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**September 18, 2024**

**Rickey Tse, P.E.**  
**Program and Project Supervisor**  
**Electric Safety and Reliability Branch**  
**Safety and Enforcement Division**  
**California Public Utilities Commission**  
**505 Van Ness Avenue**  
**San Francisco, CA 94102-3298**

Dear Mr. Tse,

Subject: Response to Electric Transmission and Distribution Facilities Audit Report (EA2024-1174)

Thank you for your letter dated August 28, 2024, detailing the findings from the Electric Safety and Reliability Branch's (ESRB) audit of Redding Electric Utility's (REU) electric transmission and distribution facilities conducted from April 29 to May 3, 2024. We appreciate the thoroughness of the audit and the opportunity to address the identified areas of concern.

The REU management team has reviewed the audit report and would like to provide our response, outlining the corrective actions and preventive measures that REU will undertake to address the findings. Our response is organized into the following categories:

## **1. Records Management and Documentation**

REU recognizes the importance of accurate and comprehensive records management. In response to the findings related to record retention and documentation gaps, we are implementing the process improvements listed below:

- Extending our record retention period to meet or exceed regulatory requirements.
- Enhancing our data management systems to ensure all inspections and maintenance activities are accurately recorded and easily retrievable. This effort includes the following:
  - Updating our inspection guideline document "Overhead and Underground Asset Inspection and Preventative Maintenance Guidelines (2023)" to ensure it aligns with all CPUC General Order (GO) requirements and industry best practices.

- Developing a new inspection program management tool built on our ESRI GIS platform. This tablet-based field inspection tool will ensure all aspects of our inspection program aligns with the "Overhead and Underground Asset Inspection and Preventative Maintenance Guidelines (2023)." This is a large project that includes an overhaul of our GIS database, development of new tablet-based tools to replace paper maps, and retraining of our inspection staff. This new database will incorporate the required inspection record retention periods, will give our manager tools to ensure all patrol, detailed and intrusive cycles are completed on time, and will ensure data quality by enforcing the required fields in the electronic data collection form.
- In April of 2024, we launched a new work order management database to replace our paper processes. Using this new database, all inspection driven maintenance work orders and field tags will be tracked through completion, and all maintenance records will be retained for the required retention periods defined in the GO. This new database tracks inspection driven work orders and field tags, and will include initiation date and due date based on the date a defect is identified and the defect priority level.

## 2. General Compliance Violations

REU acknowledges the identified general compliance violations of GO 95, 128, 165, and 174, which included records retention violations, corrective action timelines that do not adhere to GO requirements, missing information, and required updates to our substation inspection guidelines. To address these, our corrective actions include:

- The efforts described in Section 1 will address most of these compliance violations for the transmission system and overhead and underground distribution system.
- However, to address these violations at the substation level, we will develop new guidelines, data collection tools, and methods that align the GO 174 requirements as substations have not been addressed in the "Overhead and Underground Asset Inspection and Preventative Maintenance Guidelines (2023)", the tablet-based data collection tools or the work order database. These guidelines will address many of the findings related to substations including infrared test conditions and criteria, infrared inspection documentation and condition ratings, priority ratings and correction due dates.

## 3. Inspection and Maintenance Procedures

As described in Section 1, to improve our inspection and maintenance procedures and ensure the safety and reliability of our facilities, REU is updating our inspection guideline document, "Overhead and Underground Asset Inspection and Preventative Maintenance Guidelines (2023)" to ensure it aligns with all CPUC GO requirements and industry best practices. This project will be expanded to include substations.

#### **4. Substation-Specific Issues**

In response to the specific issues identified within our substations, including fire extinguisher inspections, oil leaks, and unreadable equipment counters, we are taking immediate corrective measures to address all findings.

#### **5. Field Inspection Findings**

We have reviewed the field inspection findings and are taking the following actions to address the noted deficiencies:

- Repairing or replacing damaged and deteriorated infrastructure, such as crossarms, insulators, and high voltage signs and obstructed climbing spaces. The findings from the report have been added to our inspection database and will be addressed based on the assigned priority level.
- Working with our inspection team to conduct a root cause analysis to understand gaps in our processes and what can be improved to ensure we do a better job identifying failure or gaps in the future. Lessons learned will be incorporated into the revised "Overhead and Underground Asset Inspection and Preventative Maintenance Guidelines (2023)".

#### **6. Third-Party and Communication Facilities**

REU is committed to coordinating with third-party companies to ensure compliance and safety standards are upheld. We are taking the following actions:

- REU will present the findings of the ESRB audit to all franchise and joint pole owners and initiate efforts to improve coordination.
- Coordination efforts will be documented in the revised version of the "Overhead and Underground Asset Inspection and Preventative Maintenance Guidelines (2023)".
- All processes will be updated to ensure coordination efforts are effectively implemented.

#### **7. Late Work Orders**

ESRB identified several late work orders and work orders with missing dates. REU has reviewed these open inspections and developed the following corrective action plan:

- 1) All open inspections will be reviewed and if repairs are required, they will be assigned a priority level. This task will be completed by December 1<sup>st</sup>, 2024.
- 2) Overdue open inspections with a priority rating 1-4 will be assigned a due date not to exceed 12 months, and will be repaired by this due date.
- 3) Overdue open inspections with a priority rating 5 (minor wear and tear but no functional degradation) will be re-evaluated on the next inspection cycle.

## Conclusion

REU management takes the findings of the ESRB audit very seriously and are committed to addressing all identified issues promptly and thoroughly. REU is dedicated to maintaining the highest standards of safety and reliability in our operations. In the next ESRB audit in or around 2029, we will strive to have industry leading tools and processes in place that result in a finding of few or no compliance violations.

Should you have any questions or require additional information, please do not hesitate to contact me.

Thank you for your attention to this matter.

Sincerely,



Nick Zettel  
Electric Utility Director  
Redding Electric Utility