

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 23, 2024

EA2024-1122

Jennifer Kaminsky
Manager – Electric Assets & Compliance
San Diego Gas and Electric (SDG&E)
8315 Century Park Court, Suite CP22B
San Diego, CA 92123

SUBJECT: Audit of San Diego Gas and Electric (SDG&E) Eastern District

Ms. Kaminsky:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujiiye of my staff conducted an electric distribution audit of SDG&E's Eastern District from February 26 – March 1, 2024. The audit included a review of SDG&E's inspection and maintenance records and a field inspection of SDG&E's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than May 23, 2024, by electronic or hard copy, of all corrective measures taken by SDG&E to remediate and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Eric Ujiiye at (213) 620-2598 or eric.ujiiye@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, CPUC
Eric Ujiiye, Utilities Engineer, ESRB

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Intrusive test records.
- SDG&E's visual inspection program.
- ESRB's interview of SDG&E inspectors.

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

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

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

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

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.

SDG&E's records indicated that from January 2020 to December 2023, SDG&E had 65 overhead work orders that were either completed or pending completion past SDG&E's assigned due date for corrective action.

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.

SDG&E's records indicated that from January 2020 to December 2023, SDG&E had 72 underground work orders that were either completed or pending completion past SDG&E's assigned due date for corrective action.

III. Field Inspection

My staff inspected the following facilities during the field portion of the audit:

No.	Structure ID.	Type of Structure	Location
1	P177400	Pole	Jamul
2	P177399	Pole	Jamul
3	P177398	Pole	Jamul
4	P114928S	Pole	Jamul
5	P177397	Pole	Jamul
6	P173365	Pole	Jamul
7	P173366	Pole	Jamul
8	P173367	Pole	Jamul
9	P108571N	Pole	Jamul
10	P108572N	Pole	Jamul
11	P173368	Pole	Jamul
12	P173369	Pole	Jamul
13	JP570526	Pole	Jamul
14	JP570528	Pole	Jamul
15	P776156	Pole	Jamul
16	663654H	Pole	Jamul
17	JP570530	Pole	Jamul
18	771890	Pole	El Cajon
19	771889	Pole	El Cajon
20	P474730	Pole	El Cajon
21	P474732	Pole	El Cajon
22	P572428	Pole	El Cajon
23	P472958	Pole	El Cajon
24	P192128	Pole	El Cajon
25	P259660	Pole	El Cajon
26	P941992	Pole	El Cajon
27	P75370	Pole	El Cajon
28	P74377	Pole	El Cajon
29	P173433	Pole	Lakeside
30	P173432	Pole	Lakeside
31	P173421	Pole	Lakeside
32	P205591S	Pole	Lakeside
33	P677256	Pole	Lakeside
34	P677257	Pole	Lakeside
35	P677258	Pole	Lakeside
36	P173430	Pole	Lakeside
37	P173429	Pole	Lakeside
38	875940	Pole	Granite Hills
39	74263	Pole	Granite Hills

40	JP478049	Pole	Granite Hills
41	74262	Pole	Granite Hills
42	P477413	Pole	Granite Hills
43	P477414	Pole	Granite Hills
44	P477415	Pole	Granite Hills
45	P477416	Pole	Granite Hills
46	P477417	Pole	Granite Hills
47	P671701	Pole	Granite Hills
48	P247717S	Pole	Granite Hills
49	P671702	Pole	Granite Hills
50	P671322	Pole	Granite Hills
51	P165304S	Pole	Granite Hills
52	P370361	Pole	Bostonia
53	P78055	Pole	Bostonia
54	P101252	Pole	Bostonia
55	JP370362	Pole	Bostonia
56	P175324J	Pole	Bostonia
57	Z272731	Pole	Bostonia
58	P276893	Pole	Bostonia
59	P176853	Pole	Bostonia
60	P276892	Pole	Bostonia
61	JP370364	Pole	Bostonia
62	D2173578147	Pad Mount	La Mesa
63	D2180578158	Pad Mount	La Mesa
64	H2182578142	Hand Hole	La Mesa
65	D2182478147	Pad Mount	La Mesa
66	H2311080110	Hand Hole	Granite Hills
67	H2311780211	Hand Hole	Granite Hills
68	H2312180238	Hand Hole	Granite Hills
69	D2311980238	Pad Mount	Granite Hills
70	D135737	Pad Mount	Lakeside
71	D133458	Pad Mount	Lakeside
72	D133540	Pad Mount	Lakeside
73	H113882	Hand Hole	Lakeside
74	D122714	Pad Mount	Lakeside
75	D122715	Pad Mount	Lakeside
76	D122716	Pad Mount	Lakeside
77	D122717	Pad Mount	Lakeside

IV. Field Inspection – Violations List

GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:

(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 10 business days after the discovery.

Due to a fallen tree, a communications service drop supported on Pole number P177400 was pulled towards the ground and touching a fence. During SDG&E's latest inspection, SDG&E did not document and report this safety hazard to the responsible third party.

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.

On an SDG&E down guy anchor supporting Pole number JP570526, the point where the down guy wire attaches to the down guy anchor was buried and covered by vegetation.

GO 95, Rule 54.8 – C.4, From Communication Service Drops, states:

The radial clearance between supply service drop conductors and communication service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.

An SDG&E service drop on Pole number JP370364, was detached from its attachment point on a roof eave. This caused the SDG&E service drop to become entangled with a communications service drop at the roof. As a result, the clearance between the SDG&E service drop and the communications service drop was less than 12 inches within 15 feet of the point of attachment.

GO 95, Rule 51.6-A, Marking and Guarding, High Voltage Marking of Poles, 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. A pair of signs may be stacked to a height of no more than 12

inches. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible.

The “HIGH VOLTAGE” sign on Pole number P671322 on the top double crossarm was damaged, with portions of the lettering missing.

GO 95, Rule 54.6-B, Ground Wires, states in part:

That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).

The ground wire attached to each of the following poles was missing sections of ground moulding:

- Pole 663654H – a 1-inch section of ground wire was exposed due to a gap in the ground moulding at the public level.
- Pole P474432 – the ground moulding was bowing out near the base, creating a 0.5-inch gap that exposed the ground wire.
- Pole JP370364 – a section of ground moulding was damaged at the public level, exposing the ground wire.

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.

The strut channel that was supporting a primary elbow rack in SDG&E Handhole H2312180238, was corroded.