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

September 19, 2024 EA2024-1222

Jason Niccoli
Electric Utility Division Manager
Public Works
City of Moreno Valley
14331 Frederick St.
Moreno Valley, CA 92553

Subject: Electrical Distribution Audit of the Moreno Valley Electric Utility ("MVU")

Mr. Niccoli:

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 MVU from July 22-26, 2024. The audit included a review of MVU's inspection and maintenance records and an onsite field inspection of MVU's electrical distribution 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 October 21, 2024, by electronic or hard copy, of all corrective measures taken by MVU to remedy 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,

Derek Jones

for 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, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- Intrusive test records
- MVU's documented inspection program.

II. Records Review – Violations List

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

GO 165, Section III-B, Standards for Inspection, states:

> *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.*

GO 128, Rule 17.2, Inspection, states:

> *Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules.*

MVU's excel sheet labeled "Part 7. Patrol and Detailed Inspection Records 3-1-22 to 5-31-24" tab "Transformers" shows that padmount transformer T936 was last detailed inspected on 8/01/2022, with no other inspections since. GO 165 requires transformers in urban areas to be patrolled annually. Therefore, MVU is in violation of GO 165 for not performing an annual patrol of the transformer in 2023.

III. Field Inspections

My staff inspected the following facilities during the field inspection:

No.	Struct. ID.	Structure	Equipment	Location
1	T880	Pad Mounted	Single Phase Transformer	Moreno Valley
2	T879	Pad Mounted	Single Phase Transformer	Moreno Valley
3	T878	Pad Mounted	Single Phase Transformer	Moreno Valley
4	T876	Pad Mounted	Single Phase Transformer	Moreno Valley
5	T874	Pad Mounted	Single Phase Transformer	Moreno Valley
6	T875	Pad Mounted	Single Phase Transformer	Moreno Valley
7	M1355	Maintenance Hole	PME Switch	Moreno Valley
8	T1856	Pad Mounted	Single Phase Transformer	Moreno Valley
9	T1863	Pad Mounted	Single Phase Transformer	Moreno Valley
10	X1855	Vault	Junction	Moreno Valley
11	T1859	Pad Mounted	Single Phase Transformer	Moreno Valley
12	T1860	Pad Mounted	Single Phase Transformer	Moreno Valley
13	T115	Pad Mounted	Single Phase Transformer	Moreno Valley
14	T114	Pad Mounted	Single Phase Transformer	Moreno Valley
15	T113	Pad Mounted	Single Phase Transformer	Moreno Valley
16	T117	Pad Mounted	Single Phase Transformer	Moreno Valley
17	T112	Pad Mounted	Single Phase Transformer	Moreno Valley
18	T116	Pad Mounted	Single Phase Transformer	Moreno Valley
19	X1276	Vault	Junction	Moreno Valley
20	T1286	Pad Mounted	Single Phase Transformer	Moreno Valley
21	T1287	Pad Mounted	Single Phase Transformer	Moreno Valley
22	T1288	Pad Mounted	Single Phase Transformer	Moreno Valley
23	T80	Pad Mounted	Single Phase Transformer	Moreno Valley
24	T79	Pad Mounted	Single Phase Transformer	Moreno Valley
25	T77	Pad Mounted	Single Phase Transformer	Moreno Valley
26	V1332	Vault	Gas Switch	Moreno Valley
27	T1330	Pad Mounted	Single Phase Transformer	Moreno Valley
28	T1839	Pad Mounted	Three Phase Transformer	Moreno Valley
29	T1841	Pad Mounted	Single Phase Transformer	Moreno Valley
30	T1366	Pad Mounted	Three Phase Transformer	Moreno Valley
31	S1507	Pad Mounted	PME Switch	Moreno Valley
32	S849	Pad Mounted	PME Switch	Moreno Valley
33	V1089	Vault	Gas Switch	Moreno Valley
34	T1377	Pad Mounted	Three Phase Transformer	Moreno Valley
35	T1374	Pad Mounted	Three Phase Transformer	Moreno Valley
36	T1800	Pad Mounted	Three Phase Transformer	Moreno Valley
37	T854	Pad Mounted	Three Phase Transformer	Moreno Valley
38	T1968	Pad Mounted	Three Phase Transformer	Moreno Valley
39	T1966	Pad Mounted	Three Phase Transformer	Moreno Valley
40	T1969	Pad Mounted	Three Phase Transformer	Moreno Valley
41	T765	Pad Mounted	Three Phase Transformer	Moreno Valley
42	T760	Pad Mounted	Three Phase Transformer	Moreno Valley
43	T762	Pad Mounted	Three Phase Transformer	Moreno Valley
44	T763	Pad Mounted	Three Phase Transformer	Moreno Valley

45	T766	Pad Mounted	Three Phase Transformer	Moreno Valley
46	T937	Pad Mounted	Three Phase Transformer	Moreno Valley
47	T935	Pad Mounted	Three Phase Transformer	Moreno Valley
48	T939	Pad Mounted	Three Phase Transformer	Moreno Valley
49	T1313	Pad Mounted	Single Phase Transformer	Moreno Valley
50	T1314	Pad Mounted	Single Phase Transformer	Moreno Valley
51	T1302	Pad Mounted	Single Phase Transformer	Moreno Valley
52	T1301	Pad Mounted	Single Phase Transformer	Moreno Valley
53	T1303	Pad Mounted	Single Phase Transformer	Moreno Valley
54	T1306	Pad Mounted	Single Phase Transformer	Moreno Valley
55	T1307	Pad Mounted	Single Phase Transformer	Moreno Valley
56	T1309	Pad Mounted	Single Phase Transformer	Moreno Valley
57	T1310	Pad Mounted	Single Phase Transformer	Moreno Valley
58	T1791	Pad Mounted	Single Phase Transformer	Moreno Valley
59	T1792	Pad Mounted	Single Phase Transformer	Moreno Valley
60	T1793	Pad Mounted	Single Phase Transformer	Moreno Valley
61	T1798	Pad Mounted	Single Phase Transformer	Moreno Valley
62	T1165	Pad Mounted	Three Phase Transformer	Moreno Valley
63	T1163	Pad Mounted	Three Phase Transformer	Moreno Valley
64	T1164	Pad Mounted	Three Phase Transformer	Moreno Valley
65	T1162	Pad Mounted	Three Phase Transformer	Moreno Valley
66	S723	Pad Mounted	PME Switch	Moreno Valley
67	T1446	Pad Mounted	Three Phase Transformer	Moreno Valley
68	T1447	Pad Mounted	Three Phase Transformer	Moreno Valley
69	S1445	Pad Mounted	PME Switch	Moreno Valley
70	T1432	Pad Mounted	Three Phase Transformer	Moreno Valley
71	T1433	Pad Mounted	Three Phase Transformer	Moreno Valley
72	S1431	Pad Mounted	PME Switch	Moreno Valley
73	S1592	Pad Mounted	PME Switch	Moreno Valley
74	T1592	Pad Mounted	Three Phase Transformer	Moreno Valley
75	T1596	Pad Mounted	Three Phase Transformer	Moreno Valley
76	V1455	Vault	Gas Switch	Moreno Valley
77	V1554	Vault	Gas Switch	Moreno Valley
78	S1570	Pad Mounted	PME Switch	Moreno Valley
79	C1571	Pad Mounted	Capacitor Bank	Moreno Valley
80	T1557	Pad Mounted	Three Phase Transformer	Moreno Valley
81	V1363	Vault	Dielectric Switch	Moreno Valley
82	V1364	Vault	Dielectric Switch	Moreno Valley
83	V1362	Vault	Gas Switch	Moreno Valley
84	V1361	Vault	Gas Switch	Moreno Valley
85	V1360	Vault	Gas Switch	Moreno Valley
86	V1359	Vault	Gas Switch	Moreno Valley
87	T817	Pad Mounted	Single Phase Transformer	Moreno Valley
88	T818	Pad Mounted	Single Phase Transformer	Moreno Valley
89	T819	Pad Mounted	Single Phase Transformer	Moreno Valley
90	T813	Pad Mounted	Single Phase Transformer	Moreno Valley
91	T814	Pad Mounted	Single Phase Transformer	Moreno Valley
92	T810	Pad Mounted	Single Phase Transformer	Moreno Valley
93	S808	Pad Mounted	PME Switch	Moreno Valley

94	T1256	Pad Mounted	Single Phase Transformer	Moreno Valley
95	T1257	Pad Mounted	Single Phase Transformer	Moreno Valley
96	T1258	Pad Mounted	Single Phase Transformer	Moreno Valley
97	T1259	Pad Mounted	Single Phase Transformer	Moreno Valley
98	T1260	Pad Mounted	Single Phase Transformer	Moreno Valley
99	T1261	Pad Mounted	Single Phase Transformer	Moreno Valley
100	T1262	Pad Mounted	Single Phase Transformer	Moreno Valley
101	T1263	Pad Mounted	Single Phase Transformer	Moreno Valley

IV. Field Inspection Violations List

My staff observed the following violations during the field inspections portion of the audit.

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 following facilities required maintenance:

- Padmounted Transformer T762 – a bracket that secures the transformer to the pad was deteriorated.
- Padmounted Transformer T813 –the retaining structure under the pad (supporting the transformer) was damaged.

GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures, states:

> *Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.*

For the following facilities, the subsurface access panel cover was incorrectly labeled as SCE:

- Padmounted Transformer T1839
- Padmounted Transformer T1800

GO 128, Rule 32.8, Location, state in part:

> *Manhole, handhole and subsurface equipment enclosure, locations shall be such that the opening will provide safe access and, where practicable, shall be so located that future maintenance work will cause minimum interference with the normal flow of vehicular traffic.*

Access to the following facilities was obstructed:

- Padmounted transformer T854 – The door of the single-phase transformer was obstructed by vegetation not allowing clear access.
- Padmounted transformer T1301 – The door of the single-phase transformer was obstructed by vegetation not allowing clear access.
- Padmounted transformer T1307 – The door of the single-phase transformer was obstructed by a bollard that allowed the door to open partially.