

**CPUC SUBSTATION AUDIT FINDINGS
PG&E BAKERSFIELD HEADQUARTERS
NOVEMBER 13 – 17, 2023**

I. Records Review

During the substation audit, Electric Safety and Reliability Branch (ESRB) reviewed the following standards, procedures, and records for PG&E's Bakersfield Headquarters (HQ):

- List of all assigned PG&E substations
- Map showing all assigned PG&E substations in the Bakersfield HQ
- PG&E Substation Maintenance and Construction (SM&C) Manual, Utility Standard: TD-3322M, Revisions 9 and 11, with attachments 3 through 8 & 11, with forms 1, 2, 5, 6, 7
- PG&E Utility Standard: TD-3328P attachments 2 through 4, Revision 0
- PG&E Mobile Inspection Form, Utility Standard: TD-3468-01-F01, Revision 1
- PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S, Revisions 8 and 9, with attachments 2 through 12
- PG&E Substation Supplemental Inspection Program, Utility Standard: TD-3328S, Revision 2, with attachment 1
- PG&E Substation Asset Performance Management (APM) Process, Utility Procedure: TD-3320P-36, Revision 0
- PG&E Substation SAP Work Management System (WMS) Process, Utility Procedure: TD-3320P-12, Revision 7
- PG&E SM&C Manual – Infrared Inspections, Utility Standard: TD-3322M, Revision 11
- PG&E SM&C Manual – Insulating Oil, Utility Standard: TD-3322M, Revisions 7 and 8
- PG&E Accumulated Critical Current (ACC) Process, Utility Standard: TD-3320P-12, Revision 0
- PG&E SM&C Manual – Substation Batteries, Utility Standard: TD-3322M, Revision 13
- PG&E Substation Fire Protection Systems and Equipment – Inspection, Test and Maintenance: TD-3320P-07, Revision 3
- PG&E Substation General Work Procedures, Utility Standard: TD-3320S, Revision 2
- Explanation of PG&E inspector training policies
- List of all substation inspections conducted in the last five years for Bakersfield HQ
- List of all open/pending, completed, cancelled, and late work orders and maintenance items in the previous five years
- Equipment lists for ESRB selected substations
- Single-line diagrams of ESRB selected substations
- Last two visual inspection checklists for ESRB selected substations
- List of transformer banks that operated beyond nameplate capacity for the last five years for ESRB selected substations.
- Infrared Testing records for ESRB selected substations in the last two years
- Most recent oil sample test results for ESRB selected substations
- Most recent electric test results for ESRB selected substations
- Training records for all substation and maintenance personnel in the past five years
- Other relevant substation inspections for the past five years for ESRB selected substations
- Internal audit findings for Bakersfield HQ for the past five years

II. Records Violations

ESRB observed the following violations during the records review portion of the audit:

1. General Order (GO) 174, Rule 12, General states in part:

“Design, construction and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S¹, establishes PG&E’s required end dates and out-of-compliance dates as follows:

Table 1. Due Dates Per Priority Code

Priority Code	Required End Date	Out-of-Compliance Date
A	Within 30 days	Close notifications (after removing the hazard [make safe]) with either permanent or temporary repairs within 30 days. Create a new lower priority notification immediately for any remaining work that will exceed 30 days.
B	Within 90 days	The out-of-compliance date is the 1 st day of the 2 nd month following the month in which the required end date occurs.
E	Within 365 days	The out-of-compliance date is the 1 st day of the year following the year in which the required end date occurs.
F	Greater than 365 days	There is no out-of-compliance date. This work will be completed when it is operationally efficient to perform the work.

Based on Table 1 above, ESRB noted 42 notifications that were closed after their past due dates. Therefore, PG&E did not perform maintenance in accordance with accepted good practices described in Utility Standard TD-3322S. See Table 2 below for the past-due Line Corrective (LC) notifications.

Table 2. Overdue LC Notifications

Notification Number	Priority	Notification Date	Completion Date	Out-of-Compliance Date	Days Late
124695326	B	10/12/2022	6/30/2023	3/1/2023	121
120158993	B	12/9/2020	6/15/2021	5/1/2021	45
120106121	B	11/25/2020	5/15/2021	4/1/2021	44
120210622	B	12/15/2020	6/14/2021	5/1/2021	44
124454515	B	9/7/2022	3/15/2023	2/1/2023	42
124773472	B	9/30/2022	3/6/2023	2/1/2023	33

¹ PG&E Utility Standard TD-3322S, August 3, 2023, Revision 9.

120158992	B	12/9/2020	5/14/2021	5/1/2021	13
119994875	B	7/17/2020	12/12/2020	12/1/2020	11
124486411	B	9/12/2022	2/10/2023	2/1/2023	9
120165073	B	12/10/2020	5/4/2021	5/1/2021	3
120210576	B	12/15/2020	5/2/2021	5/1/2021	1
120210626	E	12/15/2020	5/26/2023	1/1/2022	510
120084069	E	11/21/2020	5/26/2023	1/1/2022	510
120084070	E	11/21/2020	5/26/2023	1/1/2022	510
120084072	E	11/21/2020	5/26/2023	1/1/2022	510
120165218	E	12/10/2020	4/18/2023	1/1/2022	472
120165078	E	12/10/2020	3/24/2023	1/1/2022	447
120165159	E	12/10/2020	3/24/2023	1/1/2022	447
120189221	E	12/11/2020	3/24/2023	1/1/2022	447
120084064	E	11/21/2020	3/22/2023	1/1/2022	445
120084067	E	11/21/2020	3/22/2023	1/1/2022	445
120018066	E	8/4/2020	3/21/2023	1/1/2022	444
121675460	E	7/7/2021	8/3/2023	1/1/2023	214
122150805	E	10/5/2021	5/24/2023	1/1/2023	143
121408770	E	5/22/2021	4/14/2023	1/1/2023	103
119051298	E	5/21/2020	4/1/2022	1/1/2022	90
119997608	E	8/13/2020	3/30/2022	1/1/2022	88
120018321	E	8/11/2020	3/4/2022	1/1/2022	62
120033190	E	8/12/2020	3/4/2022	1/1/2022	62
120033192	E	8/11/2020	3/3/2022	1/1/2022	61
121921519	E	8/13/2021	2/24/2023	1/1/2023	54
119969901	E	7/30/2020	2/23/2022	1/1/2022	53
120189220	E	12/11/2020	2/10/2022	1/1/2022	40
120506103	E	2/6/2021	1/21/2023	1/1/2023	20
118536015	E	2/7/2020	1/16/2021	1/1/2021	15
118757971	E	3/30/2020	1/16/2021	1/1/2021	15
124637790	E	10/6/2022	1/9/2023	1/1/2023	8
124637734	E	10/6/2022	1/9/2023	1/1/2023	8
117035913	E	N/A	5/8/2019	5/1/2019	7
120693494	E	N/A	5/5/2021	5/1/2021	4
119013295	E	N/A	6/3/2020	6/1/2020	2
123967114	E	N/A	8/2/2022	8/1/2022	1

PG&E Response:

We agree with 34 of the 42 record violations cited above in “Table 2: Overdue LC Notifications”. Please note that 4 of the 42 cited are preventative maintenance (PR) notifications, while the remaining are Line corrective (LC) notifications. Please see the breakdown of these notifications in Table1PGE below.

Table1PGE

Priority Code	CPUC Overdue Notifications	PG&E Agrees Overdue	PG&E Disagrees Completed On-Time
B	11	11	-
E	27	20	7
E*	4	3	1
Total	42	34	8

*Preventative Notifications that are on a planned maintenance cycle

We disagree with 8 of the cited record violations in “Table 2: Overdue LC Notifications”.

- Upon further review, four of these notifications (121408770, 121921519, 121675460, 122150805) were found to be duplicative or created in error per notification long text and have since been cancelled in SAP. Therefore, these notifications are not considered past due.
- LC Notification 118536015 has a basic finish date that was not updated to match an E priority. Per TD-3322S, revision 8, the basic finish dates should have been updated to February 6, 2021, giving an out of compliance date of January 1, 2022. This notification was completed on January 16, 2021, therefore is not considered past due.
- LC Notification 118757971 has a basic finish date that was not updated to match an E priority. Per TD-3322S, revision 8, the basic finish dates should have been updated to March 20, 2021, giving an out of compliance date of January 1, 2022. This notification was completed on January 16, 2021, therefore is not considered past due.
- Notification 119051298 was created on May 21, 2020, to replace a battery at Cadet substation. At the time of the PADR, the completion date referred to the date the notification was closed and not the date of the battery removal. We have since updated the notification to reflect the correct date of December 7, 2020, and it is therefore not considered past due.
- We disagree that PR 119013295 is past-due as this was completed prior to the out of compliance due date of August 1, 2020. The out of compliance date was incorrectly calculated on the pre-audit data request, question 13 and we apologize for this oversight. This PR notification was completed on June 3, 2020, before the out of compliance date; therefore, this notification is not considered past-due.

2. GO 174, Rule 31.1, Inspection Program Frequency states in part:

“Substations shall be inspected as frequently as necessary.

- *Time intervals or other bases shall be specified in the Inspection Program.”*

PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S², establishes PG&E’s substation inspection program as follows:

“Substation inspections – PG&E Substation Inspection Program is based on a time-based trigger. Substation Inspections are scheduled to be performed monthly for high criticality substations, and every other month for low criticality substations.

The Substation Inspection Program activities include the following:

1. Inspecting the substation and equipment for damages or abnormal conditions.
2. Inspecting all other items appropriate to the substation and its equipment.
3. Documenting and reporting any abnormal conditions found in the substation and documenting any repairs, services, or other work performed.”

ESRB found that PG&E completed a monthly inspection for the Columbus Substation late. The Columbus Substation had a monthly inspection for the mobile circuit breaker CB-115 (Notification #123623222) with an out-of-compliance date of August 1, 2022, however PG&E did not complete this inspection until August 3, 2022.

PG&E Response:

We agree that the monthly inspection for mobile CB-115 was completed three days past the out-of-compliance date. While the inspection was performed late, no issues were found.

² PG&E Utility Standard TD-3322S, August 3, 2023, Revision 9 – Attachment 11, PG&E Substation Inspection Program Summary, April 7, 2022, Revision 3.

III. Field Inspection

During the field inspection, ESRB inspected the following 17 substations:

Substation	City
Live Oak Switching Station	Bakersfield
Cal Water Substation	Bakersfield
Weedpatch Substation	Weedpatch
Adobe Switching Station	Arvin
Tejon Substation	Lebec
Old River Substation	Knob Hill
Rosedale Substation	Bakersfield
Midway Substation	Button Willow
Semitropic Substation	Wasco
Shafter Substation	Shafter
Elk Hills Substation	Valley Acres
Norco Substation	Bakersfield
Stockdale Substation	Bakersfield
Kern Power Distribution	Bakersfield
Bakersfield Substation	Bakersfield
Belridge 1B Substation	Button Willow
Ganso Substation	Button Willow

IV. Field Inspection – Violations List

ESRB observed the following violations of GO 174, Rule 12 during the field inspection:

GO 174, Rule 12, General 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.

Design, construction, and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

PG&E Response:

We appreciate the valuable insight and feedback provided by the ESRB, as well as their support in helping us achieve our stand that everyone and everything is always safe. We agree with 15 of the ESRB’s 80 identified violations and are fully committed to addressing these issues while continuously working to prevent and eliminate such findings in the future.

We do not believe some of the field observations qualify as violations of GO 174, Rule 12. Our Substation Inspection Program focuses on monthly and bi-monthly station inspections, along with our Enhanced Inspections (EI), Quality Verification (QV) audits, and Annual Infrared (IR) Inspections. These different levels of visual and technical assessments are conducted to indicate abnormal conditions before the equipment fails and to prevent unsafe events. 65 of the ESRB’s observations made during the field portion of the audit were previously identified and properly recorded in our system of record (SAP) as abnormal conditions during planned inspections. Each of these notifications were identified timely by our QEWs and scheduled for the appropriate corrective action in accordance with our maintenance standard/procedures and GO 174 requirements. Therefore, we do not believe that these 65 notifications qualify as GO 174, Rule 12 violations.

1. Live Oak Switching Station

- 1.1. Circuit Breaker 182 has a faded exterior warning label. PG&E has existing Notification #127308651 for this issue.



PG&E Response:

We agree with the finding that Circuit Breaker 182 has a faded exterior warning label, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127308651. This will be completed based on current work prioritization and material availability.

1.2. Circuit Breaker 172 has a faded exterior warning label.



PG&E Response:

We agree with the finding of a faded warning label on Circuit Breaker 172 at Live Oak Switching Station. We created notification 129696173, and this work will be completed based on current work prioritization and material availability.

1.3. Circuit Breaker 182 has a faded counter. PG&E has existing Notification #125255196 for this issue.

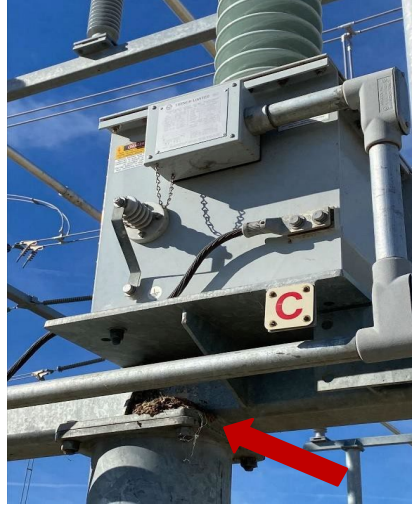


PG&E Response:

We agree with the finding that Circuit Breaker 182 has a faded counter at Live Oak Switching Station, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 125255196. This work was completed on November 30, 2023.

2. Weedpatch Substation

- 2.1. The C Phase Bus Section E has a bird's nest. PG&E removed the bird's nest in the field.



PG&E Response:

We agree with the finding of a bird's nest on the C Phase Bus Section at Weedpatch substation. This was removed/corrected onsite by PG&E QEW on the day of the field audit.

- 2.2. Circuit Breaker 72 has bird's nests. PG&E has existing Notification #126885854 for this issue.



PG&E Response:

We agree with the finding of a bird's nest on Circuit Breaker 72 at Weedpatch Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 126885854. The nest was removed on August 7, 2024.

2.3. Distribution Pole #120073005 has a loose guy wire.



PG&E Response:

We agree with the finding of a loose guy wire on Distribution Pole 120073005 inside Weedpatch Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as EC notification 125821606. This pole was replaced on March 20, 2024.

- 2.4. There are missing grounds throughout the substation. PG&E has existing Notification #127465284 to replace the stolen grounds.



PG&E Response:

We agree with the finding that there are missing grounds on some of the assets in Weedpatch substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127465284. The missing grounds will be replaced based on current work prioritization and material availability.

3. Adobe Switching Station

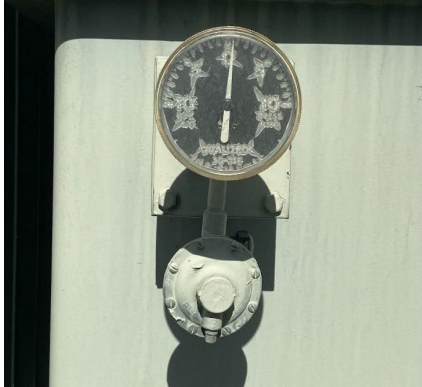
Station missing spare fuses.

PG&E Response:

We agree with the finding that there are no spare fuses at Adobe Switching Station, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127297301. Spare fuses will be added based on current work prioritization and material availability.

4. Tejon Substation

- 4.1. Transformer Bank 1 B Phase has a faded nitrogen pressure gauge. PG&E has existing Notification #127304752 for this issue.



PG&E Response:

We agree with the finding of the faded nitrogen pressure gauge on Transformer Bank 1 B Phase at Tejon Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127304752 and will be completed based on current work prioritization and material availability.

- 4.2. Transformer Bank 1 B Phase has an illegible site glass on a high side bushing. PG&E has existing Notification #127304711 for this issue.



PG&E Response:

We agree with the finding of the illegible site glass on a high side bushing on Transformer Bank 1 B at Tejon Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127304711. The site glass will be cleaned or replaced based on current work prioritization.

4.3. Transformer Bank 2 LTC Liquid Temperature gauge is cracked.



PG&E Response:

We agree with the finding of a cracked liquid temperature gauge cover on Transformer Bank 2 at Tejon Substation. We created notification 129696174 and this work will be completed based on current work prioritization and material availability.

4.4. Station has various large holes in the ground that present tripping hazards. PG&E has existing Notification #124703573 for this issue.



PG&E Response:

We agree with the finding of large holes presenting tripping hazards at Tejon Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 124703573. Tripping hazards will be rectified based on current work prioritization.

5. Old River Substation

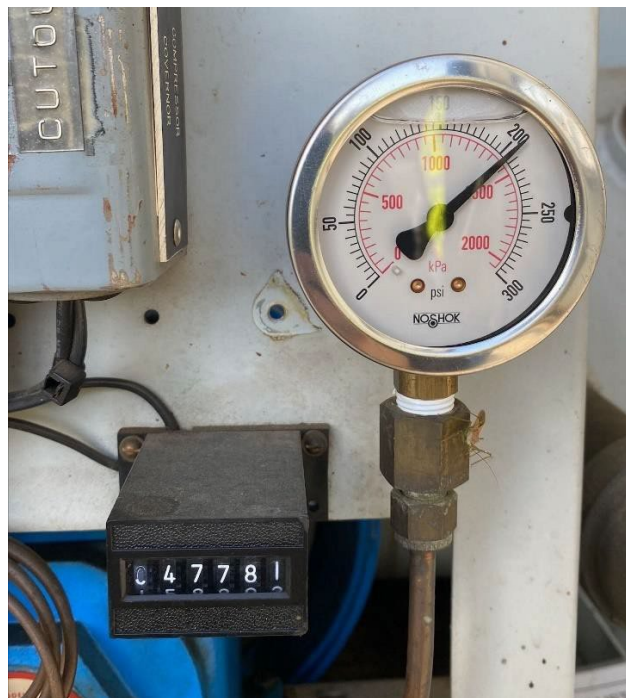
- 5.1. Circuit Breaker 32 has a faded counter. PG&E has existing Notification #127305881 for this issue.



PG&E Response:

We agree with the finding of the faded counter on circuit breaker 32 at Old River Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127305881. This work was completed on September 25, 2024.

- 5.2. Circuit Breaker 12 has a faded counter.



PG&E Response:

We agree with the finding of the faded counter at circuit breaker 12 at Old River Substation. We created notification 129696176, and this work will be completed based on current work prioritization and material availability.

- 5.3. Oil Circuit Breaker 1103 has a faded semaphore. PG&E has existing Notification #127305512 for this issue.



PG&E Response:

We agree with the finding of the faded semaphore on oil circuit breaker 1103 at Old River Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127305512. The semaphore will be replaced based on current work prioritization and material availability.

- 5.4. Transformer Bank 1 has bird's nests in the radiator fins. PG&E has existing Notification # 127304898 for this issue.



PG&E Response:

We agree with the finding of a bird's nest in the radiator fans of Transformer 1 at Old River Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127304898. The nest was removed on September 25, 2024.

6. Rosedale Substation

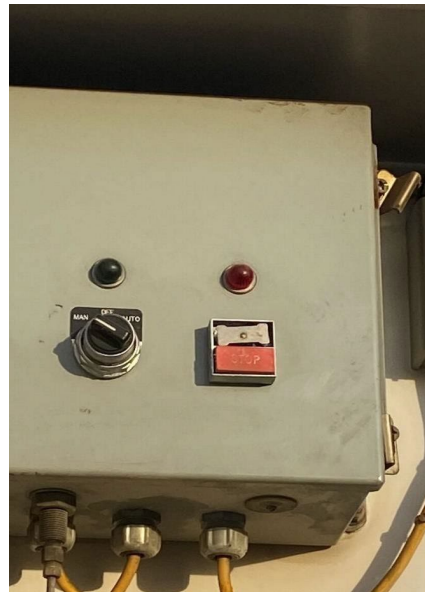
6.1. Transformer Bank 1 Circuit Switcher 176 has a faded counter



PG&E Response:

We agree with the finding of the faded counter at Transformer Bank 1 Circuit Switcher 176 as Rosedale Substation. We created notification 129696177 and this work will be completed based on current work prioritization and material availability.

6.2. Transformer Bank 1 oil filtration system has a missing OPEN button cover and a motor that needs replacement. PG&E has existing Notification #127327829 to replace the motor, and all other issues will be resolved when the repair occurs.



PG&E Response:

We agree with the finding of the missing OPEN button cover and a motor that needs to be replaced on the oil filtration system of Transformer Bank 1 at Rosedale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127327829. This work will be completed based on current work prioritization and material availability.

- 6.3. Circuit Breaker 1102 has a faded counter and a faded semaphore. PG&E has existing Notification #127327491 for the faded counter.



PG&E Response:

We agree with the finding of the faded counter on Circuit Breaker 1102 at Rosedale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127327491. These items will be replaced based on current work prioritization and material availability.

7. Midway Substation

- 7.1. Circuit Breaker 1104/2 has a faded counter and a faded semaphore. PG&E has existing Notification #126254408 for this issue.



PG&E Response:

We agree with the finding that the Circuit Breaker 1104/2 has a faded counter and a faded semaphore at Midway Substation but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 126254408. These items will be replaced based on current work prioritization and material availability.

- 7.2. Transformer Bank 7 (70kV) has extra nitrogen canisters that need to be removed. PG&E has existing Notification #127338464 for this issue.



PG&E Response:

We agree with the finding that Transformer Bank 7 (70kV) has extra nitrogen canisters that need to be removed at Midway Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127338464. The extra canisters will be removed based on current work prioritization.

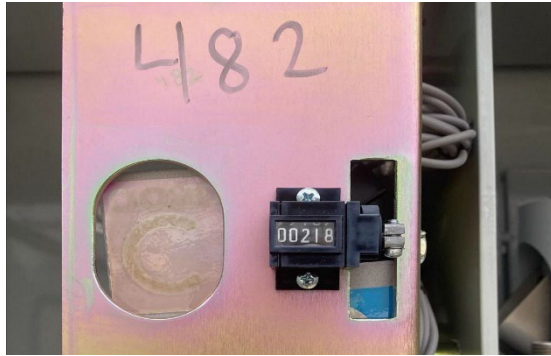
7.3. Transformer Bank 8 (70kV) has a broken X2 winding temperature gauge that is not reading.



PG&E Response:

We agree with the finding of a minor oil seep at Transformer Phase B at Midway Substation. We created notification 129696523, and this work will be completed based on current work prioritization and material availability.

- 7.4. Circuit Breaker 482 has a faded semaphore. PG&E has existing Notification #127337715 for this issue.



PG&E Response:

We agree with the finding that Circuit Breaker 482 has a faded semaphore at Midway Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127337715. The semaphore will be replaced based on current work prioritization and material availability.

- 7.5. Circuit Breaker 572 has a faded counter. PG&E has existing Notification #126281693 for this issue.



PG&E Response:

We agree with the finding that Circuit Breaker 572 has a faded counter at Midway Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 126281693. This will be completed based on current work prioritization and material availability.

7.6. Circuit Breaker 512 has a faded counter. PG&E has existing Notification #126280359 for this issue.



PG&E Response:

We agree with the finding that Circuit Breaker 512 has a faded counter at Midway Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 126280359. This counter will be replaced based on current work prioritization and material availability.

7.7. Circuit Breaker 532 has a faded counter. PG&E has existing Notification #126281046 for this issue.



PG&E Response:

We agree with the finding that Circuit Breaker 532 has a faded counter at Midway Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 126281046. This counter will be replaced based on current work prioritization and material availability.

7.8. Circuit Breaker 552 has a faded counter. PG&E has existing Notification #127346613 for this issue.



PG&E Response:

We agree with the finding that Circuit Breaker 552 has a faded counter at Midway Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127346613. This counter will be replaced based on current work prioritization and material availability.

7.9. Circuit Breaker 212 has a faded counter. PG&E has existing Notification #127346610 for this issue.



PG&E Response:

We agree with the finding that the counter on Circuit Breaker CB212 has a faded counter at Midway Substation but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127346610. This counter will be replaced based on current work prioritization and material availability.

7.10. Circuit Breaker 672 has a faded counter. PG&E has existing Notification #126293369 for this issue.



PG&E Response:

We agree with the finding that the counter on Circuit Breaker 672 has a faded counter at Midway Substation but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 126293369. This counter will be replaced based on current work prioritization and material availability.

7.11. Circuit Breaker 292 has a faded counter. PG&E has existing Notification #126281199 for this issue.



PG&E Response:

We agree with the finding that the counter on Circuit Breaker 292 has a faded counter at Midway Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 126281199. This counter will be replaced based on current work prioritization and material availability.

7.12. Transformer Bank 12 C Phase has a leaking nitrogen system that is not displaying positive pressure and an empty nitrogen tank. PG&E has existing Notification #127353472 for this issue.



PG&E Response:

We agree with the finding that Transformer Bank 12, C Phase, has a leaking nitrogen system that is not displaying positive pressure and an empty nitrogen tank at Midway Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127353472. This will be completed based on current work prioritization.

7.13. Circuit Breaker 822 has a faded counter.

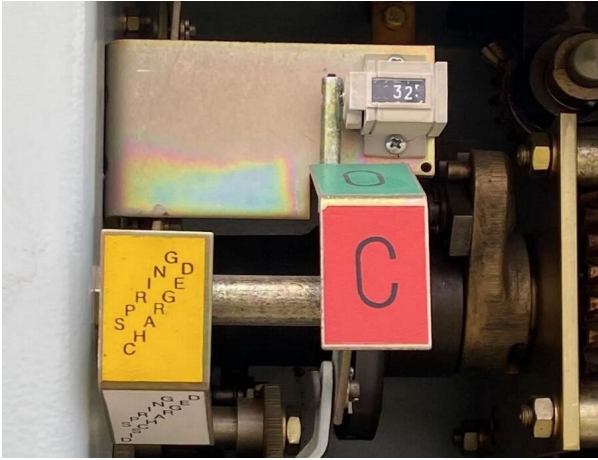


PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 822 at Midway Substation. We created notification 129696524, and this counter will be replaced based on current work prioritization and material availability.

8. Semitropic Substation

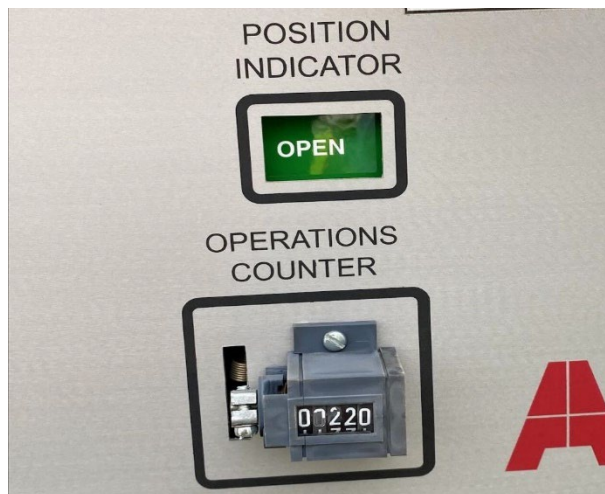
8.1. Circuit Breaker 152 has a faded counter. PG&E has existing Notification #127286609 for this issue.



PG&E Response:

We agree with the finding that there is a faded counter on Circuit Breaker 152 at Semitropic Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127286609. This counter will be replaced based on current work prioritization and material availability.

8.2. Circuit Breaker 1112 has a faded counter.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 1112 at Semitropic Substation. We created notification 129696526, and this work will be completed based on current work prioritization and material availability.

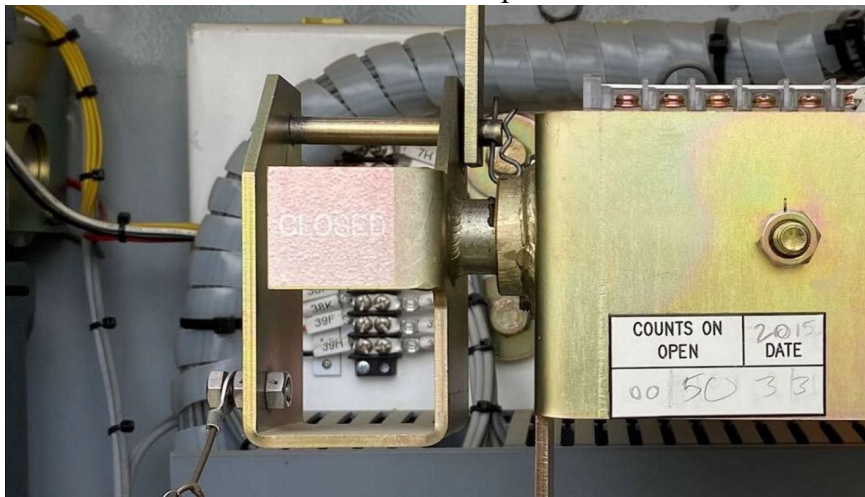
8.3. Circuit Breaker 1110 has a faded counter. PG&E has existing Notification #127286600 for this issue.



PG&E Response:

We agree with the finding that there is a faded counter on Circuit Breaker 1110 at Semitropic Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127286600. This counter will be replaced based on current work prioritization and material availability.

8.4. Circuit Breaker 142 has a faded semaphore.



PG&E Response:

We agree with the finding of a faded semaphore on Circuit Breaker 142 at Semitropic substation. We created notification 129696525, and this work will be completed based on current work prioritization and material availability.

- 8.5. Circuit Breaker 1106 has a faded semaphore. PG&E has existing Notification #127286516 for this issue.



PG&E Response:

We agree with the finding that there is a faded semaphore on Circuit Breaker 1106 at Semitropic Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127286516. The semaphore will be replaced based on current work prioritization and material availability.

- 8.6. Transformer Bank 1 A Phase has a discolored desiccant that needs replacement. PG&E has existing Notification #127287729 for this issue.



PG&E Response:

We agree with the finding that there is a discolored desiccant that needs replacement on Transformer Bank 1, A Phase, at Semitropic Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127287729. The desiccant will be replaced based on current work prioritization.

- 8.7. Transformer Bank 1 B Phase has a discolored desiccant that needs replacement. PG&E has existing Notification #127287761 for this issue.



PG&E Response:

We agree with the finding that there is a discolored desiccant that needs replacement on Transformer Bank 1, B Phase, at Semitropic Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127287761. The desiccant will be replaced based on current work prioritization.

- 8.8. Transformer Bank 1 C Phase has a discolored desiccant that needs replacement. PG&E has existing Notification #127287768 for this issue.



PG&E Response:

We agree with the finding that there is a discolored desiccant that needs replacement on Transformer Bank 1, C Phase, at Semitropic Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127287768. The desiccant will be replaced based on current work prioritization.

8.9. Transformer Bank 1 Spare has a discolored desiccant that needs replacement. PG&E has existing Notification #127288117 for this issue.



PG&E Response:

We agree with the finding that there is a discolored desiccant that needs replacement on Transformer Bank 1, Spare, at Semitropic Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127288117. The desiccant was replaced on October 2, 2024.

9. Shafter Substation

9.1. Circuit Breaker 1022 has bird's nests. PG&E has existing Notification #127310855 for this issue.



PG&E Response:

We agree with the finding that there are bird's nests on Circuit Breaker 1022 at Shafter Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127310855. The nests were removed on October 15, 2024.

9.2. Circuit Breaker 1062 has bird's nests. PG&E has existing Notification #127316803 for this issue.



PG&E Response:

We agree with the finding that there are bird's nests on Circuit Breaker 1062 at Shafter Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127316803. The nest will be removed based on current work prioritization.

9.3. Transformer Bank 1 has a spare tank/cylinder that needs to be removed.



PG&E Response:

We agree with the finding of a spare tank/cylinder that needs to be removed on Transformer Bank 1 at Shafter Substation. We created notification 129696529, and this work will be completed based on current work prioritization and material availability.

9.4. Air Switch 1041 has bird's nests in the A Phase, B Phase, and C Phase. PG&E has existing Notification #127310758 for this issue.



PG&E Response:

We agree with the finding of bird's nests in the A, B, and C phase of Air Switch 1041 at Shafter Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127310758. The nests were removed on October 16, 2024.

9.5. Air Switch 1033 has bird's nests in the A Phase, B Phase, and C Phase. PG&E has existing Notification #127310757 for this issue.



PG&E Response:

We agree with the finding of bird's nests in the A, B, and C phase of Air Switch 1033 at Shafter Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127310757. The nests were removed on October 16, 2024.

10. Elk Hills Substation

10.1. Transformer Bank 1 has an empty nitrogen tank.

PG&E Response:

We agree with the finding of an empty nitrogen tank that needs to be removed on Transformer Bank 1 at Elk Hills Substation. During our routine station inspection on December 5, 2023, this bottle was replaced, and the new reading of the nitrogen bottle was 1800 psi.

11. Norco Substation

- 11.1. Station batteries (Numbers 32, 39, 42, 44, 46, 47, 48, 49) have low water levels. PG&E has existing Notification #127206385 to clean and fill the batteries and existing Notification #126622566 to replace the station batteries.

PG&E Response:

We agree with the finding of low water levels on Batteries (32, 39, 42, 44, 46, 47, 48, & 49) at Norco Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified these issues prior to the CPUC field audit and documented them in our system of record as notifications 127206385 and 126622566. The work to clean and fill the batteries, notification 127206385, was completed on December 6, 2023. An additional notification 126622566 is in place to replace the batteries and will be completed based on current work prioritization and material availability.

- 11.2. Circuit Breaker 1102 has a faded semaphore. PG&E has existing Notification #127292280 for this issue.



PG&E Response:

We agree with the finding of a faded semaphore on Circuit Breaker 1102 at Norco Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127292280. The semaphore will be replaced based on current work prioritization and material availability.

11.3. Air Switch 175 has a bird's nest. PG&E has existing Notification #127291098 for this issue.



PG&E Response:

We agree with the finding of a bird's nest on Air Switch 175 at Norco Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127291098. The nest will be removed based on current work prioritization.

12. Stockdale Substation

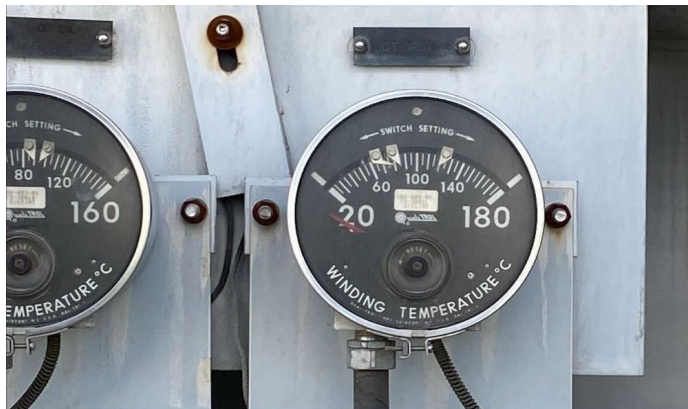
- 12.1. Transformer Bank 1 has a broken cover on the winding temperature gauge. PG&E has existing Notification #127327898 for this issue.



PG&E Response:

We agree with the finding of a broken cover on the winding temperature gauge on Transformer Bank 1 at Stockdale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127327898. The cover will be replaced based on current work prioritization and material availability.

- 12.2. Transformer Bank 6 has a broken winding temperature gauge that is not reading. PG&E has existing Notification #127327924 for this issue.



PG&E Response:

We agree with the finding of a broken winding temperature gauge that is not reading on Transformer Bank 6 at Stockdale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127327924. The gauge will be repaired based on current work prioritization and material availability.

12.3. Circuit Breaker 222 has a faded counter. PG&E has existing Notification #127328784 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 222 at Stockdale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127328784. This counter will be replaced based on current work prioritization and material availability.

12.4. Circuit Breaker Bank 5/22 has a faded counter. PG&E has existing Notification #127328787 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker Bank 5/22 at Stockdale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127328787. This counter was replaced on March 7, 2024.

12.5. Circuit Breaker 2106 has a faded counter. PG&E has existing Notification #127328726 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 2106 at Norco Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127328726. This counter will be replaced based on current work prioritization and material availability.

12.6. Circuit Breaker 2107 has a faded counter. PG&E has existing Notification #127328729 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 2107 at Stockdale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127328729. This counter will be replaced based on current work prioritization and material availability.

12.7. Circuit Breaker 2109 has a faded counter. PG&E has existing Notification #127328781 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 2109 at Stockdale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127328781. This counter will be replaced based on current work prioritization and material availability.

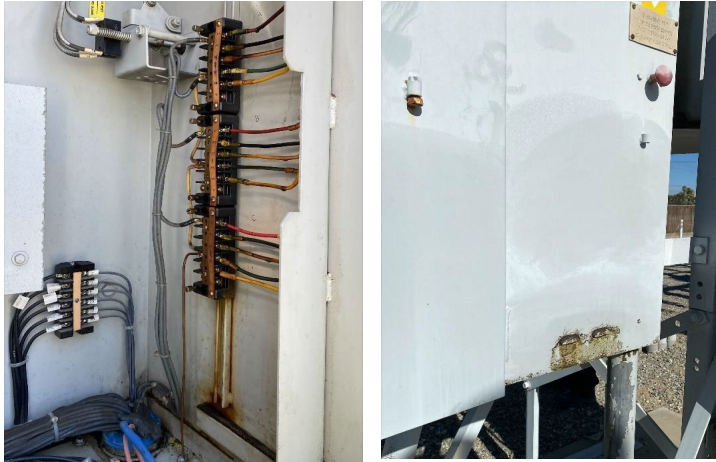
12.8. Circuit Breaker 2111 oil tank has oil residue. PG&E has existing Notification #127329067 to clean the oil tank.



PG&E Response:

We agree with the finding that there is residue on the oil tank of Circuit Breaker 2111 at Stockdale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127329067. The residue will be removed based on current work prioritization and material availability.

- 12.9. Circuit Breaker 2111 has oil residue on the inside and outside of the cabinet. PG&E has existing Notification #127329695 to clean the cabinet.



PG&E Response:

We agree with the finding that there is oil residue on the inside and outside of the cabinet of Circuit Breaker 2111 at Stockdale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127329695. This work was completed on June 7, 2024.

- 12.10. Circuit Breaker 2113 oil tank has oil residue and a possible oil leak. PG&E has existing Notification #127329260 to clean the oil tank and check for oil weeping.



PG&E Response:

We agree with the finding that there is oil residue on the oil tank of Circuit Breaker 2113 at Stockdale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127329260. However, this notification has since been cancelled as this circuit breaker is currently being replaced under capital project 74058429.

- 12.11. Circuit Breaker 2113 has oil residue on the inside of the cabinet. PG&E has existing Notification #127329751 to clean the cabinet interior.



PG&E Response:

We agree with the finding that there is oil residue on the inside of the cabinet of Circuit Breaker 2113 at Stockdale Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127329751. However, this notification has since been cancelled as this circuit breaker is currently being replaced under capital project 74058429.

13. Kern Power Distribution Substation

13.1. Circuit Breaker 292 has a faded counter.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 292 at Kern Power Plant Distribution Substation. We created notification 127493062, and this work will be completed based on current work prioritization and material availability.

- 13.2. Circuit Breaker 2103 has a faded counter. PG&E has existing Notification #127325805 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 2103 at Kern Power Plant Distribution Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127325805. This counter will be replaced based on current work prioritization and material availability.

- 13.3. Circuit Breaker 2101 has a faded counter. PG&E has existing Notification #127325804 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 2101 at Kern Power Plant Distribution Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127325804. This counter will be replaced based on current work prioritization and material availability.

- 13.4. Circuit Breaker 2700 has a faded semaphore. PG&E has existing Notification #127325746 for this issue.



PG&E Response:

We agree with the finding of a faded semaphore on Circuit Breaker 2700 at Kern Power Plant Distribution Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127325746. The semaphore will be replaced based on current work prioritization and material availability.

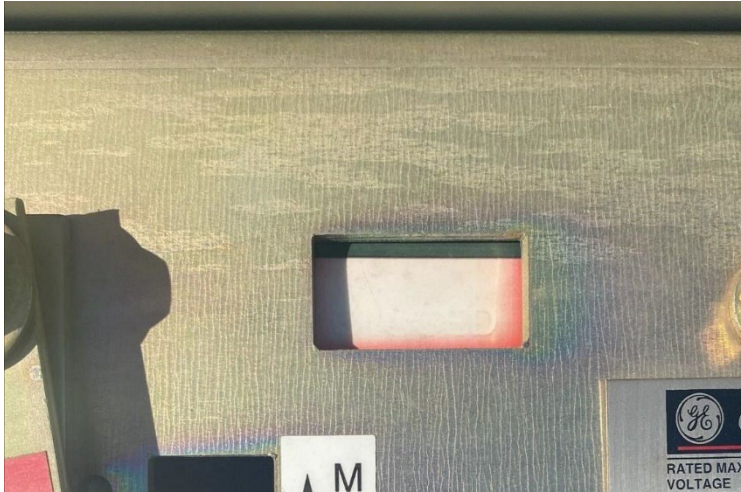
- 13.5. Circuit Breaker 2104 has a faded counter. PG&E has existing Notification #127325806 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 2140 at Kern Power Plant Distribution Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127325806. This counter will be replaced based on current work prioritization and material availability.

13.6. Circuit Breaker 2104 has a faded semaphore. PG&E has existing Notification #127325743 for this issue.



PG&E Response:

We agree with the finding of a faded semaphore on Circuit Breaker 2700 at Kern Power Plant Distribution Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127325743. This semaphore will be replaced based on current work prioritization and material availability.

13.7. Transformer Bank 6 has an empty nitrogen bottle.

PG&E Response:

We agree with the finding of transformer bank 6 having an empty nitrogen bottle at Kern Power Plant Distribution Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127327662. The nitrogen bottle was replaced on January 12, 2024.

14. Bakersfield Substation

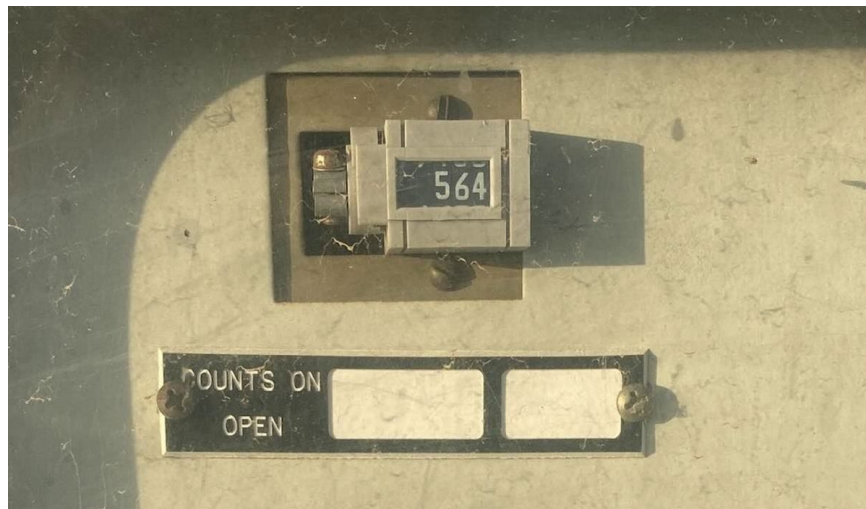
14.1. Circuit Breaker 1101 has a faded counter.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 1101 at Bakersfield Substation. We created notification 129696528, and this counter will be replaced based on current work prioritization and material availability.

14.2. Circuit Breaker 1105 has a faded counter. PG&E has existing Notification #127286648 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 1105 at Bakersfield Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127286648. This counter will be replaced based on current work prioritization and material availability.

- 14.3. Circuit Breaker 1114 has a faded semaphore. PG&E has existing Notification #127286604 for this issue.



PG&E Response:

We agree with the finding of a faded semaphore on Circuit Breaker 1114 at Bakersfield Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127286604. The semaphore will be replaced based on current work prioritization and material availability.

- 14.4. Circuit Breaker 1106 has a faded counter. PG&E has existing Notification #12728668 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 1106 at Bakersfield Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127286681. This counter will be replaced based on current work prioritization and material availability.

- 14.5. Circuit Breaker 2300 has a faded counter. PG&E has existing Notification #127286685 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 2300 at Bakersfield Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127286685. This counter will be replaced based on current work prioritization and material availability.

- 14.6. Circuit Breaker Bank 5/22 has a faded counter. PG&E has existing Notification #127286689 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker Bank 5/22 at Bakersfield Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127286689. This counter will be replaced based on current work prioritization and material availability.

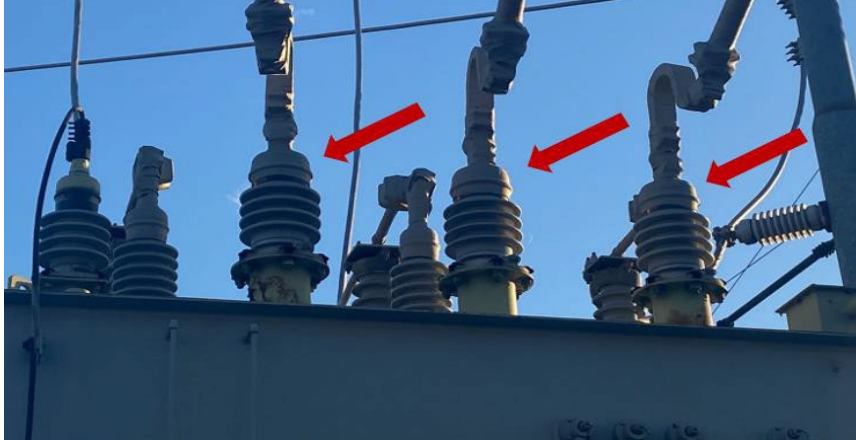
14.7. Circuit Breaker 2200 has a faded counter. PG&E has existing Notification #127286684 for this issue.



PG&E Response:

We agree with the finding of a faded counter on Circuit Breaker 2200 at Bakersfield Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127286684. This counter will be replaced based on current work prioritization and material availability.

14.8. Transformer Bank 5 has animal guarding that is covering the low side bushing sight glasses and making the oil levels unreadable.



PG&E Response:

We agree with the finding that the oil levels are unreadable due to the animal guard on Transformer Bank 5 at Bakersfield Substation. We created notification 127493066, and this work will be completed based on current work prioritization and material availability.

14.9. Distribution Pole #120070956 has a loose guy wire.

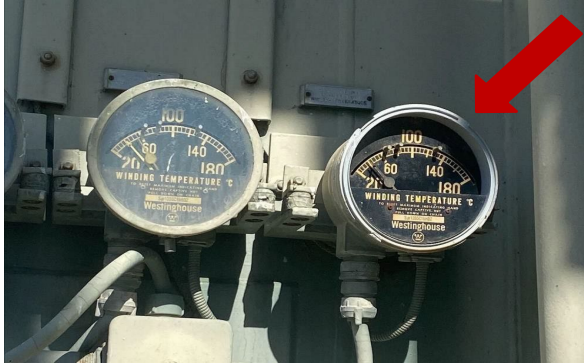


PG&E Response:

We agree with the finding that the distribution pole has a loose guy wire at Bakersfield Substation. but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as EC notification 122166986. The guy wire will be repaired based on current work prioritization.

15. Ganso Substation

- 15.1. Transformer Bank 1 Winding Temperature Gauge is dirty and missing the glass cover. PG&E cleaned the gauge and replaced the cover in the field.



PG&E Response:

We agree with the finding that the Winding Temperature Gauge is dirty and missing its glass cover on Transformer Bank 1 at Ganso Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

- 15.2. Transformer Bank 1 has bird's nests in the radiator fins. PG&E has existing Notification # 127303938 for this issue.



PG&E Response:

We agree with the finding of bird's nests in the radiator fins on Transformer Bank 1 at Ganso Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as notification 127303938. The nest will be removed based on current work prioritization.