PG&E SAN JOSE DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
APRIL 22 – 26, 2024

I. Records Review

During the distribution audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for PG&E's San Jose Division:

- Electric Distribution Preventive Maintenance Manual, December 15, 2023
- TD-2305M-B006, Revised Distribution Inspection Guidelines, January 24, 2020
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, August 02, 2022
- TD-2301S, Patrols and Detailed/Intrusive Inspections of Electric Overhead and Underground Distribution Facilities, May 15, 2020
- Electric Corrective Notifications list, January 2019 – December 2023
- Distribution facilities statistics and their wildfire risks, including equipment risks and vegetation risks.
- San Jose Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, February 2019 – February 2024
- San Jose Division Reliability Indexes and Outage list, March 2019 – February 2024
- San Jose Division New Projects list, February 2023 – February 2024
- Pole Loading Calculations list, August 2022 – March 2024
- Incoming Third-Party Notifications list, February 2019 – February 2024
- Outgoing Third-Party Notifications list, February 2019 – February 2024
- Inspector training records, January 2019 – February 2024
- Equipment test records, March 2019 – February 2024
- Intrusive Inspections, February 2023 – February 2024
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review
- San Jose Division Quality Management Audit Results, 2019– 2024

II. Records Violations

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

1. **General Order (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 maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:*
>
> *(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:*
> - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
>
> *(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*
> - *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*
>
> *(iii) Level 3 -- Any risk of low potential impact to safety or reliability:*
> - *Take corrective action within 60 months subject to the exception specified below."*

GO 95, Rule 31.1, Design, Construction and Maintenance states in part**:**

> *"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment."

GO 128, Rule 17.1, Design, Construction and Maintenance states in part:

"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment."

ESRB staff reviewed late work orders completed within the San Jose Division for January 2019 – December 2023, shown in Table 1. PG&E's Electric Distribution Preventative Maintenance (EDPM) Manual, published on December 15, 2023, defines the priority codes and associated time frames for the response/repair action as follows:

- *Priority A – Safety / Emergency Immediate Response An emergency is defined as any activity in response to an outage to customer(s) or an unsafe condition requiring immediate response or standby to protect the public.*
- *Priority B – Urgent Compliance (Due within 3 months)*
- *Priority E – Compliance (Due 3-12 months)*
- *Priority F – Compliance (For Regulatory Conditions, the Recommended Repair Date is the due date for the next Inspection (UG = 3 years, OH = 5 years)."*

ESRB staff reviewed late work orders and determined that PG&E did not address a total of 14,527 work orders by their assigned due date. Table 1 below breaks down the 14,527 late work orders by their given priority, including the total number of late work orders completed, pending, and canceled work orders, which are included in the total.

Table 1: Late Work Orders in San Jose Division

Priority Code	Late Work Orders Completed*	Late Work Orders Pending	Late Work Orders Cancelled	Total by Priority
A	606 (361)**	-	-	967
B	1,052	339	359	1,750
E	1,630	8,386	1,805	11,821
F	7	338	5	350
Total	3,295 (3,656)	9,063	2,169	**14,527**

* For Priority A notifications recorded prior to 2020, PG&E did not have adequate mechanisms to track immediate responses to Priority A Notifications. Due to the lack of the tracking mechanism, each of the identified late notifications would require an extensive manual review to validate the accuracy of the

completion date. Therefore, PG&E's internal analysis of completed late Priority A notifications includes potentially late Priority A EC notifications.
** Priority A notifications of 361 includes work that is categorized as Priority A (e.g., the data includes Fire Rebuilds and Vegetation Management) but is not an "emergency" as that term is defined for Priority A.

PG&E shall provide ESRB with its corrective action plan to complete the 9,063 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

PG&E Response:

Priority A EC Notifications
No late pending work orders within audit data provided to CPUC for Routine or Major Emergency.

Priority B EC Notifications
We reviewed the 339 late pending Priority B Electric Corrective (EC) notifications that were identified in the pre-audit data request, and we have since addressed 243: we completed 221 notifications and 22 are cancelled. The remaining 96 are pending completion.

Priority E EC Notifications
We reviewed the 8,386 late pending Priority E EC notifications that were identified in the pre-audit data request, and we have since addressed 232: we completed 152 notifications and 80 are cancelled. The remaining 8,154 are pending completion.

Priority F EC Notifications
We reviewed the 338 late pending Priority F EC notifications that were identified in the pre-audit data request, and we have since addressed 28: we completed 27 notifications and one is cancelled. The remaining 310 are pending completion.

Corrective Action Plan for Tag Completion and Going Forward Compliance
In 2019, we began the Wildfire Safety Inspection Program (WSIP) to proactively expand inspections of poles and associated equipment in High Fire Threat Districts (HFTD)/High Fire Risk Areas (HFRA) on an accelerated and enhanced basis to mitigate ignition risk. The WSIP inspections led to a significant increase in the volume of notifications.

Along with the WSIP inspections, other programs added notifications to the backlog such as Pole Test and Treat (PT&T), Post-Event Patrols, Patrol Inspections, and Infrared Inspections.

We have developed a plan to reduce the wildfire risk associated with the backlog of ignition-risk tags in HFTD/HFRA by 77 percent at the end of the 2023-2025 Wildfire Mitigation Plan (WMP) cycle. We submitted details of the work plan in PG&E's 2023-2025 WMP R3 (revision 3).

Our highest priority is to complete all A and B tags based on required compliance dates:

- Priority A tags (Level 1 under GO 95) require response by taking corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority; and

- Effective April 29, 2024, Priority B (Level 2 under GO 95) tags are addressed within six months for potential violations that create risk of at least moderate potential impact to safety or reliability per bulletin TD-8123S-B001 Level 2 Priority B Tag Management Requirements.

We divide remaining notifications into two groups: (1) ignition risk notifications in the HFTD/HFRA; and (2) non-ignition risk notifications in the HFTD/HFRA. Ignition risk notifications in HFTD/HFRA areas are the highest priority in this group of notifications. Our focus is on HFTD ignition risk tags as our risk analysis indicates that these types of tags contain 20 times more risk than non-ignition or non-HFTD tags.

Tags identified prior to 2023 will be prioritized by considering risk. We began bundling work by isolation zones starting in 2023 to reduce customer impact and improve operational efficiency and safer coworker conditions. Our 2023 work plan and WMP commitment was to reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA by 48 percent; in 2023, we exceeded this target and reduced the backlog ignition-risk in HFTD/HFRA by over 52 percent. Our 2024 work plan and WMP commitment is to reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA by 68 percent (2023 and 2024 combined).

In 2024, we are expanding prioritization of E and F tags through a bundled risk spend efficiency approach. A and B tags are not planned to be included in the bundling approach. While we anticipate that most of the E and F tags will be prioritized this way, there will be instances where a different approach may be warranted.

The bundled risk spend efficiency approach will enable us to execute EC notifications more efficiently by reducing the number of times we perform corrective work on the same circuit, executing more tags with the same resources, and reducing the number of clearances required to close tags. We are proposing to use the bundled risk spend efficiency approach through 2029 to reduce our backlog of tags.

Table 2 below identifies the most overdue and late non-exempt work orders for each priority. The late work orders have been closed and the past-due work orders are still open, as of February 22, 2024.

Table 2: Most Overdue Work Orders*

Priority Code	Most Past Due Work Orders (WO#s)	Number of Days Past Due**
A	119659420	31
B	116682597	1,447
E	116788563	1,621
F	117691877	1,301

*Days past due determined using the Required End Date noted in Data Request Response 3
**As of February 22, 2024

PG&E identified work order #119659420 (A-Closed) on August 22, 2020, to replace a burned pole with a required end date of August 28, 2020. As of February 22, 2024, PG&E's records indicate that the order is closed.

PG&E Response:

Priority A Notifications
We created Priority A EC notification 119659420 on August 23, 2020 to replace a pole that was destroyed during the SCU Lightning Complex. Emergency conditions are remedied prior to these tag creations. We completed this notification during the OEC activation for the event. This was a large-scale wildfire event that consumed several hundred poles along multiple circuits in the area, and rebuild efforts took place while the OEC was active for multiple weeks. Work was completed at this location on September 28, 2020.

PG&E identified work order #116682597 (B-Open) on March 7, 2019, to replace a damaged pole with a required end date of March 7, 2020. As of February 22, 2024, PG&E's records indicate that the order is still open.

PG&E Response:

Priority B Notifications
We created Priority E EC notification 116682597 on March 7, 2019 for woodpecker damage. The tag was identified to be worked under hardening project in June 2019 and was released as individual pole project in August 2019. It was upgraded to a Priority B tag July 2023 after safety reassessment stated extensive pole damage. Currently, it is waiting on Caltrans permit.

PG&E identified work order #116788563 (E-Open) on March 19, 2019, to replace a decayed pole with a required end date of September 15, 2019. As of February 22, 2024, PG&E's records indicate that the order is still open.

PG&E Response:

Priority E Notifications
We created Priority E EC notification 116788563 on March 20, 2019 for wood pole damage. The tag was identified to be worked under hardening project in June 2019 and was released as individual pole project in August 2019. Regular Safety Reassessments are being conducted annually. Currently, this tag is an E tag on the 2026 work plan.

PG&E identified work order #117691877 (F-Open) on July 31, 2019, to test an overloaded pole with a required end date of July 31, 2020. As of February 22, 2024, PG&E's records indicate that the order is still open.

PG&E Response:

Priority F EC Notifications

We created Priority F EC notification 117691877 on July 31, 2019 to test an overloaded pole due to third party attachments. Currently, this tag is still open.

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

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

GO 165, Section III-B, Standards for Inspection states 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."

Table 1: Distribution Inspection Cycles (Maximum Intervals in Years)

	Patrol		Detailed		Intrusive	
	Urban	Rural	Urban	Rural	Urban	Rural
Transformers						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Switching/Protective Devices						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Regulators/Capacitors						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Overhead Conductor and Cables	1	2[1]	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

a. ESRB staff identified that PG&E completed a total of 4,864 patrol and detailed inspections of padmount/underground (UG) and overhead (OH) electric facilities past their GO 165 required completion dates, as shown in Table 3.

Table 3: Late Patrols and Detailed Inspections in San Jose Division

Year	OH Patrol	OH Detailed Inspection	UG Patrol	UG Detailed Inspection	Total Structures
2019	-	-	-	-	-
2020	-	1,198	-	-	1,198
2021	60	3,601	-	2	3,663
2022	-	3	-	-	3
2023*	-	-	-	-	-
2024**	-	-	-	-	-
Total	60	4,802	0	2	**4,864**

* Preliminary information, final report due July 1, 2024
**Preliminary information, final report due July 1, 2025

PG&E's Response:

In 2020, the 1,198 late Overhead (OH) inspections in our service territory of San Jose Division were late due to external weather events. On August 15, 2020, unprecedented lightning strikes occurred throughout our territory resulting in multiple fires across California. As these fires grew, they were blended into the August Complex, the North Complex, the LNU Lightning Complex, the SCU Lightning Complex, the SQF Complex, and the Creek Fire. Because it took several months for these fires to be contained, many of our assets were not accessible due to the unsafe field conditions. During the time of the fires, our priority was to restore service to our customers safely, which also impacted these units from being completed on time. Furthermore, we had multiple PSPS events take place in September, October, and November compounding the planned patrol and detailed inspections. Consequently, by the end of 2020, OH inspections were completed after their GO 165 due dates. We identified and included the 1,198 assets as late inspections in our 2020 GO 165 Annual Report.

In 2021, the 3,706 OH assets patrolled on 60 maps and 3,601 OH inspections in our service territory of San Jose Division were late due to our WMP commitment in 2020 to prioritize our detailed inspections in HFTD areas prior to peak fire season. This change in inspection priorities caused a misalignment to CPUC due dates as defined in GO 165. Consequently, by the end of 2021, OH patrols and OH inspections were completed after their GO 165 due dates. We mitigated this error by ensuring our workplan reflects both the WMP commitment dates and the GO 165 due dates. We identified and included the 3,706 assets as late patrols and 3,601 assets as late inspections in our 2021 GO 165 Annual Report.

Also, in 2021, the four Underground (UG) assets inspected on two maps in our service territory of San Jose Division were late due to human error and access constraints. While validating a routine report for maps at risk, the Compliance Specialist discovered two assets on UG Map H1414 were inspected late. The San Jose Division completed the two UG inspections on June 1, 2021, after the CPUC due date of May 20, 2021. The other two UG inspections were late due to access issues. During the initial attempt

to inspect, we were unable to locate assets on UG Map H1705 because assets were paved over by asphalt. We coordinated with locate and mark workgroup to assist and external parties for city permit and traffic control because assets were located on city street. Inspections were completed on February 1, 2022, after the CPUC due date of December 30, 2021. We identified and included the four assets as late inspections in our 2021 GO 165 Annual Report.

Additionally, in 2023, the three OH inspections and one UG inspection in our service territory of San Jose Division were late due to a human error and access constraints. These inspections were completed by year end 2023 after their due dates. We identified and included the three OH inspections and one UG inspection as late in our 2023 GO 165 Annual Report.

- **SAP ID 100561380, Human Error**

  Our mapping department identified duplicate photos submitted for a map correction in error for another pole. The pole was re-inspected and completed on December 6, 2023.

- **SAP ID 100613571, Access Constraint**

  Asset was late due to access constraint from a homeless encampment. We were able to obtain access and completed OH inspection on December 11, 2023.

- **SAP ID 100559738, Access Constraint**

  Asset was late due to customer restricting access on property. We were able to obtain access and completed OH inspection on July 31, 2023.

- **SAP ID 107605180, Access Constraint**

  Asset was late due to access restriction due to a delay in acquiring a permit to perform work. The enclosure required cleaning before an inspection could be completed. Once we obtained the approved permit, the enclosure was cleaned. We completed the UG inspection on June 13, 2023.

b. In compliance with GO 165, PG&E's Patrols and Detailed/Intrusive Inspections of Electric Overhead and Underground Distribution Facilities (TD-2301S), published on May 15, 2020, states the following:

   "Intrusive Inspection Testing Cycle of Wood Poles – In addition to wood pole patrols, the following intrusive inspection interval criteria must be met:
   - *Poles that have passed an intrusive inspection require an intrusive test within **20 years** of the previous intrusive test."*

   ESRB staff reviewed the intrusive inspection records for February 22, 2023 to February 22, 2024 and identified that PG&E completed a total of 13 intrusive inspections of their wood poles past their GO 165 required completion date, as shown in Table 4.

PG&E's Response:

We identified gaps in our Pole Test and Treat (PT&T) program and performed an end-to-end program assessment. We submitted the assessment to the CPUC on December 6, 2023. The 13 poles listed on Table 4 were reported as part of the Sand Creek self-report with inspections completed by September 2023 in accordance with the corrective actions noted in our December 22, 2022 PT&T Supplemental Self-Report letter.

Table 4: Late Intrusive Inspections in San Jose Division

Equipment Number	Equipment Description	Inspection Date (2023)	Previous Inspection Date	PG&E's Response
100618565	Pole – Class: 1 : Wood : 65	5/20/2023	1/1/1996	PT&T inspected this 65-foot pole in 2006; the inspector performed only a visual inspection.
100561501	Pole – Class: 1 : Wood : 80	5/20/2023	1/1/1996	PT&T inspected this 80-foot pole in 2006; the inspector performed only a visual inspection.
100585863	Pole – Class: 2 : Wood : 70	5/20/2023	1/1/1996	PT&T inspected this 70-foot pole in 2006; the inspector performed only a visual inspection.
100591011	Pole – Class: 3 : Wood : 35	5/22/2023	1/1/1996	PT&T inspected this 35-foot wood streetlight pole in 2006; the inspector performed only a visual inspection.
100619018	Pole – Class: 3 : Wood : 65	5/22/2023	1/1/1996	PT&T inspected this 65-foot pole in 2006; the inspector performed only a visual inspection.
100619020	Pole – Class: 3 : Wood : 85	5/22/2023	1/1/1996	PT&T inspected this 85-foot pole in 2006; the inspector performed only a visual inspection.
100561685	Pole – Class: 5 : Wood : 30	5/19/2023	1/1/1996	PT&T inspected this 30-foot wood guy pole in 2006 and 2015; the inspectors performed only a visual inspection (misidentifying the pole as an ET pole).
103098224	Pole – Class: 5 : Wood : 30	5/19/2023	1/1/1996	PT&T inspected this 30-foot wood pole in 2006 and 2016; the inspectors performed only a visual inspection (misidentifying the pole as customer owned).
103543291	Pole – Class: 5 : Wood : 30	5/19/2023	1/1/1996	In 2015 a PT&T inspector wrongly identified this 30-foot guy pole as Not-In-Field.
100623203	Pole – Class: 1 : Wood : 65	5/22/2023	1/1/1997	PT&T inspected this 65-foot pole in 2006; the inspector performed only a visual inspection.
100619017	Pole – Class: 2 : Wood : 65	5/22/2023	1/1/1997	PT&T inspected this 65-foot pole in 2006; the inspector performed only a visual inspection.
100619021	Pole – Class: 2 : Wood : 65	9/2/2023	1/1/1997	PT&T inspected this 65-foot pole in 2006; the inspector performed only a visual inspection.
100619016	Pole – Class: 3 : Wood : 65	4/26/2023	1/1/1997	PT&T inspected this 65-foot pole in 2006; the inspector performed only a visual inspection.

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities in PG&E's San Jose Division:

Location	Structure Type	SAP ID Number
1	Pole	100571663
2	Pole	100571670
3	Pole	100571672
4	Pole	100571673
5	Splice Box	107500856
6	Subsurface Switch	107403113
7	Subsurface Transformer and Switch	107500311
8	Subsurface Junction Box	107388319
9	Pole	100621148
10	Pole	100621147
11	Pole	102349384
12	Pole	100616283
13	Pole	100616282
14	Pole	100616281
15	Pole	100614141
16	Pole	100614143
17	Pole	100614144
18	Pole	100613611
19	Pole	104172788
20	Pole	100609734
21	Pole	100623324
22	Pole	100609735
23	Pole	100609736
24	Pole	100609737
25	Pole	100609731
26	Pole	100609730
27	Pole	100607583
28	Pole	100607582
29	Pole	100607581
30	Pole	100621738
31	Padmount Transformer	107273944
32	Subsurface Junction Box	107482542
33	Padmount Transformer	107273972
34	Padmount Transformer	108197206
35	Padmount Transformer	107273960
36	Subsurface Switch	107576119
37	Pole	103426203
38	Pole	100604178
39	Pole	100605708

40	Pole	100606149
41	Pole	100606718
42	Pole	100603586
43	Pole	103919477
44	Pole	103886713
45	Pole	100604041
46	Pole	100600270
47	Pole	100600271
48	Pole	100600274
49	Pole	100600273
50	Padmount Transformer	107279009
51	Subsurface Junction Box	107501510
52	Subsurface Switch	107434014
53	Subsurface Switch	107647161
54	Subsurface Junction Box	107434019
55	Padmount Transformer	107279002
56	Padmount Transformer	107278968
57	Padmount Transformer	107341509
58	Padmount Transformer	107341517
59	Padmount Transformer	107370770
60	Padmount Transformer	107370772
61	Padmount Transformer	107377210
62	Padmount Transformer	107377207
63	Subsurface Transformer	108308106
64	Secondary Service Box	Adjacent to 108308106
65	Padmount Transformer	107347786
66	Subsurface Switch	107560876
67	Pole	103991499
68	Pole	103991557
69	Pole	103991558
70	Pole	103991559
71	Pole	103991354
72	Pole	103991626
73	Pole	104001916
74	Pole	100579366
75	Pole	103991792
76	Pole	103991737
77	Pole	103991829
78	Pole	103094544
79	Pole	100566965
80	Pole	100566963
81	Pole	100566962
82	Pole	100623981
83	Pole	100562284

84	Pole	100562285
85	Pole	100562286
86	Subsurface Transformer	107542501
87	Padmount Transformer	107328374
88	Pole	100585896
89	Pole	100585549
90	Pole	100585552
91	Pole	100585559
92	Pole	100586582
93	Pole	100599824
94	Pole	100599823
95	Pole	100583129
96	Pole	100583128
97	Pole	100583127
98	Pole	100600559
99	Pole	100600558
100	Pole	100600557
101	Pole	100600556
102	Pole	103136350
103	Pole	100600560

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. **GO 95, Rule 31.1, Design, Construction and Maintenance** states in part:

> *"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service."*

ESRB's findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 31.1 Findings

Location	Finding	Notes	PG&E Response Agree/Disagree
1	The pole is leaning more than 10%.	PG&E has a preexisting tag for the issue (EC 119976249).	Disagree with Finding- Existing EC for condition found
3	The pole is missing visibility strips.	PG&E has a preexisting tag for the issue (EC 119971949).	Disagree with Finding- Existing EC for condition found
11	The pole 1) is leaning more than 10% and 2) has faded operating numbers for the cutouts.	PG&E has a preexisting tag for the issues (EC 199823134). Correction: 119823134	Disagree with Finding- Existing EC for condition found
12	The pole has a down guy with a buried anchor.	PG&E has a preexisting tag for the issues (EC 127143303).	Disagree with Finding- Existing EC for condition found
13	The pole 1) has a down guy with a buried anchor and 2) a conductor that needs repair.	PG&E has a preexisting tag for the issues (EC 127143032).	Disagree with Finding- Existing EC for condition found
14	The pole 1) is missing bonding on the crossarm, 2) has a decaying crossarm that needs replacement, and 3) has a missing dampener.	PG&E has a preexisting tag for the missing bonding and decaying crossarm (EC 127142803).	Disagree with Finding- Existing EC for condition found
15	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 123261632).	Disagree with Finding- Existing EC for condition found

16	The pole 1) has a broken insulator that is rusting near the tie wire and 2) needs a crossarm to provide the necessary clearances.	PG&E has a preexisting tag for the issues (EC 126624698).	Disagree with Finding- Existing EC for condition found

17	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 126633617).	Disagree with Finding- Existing EC for condition found
22	The pole has a broken secondary insulator.	PG&E has a preexisting tag for the issue (EC 127327077).	Disagree with Finding- Existing EC for condition found
26	The pole has a bent primary spool insulator.	PG&E has a preexisting tag for the issue (EC 127402376). Correction: 127402375	Disagree with Finding- Existing EC for condition found
40	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 124372331).	Disagree with Finding- Existing EC for condition found
46	The pole 1) has a rusted transformer, 2) a conductor that needs replacement, and 3) a loose hardware cover for the transformer bolt attachment.	PG&E has a preexisting tag for the rusted transformer and broken conductor (122139363).	Disagree with Finding- Existing EC for condition found
48	The pole is leaning more than 10% and needs replacement.	PG&E has a preexisting tag for the issue (EC 122139372).	Disagree with Finding- Existing EC for condition found
49	The pole is leaning more than 10% with woodpecker holes and needs replacement.	PG&E has a preexisting tag for the issues (EC 122139245).	Disagree with Finding- Existing EC for condition found
72	The pole has twisted bird protection that requires adjustment.	PG&E has a preexisting tag for the issue (EC 126436405).	Disagree with Finding- Existing EC for condition found
73	The pole has twisted bird protection that requires adjustment.	PG&E has a preexisting tag for the issue (EC 126437711).	Disagree with Finding- Existing EC for condition found
79	The pole is missing visibility strips.	PG&E fixed the finding in the field.	Disagree with Finding-

			Corrected in field
82	The pole 1) needs bird guarding and 2) has faded operating numbers.	PG&E has a preexisting tag for the bird guarding (EC 127172998).	Disagree with Finding- Existing EC for condition found
91	The pole 1) has faded operating numbers and 2) a rocked crossarm.	PG&E has a preexisting tag for the issues (EC 120140984).	Disagree with Finding- Existing EC for condition found
94	The pole has a down guy with a buried anchor.	PG&E has a preexisting tag for the issue (EC 112433999).	Disagree with Finding- Existing EC for condition found
98	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 126374462).	Disagree with Finding- Existing EC for condition found
100	The pole 1) is leaning more than 10% and needs replacement and 2) has a conductor that needs replacement.	PG&E has a preexisting tag for the issues (EC 11768378). Correction: 117683789	Disagree with Finding- Existing EC for condition found
101	The pole 1) has woodpecker damage and needs replacement and 2) the pole has a down guy with a buried anchor.	PG&E has a preexisting tag for the issues (EC 126565166).	Disagree with Finding- Existing EC for condition found

2. **GO 95, Rule 34, Foreign Attachments** states in part:

> *"Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*
>
> *Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner's or owners' consent.)."*

ESRB's findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 34 Findings

Location	Finding	Notes	PG&E Response Agree/Disagree
29	The pole has an unauthorized third-party attachment.	PG&E removed the attachment in the field.	Disagree with Finding- Corrected in field
30	The pole has an unauthorized third-party attachment.		Agree with Finding- EC Created 128630545
42	The pole has an unauthorized third-party attachment.	PG&E removed the attachment in the field.	Disagree with Finding- Corrected in field

3. **GO 95, Rule 49.3-C(1)(b), Pins and Conductor Fastenings, Strength** states in part:

> *"Insulator pins and conductor fastenings shall be able to withstand the loads to which they may be subjected with safety factors at least equal to those specified in Rule 44.*
>
> *(1) Longitudinal Loads Normally Balanced:*
>
> *b. Conductor Fastenings: Where longitudinal loads are normally balanced, tie wires or other conductor fastenings shall be installed in such a manner that they will securely hold the line conductor to the supporting insulators and will withstand without slipping of the conductor unbalanced pulls as follows:*
> *Supply conductor fastening – 40% of the maximum working tensions but not more than 500 pounds.*
> *Class C conductor fastenings – 15% of the maximum working tensions but not more than 300 pounds.*
> *Tie wires are not required on Class C conductors at point– type transpositions in Grade F construction."*

ESRB's findings related to the above rule are listed in Table 7:

Table 7: GO 95, Rule 49.3-C(1)(b) Findings

Location	Finding	Notes	PG&E Response Agree/Disagree
20	The pole is missing tap guards for the tap clamps.	PG&E has a preexisting tag for the issue (EC 119803509).	Disagree with Finding- Existing EC for condition found
22	The pole has a loose tie wire on the secondary phase.	PG&E has a preexisting tag for the issue (EC 127327077).	Disagree with Finding- Existing EC for condition found
78	The pole is missing tap guards for the tap clamps.	PG&E has a preexisting tag for the issue (EC 127249447).	Disagree with Finding- Existing EC for condition found
93	The pole is missing tap guards for the tap clamps.	PG&E has a preexisting tag for the issue (EC 119803509). Correction: 122278644	Disagree with Finding- Existing EC for condition found

4. **GO 95, Rule 51.6-A, High Voltage Marking** states in part:

"Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible.

The top of such sign(s) shall be located between the level of the lowest line conductor, energized in excess of 750 volts, on the pole to no more than 40 inches below that conductor level (see Figure51–1).

Poles that support risers of more than 750 volts, which are not supporting line conductors of more than 750 volts, shall be marked with a high voltage sign(s). The top of such sign(s) shall be located between the level of the lowest exposed energized portion of the riser to no more than 40" below that portion of the riser."

ESRB's findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 51.6-A Findings

Location	Finding	Notes	PG&E Response Agree/Disagree
2	The pole has a broken high voltage sign.		Agree with Finding- EC Created 128622507
3	The pole has a missing high voltage sign.	PG&E has a preexisting tag for the issue (EC 123637371). Correction: 119971949	Disagree with Finding- Existing EC for condition found
12	The pole has a broken high voltage sign.	PG&E has a preexisting tag for the issue (EC 127143303).	Disagree with Finding- Existing EC for condition found
22	The pole has a broken high voltage sign.	PG&E has a preexisting tag for the issue (EC 127327077).	Disagree with Finding- Existing EC for condition found
38	The pole has a missing high voltage sign.	PG&E has a preexisting tag for the issue (EC 113072358).	Disagree with Finding- Existing EC for condition found
91	The pole has a missing high voltage sign on the crossarm.	PG&E has a preexisting tag for the issue (EC 120140984).	Disagree with Finding- Existing EC for condition found

92	The pole has a missing high voltage sign.	PG&E fixed the finding in the field.	Disagree with Finding- Corrected in field

5. **GO 95, Rule 54.6-I, Attachment of Protective Covering** states in part:

> *"Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion–resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position.*
>
> *Where such covering consists of wood moulding, rigid plastic moulding, or other suitable protective moulding, the distance between the attachment materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) shall not exceed 36 inches on either side of the moulding."*

ESRB's findings related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 54.6-I Findings

Location	Finding	Notes	PG&E Response Agree/Disagree
46	The pole has a broken ground moulding that is exposing the transformer ground wire.	PG&E fixed the finding in the field.	Disagree with Finding- Corrected in field
97	The pole has a broken ground moulding that is exposing the transformer ground wire.	PG&E fixed the finding in the field.	Disagree with Finding- Corrected in field

6. **GO 95, Rule 54.8-B, Service Drops, 0-750 Volts, Clearances above Ground, Buildings, Etc.** states in part:

> *"The vertical clearances of supply service drops above ground, buildings, etc., shall be not less than the minimum clearances specified in Rule 37, Table 1, Column B, with the following modifications:*
>
> *(1) Above Public Thoroughfares: Service drop conductors shall have a vertical clearance of not less than 18 feet above public thoroughfares, except that this clearance may grade from 18 feet at a position not more than 12 feet horizontally from the curb line to a clearance of not less than 16 feet at the curb line, provided the clearance at the centerline of any public thoroughfare shall in no case be less than 18 feet. Where there are no curbs the foregoing provisions shall apply using the outer limits of possible vehicular movement in lieu of a curb line."*

ESRB's finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 54.8-B Finding

Location	Finding	Notes	PG&E Response Agree/Disagree
85	The pole has a service drop that is hanging low over the sidewalk.	PG&E fixed the finding in the field.	Disagree with Finding- Corrected in field

7. **GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, Use** states in part:

   "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."

ESRB's findings related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 56.2 Findings

Location	Finding	Notes	PG&E Response Agree/Disagree
3	The pole has a broken down guy.	PG&E has a preexisting tag for the issue (EC 119971949).	Disagree with Finding- Existing EC for condition found
16	The pole has a slack span guy.	PG&E has a preexisting tag for the issue (EC 126624698).	Disagree with Finding- Existing EC for condition found
17	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (126633617).	Disagree with Finding- Existing EC for condition found
22	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (127327077).	Disagree with Finding- Existing EC for condition found
28	The pole has a slack span guy from Location 28 to Location 30.		Agree with Finding- EC Created 129226752
43	The pole has a slack down guy.		Agree with Finding- EC Created 128634399

46	The pole has a slack down guy with vegetation strain.	PG&E has a preexisting tag for the issue (122139363).	Disagree with Finding- Existing EC for condition found
67	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (126433849).	Disagree with Finding- Existing EC for condition found
68	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (121331359).	Disagree with Finding- Existing EC for condition found
70	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (126434603).	Disagree with Finding- Existing EC for condition found
71	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (126433585).	Disagree with Finding- Existing EC for condition found
72	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (126436405).	Disagree with Finding- Existing EC for condition found
74	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (126406128).	Disagree with Finding- Existing EC for condition found
79	The pole has a slack down guy.		Agree with Finding- EC Created 129227416
101	The pole has a tree that is pressing on and straining the down guy.	PG&E has a preexisting tag for the issue (EC 126565166).	Disagree with Finding- Existing EC for condition found

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

> *"In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule."*

ESRB's findings related to the above rule are listed in Table 12:

Table 12: GO 95, 56.7-B Findings

Location	Finding	Notes	PG&E Response Agree/Disagree
38	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.		Agree with Finding- EC Created 128631312
103	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.	PG&E has a preexisting tag for the issue (EC 126563555).	Disagree with Finding- Existing EC for condition found

9. **GO 95, Rule 56.9, Guy Marker (Guy Guard)** states:

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

ESRB's findings related to the above rule are listed in Table 13:

Table 13: GO 95, Rule 56.9 Findings

Location	Finding	Notes	PG&E Response Agree/Disagree
2	The pole has a down guy marker that is missing visibility strips.		Agree with Finding- EC Created 128622507
78	The pole has a down guy marker that is missing visibility strips.		Disagree with Finding- Corrected in field

10. GO 95, Rule 91.3-C, Stepping states:

> *"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."*

ESRB's findings related to the above rule are listed in Table 14:

Table 14: GO 95, Rule 91.3-C Findings

Location	Finding	Notes	PG&E Response Agree/Disagree
30	The pole has a low pole step.	PG&E fixed the finding in the field.	Disagree with Finding- Corrected in field
85	The pole has a low pole step.	PG&E has a preexisting tag for the issue (EC 126736518).	Disagree with Finding- Existing EC for condition found
89	The pole has a low pole step.	PG&E fixed the finding in the field.	Disagree with Finding- Corrected in field

11. GO 128, Rule 17.1, Design, Construction and Maintenance states in part:

> *"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.*
>
> *For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.*

ESRB's finding related to the above rule is listed in Table 15:

Table 15: GO 128, Rule 17.1 Finding

Location	Finding	Notes	PG&E Response Agree/Disagree
6	The subsurface switch has a ripped exterior switch label.	PG&E fixed the finding in the field.	Disagree with Finding- Corrected in field

12. **GO 128, Rule, 34.2-C, Equipment in Manholes, Vaults, Rooms, and other Enclosures, Transformers** states:

> *"Transformers operating at more than 600 volts, other than current and potential transformers and transformers which constitute a component part of other apparatus, and which conform to the requirements of such apparatus, shall be readily accessible for operation, inspection, maintenance, and replacement.*
>
> *Transformers shall be installed in such a manner as to permit safe operation, maintenance, or replacement of other equipment."*

ESRB's finding related to the above rule is listed in Table 16:

Table 16: GO 128, Rule 34.2-C Finding

Location	Finding	Notes	PG&E Response Agree/Disagree
58	The padmount transformer has vegetation impeding safe access to the enclosure.		Agree with Finding- EC Created 129226726

13. **GO 128, Rule 34.3-A, Self-contained Surface-mounted Equipment, Strength** states:

> *"The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons."*

ESRB's finding related to the above rule is listed in Table 17:

Table 17: GO 128, Rule 34.3-A Finding

Location	Finding	Notes	PG&E Response Agree/Disagree
59	The padmount transformer has a corroded enclosure and broken handle.	PG&E has a preexisting tag for the broken handle and will replace the entire enclosure during repair (EC 126946796).	Disagree with Finding- Existing EC for condition found

14. **GO 128, Rule 35.1, Identification of Cables** states:

> *"Cables operating at a voltage in excess of 750 volts shall be permanently and clearly identified by tags or other suitable means to indicate their operating*

voltage and the circuit with which they are normally associated at each manhole or other commonly accessible location of the underground system."

ESRB's findings related to the above rule are listed in Table 18:

Table 18: GO 128, Rule 35.1 Findings

Location	Finding	Notes	PG&E Response Agree/Disagree
60	The padmount transformer is missing a voltage label on the primary phase to SW 44616.		Agree with Finding- EC Created 129227221
86	The subsurface transformer is missing a voltage label on the primary phase.		Agree with Finding- EC Created 129227699

V. Observations

1. **GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities** states in part:

> *"For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property..."*

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

> *"(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 GO 95."*

During the field inspection, ESRB observed the following third-party safety concerns listed in Table 19:

Table 19: Third-Party Audit Observations

Location	Finding	Notes	PG&E Response Notification
1	The pole has an idle and unattached conductor.	PG&E has a pre-existing third-party notification for this issue (TPN 119976265).	Existing TPN – 119976265
2	The communication line is in contact with the guy wire.		Created TPN - 128622506
9	The pole has excessive vegetation causing strain and abrasion.		Created TPN - 129228575

38	The pole has a slack communications guy wire and vegetation causing strain and abrasion.	PG&E has a pre-existing third-party notification for this issue (TPN 128631312).	Existing TPN - 128631312

39	The pole has an idle and unattached conductor.	PG&E has a pre-existing third-party notification for this issue (TPN 124368897).	Existing TPN - 124368897
44	The pole has an abandoned communications drop.	PG&E has a pre-existing third-party notification for this issue (TPN 126893471 and TPN 126893472).	Existing TPN - 126893471 Existing TPN - 126893472
46	The pole has an idle and unattached conductor.	PG&E has pre-existing third-party notifications for this issue (TPN 122139389 and TPN 122142066).	Existing TPN - 122139389 Existing TPN - 122142066
47	The pole has excessive vegetation causing strain and abrasion.		Created TPN - 128641155
49	The pole has an idle and unattached conductor.	PG&E has pre-existing third-party notifications for this issue (TPN 122139324 and TPN 122142939).	Existing TPN - 122139324 Existing TPN - 122142939
85	The pole has an idle and unattached conductor and an exposed ground wire.	PG&E has a pre-existing third-party notification for this issue (TPN 126736493).	Existing TPN - 126736493
92	The pole has excessive vegetation causing strain and abrasion.		Created TPN - 128660549
98	The pole has an exposed ground wire.	PG&E has a pre-existing third-party notification for this issue (TPN 126563835 and TPN 126570983).	Existing TPN – 126563835 Existing TPN – 126570983