PG&E SAN FRANCISCO DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
JUNE 10-14, 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 Francisco Division:

- TD-2305M, Electric Distribution Preventive Maintenance Manual, March 29, 2024
- TD-2305M-JA02, Job Aid: Overhead Assessment, March 25, 2024
- TD-2305M-JA03, Job Aid: Underground Inspection, August 4, 2022
- TD-8123P-200 Open Electric Corrective (EC) Tag Validation Procedure, December 29, 2023
- TD-8125S Level 2 Priority X Electric Corrective (EC) Standard, March 25, 2024
- TD-2305M-JA13 EC Job Aid: Create, Complete, Cancel EC Notifications-Field Employees, April 2016
- TD-2302P-01 Distribution Network Transformers and Protectors – Maintenance and Inspection, June 4, 2023
- TD-2302P-02 Distribution Network Protectors – Maintenance and Inspection, August 7, 2022
- Electric Corrective Notifications list, April 2019 – April 2024
- Patrol and Inspection Records list, April 2019 – April 2024
- San Francisco Division Reliability Indexes and Outage list, April 2019 – April 2024
- San Francisco Division New Projects list, April 2023 – April 2024
- Pole Loading Calculations list, April 2023 – April 2024
- Incoming Third-Party Notifications list, April 2019 – April 2024
- Outgoing Third-Party Notifications list, April 2019 – April 2024
- Inspector training records, April 2019 – April 2024
- Equipment test records, April 2019 – April 2024
- Intrusive Inspections, April 2023 – April 2024
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review
- San Francisco 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."

PG&E's TD-2305M, Electric Distribution Preventive Maintenance Manual, March 29, 2024 does not define priority codes nor specify time frames for repairs. Previous revisions of TD-2305M listed both priority codes and specified time frames for corrective action.

PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, page 5, published on March 23, 2024, defines the priority codes and associated time frames for the response/repair action as follows for overhead facilities:

- *Priority A – Immediate risk of high potential impact to safety and reliability (due within 24 hours).*
- *Priority X – At least moderate potential impact (due up to 7 days).*
- *Priority B – At least moderate potential impact (due up to 6 months).*
- *Priority E – At least moderate potential impact (due up to 6 months in HFTD Tier 3 areas, up to 12 months in Tier 2/HFTA area, up to 36 months in Non-HFTD areas).*
- *Priority F – Low potential impact (due in 60 months).*

a) PG&E's TD-2305M-JA03, Underground Job Aid, Effective Date August 4, 2022 instructs inspectors to assign a priority or to prioritize based on condition when a non-conformance is found. TD-2305M-JA03 does not provided guidance nor contain definition of priority levels nor correction completion intervals. TD-2305M-JA03 previously used the parent document, PG&E's TD-2305M, to define priorities. The current revision of PG&E's TD-2305M no longer contains priority definitions nor completion intervals.

PG&E Response:

We will include the EC priority table in the next update to the UG inspection job aid (JA_03), for consistency with the OH job aid, since we have removed the priority table from the EDPM manual with the last update that was made.

b) ESRB staff reviewed work orders created withing the San Francisco Division from February 2019 through February 2024 and determined that PG&E did not address a total of 14,088 work orders by their assigned due date.[1] [2] Table 1 below breaks down the 14,088 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 Francisco Division[3] [4]

Priority Code	Late Work Orders Completed	Late Work Orders Pending*	Late Work Orders Cancelled	Total by Priority
A	919	3	-	922
X	-	-	-	0
B	1,267	442	98	1,807
E	1,345	9,507	366	11,218
F	11	127	3	141
Total	3,276	10,079	467	**14,088**

* As of April 22, 2024

PG&E shall provide ESRB with its corrective action plan to complete the 10,079 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

PG&E Response: The Priority A Notification "Required End Date" is system generated, which uses a default entry of 1-30 days after the notification is created. Emergency EC notifications (Priority A) are created for emergency work or an unsafe condition requiring immediate response and standby to protect the public. We meet the requirements of GO 95, Rule 18, for Level 1 Safety Hazards by acting immediately to address the condition. The results of the immediate action are captured in the creation of an emergency notification (nature of the work, the date the work was performed, and the identity of the persons performing the work). As such, the 'Required End Date' field in SAP for these Emergency notifications does not reflect an accurate deadline and is not applicable for Priority-A EC notifications.

PG&E Response: Priority A - We showed 4 pending/open work orders from Emergency and 1 open work order from Vegetation Management. All 5 have been closed.

PG&E Response: We reviewed the 425 late pending Priority B EC Notifications that were identified in the pre-audit data request, and we have since addressed 255: we completed 236 notifications and canceled 19. The remaining 170 are pending completion.

PG&E Response: We reviewed the 9,196 late pending Priority E EC Notifications that were identified in the pre-audit data request, and we have since addressed 266: we completed 117 notifications and canceled 149. The remaining 8,930 are pending completion.

PG&E Response: We reviewed the 126 late pending Priority F EC Notifications that were identified in the pre-audit data request, and we have since addressed 6: we completed 5 notifications and canceled 1. The remaining 120 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 work orders as of April 22, 2024.

Table 2: Most Overdue Work Orders**

Priority Code	Most Past Due Work Orders (WO#s)	Number of Days Past Due***
A	128238349	49
B	117874155	1,318
E	117378276	1,574
F	117221797	1,003

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

PG&E identified work order #128238349 (A-Open) on March 4, 2024, to replace a burned conductor with a required end date of March 4, 2024. As of April 22, 2024, PG&E's records indicate that the order is still open.

PG&E Response: Notification 128238349 was temporarily repaired same day, mitigating the outage to the customer. Remaining work included installing a Remote Voltage Monitor (RVM) onto the service which required coordination with the business customer to accommodate their business needs for a planned shutdown. This work was completed on April 26, 2024.

PG&E identified work order #117874155 (B-Open) on September 12, 2019, to replace a decayed pole with a required end date of January 1, 2020. As of April 22, 2024, PG&E's records indicate that the order is still open.

PG&E Response: On April 26, 2024, the tag was completed on arrival under Notification 121909251.

PG&E identified work order #117378276 (E-Open) on June 3, 2019, to repair a switch with a required end date of December 31, 2019. As of April 22, 2024, PG&E's records indicate that the order is still open.

PG&E Response: Notification 117378276 work was completed in field on December 13, 2022. This Notification is currently in the process of being closed.

PG&E identified work order #117221797 (F-Open) on May 9, 2019, to install missing primary marker tags on a padmounted transformer with a required end date of July 24, 2021. As of April 22, 2024, PG&E's records indicate that the order is still open.

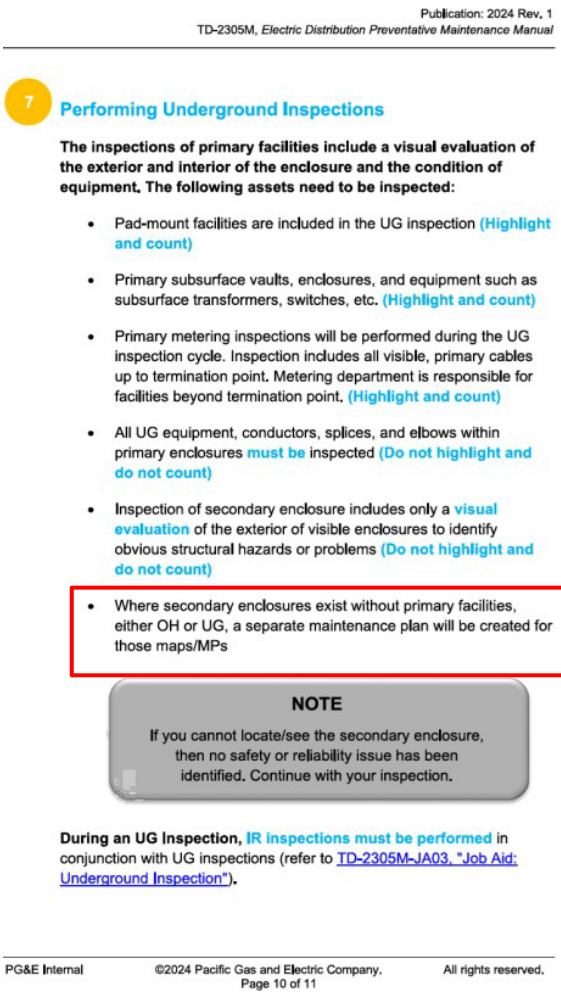
PG&E Response: Notification #117221797 is currently open for a missing 12kv tag on the primary cable. We are in the process of field verifying if this work still needs to be addressed.

2. **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."*

PG&E's Electronic Distribution Preventative Maintenance (EDPM) manual TD-2305M, Rev. 1 dated March 29, 2024, discusses underground inspections including enclosures with only secondary voltage equipment on page 26 at the sixth bullet point, "Where secondary enclosures exist without primary facilities, either OH or UG, a separate maintenance plan will be created for those maps/MPs." [5] See Figure 1.

[5] TD-2305M EDPM page 26 of the PDF, also noted as page 10 of the chapter describing the activities required by the compliance inspector to complete overhead (OH) and underground (UG) inspections.



Publication: 2024 Rev. 1
TD-2305M, *Electric Distribution Preventative Maintenance Manual*

7 **Performing Underground Inspections**

The inspections of primary facilities include a visual evaluation of the exterior and interior of the enclosure and the condition of equipment. The following assets need to be inspected:

- Pad-mount facilities are included in the UG inspection **(Highlight and count)**
- Primary subsurface vaults, enclosures, and equipment such as subsurface transformers, switches, etc. **(Highlight and count)**
- Primary metering inspections will be performed during the UG inspection cycle. Inspection includes all visible, primary cables up to termination point. Metering department is responsible for facilities beyond termination point. **(Highlight and count)**
- All UG equipment, conductors, splices, and elbows within primary enclosures **must be** inspected **(Do not highlight and do not count)**
- Inspection of secondary enclosure includes only a **visual evaluation** of the exterior of visible enclosures to identify obvious structural hazards or problems **(Do not highlight and do not count)**
- Where secondary enclosures exist without primary facilities, either OH or UG, a separate maintenance plan will be created for those maps/MPs

NOTE

If you cannot locate/see the secondary enclosure, then no safety or reliability issue has been identified. Continue with your inspection.

During an UG Inspection, IR inspections must be performed in conjunction with UG inspections (refer to TD-2305M-JA03, "Job Aid: Underground Inspection").

PG&E Internal ©2024 Pacific Gas and Electric Company. All rights reserved.
Page 10 of 11

Figure 1: Performing Underground Inspection, TD-2305M

ESRB asked for this plan and PG&E replied that the San Francisco Division does not have any secondary-only maintenance plans. [6] PG&E's failure in this instance to follow its own procedures is a violation of GO 128 Rule 17.1.

PG&E Response: As stated in our post-audit response, each plat map is evaluated for Overhead (OH) and Underground (UG) assets. If neither OH nor UG primary assets exist on the plat map, but there are secondary enclosures on the plat map, a patrol-only maintenance plan is created to track the secondary-only patrols. The maintenance plan naming convention is identified as "Secondary Only". We believe San Francisco Division currently does not have any "Secondary Only" maintenance plans because we have not identified any San Francisco plat maps that have only secondary UG enclosures on the map and we will verify to confirm this is the case.

[6] ESRB DR #1 question 9, updated PG&E response provided to ESRB August 28, 2024

3. **GO 165, Section III-C, Record Keeping** states in part:

> *"The utility shall maintain records for (1) at least ten (10) years of patrol **and** detailed inspection activities, and (2) the life of the pole for intrusive inspection activities."*

PG&E's TD-2305M, Electric Distribution Preventive Maintenance Manual, March 29, 2024, Record Retention, Record Retention Requirement, GO 165 Record Retention Guidelines Table lists requirements of 2 inspection cycles or 5 years with minimum record retention of 5 to 10 (years, note: no time unit is specified, in context, years is implied). See Figure 2.

2 G.O. 165 Record Retention Guidelines

RECORD TYPE	REQUIREMENT	MINIMUM RECORD RETENTION
OH Inspection Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Inspection cycles or 5 years, whichever is longer	10
UG Inspection Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Inspection cycles or 5 years, whichever is longer	6
OH Patrol Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Patrol cycles or 5 years, whichever is longer	5
UG Patrol Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Patrol cycles or 5 years, whichever is longer	5

Figure 2: GO 165 Record Retention Guidelines, TD-2305M

Per GO 165, Section III-C, records shall be maintained for at least 10 years for patrol and inspection activities. PG&E's TD-2305M, Electric Distribution Preventive Maintenance Manual and practices need revision requiring a minimum record retention as prescribed.

PG&E Response: We agree with this finding that the table in the EDPM is incorrect and is not consistent with our practice of maintaining patrol and inspection records for at least 10 years.

4. **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

ESRB staff identified that PG&E completed a total of 8,091 patrol and detailed inspections of overhead (OH) electric facilities past their GO 165 required completion dates, as shown in Table 3. There are no recorded incidents of padmounted or underground (UG) electric facility inspections beyond the GO 165 required completion dates.

Table 3: Late Patrols and Detailed Inspections in San Francisco Division [7]

Year	OH Patrol	OH Detailed Inspection	Total Structures
2019	-	-	-
2020	-	-	-
2021	4,730 (13.5%)[8]	3,361 (51.4%) [9]	8,091
2022	-	-	-
2023	-	-	-
2024*	-	-	-
Total	4,730	3,361	**8,091**

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

PG&E Response: In 2021, the 4,730 Overhead (OH) assets patrolled and the 3,361 OH inspections in our San Francisco Division service territory 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 4,730 assets as late patrols and 3,361 assets as late inspections in our 2021 GO 165 Annual Report.

[7] DRU13243_Q04(c)_Atch01_SF Late Units (2019-2024)
[8] 34,945 Facilities patrolled during 2021 per DRU13243_Q04(a)_Atch01_SF PI Data 2019-2024
[9] 6,538 Facilities inspected (detailed) conducted during 2021 per DRU13243_Q04(a)_Atch01_SF PI Data 2019-2024

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities in PG&E's San Francisco Division, listed in Table 4:

Table 4: San Francisco Division Field Inspection Locations

Location	Structure Type	SAP ID Number	Latitude	Longitude
1	Wood pole	110026341	37.74874568	-122.4160323
2	Wood pole	101825442	37.74902531	-122.4159765
3	Wood pole	101839261	37.74913034	-122.4160749
4	Underground	108112641	37.74837955	-122.415775
5	Wood pole	101839259	37.74919796	-122.4153131
6	Wood pole	103854308	37.74921338	-122.4147772
7	Wood pole	101825443	37.74916182	-122.4155378
8	Wood pole	101825444	37.74923876	-122.4154716
9	Wood pole	103967968	37.744031	-122.42253
10	Wood pole	101828055	37.744031	-122.42233
11	Padmount	107782424	37.742989	-122.42281
12	Underground	108253988	37.742869	-122.42294
13	Underground vault	107687749	37.79222254	-122.4006401
14	Underground vault	107690459	37.79260644	-122.4007977
15	Underground vault	107694451	37.79298495	-122.4015113
16	Underground vault	107700481	37.79294898	-122.4015564
17	Underground vault	107684108	37.7929883	-122.4023241
18	Underground	108140404	37.7939565	-122.4112528
19	Underground	108276291	37.7937402	-122.411234
20	Underground	108139912	37.79374286	-122.411296
21	Wood pole	103993484	37.79446897	-122.4113814
22	Wood pole	101813123	37.79456036	-122.4111348
23	Wood pole	103852285	37.79340725	-122.4201974
24	Wood pole	103837362	37.79347452	-122.4196937
25	Wood pole	103768515	37.79349855	-122.4196098
26	Wood pole	103768516	37.79331322	-122.4195819
27	Wood pole	101842540	37.79438185	-122.4181155
28	Wood pole	101812927	37.79406248	-122.418116
29	Wood pole	101812928	37.79367678	-122.4179224
30	Wood pole	101812931	37.79366463	-122.4180211
31	Underground	108146200	37.80268539	-122.4226386
32	Underground	108145956	37.79379691	-122.4179001
33	Underground	108040093	37.80232784	-122.4229555
34	Underground	108087574	37.8062009	-122.4754098
35	Wood pole	103165856	37.80625594	-122.4751319
36	Padmount	108244063	37.8074925	-122.4765
37	Wood pole	103165857	37.80599768	-122.4746799
38	Wood pole	101812449	37.80246821	-122.4410581
39	Underground	None (new) J52212, 230 Capra	37.80254104	-122.4411934
40	Underground	108062466	37.8025522	-122.4411457
41	Underground	None	37.80253158	-122.4410877
42	Wood pole	101812448	37.80326709	-122.4412564
43	Underground	108059081	37.79971541	-122.4374022
44	Underground	108133382	37.79971395	-122.4370757

Location	Structure Type	SAP ID Number	Latitude	Longitude
45	Underground vault	107682843	37.79974309	-122.4371284
46	Underground	108039297	37.7947139	-122.4324096
47	Underground	108300149	37.79462104	-122.4327289
48	Underground	108276454	37.79457351	-122.4327739
49	Wood pole	101840002	37.79492336	-122.4333675
50	Underground	108140000	37.79456838	-122.433213
51	Wood pole	101812686	37.79456673	-122.4332646
52	Wood pole	101812688	37.79520715	-122.433421
53	Underground vault	107698622	37.78837978	-122.423796
54	Padmount	108236579	37.72863822	-122.4776519
55	Padmount	108237891	37.7286828	-122.4776383
56	Underground	108246685	37.72949687	-122.4773957
57	Underground	108073109	37.7292809	-122.4773612
58	Underground	108073143	37.72933705	-122.4773271
59	Wood pole	101811107	37.74178002	-122.4745691
60	Wood pole	101811106	37.74131384	-122.4745493
61	Wood pole	103767709	37.74116106	-122.4743753
62	Wood pole	101811104	37.7411679	-122.4746082
63	Wood pole	101807467	37.75720255	-122.4922144
64	Wood pole	101807466	37.7573554	-122.4926856
65	Wood pole	101841705	37.75737802	-122.4916475
66	Wood pole	101841921	37.75734669	-122.4910951
67	Wood pole	101841699	37.75748689	-122.4907765
68	Wood pole	101830867	37.75492735	-122.505989
69	Wood pole	101830868	37.7548549	-122.5065114
70	Wood pole	101838296	37.7548989	-122.5065644
71	Wood pole	103812904	37.75494459	-122.5055969
72	Wood pole	101830946	37.75490783	-122.505448
73	Underground	108011709	37.77477574	-122.4841999
74	Wood pole	101815131	37.77448674	-122.4842958
75	Wood Pole	101815130	37.77448315	-122.4842017
76	Underground vault	107684456	37.78479002	-122.413424
77	Underground vault	108143391	37.78462109	-122.4141839
78	Underground vault	107701295	37.78366812	-122.4139661
79	Underground	108098109	37.78217543	-122.4156932
80	Underground	108095150	37.74723605	-122.4137877
81	Wood pole	101826417	37.74725666	-122.4140726
82	Wood pole	101826418	37.74727148	-122.4145061
83	Underground	108133975	37.74714951	-122.413475

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	Agree/Disagree
7	Unlocked switch		Agree – Switch was locked on 9/11/2024
69	Broken cross arm		Agree – This issue was resolved on 6/19/2024 under EC Notification #129072723
70	Primary cross arm requires replacement	EC # 122036474 to replace primary and secondary cross arms past both original and FSR due dates	Disagree – Existing EC for issues found in field

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 finding related to the above rule is listed in Table 6:

Table 6: GO 95, Rule 34 Finding

Location	Finding	Notes	Agree/Disagree
1	The pole has an unauthorized third-party attachment on pole and service drop.		Agree - Our inspector performed minor work on 09/11/2024. Finding has been resolved.

3. **GO 95, Rule 38, Minimum Clearance of Wires from Other Wires** states in part:

> *"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition and shall not be held in violation of Table 2, Cases 8–15, inclusive.*
>
> *Table 2, Case 3C: The clearance between wires, cables and conductors not supported on the same poles, vertically at crossings in spans and radially where colinear or approaching crossings for communication conductors (including open wire, cables and service drops) must be at least 24 inches."*

ESRB's finding related to the above rule is listed in Table 7:

Table 7: GO 95, Rule 38 Finding

Location	Finding	Notes	Agree/Disagree
7	Supply service drop contacting communications drop over street.		Disagree – TPN 129053636 created for third party communication utility.

4. **GO 95, Rule 49.1-A(1) Poles, Towers and Other Structures, Strength** states:

> *"Wood poles shall be of sound timber"*

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

Table 8: GO 95, Rule 49.1-A(1) Findings

Location	Finding	Notes	Agree/Disagree
8	Deteriorated pole.		Disagree – Field Inspector determined pole is safe until next inspection cycle
25	Deteriorated pole.	Work order EC # 126160354 to replace pole past due date (5/2024)	Disagree – Existing EC for issues found in field
49	Deteriorated pole.	Work order EC # 124173064 to replace pole past due date (7/2023)	Disagree – Existing EC for issues found in field
52	Deteriorated pole.	Work order EC # 125209429 to replace pole past due date (7/2023)	Disagree – Existing EC for issues found in field
64	Deteriorated pole.	Work order EC # 124303277 to replace pole past due date (8/2023)	Disagree – Existing EC for issues found in field
65	Deteriorated pole.	Work order EC # 121600081 to replace pole past due date (6/2022)	Disagree – Existing EC for issues found in field
66	Deteriorated pole.	Work order EC # 121600184 to replace pole past due date (6/2022)	Disagree – Existing EC for issues found in field
74	Deteriorated pole.	Work order EC # 121826876 to replace pole past both original (8/2022) and FSR (12/2023) due dates	Disagree – Existing EC for issues found in field

5. **GO 95, Rule 54.6 E(1) Risers Encased from Ground Level to 8 Feet Above the Ground** states:

> *"Risers from underground cables or other conductors shall be encased from the ground level to a level not less than 8 feet above the ground."*

ESRB's finding related to the above rule is listed in Table 9:

Table 9: GO 95, Rule 54.6 E(1) Finding

Location	Finding	Notes	Agree/Disagree
51	Riser is lifted from pole surface.	Work order EC # 124180140 to replace pole past due date (7/2023)	Disagree – Existing EC for issues found in field

6. **GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires** states:

> *"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 finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 56.2 Finding

Location	Finding	Notes	Agree/Disagree
28	Span guy deflected.		Agree – EC 126216692 has been updated to include tree branch on span guy

7. **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 finding related to the above rule is listed in Table 11:

Table 11: GO 95, Rule 56.9 Finding

Location	Finding	Notes	Agree/Disagree
24	Outmost down guy missing marker.	Repaired in field.	Disagree – Issue corrected in field

8. **GO 95, Rule 59.4-A(1)(a), Grounding Conductors** states:

> *"The grounding conductor from each ground rod to the base of the pole shall not be less than 1 foot below the surface of the ground."*

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

Table 12: GO 95, 59.4-A(1)(a) Findings

Location	Finding	Notes	Agree/Disagree
37	Exposed ground rod.	Work order EC # 120842328 to repair various nonconformances past due date (4/2022)	Disagree – Existing EC for issues found in field
75	Exposed ground rod.	Repaired in field.	Disagree – Issue corrected in field

9. **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 13:

Table 13: GO 128, Rule 17.1 Finding

Location	Finding	Notes	Agree/Disagree
79	Subsurface enclosure lid is corroded/damaged, creating a sidewalk tripping hazard.	Work order EC # 1226267801 to repair enclosure lid past due date (10/2022).	Disagree – Existing EC for issues found in field *NOTE* - EC should read 122267801

10. **GO 128, Rule 35.2 A, Guarding Live Parts** states:

"Live parts shall be enclosed, isolated, guarded, or insulated to prevent accidental contact."

ESRB's finding related to the above rule is listed in Table 14:

Table 14: GO 128, Rule 35.2 A Finding

Location	Finding	Notes	Agree/Disagree
46	Hook guard missing from access lid.	Repaired in field.	Disagree – Issue corrected in field

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 15:

Table 15: Third-Party Audit Observations

Location	Finding	Notes	PG&E's Response
7	Insufficient clearance, communications line to supply service drop	PG&E created a third-party notification for this issue during the audit (TPN 129053636).	We created TPN 129053636
8	Insufficient clearance, communications line to supply service drop	PG&E created a third-party notification for this issue during the audit (TPN 129053814).	We created TPN 129053814
10	Low comm drop over street, 13.5 ft.	PG&E created a third-party notification for this issue during the audit (TPN 129054136).	We created TPN 129054136

23	Unsecured communication amplifier and ground rod.	PG&E created a third-party notification for this issue during the audit (TPN 129059287).	We created TPN 129059287
24	Communication lines need transfer to new pole, abandoned pole removed.	PG&E created a third-party notification for this issue during the audit (TPN 129059426).	We created TPN 129059426
30	Communications splice box needs to be secured. Loose lashing.	PG&E created a third-party notification for this issue during the audit (TPN 129060196).	We created TPN 129060196
60	Communications down guy not taut.	PG&E created a third-party notification for this issue during the audit (TPN 129071117).	We created TPN 129071117
62	Broken communicatio ns lashing.	PG&E created a third-party notification for this issue during the audit (TPN 129071247).	We created TPN 129071247
63	Abandoned communications lines.	PG&E created a third-party notification for this issue during the audit (TPN 129072390).	We created TPN 129072390
67	Broken communications ground moulding, exposed ground conductor.	PG&E created a third-party notification for this issue during the audit (TPN 129072348).	We created TPN 129072348
69	Abandoned communications lines.	PG&E created a third-party notification for this issue during the audit (TPN 129072642).	We created TPN 129072642
69 (2)	Broken communicatio ns cross arm.	PG&E created a third-party notification for this issue during the audit (TPN 129072723).	Agree – This issue has been resolved on 6/19/2024 on EC 129072723
70	Abandoned communications lines and equipment.	PG&E created a third-party notification for this issue during the audit (TPN 129072780).	We created TPN 129072780

71	Low communications service drop (12 ft, 11 inches), insufficient service drop clearance, unsecured equipment.	PG&E created a third-party notification for this issue during the audit (TPN 129072886).	We created TPN 129072886
74	Unsecured vertical communications lines on pole, broken communications conduit, span guy not taut.	PG&E created a third-party notification for this issue during the audit (TPN 129073292).	We created TPN 129073292
81	Broken communicatio ns cross arm.	PG&E created a third-party notification for this issue during the audit (TPN 129076935).	We created TPN 129076935