

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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November 1, 2024

EA2024-1255

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

Subject: Electric distribution audit of SDG&E's North Coast District

Ms. Kaminsky:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Jose Lastra of my staff conducted an electric distribution audit of SDG&E's North Coast District from July 15-19, 2024. The audit included a review of SDG&E's records and field inspections of SDG&E's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). Included with this letter is a copy of the audit findings that itemize the violations discovered during the audit. Please advise me no later than December 2, 2024, by electronic or hard copy, of all corrective measures taken by SDG&E 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 Jose Lastra (213) 507-1438 or jose.lastra@cpuc.ca.gov.

Sincerely,

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

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

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Jose Lastra, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Pole load calculations
- Intrusive test records
- Safety hazard notifications
- SDG&E's documented inspection program.
- Vegetation Records

II. Records Review – Violations List

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

GO 165, Section III-B, Distribution Facilities, 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 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.

SDG&E's records indicated that from January 1, 2021 to May 1, 2024, SDG&E completed 76 detailed inspections past SDG&E's scheduled due date.

GO 165, Section III-B, Distribution Facilities, 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.

SDG&E's records indicated that from January 1, 2021 to May 1, 2024, SDG&E completed 63 (Padmount and Subsurface) underground inspections past SDG&E's scheduled due date.

GO 95, Rule 18-B1, Maintenance Programs, states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...

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

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.

SDG&E's records indicated that from January 1, 2021 to May 1, 2024, SDG&E completed 92 overhead work orders past SDG&E's due date for corrective action.

GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

SDG&E's records indicated that from January 1, 2021 to May 1, 2024, SDG&E completed 73 underground work orders past SDG&E's due date for corrective action.

III. Field Inspections

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

| No. | Structure ID. | Type of Structure | Location |
|-----|---------------|-------------------|-----------|
| 1 | P123017 | Wood Pole | Carlsbad |
| 2 | P123016 | Wood Pole | Carlsbad |
| 3 | P247448 | Wood Pole | Carlsbad |
| 4 | P247430 | Wood Pole | Carlsbad |
| 5 | P123015 | Wood Pole | Carlsbad |
| 6 | P123014 | Wood Pole | Carlsbad |
| 7 | P220283 | Wood Pole | Carlsbad |
| 8 | P168726 | Wood Pole | Carlsbad |
| 9 | P123013 | Wood Pole | Carlsbad |
| 10 | P125450 | Wood Pole | Carlsbad |
| 11 | P24879 | Wood Pole | Carlsbad |
| 12 | P20945 | Wood Pole | Carlsbad |
| 13 | P21381 | Wood Pole | Carlsbad |
| 14 | P24880 | Wood Pole | Carlsbad |
| 15 | P20947 | Wood Pole | Carlsbad |
| 16 | P612067 | Wood Pole | Carlsbad |
| 17 | P27442 | Wood Pole | Carlsbad |
| 18 | P29702J | Wood Pole | Carlsbad |
| 19 | P28882J | Wood Pole | Carlsbad |
| 20 | P120819 | Wood Pole | Carlsbad |
| 21 | P20946 | Wood Pole | Carlsbad |
| 22 | P61359 | Wood Pole | Del Mar |
| 23 | P61358 | Wood Pole | Del Mar |
| 24 | P60593 | Wood Pole | Del Mar |
| 25 | P62031 | Wood Pole | Del Mar |
| 26 | P62032 | Wood Pole | Del Mar |
| 27 | P60534 | Wood Pole | Del Mar |
| 28 | P61578 | Wood Pole | Del Mar |
| 29 | P60875 | Wood Pole | Del Mar |
| 30 | P60533 | Wood Pole | Del Mar |
| 31 | P60776 | Wood Pole | Del Mar |
| 32 | P167438 | Wood Pole | Del Mar |
| 33 | P167437 | Wood Pole | Del Mar |
| 34 | P310991 | Wood Pole | Del Mar |
| 35 | P113557 | Wood Pole | Del Mar |
| 36 | P719880 | Wood Pole | Del Mar |
| 37 | Z12329 | Wood Pole | Del Mar |
| 38 | P26300 | Wood Pole | Oceanside |
| 39 | P26301 | Wood Pole | Oceanside |
| 40 | P26302 | Wood Pole | Oceanside |
| 41 | P26303J | Wood Pole | Oceanside |
| 42 | P25710 | Wood Pole | Oceanside |
| 43 | P26304 | Wood Pole | Oceanside |
| 44 | P26305J | Wood Pole | Oceanside |

| | | | |
|----|----------|------------|-----------|
| 45 | P26305J | Wood Pole | Oceanside |
| 46 | P26306 | Wood Pole | Oceanside |
| 47 | P26307J | Wood Pole | Oceanside |
| 48 | P26308 | Wood Pole | Oceanside |
| 49 | P29728J | Wood Pole | Oceanside |
| 50 | P29727 | Steel Pole | Oceanside |
| 51 | P29726J | Wood Pole | Oceanside |
| 52 | P29725 | Wood Pole | Oceanside |
| 53 | P25712 | Wood Pole | Oceanside |
| 54 | P25804 | Wood Pole | Oceanside |
| 55 | P25711 | Wood Pole | Oceanside |
| 56 | P122422 | Wood Pole | Oceanside |
| 57 | P122421 | Wood Pole | Oceanside |
| 58 | P122267 | Wood Pole | Oceanside |
| 59 | P122266 | Wood Pole | Oceanside |
| 60 | P122782 | Wood Pole | Oceanside |
| 61 | P121151 | Wood Pole | Oceanside |
| 62 | P121150 | Wood Pole | Oceanside |
| 63 | P414277 | Wood Pole | Vista |
| 64 | P414278J | Wood Pole | Vista |
| 65 | P414279 | Wood Pole | Vista |
| 66 | P414280 | Wood Pole | Vista |
| 67 | P414281 | Wood Pole | Vista |
| 68 | P414282J | Wood Pole | Vista |
| 69 | P414283J | Wood Pole | Vista |
| 70 | P198166 | Wood Pole | Vista |
| 71 | P414286 | Wood Pole | Vista |
| 72 | P414287 | Wood Pole | Vista |
| 73 | P413815 | Wood Pole | Vista |
| 74 | P413816J | Wood Pole | Vista |
| 75 | P413814J | Wood Pole | Vista |
| 76 | P413812J | Wood Pole | Vista |
| 77 | P413813 | Wood Pole | Vista |
| 78 | P413811 | Wood Pole | Vista |
| 79 | P414276J | Wood Pole | Vista |
| 80 | P513905 | Wood Pole | Vista |
| 81 | P513804 | Wood Pole | Vista |
| 82 | P117917 | Wood Pole | Vista |
| 83 | P512986 | Wood Pole | Vista |
| 84 | P117918 | Wood Pole | Vista |
| 85 | P410584 | Wood Pole | Vista |
| 86 | P117920 | Wood Pole | Vista |
| 87 | P217074 | Wood Pole | Vista |
| 88 | P161578 | Wood Pole | Vista |
| 89 | P16043 | Wood Pole | Vista |
| 90 | P510055 | Wood Pole | Vista |
| 91 | P16044 | Wood Pole | Vista |
| 92 | P510056 | Wood Pole | Vista |
| 93 | P510057 | Wood Pole | Vista |

| | | | |
|-----|-------------|------------------------|----------|
| 94 | P510058 | Wood Pole | Vista |
| 95 | P16042 | Wood Pole | Vista |
| 96 | B286196115 | Padmounted Transformer | Del Mar |
| 97 | D2862069099 | Pad Mount | Del Mar |
| 98 | D2862569094 | Padmounted Terminator | Del Mar |
| 99 | D100567 | Padmounted Terminator | Del Mar |
| 100 | D100543 | Padmounted Transformer | Del Mar |
| 101 | D100544 | Padmounted Transformer | Del Mar |
| 102 | D115304 | Padmounted Transformer | Del Mar |
| 103 | D115303 | Padmounted Transformer | Del Mar |
| 104 | W100727 | Padmounted Switch | Carlsbad |
| 105 | D104732 | Pad Mount | Carlsbad |
| 106 | W100728 | Padmounted Switch | Carlsbad |
| 107 | W100730 | Padmounted Switch | Carlsbad |
| 108 | D104736 | Padmounted Transformer | Carlsbad |

IV. Field Inspection Violations List

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

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.

SDG&E's facilities on the following poles required maintenance:

- Pole P60875: the SDG&E hog eye connection for the span guy wire supporting the pole was corroded
- Pole P122421: a mylar balloon was entangled on a secondary conductor

GO 95, Rule 35, Vegetation Management, states in part:

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).

An SDG&E secondary service drop conductor attached to Pole P410584 was strained by vegetation.

GO 95, Rule 51.6, Marking and Guarding, High Voltage Marking of Poles, states in part:

Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.

The high voltage signs on the following poles were damaged:

- Pole P414276J
- Pole P16044

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

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

The ground moulding attached to Pole P26305J was damaged.

GO 95, Rule 54.7, Climbing Space, states in part:

Climbing space shall be maintained from the ground level. Climbing space, measured from center line of pole, shall be provided on one side or in one quadrant of all poles or structures....

The climbing space on Pole P513905 was obstructed by vegetation.