule III.B.

III. Field Inspection

ESRB inspected distribution, substation, and transmission assets in Silicon Valley Power's service territory from September 25 to 28, 2023. ESRB inspected 84 locations and identified 36 violations.

Location #	Date/Time Visited	GPS Coordinates
1	2023-09-25 13:23:50	Point (-121.99816529 37.33403462)
2	2023-09-25 13:29:10	Point (-121.99772224 37.33383188)
3	2023-09-25 13:37:09	Point (-121.9982398 37.33155242)
4	2023-09-25 13:41:13	Point (-121.99877378 37.33163181)
5	2023-09-25 13:48:38	Point (-121.99920701 37.33166204)
6	2023-09-25 13:54:06	Point (-121.99783968 37.33151437)
7	2023-09-25 13:58:40	Point (-121.99760683 37.33152631)
8	2023-09-25 14:04:37	Point (-121.9973257 37.33142246)
9	2023-09-25 14:09:30	Point (-121.99701665 37.33151068)
10	2023-09-25 14:23:15	Point (-121.99999245 37.3276331)
11	2023-09-25 14:29:15	Point (-121.99966549 37.32772202)
12	2023-09-25 14:34:20	Point (-121.9994196 37.32763256)
13	2023-09-25 14:42:23	Point (-121.99881508 37.32761178)
14	2023-09-25 14:46:08	Point (-121.99859275 37.32764583)
15	2023-09-25 14:51:29	Point (-121.99800153 37.32757368)
16	2023-09-25 14:58:46	Point (-122.0003883 37.32760657)
17	2023-09-25 15:05:23	Point (-122.00097592 37.32763798)
18	2023-09-25 15:12:15	Point (-122.00143299 37.32755755)
19	2023-09-25 15:38:42	Point (-121.97966983 37.33775316)
20	2023-09-25 15:42:53	Point (-121.98045578 37.33782213)
21	2023-09-25 15:47:30	Point (-121.98086071 37.33783205)
22	2023-09-25 15:53:29	Point (-121.98129091 37.33784429)
23	2023-09-26 08:53:21	Point (-121.94199336 37.39282555)
24	2023-09-26 09:17:29	Point (-121.94135232 37.39225037)
25	2023-09-26 09:23:56	Point (-121.94186128 37.3903561)
26	2023-09-26 09:34:23	Point (-121.94054262 37.39115002)
27	2023-09-26 09:50:00	Point (-121.94239948 37.39304872)

Location #	Date/Time Visited	GPS Coordinates
28	2023-09-26 10:20:01	Point (-121.98222847 37.40828033)
29	2023-09-26 10:25:12	Point (-121.98209713 37.40822911)
30	2023-09-26 10:50:59	Point (-121.98639929 37.35950614)
31	2023-09-26 11:05:30	Point (-121.98669532 37.35885415)
32	2023-09-26 11:12:16	Point (-121.98614286 37.35828524)
33	2023-09-26 11:36:54	Point (-121.98252726 37.34166038)
34	2023-09-26 11:41:49	Point (-121.98251735 37.34164104)
35	2023-09-26 11:49:43	Point (-121.98285976 37.3414118)
36	2023-09-26 12:06:11	Point (-121.98248571 37.34229614)
37	2023-09-26 13:30:26	Point (-121.95692038 37.34937623)
38	2023-09-26 13:35:18	Point (-121.95689874 37.3493856)
39	2023-09-26 13:42:26	Point (-121.95598501 37.34936939)
40	2023-09-26 13:51:46	Point (-121.95542406 37.34945124)
41	2023-09-26 13:56:54	Point (-121.9549039 37.34959305)
42	2023-09-26 14:01:24	Point (-121.95441176 37.34969139)
43	2023-09-26 14:10:21	Point (-121.95404141 37.3498237)
44	2023-09-26 14:15:51	Point (-121.95433583 37.34981196)
45	2023-09-26 14:20:39	Point (-121.95468924 37.34970225)
46	2023-09-26 14:23:51	Point (-121.95535376 37.34944421)
47	2023-09-26 14:34:31	Point (-121.95274757 37.34912435)
48	2023-09-26 14:39:46	Point (-121.95243341 37.34882477)
49	2023-09-26 14:44:05	Point (-121.9523455 37.34847362)
50	2023-09-26 14:51:39	Point (-121.9520827 37.34818677)
51	2023-09-26 15:10:24	Point (-121.9461336 37.34471789)
52	2023-09-26 15:14:26	Point (-121.94640874 37.34460977)
53	2023-09-26 15:22:46	Point (-121.94693666 37.34439674)
54	2023-09-26 15:28:16	Point (-121.94737741 37.34430886)
55	2023-09-26 15:31:54	Point (-121.94766305 37.34418707)
56	2023-09-26 15:38:25	Point (-121.94705451 37.34420946)
57	2023-09-26 15:44:09	Point (-121.94676742 37.34372378)
58	2023-09-27 08:48:20	Point (-121.94029166 37.35629728)
59	2023-09-27 11:12:51	Point (-121.95376747 37.37651563)

Location #	Date/Time Visited	GPS Coordinates
60	2023-09-27 13:57:01	Point (-121.96506076 37.40339678)
61	2023-09-27 16:02:22	Point (-121.95750605 37.39460793)
62	2023-09-28 08:52:21	Point (-121.98687736 37.34565097)
63	2023-09-28 08:56:28	Point (-121.98698158 37.34585163)
64	2023-09-28 09:03:08	Point (-121.98719796 37.34558708)
65	2023-09-28 09:09:49	Point (-121.98701883 37.3460502)
66	2023-09-28 09:19:01	Point (-121.98690383 37.34673379)
67	2023-09-28 09:28:39	Point (-121.98683043 37.34727233)
68	2023-09-28 09:34:54	Point (-121.98685417 37.34783213)
69	2023-09-28 10:03:35	Point (-121.93419217 37.34231885)
70	2023-09-28 10:07:26	Point (-121.9338382 37.34205275)
71	2023-09-28 10:12:23	Point (-121.93367633 37.3417819)
72	2023-09-28 10:17:52	Point (-121.93336725 37.34150473)
73	2023-09-28 10:20:33	Point (-121.93309378 37.34136062)
74	2023-09-28 10:27:04	Point (-121.93271838 37.34105509)
75	2023-09-28 10:34:18	Point (-121.93249685 37.34077041)
76	2023-09-28 10:37:12	Point (-121.93230948 37.34070827)
77	2023-09-28 11:07:27	Point (-121.98306655 37.33327675)
78	2023-09-28 11:12:56	Point (-121.98359082 37.3334654)
79	2023-09-28 11:19:31	Point (-121.98387745 37.33354623)
80	2023-09-28 11:30:08	Point (-121.98275786 37.333201)
81	2023-09-28 11:34:33	Point (-121.98188467 37.33284609)
82	2023-09-28 11:41:46	Point (-121.98141198 37.33276656)
83	2023-09-28 11:51:50	Point (-121.98178988 37.3328939)
84	2023-09-28 11:58:04	Point (-121.98202031 37.3330362)

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. **GO 95, Rule 22.8.A** states in part:

"Ground Wire, Bond Wire, and Communication Conductor shall be covered by a minimum of:

(1) Hardwood Moulding (of Oak or Rock Elm) three-eighths inch in thickness, or Douglas Fir moulding one-half inch in thickness, or any of these woods having a cross-section as shown in Figure 81 of Appendix G.

(2) Flexible and Rigid Conduit, and Rigid U-Shaped Moulding of plastic or other material, as tested according to National Electrical Manufacturers Association (NEMA) Standards TC 2-1998 (for Plastic Conduit) and TC 19-2001 (for Plastic U-Shaped Moulding), shall:

(a) Have a normal temperature minimum impact strength equal to one-half inch nominal EPC-40-PVC conduit (50 ft.-lbs) using the test method specified in NEMA TC 2-1998, and a low temperature minimum impact strength equal to 12.5ft.-lbs using the test method specified in TC 19-2001; and

(b) Have a minimum insulating efficiency of 12 kV/in. dry; and

(c) Meet the minimum sunlight resistance of 100,000 Langleys, or equivalent laboratory ultra violet test, of TC 19-2001.

(d) On wood poles and structures, they shall be installed only outside the climbing space unless installed in accordance with Rule 54.6-C (for lateral conductors).

(3) Plastic or Other Non-Conductive Material meeting the requirements of 22.8-A(2)."

Location #	Violation Description	General Order	Rule Violation
47	There is an exposed ground wire at this location.	95	22.8.A

2. **GO 95, Rule 35** states in part:

"Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained."

Location #	Violation Description	General Order	Rule Violation
7	Vegetation was touching a down guy above its insulating bob.	95	35
10	There are branches attached to the primary and secondary lines.	95	35
63	There is vegetation touching the down guy above its insulating bob.	95	35
66	There is vegetation contacting a down guy above its insulating bob.	95	35
68	Vegetation touching down guy above insulating bob.	95	35
81	There is vegetation touching a guy wire on the side of the insulating bob that is closer to the pole.	95	35
82	There is vegetation touching the down guy above its insulating bob at this location.	95	35
82	Vegetation touching down guy above insulating bob to secondary.	95	35

3. **GO 95, Rule 56.2** states in part:
"Where mechanical loads imposed on poles, towers, or structures are greater than can be supported with safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.
Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire load, the pole below the point of guy attachment acting merely as a strut.
Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."

Location #	Violation Description	General Order	Rule Violation
10	One of the down guys is slack.	95	56.2
22	The guy wire to the primary line at this location is slack.	95	56.2

4. **GO 95, Rule 91.3** states in part:

"A. Unless otherwise specified in this Order, pole steps used to ascend and descend joint use wood poles are not required. However, occupants on joint use wood poles are not prohibited from installing and maintaining temporary or permanent steps.
B. Unless non climbable, joint use nonwood poles shall include provisions for ascending and descending.
C. Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps."

Location #	Violation Description	General Order	Rule Violation
55	The pole at this location has a step that is below the minimum height requirement. The height of the step is recorded at 7.5 feet	95	91.3

5. GO 95, Rule 93 states in part:
"Climbing space shall be provided on all jointly used poles in accordance with the provisions of Rules 54.7, 54.9, 54.10, 54.11, 54.12, and 84.7.
Climbing space on jointly used poles shall be maintained so that its position in relation to the pole is not changed by more than 90 degrees in a vertical distance of less than 8 feet.
Climbing space shall be maintained from the ground level."

Location #	Violation Description	General Order	Rule Violation
76	There is vegetation blocking the pole's climbing space.	95	93
80	There is vegetation surrounding the pole at this location pole that is blocking the climbing space.	95	93

6. GO 128, Rule 17.1 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.
All work performed on public streets and highways shall be done in such a manner that the operations of other utilities and the convenience of the public will be interfered with as little as possible and no conditions unusually dangerous to workmen, pedestrians or others shall be established at any time."

Location #	Violation Description	General Order	Rule Violation
32	There is oil seepage at the exterior base of the transformer.	128	17.1
32	Oil seepage inside on high voltage side of cabinet. Elbows have moldy residue.	128	17.1
36	Significant amount of corrosion along interior rim of the transformer cabinet door and as well as along the bottom wall of the low-voltage side of the cabinet.	128	17.1

7. **GO 174, Rule 12** states in part:
"Substations shall be designed, constructed and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service.."

Location #	Violation Description	General Order	Rule Violation
61	There was a bird nest in switch 23-2 b phase.	174	12

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

(2) "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.

(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO95."

The third-party violations for the audit are listed below:

Location #	Violation Description	General Order	Rule Violation
8	Communications guy has sawed through half of a tree branch at mid-span.	95	31.1
10	Communications cables are attached to the pole by rope.	95	31.1
12	There is a communications line that is extremely slack and is relatively low.	95	31.1
16	There is a communications line draped on the pole.	95	31.1
17	There is a slack communications line that is contacting the vines on an adjacent fence.	95	31.1
39	There is an abandoned communications line.	95	31.6
41	There is an abandoned communications line at this location.	95	31.6
42	There is a tree branch straining the communications lines service drops.	95	35
49	The communications service drop is low at this location. Requirement is no less than 10 feet.	95	84.8.C.2.b
53	The communication service drop lines are contacting each other. Requirement is 3 inches.	95	Table 2
64	There is an abandoned communications line.	95	31.6

Location #	Violation Description	General Order	Rule Violation
67	The communications lines and down guys are within about a half foot of each other. GO 95, Table 2 requires 3 inches of separation.	95	Table 2
75	There is an abandoned communications line.	95	31.6
77	There is an exposed communications ground wire.	95	84.7
78	Exposed communication ground.	95	84.6.B
78	The climbing space at the bottom of this pole is blocked by vegetation.	95	84.6.B
78	There is vegetation touching the down guy above its insulator bob. The down guy attaches to the pole just above the communications level.	95	35
83	Exposed communications ground	95	84.6.B