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

January 9, 2025 EA2024-1237

Jerrod Meier
Director – Electric Regulatory Compliance
Pacific Gas & Electric Company (PG&E)
300 Lakeside Dr., Oakland, CA 94612

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

Mr. Meier:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Monica Hoskins, Emiliano Solorio, and Rafael Herranz of ESRB staff conducted an electric distribution audit of PG&E's East Bay Division from October 21 through October 25, 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 General Order (GO) 95, GO 128, and GO 165. A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than February 7, 2025, via 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 Monica Hoskins at monica.hoskins@cpuc.ca.gov or (415) 652-1847.

Sincerely,

Rickey Tse, P.E.

Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

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

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
Yi Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Monica Hoskins, Utilities Engineer, ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Rafael Herranz, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
Anne Beech, Director of Governance and Reporting, PG&E
Sean Mackay, Director of Investigations, PG&E
Leah Hughes, Manager of Investigations, PG&E
Barbara Moses, Manager of EO Compliance, PG&E
Meredith Allen, VP of Regulatory Affairs, PG&E
Spencer Olinek, Chief Regulatory Liaison, PG&E
Electric Data Requests (ElectricDataRequests@pge.com)
Electric CPUC Regulatory Compliance (ElectricCPUCRegulatoryComplianceAudit@pge.com)

PG&E EAST BAY DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
OCTOBER 21 – 25, 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 East Bay Division:

- TD-2305M, Electric Distribution Preventive Maintenance Manual, March 29, 2024
- TD-2305M-JA02, Job Aid: Overhead Assessment, Rev13: March 25, 2024
- TD-2305M-JA03, Job Aid: Underground Inspection, Rev4: August 4, 2022
- TD-2305S, Electric Distribution Maintenance Requirement, Rev0: January 31, 2020
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, Rev2: August 02, 2022
- TD-2301S, Patrols and Detailed/Intrusive Inspections of Electric Overhead and Underground Distribution Facilities, Rev1: May 15, 2020
- TD-8125S, Level 2 Priority X Electric Corrective (EC) Standard, Rev0: March 25, 2024
- Electric Corrective Notifications list, August 2019 – August 2024
- Distribution facilities statistics and their wildfire risks, including equipment risks and vegetation risks
- East Bay Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, August 2019 – August 2024
- East Bay Division Reliability Indexes and Outage list, January 2019 – August 2024
- East Bay Division New Projects list, August 2023 – August 2024
- Pole Loading Calculations list, August 2023 – September 2024
- Incoming Third-Party Notifications list, August 2019 – August 2024
- Outgoing Third-Party Notifications list, August 2019 – August 2024
- Inspector training records, January 2019 – August 2024
- Equipment test records, September 2019 – September 2024
- Intrusive Inspections, August 2023 – August 2024
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review
- East Bay 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."

a) ESRB staff reviewed late work orders completed within the East Bay Division for the past 60 months (August 2019 – August 2024), shown in Table 1. PG&E's Electric Distribution Preventative Maintenance (EDPM) Manual, Job Aid: Overhead Assessment (TD-2305M-JA02), published on March 23, 2024, defines the priority codes and associated time frames for the response/repair action of overhead facilities as follows:

PG&E Priority		Tier 3	Tier 2/HFRA	Non-HFTD
Level 1: Immediate risk of high potential impact to safety and reliability	A	Within 24 hours	Within 24 hours	Within 24 hours
Level 2: At least moderate potential impact	X	Up to 7 days	Up to 7 days	Up to 7 days
	B	Up to 6 months	Up to 6 months	Up to 6 months
	E	Up to 6 months	Up to 12 months	Up to 36 months
Level 3: Low potential impact	F	60 months	60 months	60 months

PG&E's EDPM Job Aid: Underground Inspection (TD-2305M-JA03), published on August 4, 2022, instructs inspectors to assign a priority and due date based on the compelling abnormal condition when a non-conformance is identified. However, 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 (Rev13) of PG&E's TD-2305M no longer contains priority definitions or completion intervals.

b) ESRB staff reviewed late work orders and determined that PG&E did not address a total of 30,670 work orders (59.2%) by their assigned due date. Table 1 below breaks down the 30,670 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 East Bay Division

Priority Code	Late Work Orders Completed*	Late Work Orders Pending*	Late Work Orders Cancelled	Total by Priority
A	1,732	5	253	1,990
X	1	0	2	3
B	1,685	324	392	2,401
E	2,307	22,843	951	26,101
F	13	157	5	175
Total	5,738	23,329	1,603	**30,670**

*As of August 26, 2024

PG&E shall provide ESRB with its corrective action plan to complete the 23,329 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Table 2 below identifies the most overdue and late non-exempt work orders for each priority. The late work orders have been closed and the past-due work orders are still open, as of August 26, 2024.

Table 2: Most Overdue Work Orders*

Priority Code	Most Past Due Work Orders (WO#s)	Number of Days Past Due**
A	125335742	116
X	129140932	1
B	119005626	1,386
E	117847193	1,635
F	119036560	853

*Days past due determined using the Authorized End Date noted in Data Request Response 3
**As of August 26, 2024

PG&E identified work order #125335742 (A-Complete-Late) on January 12, 2023, to replace a broken conductor with an authorized end date of January 12, 2023. PG&E completed the notification on May 8, 2023, and as of August 26, 2024, PG&E's records indicate that the order is closed.

PG&E identified work order #129140932 (X-Complete-Late) on June 27, 2024, to replace a leaning pole with an authorized end date of July 4, 2024. PG&E completed the notification on July 5, 2023, and as of August 26, 2024, PG&E's records indicate that the order is closed.

PG&E identified work order #119005626 (B-Open) on May 9, 2020, to replace an overloaded pole with an authorized end date of November 9, 2020. As of August 26, 2024, PG&E's records indicate that the order is open.

PG&E identified work order #117847193 (E-Open) on September 5, 2019, to replace a damaged pole with an authorized end date of March 5, 2020. As of August 26, 2024, PG&E's records indicate that the order is open.

PG&E identified work order #119036560 (F-Open) on May 16, 2020, to remove a low pole step with an authorized end date of April 26, 2022. As of August 26, 2024, PG&E's records indicate that the order is open.

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

"Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."

PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, March 25, 2024 Rev13, Miscellaneous Other Compelling Abnormal Conditions, Guy Broken/Slack/Corroded states:

"Pole must be straight with Guy no more than an arm's length (3ft) from taut, that does not have significant impact on the structural integrity of the pole."

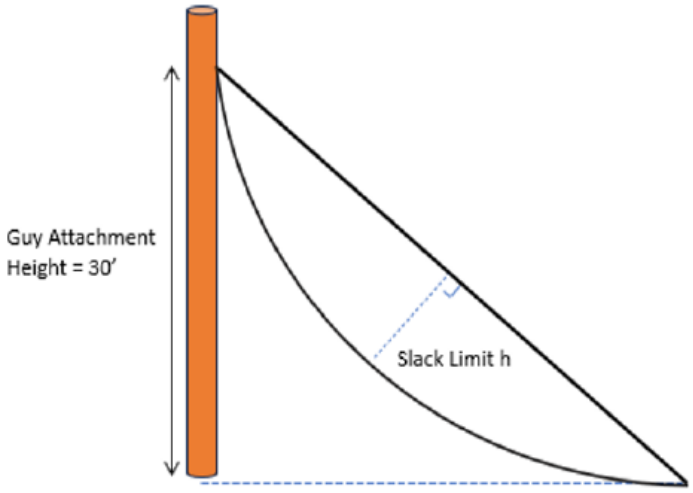

Figure 1: Guy slack limit, TD-2305M-JA02 Rev13

Per GO 95, Rule 56.2, guys are to be maintained taut[1]. PG&E's TD-2305M-JA02 allows a deviation from taut by as much as 3 feet without regard to length or angle of attachment.[2]

[1] Taut: Stretched or pulled tight; not slack. Oxford English dictionary.
[2] ESRB reviewed PG&E's FDA Tag Evaluation, Guy Loose/Adjust ATS Report 006.4.3-23.9 Sept 2023, an analysis of guy slack limits to achieve a taut guy at a lean of 10 %. The analysis assumed 30-foot attachment points and various angles of down guys. The analysis did not evaluate stresses on poles without guying per Rule 56.2 nor the effects of slack guys on Safety Factors per Rule 44. The analysis included the statement: "*Pole overload and pole lean are two different phenomena, and pole may be overloaded without guy support before overall lean reaches [PG&E's] allowable limit.*"

PG&E's TD-2305M-JA02, Job Aid, Miscellaneous Other Compelling Abnormal Conditions, Guy Broken/Slack/Corroded does not comply with GO 95, Rule 56.2, which requires guys to be maintained taut in all circumstances.

3. **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."

a) ESRB staff identified that PG&E completed a total of 5,145 patrol and detailed inspections (1.80%) of padmount/underground (UG) and overhead (OH) electric facilities past their GO 165 required completion date, as shown in Table 3.

Table 3: Late Overhead Patrols and Inspections in East Bay Division

Year	OH Patrol	OH Detailed Inspection	UG Patrol	UG Detailed Inspection	Total Structures
2019	-	-	-	-	-
2020	-	8	-	-	8
2021	3,389	503	-	-	3,892
2022	-	-	-	-	-
2023*	-	1,245	-	-	1,245
2024**	-	-	-	-	-
Total	3,389	1,756	0	0	**5,145**

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

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

Intrusive Inspection Testing Cycle of Wood Poles – In addition to wood pole patrols, the following intrusive inspection interval criteria must be met:

- *Poles over 15 years old that have not been subject to an intrusive inspection require an intrusive test within 10 years.*
- *Poles that have passed an intrusive inspection require an intrusive test within 20 years of the previous intrusive test.*

ESRB reviewed the intrusive inspection records for August 2023 to August 2024 and

identified that PG&E completed a total of 32 intrusive inspections of their wood poles past their GO 165 required completion date, as shown in Table 4.

Table 4: Late Intrusive Inspections in East Bay Division

Equipment Number	Equipment Description	Inspection Date	Previous Inspection Date
103048120	Pole - Class: 5 : Wood : 35	4/1/2024	1/1/1997
103049422	Pole - Class: 5 : Wood : 30	5/6/2024	1/1/1997
103789398	Pole - Class: 3 : Wood : 35	6/3/2024	1/1/1997
103789397	Pole - Class: 5 : Guy Pole : 35	7/11/2024	1/1/1997
103047583	Pole - Class: 5 : Wood : 35	3/26/2024	1/1/1996
103047587	Pole - Class: 3 : Wood : 35	3/26/2024	1/1/1996
103047590	Pole - Class: 6 : Wood : 35	3/13/2024	1/1/1996
103043403	Pole - Class: 4 : Wood : 25	4/10/2024	1/1/1996
103043404	Pole - Class: 1 : Wood : 35	4/10/2024	1/1/1996
103043741	Pole - Class: 3 : Wood : 55	4/25/2024	1/1/1996
103043998	Pole - Class: 4 : Wood : 45	4/29/2024	1/1/1996
103047994	Pole - Class: 4 : Wood : 45	4/18/2024	1/1/1996
103047998	Pole - Class: 5 : Wood : 35	4/18/2024	1/1/1996
103043870	Pole - Class: 3 : Wood : 30	6/4/2024	1/1/1996
103043995	Pole - Class: 5 : Wood : 30	6/4/2024	1/1/1996
103044240	Pole - Class: 4 : Wood : 35	6/4/2024	1/1/1996
104120642	Pole - Class: 4 : Wood : 25	9/27/2023	1/1/1995
103048674	Pole - Class: : Wood : 0	10/24/2023	1/1/1995
103049487	Pole - Class: 3 : Wood : 35	10/24/2023	1/1/1995
103042894	Pole - Class: 4 : Wood : 40	4/2/2024	1/1/1995
103043073	Pole - Class: 4 : Wood : 30	4/2/2024	1/1/1995
103044828	Pole - Class: 4 : Wood : 25	4/3/2024	1/1/1995
103045852	Pole - Class: 5 : Wood : 35	4/24/2024	1/1/1995
103046788	Pole - Class: 1 : Wood : 30	4/4/2024	1/1/1995
103047856	Pole - Class: 5 : Wood : 30	4/16/2024	1/1/1995
103974379	Pole - Class: H2 : Wood : 50	4/3/2024	1/1/1995
104162124	Pole - Class: 1 : Wood : 40	4/3/2024	1/1/1995
103045461	Pole - Class: 1 : Wood : 45	5/8/2024	1/1/1995
103045596	Pole - Class: 4 : Wood : 45	5/13/2024	1/1/1995
103827192	Pole - Class: 5 : Wood : 25	3/27/2024	1/1/1984
103043569	Pole - Class: 4 : Wood : 35	6/4/2024	1/1/1977
104126612	Pole - Class: 5 : Wood : 45	7/11/2024	1/1/1963

4. **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 EDPM Manual (TD-2305M), Record Retention Requirements, GO 165 Record Retention Guidelines, shown in Figure 2, 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).

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
OH IR 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

Figure 2: TD-2503M GO 165 Record Retention Guidelines

GO 165 requires records to be maintained for at least 10 years for patrols and inspection activities. PG&E's EDPM Manual and practices do not comply with the record retention requirements as prescribed by GO 165.

III. Field Inspection

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

Location	Structure Type	SAP ID Number
1	Pole	103750505
2	Pole	103750502
3	Pole	101452887
4	Pole	103819794
5	Pole	101445423
6	Pole	101445422
7	Pole	103819376
8	Pole	103819377
9	Pole	101367831
10	Pole	101361765
11	Pole	101361766
12	Pole	101362987
13	Pole	104211681
14	Pole	101424110
15	Pole	101424111
16	Pole	103582253
17	Pole	101424113
18	Pole	101443629
19	Pole	101423155
20	Pole	101423206
21	Pole	101423205
22	Pole	101423204
23	Subsurface Transformer	108103226
24	Subsurface Transformer	108103231
25	Underground Splice Box	108127066
26	Subsurface Transformer and Switch	108099992
27	Pole	101429381
28	Pole	101429382
29	Pole	101429383
30	Pole	101429380
31	Pole	101431031
32	Pole	104139943
33	Pole	101431032
34	Pole	103921241
35	Pole	103921259
36	Pole	101430512
37	Pole	101430511
38	Pole	101445240
39	Pole	101445241

40	Pole	103925739
41	Pole	101445245
42	Pole	101454839
43	Underground Splice Box	108089363
44	Subsurface Switch	108089370
45	Underground Splice Box	108063198
46	Subsurface Switch	108063207
47	Pole	103927502
48	Pole	103921121
49	Pole	101441318
50	Pole	101441319
51	Pole	104041801
52	Pole	101435820
53	Pole	103805063
54	Underground Splice Box	108152401
55	Pole	101446148
56	Pole	104087830
57	Pole	101446145
58	Pole	101451203
59	Pole	101451202
60	Pole	104200471
61	Pole	104200468
62	Pole	104200465
63	Pole	104200464
64	Pole	102298965
65	Pole	101341920
66	Pole	101353874
67	Pole	101353872
68	Pole	103341948
69	Pole	101353868
70	Pole	101353867
71	Pole	101359127
72	Pole	101359126
73	Pole	101359125
74	Pole	101359124
75	Pole	101359123
76	Pole	101348506
77	Pole	101348505
78	Pole	101348504
79	Pole	103043835
80	Pole	101354547
81	Subsurface Transformer	108141018
82	Padmount Transformer	107791993
83	Underground Splice Box	108097865

84	Padmount Transformer	107792893
85	Underground Splice Box	108101888
86	Pole	101347792
87	Pole	101347791
88	Pole	101347790
89	Pole	101358500
90	Pole	101358501
91	Pole	101350464
92	Pole	101350463
93	Pole	101352630
94	Pole	101348411
95	Pole	103733346
96	Pole	101363239
97	Pole	104201548
98	Pole	101369227
99	Pole	104205698
100	Pole	102296422
101	Pole	102299879
102	Pole	102299878
103	Pole	103743305
104	Pole	102296421
105	Underground Splice Box	108177387
106	Underground Splice Box	108177386
107	Subsurface Transformer and Switch	108079547
108	Padmount Transformer	107789086
109	Padmount Transformer	107789043
110	Padmount Transformer	108237640
111	Padmount Transformer	107793795
112	Padmount Transformer	107793765
113	Padmount Transformer	107793807

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
2	The pole has a potential oil leak at the insulator base.	PG&E has added the issue to the preexisting tag at this location (EC 119122060).
3	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 120764890).
5	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 119610550).
9	The pole has loose hardware and is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 125857393).
11	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 125860377).
12	The pole has loose hardware and is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 125910516).
15	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 126469854).
17	The pole and down guy anchor are decayed and need replacement.	PG&E has a preexisting tag for the issue (EC 126468586).
22	The pole has faded and missing markers.	PG&E has a preexisting tag for the issue (EC 126656587).
27	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 123659351).

28	The pole is rotten and decayed and needs replacement, and the transformer has signs of leaking.	PG&E has a preexisting tag for the issue (EC 123658997).
36	The pole is rotten and decayed and needs replacement, and the transformer is corroded with a loose bolt.	PG&E has a preexisting tag for the issue (EC 112690116).
37	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 112690113).
39	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 125029483).
42	The pole has a rusted transformer.	PG&E has added the issue to the preexisting tag at this location (EC 111983325).
51	The pole has a down guy with a buried anchor.	PG&E has a preexisting tag for the issue (EC 119608815).
55	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 119551680).
57	The pole is missing visibility strips.	PG&E fixed the finding in the field.
65	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 116848423).
66	The pole and the down guy anchor are decayed and need replacement, and the pole has loose hardware.	PG&E has a preexisting tag for the issue (EC 126118368).
70	The pole has a down guy with a buried anchor.	PG&E has a preexisting tag for the issue (EC 129029745).
71	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 126446136).
72	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 126446098).
73	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 126443939).

74	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 126443710).
78	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 121840677).
87	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 123315968).
95	The pole has incorrectly installed parallel transformers that need replacement.	PG&E has a preexisting tag for the issue (EC 126893914).
96	The pole has loose hardware and is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 126894303).
98	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 126902500).

2. **GO 95, Rule 33.3-A, Grounding Connections, Effective Grounds** states in part:

   "Supply equipment of the following types, when grounded to conform to requirements of this Order or for any other reasons, shall be effectively grounded:
   - *Neutral conductors of low voltage supply circuits (0 - 750 volts, see Rule 58.2–A);*
   - *Neutral conductors of supply circuits exceeding 750 volts;*
   - *Bond wires;*
   - *Lightning arresters;*
   - *Transformer cases grounded in accordance with Rule 58.2–A."*

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

Table 6: GO 95, Rule 33.3-A Findings

Location	Finding	Notes
57	The pole is missing the appropriate grounding.	PG&E has a preexisting tag for the issue (EC 119551682).

3. **GO 95, Rule 35, Vegetation Management** states in part:

   "Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be

performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained. (Also see Appendix E for tree trimming guidelines.) These requirements apply to all overhead electrical supply and communication facilities that are covered by this General Order, including facilities on lands owned and maintained by California state and local agencies.

Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).”

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

Table 7: GO 95, Rule 35 Findings

Location	Finding	Notes
2	Excessive vegetation surrounding the pole needs trimming.	PG&E has a preexisting tag for the issue (EC 119122060).
5	The pole has vegetation laying on the secondary lines.	PG&E has added the issue to the preexisting tag at this location (EC 119610550).
10	Excessive vegetation surrounding the pole needs trimming.	PG&E has a preexisting tag for the issue (EC 125858648).
14	Excessive vegetation surrounding the pole needs trimming.	PG&E has a preexisting tag for the issue (EC 126469997).
36	Excessive vegetation is causing strain and abrasion.	PG&E has a preexisting tag that includes the issue (EC 112690116).
74	Excessive vegetation surrounding the pole is in the climbing space and needs trimming.	PG&E has a preexisting tag for the issue (EC 126443710).

4. **GO 95, Rule 44.3, Replacement** states:

> *"Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade "C" construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one."*

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

Table 8: GO 95, Rule 44.3 Findings

Location	Finding	Notes
9	The pole has an insulator that needs replacement.	PG&E has a preexisting tag for the issue (EC 125857393).
10	The pole has service drop conductors that need replacement.	PG&E has a preexisting tag for the issue (EC 125858648).
27	The pole has conductors that need replacement.	PG&E has a preexisting tag for the issue (EC 123659351).
52	The pole has a service drop conductor that needs replacement.	PG&E has added the issue to the preexisting tag at this location (EC 121764145).
66	The pole has an insulator that needs replacement.	PG&E has a preexisting tag for the issue (EC 126118368).

5. **GO 95, Rule 49.2-C, Crossarms, Strength** states in part:

> *"Crossarms shall be securely supported by bracing, where necessary, to withstand unbalanced vertical loads and to prevent tipping of any arm sufficiently to decrease clearances below the values specified in Section III. Such bracing shall be securely attached to poles and crossarms. Supports in lieu of crossarms shall have means of resisting rotation in a vertical plane about their attachment to poles or shall be supported by braces as required for crossarms. Metal braces or attachments shall meet the requirements of Rules 48.2 and 49.8."*

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

Table 9: GO 95, Rule 49.2-C Findings

Location	Finding	Notes
9	The pole has a decaying crossarm and broken underarm bus that needs replacement.	PG&E has a preexisting tag for the issue (EC 125857393).
10	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 125858648).
12	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 125910516).
28	The pole has a decaying crossarm and broken underarm bus that needs replacement.	PG&E has a preexisting tag for the issue (EC 123658997).
33	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 123466608).
37	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 112690113).
65	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 116848423).
66	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 126118368).
71	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 126446136).
72	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 126446098).
74	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 126443710).
77	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 121824580).
78	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 121840677).

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

"Insulator pins and conductor fastenings shall be able to withstand the loads to which they may be subjected with safety factors at least equal to those specified in Rule 44.

(1) Longitudinal Loads Normally Balanced:

b. Conductor Fastenings: Where longitudinal loads are normally balanced, tie wires or other conductor fastenings shall be installed in such a manner that they will securely hold the line conductor to the supporting insulators and will withstand without slipping of the conductor unbalanced pulls as follows:
Supply conductor fastening – 40% of the maximum working tensions but not more than 500 pounds.
Class C conductor fastenings – 15% of the maximum working tensions but not more than 300 pounds.
Tie wires are not required on Class C conductors at point– type transpositions in Grade F construction."

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

Table 10: GO 95, Rule 49.3-C(1)(b) Findings

Location	Finding	Notes
12	The pole has an improperly connected tie wire and conductor splice.	PG&E has a preexisting tag for the issue (EC 125910516).

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

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

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

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

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

Table 11: GO 95, Rule 51.6-A Findings

Location	Finding	Notes
18	The pole has missing high voltage signs.	PG&E has created a tag for the issue (EC 129714677).
28	The pole has a missing high voltage sign on the crossarm.	PG&E has added the issue to the preexisting tag at this location (EC 123658997).
33	The pole has a damaged high voltage sign on the crossarm.	PG&E has added the issue to the preexisting tag at this location (EC 123466608).
37	The pole has a missing high voltage sign on the crossarm.	PG&E has a preexisting tag for the issue (EC 112690113).
38	The pole has missing high voltage signs.	PG&E has created a tag for the issue (EC 121707353).
42	The pole has a missing high voltage sign.	PG&E has a preexisting tag for the issue (EC 111983325).
55	The pole has a missing high voltage sign.	PG&E has a preexisting tag to replace the pole, which will also resolve the issue (EC 111983325).
69	The pole has damaged high voltage signs.	PG&E has a preexisting tag for the issue (EC 120706535).
92	The pole has damaged high voltage signs.	PG&E has created a tag for the issue (EC 129726730).

8. **GO 95, Rule 54.5, Conductors, Sags** states:

"Minimum conductor sags shall be such that, under the loading conditions specified in Rule 43, the safety factor specified in Table 4, Rule 44 shall be met. See Charts in Appendix C for suggested sags at normal temperatures."

ESRB's finding related to the above rule is listed in Table 12:

Table 12: GO 95, Rule 54.5 Findings

Location	Finding	Notes
29	The pole has sagging conductors.	PG&E has a preexisting tag for the issue (EC 123658755).

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

"Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion–resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position.

Where such covering consists of wood moulding, rigid plastic moulding, or other suitable protective moulding, the distance between the attachment materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) shall not exceed 36 inches on either side of the moulding."

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

Table 13: GO 95, Rule 54.6-I Findings

Location	Finding	Notes
42	The pole has a broken ground moulding that is exposing the transformer ground wire.	PG&E has added the issue to the preexisting tag at this location (EC 111983325).
73	The pole has a broken ground moulding that is exposing the transformer ground wire.	PG&E has added the issue to the preexisting tag at this location (EC 126443939).
75	The pole has a broken ground moulding that is exposing the transformer and secondary ground wire.	PG&E has created a tag for the issue (EC 129724913).
77	The pole has a broken ground moulding that is exposing the transformer ground wire.	PG&E has a preexisting tag for the issue (EC 121824580).
95	The pole has a loose ground moulding that is exposing the transformer ground wire.	PG&E has a preexisting tag for the issue (EC 126893914).

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

> *"Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."*

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

Table 14: GO 95, Rule 56.2 Findings

Location	Finding	Notes
17	The pole has a slack span guy that needs replacement.	PG&E has a preexisting tag for the issue (EC 126468586).
34	The pole has a corroded span guy with overgrown vegetation.	PG&E has a preexisting tag for the issue (EC 123614394).
35	The pole has a corroded span guy with overgrown vegetation.	PG&E has a preexisting tag for the issue (EC 123615550).
98	The pole has a slack anchor down guy in contact with the communications drops.	PG&E has added the issue to the preexisting tag at this location (EC 126902500).

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

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

ESRB's findings related to the above rule are listed in Table 15:

Table 15: GO 95, 56.7-B Findings

Location	Finding	Notes
56	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.	PG&E has created a tag for this issue (EC 129722290).
86	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.	PG&E has added the issue to the preexisting tag at this location (EC 123316230).

95	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.	PG&E has a preexisting tag for this issue (EC 126893914).

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

> *"Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps."*

ESRB's findings related to the above rule are listed in Table 16:

Table 16: GO 95, Rule 91.3-C Findings

Location	Finding	Notes
29	The pole has a low pole step.	PG&E fixed the finding in the field.
70	The pole has a low pole step.	PG&E fixed the finding in the field.
73	The pole has a low pole step.	PG&E has a preexisting tag for this issue (EC 126443939).
78	The pole has a low pole step.	PG&E fixed the finding in the field.
92	The pole has a low pole step.	PG&E fixed the finding in the field.
98	The pole has a low pole step.	PG&E has a preexisting tag for the issue (EC 126902500).

13. GO 95, Rule 92.4-C(2)(c), Grounding, Material and Size states in part:

> *"Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground."*

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

Table 17: GO 95, Rule 92.4-C(2)(c) Findings

Location	Finding	Notes
37	The pole has an exposed grounding rod.	PG&E has a preexisting tag to replace the pole, which will also resolve the issue (EC 112690113).

14. 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 18:

Table 18: GO 128, Rule 17.1 Findings

Location	Finding	Notes
23	The enclosure is full of dirt and the subsurface transformer is inaccessible.	PG&E has a preexisting tag for the issue (EC 129715773).

15. 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."

ESRB's findings related to the above rule are listed in Table 19:

Table 19: GO 128, Rule 17.8 Findings

Location	Finding	Notes
110	The padmount transformer is missing a PG&E exterior ownership sticker.	PG&E fixed the finding in the field.
112	The padmount transformer has a damaged PG&E exterior ownership sticker.	PG&E fixed the finding in the field.

16. **GO 128, Rule 32.7, Manholes, Handholes and Subsurface Equipment Enclosures, Covers** states in part:

> *"Manholes, handholes, and subsurface equipment enclosures while not being worked in, shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them and arrangements shall be such that a tool or appliance shall be required for their opening and cover removal."*

ESRB's finding related to the above rule is listed in Table 20:

Table 20: GO 128, Rule 32.7 Findings

Location	Finding	Notes
37	The subsurface transformer has a damaged enclosure lid that cannot be fully secured.	PG&E has a preexisting tag for the issue (EC 129710601).

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 21:

Table 21: Third-Party Audit Observations

Location	Finding	Notes
3	The pole has an idle and unattached conductor.	PG&E has a pre-existing third-party notification for this issue (TPN 120764891).
4	Communications has a buddy pole that needs to be removed.	PG&E has a pre-existing third-party notification for this issue (119610121).
6	The pole has an abandoned communications drop.	PG&E created a third-party notification for this issue (TPN 129711736).
9	The pole has excessive vegetation causing strain and abrasion.	PG&E has pre-existing third-party notifications for this issue (TPN 125857395 and TPN 125959994).

10	The pole has excessive vegetation causing strain and abrasion and a broken communications lashing wire, and the communication drops are in contract with other services.	PG&E has pre-existing third-party notifications for this issue (TPN 125858678 and TPN 125936229).
11	The pole has excessive vegetation causing strain and abrasion.	PG&E has pre-existing third-party notifications for this issue (TPN 125860336 and TPN 125960159).
12	The pole has excessive vegetation causing strain and abrasion and an exposed ground wire.	PG&E has pre-existing third-party notifications for this issue (TPN 125910518 and TPN 126014697).
13	The pole has a slack communications guy wire and an inadequate riser guard.	PG&E created a third-party notification for this issue (TPN 129714075).
19	The pole has an abandoned communications drop.	PG&E removed the abandoned drop in the field
22	The pole has an idle and unattached communications conductor and an exposed communications ground wire.	PG&E has pre-existing third-party notifications for this issue (TPN 123855606 and TPN 124200335).
28	The pole has a missing communications riser guard.	
30	The pole has a missing communications riser guard.	
31	Communications has a buddy pole that needs to be removed, and the pole has a slack communications guy wire.	PG&E has pre-existing third-party notifications for this issue (TPN 123466960 and TPN 123571819).
32	Communications has a buddy pole that needs to be removed.	
33	The pole has a communications conductor with inadequate clearance.	PG&E has pre-existing third-party notifications for this issue (TPN 123466682 and TPN 123572395).

34	The pole has a communications conductor with inadequate clearance and a broken communications lashing wire.	PG&E has pre-existing third-party notifications for this issue (TPN 123614535 and TPN 123719226).
35	The pole has an abandoned communications drop and a loose communications lashing wire.	PG&E has pre-existing third-party notifications for this issue (TPN 123615507 and TPN 123721003).
36	The pole has an exposed communications ground wire.	PG&E has pre-existing third-party notifications for this issue (TPN 123615831 and TPN 123721451).
38	The pole has an idle and unattached communications conductor with inadequate clearance.	PG&E has pre-existing third-party notification for this issue (TPN 121707356 and TPN 121769306).
40	Communications has a buddy pole that needs to be removed.	PG&E has pre-existing third-party notifications for this issue (TPN 121707355 and TPN 121769251).
48	The pole has a slack communications guy wire and an unauthorized attachment, and communications has a missing riser guard.	PG&E has pre-existing third-party notifications for the slack guy wire and the unauthorized attachment (TPN 121548829 and TPN 122208848).
49	The pole has a slack communications guy wire.	PG&E has pre-existing third-party notifications for this issue (TPN 121548818 and TPN 122208839).
50	The pole has an exposed communications ground wire and a slack communications guy wire.	PG&E has pre-existing third-party notifications for this issue (TPN 121548817 and TPN 122208437).
51	Communications has a buddy pole that needs to be removed.	PG&E has pre-existing third-party notifications for this issue (TPN 121726798 and TPN 121794859 and TPN 124006433 and TPN 124372858).
53	The pole has an idle and unattached communications conductor.	PG&E has pre-existing third-party notifications for this issue (TPN 122326108 and TPN 12176408).

56	Communications has a buddy pole that needs to be removed and an abandoned drop, and the communication drops are in contract with other services.	PG&E removed the abandoned drop in the field and created a third-party notification for the communication drops in contact with the services (TPN 129722282).
60	Communications has a buddy pole that needs to be removed.	
61	Communications has a buddy pole that needs to be removed.	
62	Communications has a third-party pole that needs to be removed.	
63	Communications has a buddy pole that needs to be removed.	
65	The pole has an idle and unattached communications conductor with inadequate clearance.	PG&E has pre-existing third-party notifications for this issue (TPN 120930131 and TPN 121344738).
66	The pole has a slack communications guy wire.	PG&E has pre-existing third-party notifications for this issue (TPN 126118382 and TPN 127509137).
67	The pole has an idle and unattached communications conductor with inadequate clearance.	PG&E has pre-existing third-party notifications for this issue (TPN 120930207 and TPN 121345182).
71	The pole has an idle and unattached communications conductor with inadequate clearance.	PG&E has pre-existing third-party notifications for this issue (TPN 120888932 and TPN 121912183).
72	The pole has an idle and unattached communications conductor with inadequate clearance.	PG&E has pre-existing third-party notifications for this issue (TPN 122326108 and TPN 12176408).
73	The pole has an idle and unattached communications conductor with inadequate clearance and an exposed communications ground wire.	PG&E has pre-existing third-party notifications for this issue (TPN 120888823 and TPN 121912442).
74	The pole has an idle and unattached communications conductor with inadequate clearance.	PG&E has pre-existing third-party notifications for this issue (TPN 120888644 and TPN 121912590).

75	The pole has an idle and unattached communications conductor with inadequate clearance.	PG&E has pre-existing third-party notifications for this issue (TPN 120888499 and TPN 121912148).
79	The pole has an idle and unattached communications conductor with inadequate clearance.	PG&E has pre-existing third-party notifications for this issue (TPN 121840950 and TPN 121885797).
95	The pole has a slack communications guy wire.	PG&E has pre-existing third-party notifications for this issue (TPN 126893931 and TPN 126947055).
98	The pole has an exposed communications ground wire.	PG&E has pre-existing third-party notifications for this issue (TPN 126902502 and TPN 126950280).
99	The pole has an idle and unattached communications conductor with inadequate clearance.	PG&E created a third-party notification for this issue (TPN 129730231).
100	The pole has an idle and unattached communications conductor with inadequate clearance and a loose communications lashing wire.	PG&E has pre-existing third-party notifications for this issue (TPN 120949146 and TPN 121367189).
101	The pole has unattached animal guarding, an idle and unattached communications conductor, and an exposed communications ground wire.	PG&E has a pre-existing third-party notification for this issue (TPN 120949001).
102	The pole has an exposed communications ground wire and ground rod.	PG&E has created a third-party notification for this issue (TPN 129730306).
103	The pole has an exposed communications ground rod.	PG&E has created a third-party notification for this issue (TPN 129730431).