PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

June 27, 2024 EA2024-1182

Vincent Tanguay, Senior Director
Electric Compliance, Electric Engineering
Pacific Gas & Electric Company (PG&E)
300 Lakeside Dr., Oakland, CA 94612

SUBJECT: Electric Distribution Audit of PG&E's Mission Division

Mr. Tanguay:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Matthew Yunge and Sajjad Mansuri of ESRB staff conducted an electric distribution audit of PG&E's Mission Division from February 26 through March 1, 2024. During the audit, ESRB staff conducted field inspections of PG&E's distribution facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than July 26, 2024, by electronic copy of all corrective actions and preventive measures taken by PG&E to correct the identified violations and prevent the recurrence of 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 provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Matthew Yunge at (415) 603-9828 or matthew.yunge@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Electric Distribution Audit Report for PG&E Mission Division

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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PG&E MISSION DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
FEBRUARY 26 – MARCH 1, 2024

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- PG&E's inspection and maintenance procedures.
- Electric Distribution Preventive Maintenance Manual, December 15, 2023.
- Overhead and underground facilities statistics.
- Completed work orders with notifications, canceled work orders with notifications, and open work orders with notifications from January 2019 to January 2024.
- Patrol and detailed inspection records from January 2019 to December 2023.
- Reliability metrics and sustained outages from January 2018 to December 2023.
- Mission Division map.
- New Construction projects (both overhead and underground) from January 2023 to December 2023.
- Pole loading and safety factor calculations completed from February 2022 to January 2024.
- Third Party Safety Hazard notifications sent and received from January 2019 to December 2023.
- Inspector list from 2019 to 2023 and inspector qualifications.
- Equipment test records from January 2019 to October 2023.
- Intrusive inspection records from January 2023 to December 2023.
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

II. Records Violations

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

1. **General Order (GO) 95, Rule 18-B, Maintenance Programs, (1)(a)** 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 PG&E's Mission Division for the past 60 months 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 18,061 work orders by their assigned due date. Table 1 below breaks down the late work orders by their given priority, including the total number of late work orders completed, pending and cancelled work orders, which are included in the total.

Table 1: Late Work Orders in Mission Division[1,2]

Priority Code	Late Work Orders Pending	Late Work Orders Completed	Late Work Orders Canceled	Total
A	0	273	126	**399**
B	85	783	209	**1077**
E	11828	2899	1275	**14727**
F	498	49	36	**583**
Total	**12411**	**4004**	**1646**	**18061**

[1] Completed work orders were considered late if the completion date was after the authorized end date and more than 1 day after the notification date.
[2] Categorization of work orders as complete, open, or cancelled is based on the notification status provided by PG&E.

PG&E needs to provide ESRB with its corrective action plan to complete the 18,061 late pending work orders and its preventive actions to prevent any work orders from being addressed late in the future.

Table 2 below identifies the most overdue non-exempt work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
A	117146803	138
B	121717327	811
E	116873084	1558
F	116608372	1370

PG&E identified work order # 117146803 on May 2, 2019, to repair a conductor with a required end date of May 23, 2019. PG&E did not complete the work order until October 8, 2019.

PG&E identified work order #121717327 on July 12, 2021, to trim vegetation with a required end date of October 12, 2021. PG&E has not completed the work order as of January 1, 2024.

PG&E identified work order #116873084 on March 30, 2019, to test a pole with a required end date of September 26, 2019. PG&E has not completed the work order as of January 1, 2024.

PG&E identified work order #116608372 on February 26, 2019, to replace an enclosure with a required end date of April 1, 2020. PG&E has not completed the work order as of January 1, 2024.

ESRB identified 304 work orders that were listed as cancelled but had no cancellation date. ESRB also identified a Priority B work order (notification number 126262471) that was listed as completed without a completion date. Additionally, there were ten Priority E work orders and two Priority F work order that were listed as open but have completion dates.

Furthermore, the following 54 work orders were listed as complete or open but had cancellation dates.

Table 3: Completed or Open Work Orders with Cancellation Dates

Priority Code	Work Orders (WO#s)	Status	Cancellation Date
A	117295606	COMPLETE	2019-05-31
A	117639187	COMPLETE	2019-07-26

Priority Code	Work Orders (WO#s)	Status	Cancellation Date
A	117764690	COMPLETE	2019-08-17
A	117826576	COMPLETE	2019-09-11
A	118655544	COMPLETE	2020-03-11
A	119640318	COMPLETE	2020-08-20
A	120445578	COMPLETE	2021-01-21
A	120603803	COMPLETE	2021-03-04
A	122429560	COMPLETE	2021-12-01
A	123666723	COMPLETE	2022-05-25
A	123666740	COMPLETE	2022-05-25
A	123743097	COMPLETE	2022-06-03
A	118523242	COMPLETE	2022-08-31
A	118520013	COMPLETE	2022-08-31
A	124446865	COMPLETE	2022-09-05
A	125082483	COMPLETE	2023-01-27
A	125451141	COMPLETE	2023-02-08
A	125542600	COMPLETE	2023-02-23
A	125542032	COMPLETE	2023-02-23
A	126612881	COMPLETE	2023-07-19
F	117090518	COMPLETE	2022-02-01
E	123748387	COMPLETE	2022-06-03
E	123048049	COMPLETE	2022-03-03
E	119533949	COMPLETE	2020-12-22
E	121478292	COMPLETE	2021-06-08
B	119060617	COMPLETE	2020-07-22
E	117005866	COMPLETE	2019-07-16
B	118962907	COMPLETE	2020-06-08
B	120851638	COMPLETE	2021-05-18
B	117023525	COMPLETE	2019-07-18
B	122478141	COMPLETE	2022-02-09
B	117920174	COMPLETE	2020-02-25
E	116688082	COMPLETE	2019-11-05
B	117882566	COMPLETE	2020-02-19
E	117219525	COMPLETE	2020-10-10
E	121556034	COMPLETE	2022-12-22
E	121383038	COMPLETE	2022-12-15
E	121530016	COMPLETE	2022-12-14
E	121398888	COMPLETE	2022-12-15
E	121344710	COMPLETE	2022-12-14
E	121338671	COMPLETE	2022-12-14

Priority Code	Work Orders (WO#s)	Status	Cancellation Date
E	121352755	COMPLETE	2023-08-18
E	118993612	COMPLETE	2022-12-14
E	117135894	COMPLETE	2022-02-01
E	119002931	COMPLETE	2022-12-14
B	117569324	COMPLETE	2023-02-17
E	117129087	COMPLETE	2022-12-21
E	123568691	OPEN	2023-05-09
E	123527134	OPEN	2023-05-06
E	123435755	OPEN	2023-04-27
E	123425663	OPEN	2023-04-26
F	123395232	OPEN	2023-04-22
E	117768784	OPEN	2021-02-25
E	121790286	OPEN	2023-04-04

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."*

ESRB identified that PG&E had completed a total of 1,582 overhead patrols and inspections past their assigned due dates in the last five years. Table 4 below breaks down the late overhead patrols and inspections by year.

Table 4: Late Overhead Patrols and Inspections

Year	Inspection Type	Number of Late Inspections or Patrols
2020	Inspections	13
2021	Patrols	84

Year	Inspection Type	Number of Late Inspections or Patrols
2021	Inspections	1476
2022	Patrols	6
2022	Inspections	2
2023	Patrols	1

III. Field Inspection

During the field inspection, ESRB inspected the following facilities in Table 5:

Table 5: Field Inspection Locations

Location #	Structure Type	SAP ID	Approximate Longitude & Latitude
1	Pole	100931078	-122.09983252, 37.63184494
2	Pole	100931129	-122.0996038, 37.6321825
3	Pole	100931077	-122.09923557, 37.63228843
4	Pole	100932779	-122.09970532, 37.63148167
5	Pole	100932778	-122.10030062, 37.6315247
6	Pole	100932777	-122.10059568, 37.63152072
7	Pole	100931079	-122.10081568, 37.63155735
8	Pole	100931737	-122.09956264, 37.63156181
9	Pole	100931738	-122.09935109, 37.6315615
10	Underground Vault	107569044	-122.09520255, 37.62086484
11	Underground Vault	107650374	-122.09398355, 37.62053604
12	Underground Vault	107578173	-122.09297246, 37.62009352
13	Underground Vault	107578167	-122.09588507, 37.62097057
14	Pole	100937347	-122.05884036, 37.62776152
15	Pole	100958311	-122.05901924, 37.62772238
16	Pole	100934302	-122.05909662, 37.62743744
17	Pole	100937630	-122.05899859, 37.62732414
18	Pole	100934303	-122.05864176, 37.62696851
19	Pole	100934301	-122.058335, 37.62675921
20	Pole	100937346	-122.05851851, 37.62810766

Location #	Structure Type	SAP ID	Approximate Longitude & Latitude
21	Pole	104054051	-122.05811026, 37.62832351
22	Pole	100930596	-122.06779097, 37.62977104
23	Pole	100930595	-122.0671964, 37.62996329
24	Pole	100930594	-122.0668705, 37.63005054
25	Pole	100930593	-122.06644508, 37.63027205
26	Pole	100930592	-122.06618752, 37.63000451
27	Pole	100930650	-122.06775248, 37.62945977
28	Pole	100933007	-122.07554354, 37.64276364
29	Pole	100933008	-122.07607745, 37.64276872
30	Pole	100931847	-122.05557277, 37.66127708
31	Pole	100931848	-122.05553005, 37.66106105
32	Pole	100931849	-122.05542531, 37.66103983
33	Pole	100931851	-122.05540092, 37.66042949
34	Pole	100931850	-122.05525944, 37.66040733
35	Pole	100919586	-122.06171809, 37.68394599
36	Pole	100919585	-122.06168547, 37.68314715
37	Pole	100919584	-122.06162568, 37.68303918
38	Pole	100919524	-122.06175806, 37.6839466
39	Pole	100919526	-122.0621853, 37.68414984
40	Pole	100919538	-122.062473, 37.68391615
41	Pole	104156674	-122.01721518, 37.68193673
42	Pole	100910486	-122.01746924, 37.68241232
43	Pole	100910485	-122.01801231, 37.68226938
44	Pole	100910481	-122.01826774, 37.68301014
45	Pole	100910480	-122.01796784, 37.68312974
46	Pole	104145203	-122.01833744, 37.68371586
47	Pole	103852970	-122.0458778, 37.70221905
48	Pole	100909743	-122.04575143, 37.70220641
49	Pole	100909742	-122.04548354, 37.70231291
50	Underground Vault	107617694	-122.04612787, 37.70216402
51	Underground Vault	107628968	-122.04637768, 37.70201464
52	Underground Vault	107617882	-122.04707653, 37.70217809
53	Pole	100956988	-122.11156541, 37.69834293
54	Pole	100960248	-122.11143363, 37.69823011
55	Pole	104179610	-122.11201709, 37.69869024
56	Pole	100959427	-122.11209415, 37.6986798
57	Pole	103767467	-122.11204254, 37.69898786
58	Pole	100903709	-122.13397625, 37.73135532

Location #	Structure Type	SAP ID	Approximate Longitude & Latitude
59	Pole	100903708	-122.13370727, 37.73134712
60	Pole	100903669	-122.13398552, 37.73084599
61	Pole	100903726	-122.13415782, 37.73086704
62	Pole	100903679	-122.13455551, 37.73073196
63	Underground Vault	107636755	-122.15409953, 37.72352253
64	Underground Vault	107560980	-122.15373752, 37.72364906
65	Underground Vault	107587752	-122.1533518, 37.72364858
66	Underground Vault	107561109	-122.15435642, 37.72336899
67	Underground Vault	107592406	-121.91094554, 37.46510901
68	Underground Vault	107614690	-121.91080924, 37.46555654
69	Underground Vault	107614671	-121.91129396, 37.46674603
70	Underground Vault	107646779	-121.91102247, 37.46738752
71	Underground Vault	107582201	-121.9105519, 37.46749249
72	Underground Vault	107614705	-121.90955175, 37.46681707
73	Underground Vault	107582196	-121.9097638, 37.46549764
74	Padmount	107342933	-121.91461979, 37.4991595
75	Underground Vault	107628937	-121.91458678, 37.49912586
76	Underground Vault	107579979	-121.91413877, 37.49888689
77	Underground Vault	108267061	-121.91453542, 37.49955122
78	Underground Vault	107575372	-121.91537476, 37.49878053
79	Underground Vault	107579315	-121.91509295, 37.49828351
80	Padmount	107342938	-121.91593181, 37.49826059
81	Pole	100947360	-121.95225398, 37.5170413
82	Pole	100944936	-121.95169894, 37.51710825
83	Pole	100944948	-121.95121469, 37.51719937
84	Pole	100944947	-121.95066319, 37.51729639

Location #	Structure Type	SAP ID	Approximate Longitude & Latitude
85	Pole	100944946	-121.95019247, 37.51736976
86	Pole	100942220	-121.94243823, 37.54469721
87	Pole	100938224	-121.94194828, 37.54459003
88	Pole	100938195	-121.94304572, 37.5447317
89	Pole	100942191	-121.94342314, 37.54472344
90	Pole	103531322	-122.04677886, 37.531756
91	Pole	103531348	-122.04652095, 37.53196953
92	Pole	103537866	-122.04607175, 37.53225352
93	Padmount	108162647	-121.98634871, 37.77907647
94	Padmount	107583949	-121.98628101, 37.77879693
95	Padmount	107346419	-121.98687084, 37.77870551
96	Padmount	107346414	-121.98691958, 37.77792348
97	Underground Vault	107523190	-121.98689365, 37.77846533
98	Underground Vault	107664359	-121.97532058, 37.76502566
99	Underground Vault	107663450	-121.97517625, 37.76613521
100	Underground Vault	107663451	-121.97432191, 37.76638337
101	Underground Vault	107592057	-121.97371057, 37.76633331
102	Padmount	107357025	-121.91892296, 37.77436304
103	Padmount	107354641	-121.91978697, 37.77451695
104	Padmount	107357014	-121.9200589, 37.7750747
105	Padmount	107357009	-121.91966841, 37.77550004
106	Padmount	107357030	-121.91862083, 37.77530477
107	Padmount	107337297	-121.91812156, 37.77472453
108	Pole	100927108	-121.89591045, 37.6303945
109	Pole	104108494	-121.89586507, 37.63092515
110	Pole	100927110	-121.89633743, 37.63191063
111	Pole	100927111	-121.89633069, 37.63200968
112	Pole	100924051	-121.88176926, 37.6634298
113	Pole	100924052	-121.88174531, 37.66332578
114	Pole	100924053	-121.88156948, 37.6631448
115	Pole	104056684	-121.8814331, 37.66305916
116	Pole	100924055	-121.88111645, 37.66275604
117	Pole	100909133	-121.944499, 37.70006674
118	Pole	100909135	-121.94424281, 37.69990704
119	Pole	100909137	-121.94398479, 37.70000771
120	Pole	100909134	-121.94423405, 37.70020266
121	Pole	100909132	-121.94465118, 37.70063126

Location #	Structure Type	SAP ID	Approximate Longitude & Latitude
122	Pole	100906744	-121.69702447, 37.70096193
123	Pole	100906745	-121.69703089, 37.70146488
124	Pole	100906746	-121.69702371, 37.70163422
125	Pole	100906747	-121.6969738, 37.70189268
126	Pole	100924807	-121.69066055, 37.64384539
127	Pole	100924806	-121.69060181, 37.64389604
128	Pole	100924808	-121.69144574, 37.6442493
129	Pole	100924809	-121.69253004, 37.64469193
130	Pole	100957108	-121.76961348, 37.67713267
131	Pole	100908222	-121.76974789, 37.67752517
132	Pole	104149626	-121.76991154, 37.67792189
133	Pole	100926896	-121.76870228, 37.67521463
134	Padmount	107356955	-121.79887537, 37.68765759
135	Underground Vault	107550107	-121.79784208, 37.68858563
136	Padmount	107359243	-121.79776525, 37.68730064
137	Padmount	107349980	-121.79885049, 37.6858193

IV. Field Inspection Violations

ESRB identified 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 are listed in Table 6:

Table 6: GO 95, Rule 31.1 Findings

Location #	Finding Description
27	A balloon was caught on the secondary line.
86	Conduit under secondary crossarm is loose.
114	Vegetation growing under riser guard and pushing riser guard loose.
118	Bird cover has rotated so the wire is exposed from the top.

Location #	Finding Description
125	Control box was open.

2. GO 95, Rule 91.3, Stepping states in part:

"A. Unless otherwise specified in this Order, pole steps used to ascend and descend joint use wood poles are not required. However, occupants on joint use wood poles are not prohibited from installing and maintaining temporary or permanent steps.

B. Unless non climbable, joint use nonwood poles shall include provisions for ascending and descending. C. 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 are listed in Table 7:

Table 7: GO 95, Rule 91.3 Findings

Location #	Finding Description
61	Pole step is too low from top of fence. There is an existing notification for this finding.
87	Pole had a low pole step. Step was removed on site.
126	Pole step is too low compared to a nearby fence as a climbable surface. There is an existing notification for this finding.

3. GO 95, Rule 31.6, Abandoned Lines states:

"Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use."

ESRB's findings are listed in Table 8:

Table 8: GO 95, Rule 31.6 Findings

Location #	Finding Description
32	PG&E had abandoned service lines on this pole.
43	There was an abandoned service line. An EC tag was created on site.
62	Old ground wire hanging from secondary crossarm.

4. **GO 95, Rule 56.2** requires the following:

   "Where mechanical loads imposed on poles, towers, or structures are greater than can be supported with safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.

   Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire load, the pole below the point of guy attachment acting merely as a strut. 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 are listed in Table 9:

Table 9: GO 95, Rule 56.2 Findings

Location #	Finding Description
3	The down guy anchor is corroded and the anchor guy is slack. There is an existing notification.
22	There is a slack anchor guy.

5. **GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires** states:

   "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. The clearances in Table 2 shall in no case be reduced more than 10 percent, except mid-span in Tier 3 of the High Fire-Threat District where they shall be reduced by no more than 5 percent, because of temperature and loading as specified in

Rule 43 or because of a difference in size or design of the supporting pins, hardware or insulators. All clearances of less than 5 inches shall be applied between surfaces, and clearances of 5 inches or more shall be applied to the center lines of such items. The utilities of interest (including electric supply and/or communication companies) shall cooperate and provide relevant information for sag calculations for their facilities, upon request."

ESRB's findings are listed in Table 10:

Table 10: GO 95, Rule 38 Findings

Location #	Finding Description
24	A telecom service drop is touching a power service drop.
60	Guy wire touching telecom line above the guy wire's insulator.
81	Down guy wire touching service line.
88	Comms service line touching PG&E down guy wire.
89	PG&E service drop touching comms service drop.

6. **GO 95, Rule 93, Climbing Space** states:

"Climbing space shall be provided on all jointly used poles in accordance with the provisions of Rules 54.7, 54.9, 54.10, 54.11, 54.12, and 84.7.

Climbing space on jointly used poles shall be maintained so that its position in relation to the pole is not changed by more than 90 degrees in a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level."

ESRB's findings are listed in Table 11:

Table 11: GO 95, Rule 93 Findings

Location #	Finding Description
34	There is vegetation obstructing the pole's climbing space.
48	Vegetation is obstructing climbing space.
81	Pole base completely surrounded by vegetation, which obstructs climbing space.

7. **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. All work performed on public streets and highways shall be done in such a manner that the operations of other utilities and the convenience of the public will be interfered with as little as possible and no conditions unusually dangerous to workmen, pedestrians or others shall be established at any time."*

ESRB's findings are listed in Table 12:

Table 12: GO 128, Rule 17.1 Findings

Location #	Finding Description
71	CSP handle is inoperable. There is an existing tag from PG&E.
106	Corroded transformer.
107	Transformer has corrosion. PG&E has an existing notification.

8. **GO 95, Rule 56.7.B, Location of Sectionalizing Insulators (Anchor Guys)** states:

> *"An insulator shall be installed in each anchor guy which is required to be sectionalized by Rule 56.6–A or 56.6–B, so that such insulator is located:*
>
> *(1) 8 Feet or more above the ground; and (2) 8 Feet or more below the level of the lowest supply conductor, or 6 feet or more from surface of pole and one foot or more below the level of the lowest supply conductor (see Figure 56–8). These sectionalizing requirements for anchor guys can normally be met by insulation at one location; however, short guys or other conditions may require insulation at two locations:*
>
> *(a) One location being 8 feet or more above the ground; and*
>
> *(b) The other location either 8 feet or more below the lowest supply conductor, or 6 feet or more horizontally from surface of pole and one foot or more below the level of the lowest supply conductor. 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. Ungrounded portions of anchor guys which pass through a level of communication conductors at positions other than between the pole and pole pin positions or outside of the outer pin position shall be sectionalized by insulators placed between 6 and 18 inches above the level of the communication conductors (see Figure 56–8B). Any anchor guy which enters the ground less than 8 feet below the lowest level of supply conductors on the pole or structure shall be treated as an overhead guy which is grounded by means of a grounded anchor guy or metal pole. A grounded horizontal brace of a "sidewalk" guy shall in no case be less than 8 feet below the level of the lowest unprotected supply conductor on the same pole (see Figure 56–10B)."

ESRB's finding is listed in Table 13:

Table 13: GO 95, Rule 56.7.B Finding

Location #	Finding Description
111	Tree touching down guy above guy insulator.

9. **GO 95, Rule 12.2, Maintenance of Lines** states:

"All lines and portions of lines shall be maintained in such condition as to provide safety factors not less than those specified in Rule 44.3. Lines and portions of lines constructed or reconstructed on or after the effective date of this Order shall be kept in conformity with the requirements of this Order. The restoration of clearance originally established prior to the effective date of this Order, where the original clearance has been reduced by additional sagging or other causes, is not considered to be reconstruction and the reestablished clearance shall conform to the requirements of the rules in effect at the time the original clearance was established. The changing of clearance for any other purpose is reconstruction and clearances so changed shall comply with the rules of this Order applicable to reconstruction."

ESRB's findings are listed in Table 14:

Table 14: GO 95, Rule 12.2 Findings

Location #	Finding Description
62	Pole has shell rot. PG&E has an existing notification for this finding.
81	Deteriorated primary crossarm.
84	Damaged cross arm. There is an existing notification from PG&E.
87	Crossarm is damaged.
88	Damaged secondary crossarm. There is an existing notification.
89	Damaged secondary crossarm.
108	Extensive woodpecker damage and cracking at the top.
110	Pole has extensive woodpecker damage.
130	The top primary crossarm has deteriorated.
133	Damaged primary crossarm.

10. GO 95, Rule 34, Foreign Attachments states:

> *"Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light 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. All permanent attachments must be approved by the Commission (see Rule 15.1) and the owner(s) involved. All temporary attachments shall be restricted to installations*

where the period is estimated to be one year or less. The utilities, or other governmental entities may require construction standards which are more restrictive than the requirements of this Rule 34. The following rules shall apply to approved temporary foreign attachments installed on climbable poles and structures and shall be maintained as required by Rule 12.2."

ESRB's findings are listed in Table 15:

Table 15: GO 95, Rule 34 Findings

Location #	Finding Description
32	This pole had an unauthorized attachment. Removed on site.
41	Unauthorized attachment. Removed on site.
45	Unauthorized attachment on pole.
124	Unauthorized attachment. Removed on site.
130	Unauthorized attachment.
131	Unauthorized attachment on pole.

11. GO 128, Rule 35.3, Warning Signs states:

"Warning signs indicating high voltage shall be installed on an interior surface, or barrier if present, inside the entrance of vaults, manholes, handholes, pad mounted transformer compartments, and other above ground enclosures containing exposed live parts above 750 volts. Such warning signs shall also be installed on an exterior surface of all such pad mounted transformer compartments and other above ground enclosures. Such signs shall be clearly visible to a person in position to open any such access door, other opening, or barrier."

ESRB's findings are listed in Table 16:

Table 16: GO 128, Rule 35.3 Findings

Location #	Finding Description
98	Worn high voltage sign is illegible.
99	No high voltage warning sign.
101	No high voltage warning sign.

12. GO 95, Rule 49.3.C, Pins and Conductor Fastenings (Strength) states:

> *"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."*

ESRB's finding is listed in Table 17:

Table 17: GO 95, Rule 49.3.C Finding

Location #	Finding Description
89	Squatter insulator on secondary crossarm. There is an existing notification.

V. Observations

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."

Table 18 includes all non-PG&E (third-party) findings that ESRB observed during the audit:

Table 18: Observations

Location #	Observations
14	There is a telecom cable sticking out from its riser guard.
21	There is a telecom line that is not covered by a riser mould.
25	There is a telecom line that has a low clearance of less than eight feet.
29	Telecom service drops touching each other.
33	Abandoned and exposed comms line.
34	Telecom ground wire is exposed due to a broken wire guard.
38	Telecom box is hanging freely and is not secured.
41	Abandoned telecom cable.
44	Abandoned telecom service line.
47	Riser guard not firmly attached to pole.
54	Abandoned telecom cable. Cable was removed from visibility strips on site
56	Exposed ground wire.
59	Telecom box on the telecom line is open.
83	Abandoned telecom line.
87	Abandoned telecom cable.
112	Debris on telecom service drops.
114	Telecom riser loose from pole. PG&E fixed riser to pole on site.
121	Ground moulding is loose. PG&E has a notification for this finding.

Location #	Observations
125	Exposed telecom ground wire. Corrected on site.