**CPUC AUDIT OF PG&E WILLITS HEADQUARTERS**
**ELECTRIC TRANSMISSION AUDIT FINDINGS**
**APRIL 8-12, 2024**

## I. Records Review

During the audit, ESRB staff reviewed the following records:

- PG&E's Electric Transmission Preventive Maintenance (ETPM) Manual, TD-1001M, Revisions 4-5.
- PG&E's utility procedures, standards, guidelines, and job aids for electric transmission facility inspections.
- Overhead transmission facilities statistics.
- PG&E Willits HQ Service Territory Map and list of all transmission facilities owned or jointly owned by PG&E.
- Patrol, detailed, aerial, climbing, infrared, drone, and helicopter inspection records from January 2019 to March 2024.
- Third Party Safety Hazard notifications sent and received from July 2020 to June 2023.
- PG&E's utility procedures, standards, guidelines, and job aids for electric transmission vegetation management.
- A list of vegetation management inspection records and tree work orders for transmission circuits from February 2018 to February 2024.
- PG&E's policies and procedures related to transmission right-of-way maintenance, and associated performance records from April 2020 to February 2024.
- PG&E's policies and procedures for insulator washing, and associated performance records from May 2020 to March 2024.
- PG&E's policies and procedures for pole intrusive tests, foundation tests, and all other tests related to transmissions structure safety, and associated performance records from March 2021 to December 2023.
- A list of non-routine patrols for electric transmission facilities from January 2019 to March 2024.
- PG&E's policies and procedures for assigning priority levels to transmission deficiencies from March 2020 to March 2024.
- A list of all open, closed, and canceled notifications from February 2020 to March 2024.
- Pole loading and safety factor calculations completed from February 2023 to March 2024.
- New construction projects completed from March 2023 to March 2024.
- PG&E's utility standard and procedures for transmission work verification and vegetation management quality control (QC) and quality assurance (QA).
- The results of all internal quality management audits from September 2022 to January 2024.
- A list of PG&E inspector training courses from March 2019 to March 2024.

## II. Records Violations

ESRB staff found the following violations during the records review portion of the audit:

PG&E's ETPM establishes when corrective actions for problems must be completed. For the time periods reviewed in this audit two versions of the ETPM are relevant. PG&E's last two versions of its ETPM, Revision 4, effective November 20, 2018, and Revision 5, effective August 31, 2020, define the priority codes and associated due dates for the corrective actions shown in **Table 1** and **Table 2** below:

**Table 1.** PG&E ETPM Rev 4, Published on 11/20/2018, Priority Codes [1,2]

| Priority Code | Priority Code Priority Description |
|---|---|
| **A** | The condition is urgent and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date will be 30 days to allow time for post-construction processes and notification close-out. |
| **B** | Corrective action is required within 3 months from the date the condition is identified. The condition must be reported to the transmission line supervisor as soon as practical. |
| **E** | Corrective action is required within 12 months from the date the condition is identified. |
| **F** | Corrective action is recommended within 24 months from the date the condition is identified, (due beyond 12 months, not to exceed 24 months). Requires Director approval. |

**Table 2**.PG&E ETPM Rev 5, Published on 8/31/2020, Priority Codes

| Priority Code[3] | Priority Description |
|---|---|
| **A[4]** | The condition is urgent and requires **immediate** response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date will be 30 days to allow time for post-construction processes and notification close-out. |

[1] QCRs must report immediately any "Priority Code A" abnormal condition to the transmission line supervisor and GCC.

[2] In addition, QCRs must report any "Priority Code B" condition to the transmission line supervisor as soon as practical, to ensure that correction occurs within the appropriate time.

[3] Refer to 2.3.5.2, "Priority Code Due Dates for High Fire Risk Conditions within HFTDs" and 2.3.5.3, "Priority Code Due Dates for Non-Fire Risk Conditions within HFTDs."

[4] QCRs must report immediately any "Priority Code A" abnormal condition to the transmission line supervisor, and the transmission supervisor or QCR contacts GCC.

| | |
|---|---|
| **B**[5] | Corrective action is required within **3 months** from the date the condition is identified. The condition must be reported to the transmission line supervisor as soon as practical. |
| **E** | Corrective action is required within **12 months** from the date the condition is identified. ***EXCEPT FOR ITEMS WITHIN HFTD TIER 3 ARE REQUIRED WITHIN 6 MONTHS.***[6] |
| **F** | Corrective action is recommended within **24 months** from the date the condition is identified, (due beyond 12 months, not to exceed 24 months). ***EXCEPT FOR ITEMS WITHIN HFTD TIER 3 ARE REQUIRED WITHIN 6 MONTHS AND WITHIN HFTD TIER 2 ARE REQUIRED WITHIN 12 MONTHS.***[7] |

a. ESRB's review of PG&E's Line Corrective (LC) notifications from "DRU13112_Q16_Atch01_Willits Master List of Notifications" found a total of 1,547 late LC notifications. **Table 3** below breaks down the late notifications by priority and type (late-closed, late-open, and late-canceled). Late-closed notifications are notifications that were completed past their assigned due date based on their priority code. Late-open notifications are incomplete notifications that were not completed by their assigned due date based on their priority code. Late-canceled notifications are notifications that were canceled after their assigned due date based on their priority code.

**Table 3.** Number of Late Notifications by Priority and Type[8]

| Priority Code | Late Closed Notifications | Late Open Notifications | Late Canceled Notifications | Total Late Notifications |
|---|---|---|---|---|
| **A** | 2 | - | 1 | **3** |
| **B** | 17 | - | 3 | **20** |
| **E** | 965 | 139 | 216 | **1,320** |
| **F** | 18 | 94 | 92 | **204** |
| **Total** | **1,002** | **233** | **312** | **1,547** |

[5] In addition, QCRs must report any "Priority Code B" condition to the transmission line supervisor as soon as practical, to ensure that correction occurs within the appropriate time.
[6] If the condition in the HFTD Tier 3 does NOT create a fire risk (non-threatening) the corrective action is required within 12 months.
[7] If the condition in the HFTD Tier 3 OR Tier 2 does NOT create a fire risk (non-threatening) the corrective action is required within 24 months.
[8] Due dates are assumed to be the Required End Date unless a Funded Repair Date is available

[9] Current Priority Code provided by PG&E.
[10] Days late are determined to be the difference between the Completion Date (or March 1, 2024 if the notification was open) and the Required End Date (or Funded Repair Date if one was provided).

PG&E Response:
We agree with 1,125 of the 1,547 record violations cited in Table 3 "Number of Late Notifications by Priority and Type". Please see the individual category responses below:

- We agree that 1,000 of the 1,002 "Late Closed Notifications" were completed past their established due dates. Additionally, one notification was a duplicate.
- We agree that 125 of the 233 "Late Open Notifications" are considered late based on their established due dates.
- We do not agree with any of the 312 "Late Cancelled Notifications."

**Late Closed Notifications**

We agree with 1,000 of the above 1,002 records violations for "Late Closed Notifications". We disagree with the remaining 2 notifications being late as notification 119230557, was listed twice in the Pre-Audit Data Request (PADR) and notification 120805616, was cancelled after the PADR. Please see the breakdown of these notifications in Table 1PGE:

**Table 1PGE**

| Priority Code | CPUC "Late Closed Notifications" | PG&E Agrees completed late | PG&E Disagree completed on-time |
|---|---|---|---|
| **A** | 2 | 2 | - |
| **B** | 17 | 17 | - |
| **E** | 965 | 963 | 2 |
| **F** | 18 | 18 | - |
| **Total** | **1,002** | **1,000** | **2** |

**Late Open Notifications**

We agree with 125 of the 233 "Late Open Notifications" records violations cited in Table 3, "Number of Late Notifications by Priority and Type".

As of January 3, 2023, our Centralized Inspection Review Team (CIRT) began applying the new Standard TD- 8123P-103 "Electric Transmission Line Guidance for Setting Priority Codes" against all open notifications. This standard was written to help properly allocate resources to the operational and safety risks related to wildfire, public/worker safety, reliability, and to better align with CPUC G.O. 95 Rule 18. Since the PADR, CIRT has finished their evaluation of all open notifications which resulted in 70 notifications no longer classified as past-due and 38 have been cancelled.

Please see the full breakdown of the 233 CPUC "Late Open Notifications" in Table 2PGEbelow.

**Table 2PGE**

| Priority Code | CPUC "Late Open Notifications" | PG&E Agrees – late (closed and open) | PG&E Disagree - open and on-time | PG&E Disagree - Cancelled |
|---|---|---|---|---|
| **A** | - | - | - | - |
| **B** | - | - | - | - |
| **E** | 139 | 121 | 2 | 14 |

| | | | | |
|---|---|---|---|---|
| **F** | 94 | 4 | 68 | 24 |
| **Total** | **233** | **125** | **70** | **38** |

**Late Cancelled Notifications**

We disagree with 312 records violations cited in Table 3 "Late Cancelled Notifications". Our guidance documents do not specify a timeline requirement for cancelling notifications that are deemed unnecessary, duplicative, or created in error, after reviewed by CIRT. These notifications are not late as no corrective actions were performed.

**Table 4** below shows the most overdue notifications for each Priority Code.

**Table 4.** Most Overdue Notifications

| Priority Code[9] | Notification Number | Status | Completion Date | Due Date | Days Late[10] |
|---|---|---|---|---|---|
| A | 127524564 | Closed | February 6, 2024 | November 20, 2023 | 78 |
| B | 119609486 | Closed | November 4, 2020 | June 30, 2020 | 127 |
| E | 121585823 | Open | - | June 23, 2022 | 617 |
| F | 119016954 | Open | - | April 24, 2022 | 677 |

PG&E Response:

We have reviewed each of the notifications in Table 4 "Most Overdue Open or Closed Notifications" and have provided a response in descending order below:

- Notification 127524564 was created on November 29, 2023, as an E priority to stub the pole. On February 1, 2024, CIRT performed a review and upgraded this notification to an A priority. However, due to unsafe weather conditions and active storm response, the pole could not be stubbed until 5 days later on February 6, 2024.
- Notification 119609486 was created to replace the pole on August 13, 2020, after a woodpecker hole was found while crews were out to repair the guy wire on notification 117334486. This pole was replaced on November 4, 2020, 83 days after the notification was created to replace the structure.
- Notification 121585823 was completed on PM 31474477 on September 12, 2021, but was not closed out in our system of record. Our records have now been updated to reflect this completed work which was completed before the due date.
- Notification 119016954 was re-evaluated by CIRT on April 6, 2024, as part of the L123 conversion to align with G.O. 95 Rule 18. As per TD- 8123P-103 "Electric Transmission Line Guidance for Setting Priority Codes", the due date for this F priority notification is April 24, 2025, therefore is no longer considered past-due.

b. ESRB found in its review of "DRU13112_Q12_Atch06_Insulator Wash" that the following eleven notifications for washing insulators were performed late per PG&E's assigned required end date.

**Table 5**. Late Insulator Wash Notifications

| Notification Number | Original Priority Code | Notification Date | Completion Date | Required End Date |
|---|---|---|---|---|
| 119088825 | E | 5/15/2020 | 5/23/2021 | 5/15/2021 |
| 119088712 | E | 5/15/2020 | 5/24/2021 | 5/15/2021 |
| 119331074 | E | 7/8/2020 | 8/30/2021 | 1/8/2021 |
| 120948950 | E | 5/7/2021 | 5/9/2022 | 5/7/2022 |
| 120931391 | E | 5/4/2021 | 5/19/2022 | 5/4/2022 |
| 120931396 | E | 5/4/2021 | 5/19/2022 | 5/4/2022 |
| 120931398 | E | 5/4/2021 | 5/20/2022 | 5/4/2022 |
| 120931401 | E | 5/4/2021 | 5/20/2022 | 5/4/2022 |
| 121573314 | E | 6/17/2021 | 8/18/2022 | 6/17/2022 |
| 123380963 | E | 4/15/2022 | 1/19/2023 | 10/15/2022 |
| 123855437 | E | 6/16/2022 | 9/21/2023 | 6/16/2023 |

PG&E Response:
We agree that these eleven notifications for insulator washing were performed past their required end date. While we are executing priority E and F notifications as efficiently as possible, due to a backlog of work, we prioritize work based on risk. These were completed as soon as operationally feasible.

c. ESRB found 218 work orders that had Reassessment Dates that were later than PG&E's Required End Date for those work orders. Examples are shown below in **Table 6**.

**Table 6**. Notifications Reassessed After Required End Date

| Notification Number | Original Priority Code | Reassessment Date | Required End Date |
|---|---|---|---|
| 123759339 | B | 9/12/2022 | 9/2/2022 |
| 123455181 | B | 10/14/2022 | 7/28/2022 |
| 123260582 | B | 9/6/2022 | 6/25/2022 |
| 123209809 | B | 8/23/2022 | 6/23/2022 |
| 123208541 | B | 9/7/2022 | 6/23/2022 |
| 121809826 | B | 11/8/2021 | 10/26/2021 |
| 121374743 | B | 10/6/2022 | 5/5/2022 |
| 119419428 | B | 5/18/2021 | 10/16/2020 |
| 119152843 | B | 6/13/2021 | 6/9/2021 |

PG&E Response:
We agree that 7 of the 218 notifications cited above were required to have a Field Safety Reassessment (FSR) performed and that FSR was performed after the required end/work plan due

date.

Per TD-8123P-101 "Transmission Line Corrective (LC) Notification Maintenance Strategy", PG&E monitors and performs an FSR for each notification that meets all the following criteria

1. LC notification is level 2 or 3 (Priority "E" or "F")
2. LC notification is past - due or forecasted to become past due
3. LC notification is not on a structure scheduled for inspection in the current years' work plan
4. LC notification is time dependent.

Additionally, for notifications that met the above criteria and were created in 2022 or before, an FSR was to be complete by the work plan (WP) due date. The WP due date for all HFTD/HFRA was August 31st and December 31st of the calendar year for all non-HFTD.

For HFTD/HFRA notifications that met the above listed criteria and were created in 2023 or later, an FSR was to be complete by their required end date and December 31st of the calendar year for all non-HFTD.

Of the 218 notifications cited above, 46 were non-time dependent (NTDE) notifications and do not meet the fourth requirement above. NTDE notifications are conditions that cannot get worse over time, such as a missing marker and therefore does not require an FSR. These 46 notifications received a non-required FSR by a qualified company representative (QCR) documenting the current condition they witnessed.

Of the remaining 172 notifications cited above, 165 were created in or before 2022 and had an FSR by their WP due date.

For the 9 B priority notifications cited above as examples in Table 6 above, "Notifications Reassessed After Required End Date", all notifications were created in or prior to 2022 and received multiple FSRs. Please see Table 3PGE below for the first FSR dates. Seven of the nine had an FSR before the required end date.

**Table 3PGE**

| Notification Number | Original Priority Code | Reassessment Date | Required End Date |
|---|---|---|---|
| 123759339 | B | 6/16/2022 | 9/2/2022 |
| 123455181 | B | 7/27/2022 | 7/28/2022 |
| 123260582 | B | 6/6/2022 | 6/25/2022 |
| 123209809 | B | 5/24/2022 | 6/23/2022 |
| 123208541 | B | 6/9/2022 | 6/23/2022 |
| 121809826 | B | 9/21/2021 | 10/26/2021 |
| 121374743 | B | 10/6/2022 | 5/5/2022 |

The remaining two notifications from table 6 "Notifications Reassessed After Required End Date" above are further explained below:

- Notification 119419428 was created as an E priority on July 16, 2020, with a work plan (WP) due date of August 31, 2021. We performed the FSR on May 18, 2021. On December 2, 2021, CIRT upgraded this notification to a B priority and the work was

completed by January 14, 2022.

- Notification 119152843 does not require an FSR. It is a non-time dependent notification for missing fiberglass insulator rods.

## III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities:

**Table 7.** Audit Locations

| Location Number | Structure Type | ID | Circuit | Approximate Longitude, Latitude |
|---|---|---|---|---|
| 1 | Wood Pole | 012/009 | PotterValley-Willits | (-123.31721694, 39.40586884) |
| 2 | Wood Pole | 012/010 | PotterValley-Willits | (-123.31824175, 39.40585375) |
| 3 | Wood Pole | 012/011 | PotterValley-Willits | (-123.31923255, 39.40586235) |
| 4 | Wood Pole | 010/006 | Mendocino-Willits-Fort Bragg | (-123.31094482, 39.35680504) |
| 5 | Steel Pole | 010/007 | Mendocino-Willits | (-123.31103217, 39.35677841) |
| 6 | Wood Pole | 010/006 | Mendocino-Willits | (-123.31050366, 39.35538109) |
| 7 | Wood Pole | 010/005 | Mendocino-Willits | (-123.31002851, 39.35452989) |

| Location Number | Structure Type | ID | Circuit | Approximate Longitude, Latitude |
|---|---|---|---|---|
| 8 | Wood Pole | 010/005 | Mendocino-Willits-Fort Bragg | (-123.31013961, 39.35461018) |
| 9 | Steel Pole | 016/007 | Laytonville-Willits | (-123.4572322, 39.60106536) |
| 10 | Steel Pole | 016/008 | Laytonville-Willits | (-123.45814577, 39.6019066) |
| 11 | Steel Pole | 016/009 | Laytonville-Willits | (-123.45860636, 39.60313701) |
| 12 | Wood Pole | 023/004 | Garberville-Laytonville | (-123.47913003, 39.69202622) |
| 13 | Steel Pole | 023/003 | Garberville-Laytonville | (-123.47933337, 39.69070541) |
| 14 | Wood Pole | 023/005 | Garberville-Laytonville | (-123.47890836, 39.69308154) |
| 15 | Steel Pole | 025/002 | Garberville-Laytonville | (-123.48990683, 39.71574843) |
| 16 | Steel Pole | 025/001 | Garberville-Laytonville | (-123.48943627, 39.71459916) |
| 17 | Steel Pole | 056/16 | Garberville-Laytonville | (-123.68711458, 40.10026958) |
| 18 | Steel Pole | 056/013 | Garberville-Laytonville | (-123.68553822, 40.09908945) |
| 19 | Wood Pole | 056/017 | Garberville-Laytonville | (-123.68779935, 40.10085937) |
| 20 | Steel Pole | 056/018 | Garberville-Laytonville | (-123.68894797, 40.10138765) |
| 21 | Steel Pole | 047/004 | Garberville-Laytonville | (-123.61788698, 39.98822232) |
| 22 | Steel Pole | 041/004 | Garberville-Laytonville | (-123.57669248, 39.91576748) |
| 23 | Wood Pole | 053/002 | Elk-Gualala | (-123.67954613, 38.91207272) |
| 24 | Steel Pole | 053/003 | Elk-Gualala | (-123.678127, 38.91143154) |
| 25 | Steel Pole | 053/004 | Elk-Gualala | (-123.67680216, 38.91088101) |
| 26 | Steel Pole | 049/006 | Elk-Gualala | (-123.67943899, 38.96213229) |
| 27 | Wood Pole | 049/007 | Elk-Gualala | (-123.67927395, 38.96125403) |

| Location Number | Structure Type | ID | Circuit | Approximate Longitude, Latitude |
|---|---|---|---|---|
| 28 | Wood Pole | 049/005 | Elk-Gualala | (-123.67963797, 38.96292496) |
| 29 | Wood Pole | 004/009 | Fort Bragg-Elk | (-123.74607465, 39.18839465) |
| 30 | Wood Pole | 004/008 | Fort Bragg-Elk | (-123.74623881, 39.18748963) |
| 31 | Wood Pole | 008/000 | Fort Bragg-Elk | (-123.765441, 39.22906622) |
| 32 | Wood Pole | 008/001 | Fort Bragg-Elk | (-123.76626109, 39.22929862) |
| 33 | Wood Pole | 014/004 | Fort Bragg-Elk | (-123.78952194, 39.31013219) |
| 34 | Wood Pole | 014/003 | Fort Bragg-Elk | (-123.78919626, 39.30938052) |
| 35 | Wood Pole | 014/002 | Fort Bragg-Elk | (-123.78898357, 39.3087186) |
| 36 | Steel Pole | 014/001 | Fort Bragg-Elk | (-123.78877575, 39.30751055) |
| 37 | Wood Pole | 042/004 | Mendocino-Willits-Fort Bragg | (-123.79626735, 39.43429156) |
| 38 | Wood Pole | 004/000 | Mendocino-Ukiah | (-123.19272814, 39.19628307) |
| 39 | Wood Pole | 003/012 | Mendocino-Ukiah | (-123.19304682, 39.19680081) |
| 40 | Wood Pole | 003/011 | Mendocino-Ukiah | (-123.19317614, 39.19713784) |
| 41 | Wood Pole | 003/010 | Mendocino-Ukiah | (-123.19379425, 39.19786189) |
| 42 | Wood Pole | 003/009 | Mendocino-Ukiah | (-123.19403725, 39.1982973) |
| 43 | Wood Pole | 003/008 | Mendocino-Ukiah | (-123.19326771, 39.19925815) |
| 44 | Steel Tower | 058/284 | Mendocino-Redbud | (-123.14790969, 39.23673967) |
| 45 | Wood Pole | 003/000 | Mendocino-Hartley | (-123.14777494, 39.23699598) |
| 46 | Steel Tower | 023/108 | Cortina-Mendocino #1 | (-122.61189976, 39.01206358) |
| 47 | Wood Pole | 023/108A | Eagle Rock-Redbud | (-122.61200254, 39.01193165) |

| Location Number | Structure Type | ID | Circuit | Approximate Longitude, Latitude |
|---|---|---|---|---|
| 48 | Wood Pole | 020/005 | Eagle Rock-Redbud | (-122.61200502, 39.01181242) |
| 49 | Wood Pole | 020/003 | Eagle Rock-Cortina | (-122.61218752, 39.01173174) |
| 50 | Wood Pole | 012/008 | Lower Lake-Homestake | (-122.42684424, 38.87490459) |
| 51 | Wood Pole | 012/007 | Lower Lake-Homestake | (-122.42781196, 38.87483884) |
| 52 | Wood Pole | 012/010 | Konocti-Middletown | (-122.60351285, 38.75940969) |
| 53 | Wood Pole | 012/011 | Konocti-Middletown | (-122.60258207, 38.76024083) |
| 54 | Steel Pole | 012/012 | Konocti-Middletown | (-122.60167896, 38.76103028) |
| 55 | Wood Pole | 010/007 | Ukiah-Hopland-Cloverdale | (-122.98826611, 38.80205583) |
| 56 | Wood Pole | 000/001B | Ukiah-Hopland-Cloverdale | (-122.98838127, 38.80199772) |
| 57 | Wood Pole | 000/002B | Ukiah-Hopland-Cloverdale | (-122.98925225, 38.80184612) |
| 58 | Steel Tower | 010/120 | Ukiah-Hopland-Cloverdale | (-122.98807238, 38.80158158) |

## IV. Field Inspection Violations

We disagree with 12 of the 23 cited field inspection violations listed below. These locations either had a pre-existing non-conformance, that was identified by our qualified company representative (QCR), documented within our system of record (SAP), and established in our work management annual work plan, prior to the CPUC field audit or was determined as not required per CIRT.

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.*

   *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."*

**Table 8.** GO 95, Rule 31.1 Violations

| Location | Violation Description |
|---|---|
| 4 | Middle phase insulator not plumb. This should be corrected per TD-1001M-JA06. |
| 8 | Woodpecker hole by transmission hardware. There is an existing notification. |
| 22 | Anchor is buried. Anchor was uncovered on site. |
| 29 | Moss growth on transmission insulators. |
| 36 | Abandoned conductor located on the ground. |
| 37 | No fiberglass strain insulators on transmission down guys. |
| 38 | Deteriorated pole top at hardware level. Existing notification to replace pole. |
| 38 | Vegetation growing around the down guy and there's a branch stuck on the down guys. |
| 39 | The conductors have a bend where they attach to the insulators. There is an existing notification. |
| 42 | No fiberglass strain insulators on down guy. Included in existing notification per CERT team review. |
| 45 | A bolt appears to have been installed in the wrong location. |
| 48 | Missing damper based on Figure 4 of PG&E Standard 015073. There is an existing notification. |
| 48 | Broken bond wire. There is an existing notification. |
| 55 | Transmission down guy with underbuilt distribution line lacks ceramic insulator. |

**PG&E Response:**

We agree with the pre-existing non-conformance at Location 4 for the insulator not plumb; however, we disagree this is a violation of GO 95, Rule 31.1. This notification was previously identified by our QCR and documented within our system of record (SAP) prior to the CPUC field audit. Notification 126201607 is scheduled to be mitigated by May 2028.

We agree with the pre-existing non-conformance at Location 8 for the insulator not plumb; however, we disagree this is a violation of GO 95, Rule 31.1. This notification was previously identified by our QCR and documented within our system of record (SAP) prior to the CPUC field audit. Notification 126202089 is scheduled to be mitigated by May 2028.

We agree with the findings at Locations 22 and 36. However, these issues were corrected by a Qualified Company Representative (QCR) during the field audit.

We agree with the finding at Location 29 for the contaminated insulators and created notification 128538263, a time dependent priority E notification, and is currently planned to be mitigated by April 2025.

We agree with the findings at Location 37, however, we disagree this is a violation of GO 95, Rule 31.1. This notification was previously identified by our QCR and documented within our system of record (SAP) prior to the CPUC field audit. Pre-existing notification, 119116153, is currently being tracked to completion through our maintenance program.

We agree with the finding at Location 38, however, we disagree this is a violation of GO 95, Rule 31.1. This notification was previously identified by our QCR and documented within our system of record (SAP) prior to the CPUC field audit. This pole is planned to be replaced under pre-existing notification 123907096 by December 2025.

We agree with the finding at Location 38, however, we disagree this is a violation of GO 95, Rule 31.1. This notification was previously identified by our QCR and documented within our system of record (SAP) prior to the CPUC field audit. This pre-existing notification, 123907128, is scheduled to be mitigated by June 2025.

We agree with the finding at Location 39, however, we disagree this is a violation of GO 95, Rule 31.1. This notification was previously identified by our QCR and documented within our system of record (SAP) prior to the CPUC field audit. This pre-existing notification,124092503, is planned to address the bend in the conductors by June 2025.

We agree with the finding at Location 42, however, we disagree this is a violation of GO 95, Rule 31.1. This notification was previously identified by our QCR and documented within our system of record (SAP) prior to the CPUC field audit. This pole is planned to be replaced under pre-existing notification 123912762 by June 2025.

We agree with the finding at Location 45, however, we disagree that this is a violation of GO 95, Rule 31.1. This notification was previously identified by our QCR and documented within our system of

record (SAP) prior to the CPUC field audit. This pre-existing notification, 125807277, to repair the crossarm hardware is planned to be repaired by March 2028.

We agree with the findings at Location 48, however, we disagree these are a violation of GO 95, Rule 31.1. These notifications were previously identified by our QCR and documented within our system of record (SAP) prior to the CPUC field audit. Pre-existing notification, 127829318, is planned to address the damper installation by December 2024 and pre-existing notification, 123321992, to repair the bond wire was completed on July 29, 2024.

We agree with the findings at Location 55 for guy bobs to be installed below the distribution underbuild. We created notification 128538213, a non-time-dependent priority F notification, and is currently planned to be mitigated by April 2029.

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."*

**Table 9.**GO 95, Rule 56.2 Violations

| Location | Violation Description |
|---|---|
| 9 | Slack transmission down guy. |
| 19 | Slack distribution down guy. |
| 21 | Slack transmission guy. There was an existing notification. PG&E staff tightened the guy wire on site. |
| 29 | Slack distribution down guy. |
| 38 | Slack distribution down guy. |

**PG&E Response:**

We agree with the finding at Location 9 and 21 that the transmission down guy is slacked; however, these were corrected by our QCR during the field audit.

We agree with the finding at Location 19 that the distribution down guy is slacked however, we disagree this is a violation of GO 95, Rule 56.2. This notification, EC 127163194, was previously identified by our QCR and documented within our system of record (SAP) prior to the CPUC field audit. This is planned to be mitigated by September 2028.

We agree with the finding at Location 29 that the distribution down guy is slacked. We added the condition to Distribution EC 129339847 that is planned to be mitigated by August 2025.

We agree with the finding at Location 38 that the distribution down guy is slacked, however, we disagree that this is a violation of GO 95, Rule 56.2. This pole is planned to be replaced on LC 123907096 by December 2025.

3. **GO 95, Rule 51.6-B, Guarding** states in part:

> *"Where the pole or structure is of latticed metal or of similar construction and supports supply conductors in excess of 750 volts and is located in urban districts, or in rural areas adjacent to schools, dwellings, permanent or seasonal camps, or in orchards, or near roads, or trails which are frequently traveled, a barrier shall be so located on the pole or structure as to prevent easy climbing. If the bottom of the barrier is within 12 feet of the ground line, the top shall not be less than 15 feet above the ground line, but in no event shall the barrier be less than 8 feet in length. If the bottom of the barrier is more than 12 feet above the ground line, it shall not be less than 6 feet in length."*

**Table 10.** GO 95, Rule 51.6-B Violations

| Location | Violation Description |
|---|---|
| 44 | Anti-climb guard is too short. Onsite measurement is 5 feet for the vertical portion of the guard. PG&E staff stated that there is a CAP being implemented. |
| 58 | Anti-climb guard too short. Also, the top of the guard is less than 7' 7" above ground. |

**PG&E Response:**
We agree with the non-conformance at Location 44 and 58 for the anti-climb guards that are too short. CAP 126418275 was created to have the standard updated to reflect GO 95, Rule 51.6-B by our Transmission Line Engineering Standards and Work Methods Department. The standard was revised and published on November 2, 2023, and all existing non-compliant towers will be brought up to the required standard during opportunity maintenance activities.

## 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."*

During the field inspection, ESRB observed the following third-party safety concerns.

**Table 11.** Third-party safety concerns

| Location | Violation Description |
|---|---|
| 34 | Slack telecom down guy wire. |
| 34 | Frayed cable at insulator on down guy |

**PG&E Response:**
We agree with the findings at Location 34 of the slacked telecom down guy wire and the frayed cable on the down guy. This structure is scheduled to be replaced on LC 125721333, which will mitigate these issues. This work is currently scheduled for September 28, 2024.