

**PG&E DIABLO DIVISION ELECTRIC
DISTRIBUTION AUDIT FINDINGS**

May 1 – May 5, 2023

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 Diablo Division:

- Electric Distribution Preventive Maintenance Manual, April 1, 2016
- TD-2305M-B006, Revised Distribution Inspection Guidelines, January 24, 2020
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, August 02, 2022
- Distribution facilities statistics and their wildfire risks, including equipment risks and vegetation risks
- Diablo Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, February 2018 – February 2023
- Electric Corrective Notifications list, March 2018 – March 2023
- Reliability Indexes and Outage list, March 2018 – March 2023
- Diablo New Projects list, March 2022 – March 2023
- Pole Loading Calculations list, January 2022 – December 2022
- Incoming Third-Party Notifications list, March 2018 – March 2023
- Outgoing Third-Party Notifications list, March 2018 – March 2023
- Inspector training records, March 2018 – March 2023
- Equipment test records, February 2018 – February 2023
- Intrusive Inspections, February 2022 – February 2023
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

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, Maintenance Programs, (1)(a) states in part:

“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform

to these rules.

Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.

The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

- (i) Level 1 -- An immediate risk of high potential impact to safety or reliability:*
 - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
- (ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*
 - *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*
- (iii) Level 3 -- Any risk of low potential impact to safety or reliability:*
 - *Take corrective action within 60 months subject to the exception specified below. ”*

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

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

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

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

“Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions

under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

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

ESRB staff reviewed late work orders completed within the Diablo Division for the past 60 months (March 2018 – March 2023), shown in Table 1. PG&E’s Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines the priority codes and associated time frames for the response/repair action as follows:

- *Priority A – Safety / Emergency Immediate Response An emergency is defined as any activity in response to an outage to customer(s) or an unsafe condition requiring immediate response or standby to protect the public.*
- *Priority B – Urgent Compliance (Due within 3 months)*
- *Priority E – Compliance (Due 3-12 months)*
- *Priority F – Compliance (For Regulatory Conditions, the Recommended Repair Date is the due date for the next Inspection (UG = 3 years, OH = 5 years).*

ESRB staff reviewed late work orders and determined that PG&E did not address a total of 18,319 work orders by their assigned due date. Table 1 below breaks down the 18,319 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 Diablo Division

Priority Code	Late Work Orders Completed	Late Work Orders Pending	Late Work Orders Cancelled	Total
A	1,021	0	0	1,021
B	586	52	376	1,014
E	4,095	8,843	2,749	15,687
F	93	442	62	597
Total	5,795	9,337	3,187	18,319

PG&E shall provide ESRB with its corrective action plan to complete the 9,337 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

PG&E Response:

Priority A EC Notifications

We provided 7,325 Priority A Electric Corrective (EC) Notifications to California Public Utility Commission's (CPUC) Electric Safety & Reliability Branch (ESRB) staff within the response to Pre-Audit Data Request Set 3 (DR3), which included a list of all EC Notifications created between 2018 and 2023. We performed an internal analysis of the entire data set and identified 1,021 potentially late Priority A EC Notifications that have now been completed as indicated in Table 1 above. Please note, this number includes work that is categorized as Priority A (e.g., the data includes Fire Rebuilds and Vegetation Management) but is not an "emergency" as that term is defined for Priority A.

The 1,021 potentially late 'completed' Priority A EC Notifications are identified below in Table PG&E-1 by creation year.

Table PG&E-1

Notification Creation Date	Potentially Late Completed Count
2018	286
2019	384
2020	180
2021	30
2022	116
2023	25
Grand Total	1021

Prior to 2020, we did not have adequate mechanisms to track immediate responses to Priority A Notifications. Due to the lack of a tracking mechanism, each of the identified late notifications would require an extensive manual review to validate the accuracy of the completion date. In 2020, we implemented a temporary repair process to accurately track when hazards are immediately mitigated. In June 2022, we published TD-2060S providing updated compliance requirements for Priority A Notification management.

Priority B EC Notifications

We provided 4,964 Priority B EC Notifications to ESRB staff within the response to DR3, which included a list of all EC Notifications created between 2018 and 2023. At the time that we submitted the Diablo Distribution Pre-Audit Data Request response for Q03, we identified 1,014 potentially late Priority B EC Notifications. We recently performed an updated internal analysis of the late work order data set and identified that the count is now reduced to 1,005 potentially late Priority B EC Notifications.

Priority E and F EC Notifications

We provided 39,977 Priority E and F EC Notifications to ESRB staff within the response to DR3, which included a list of all EC Notifications created between 2018 and 2023. We performed an

updated internal analysis of the late work order data set for and identified 16,284 potentially late Priority E and F EC Notifications.

Corrective Action Plan for Out Tag Completion And Going Forward Compliance

In 2019, PG&E began the Wildfire Safety Inspection Program (WSIP) to proactively expand inspections of poles and associated equipment in High Fire Threat Districts (HFTD)/High Fire Risk Areas (HFRA) on an accelerated and enhanced basis to mitigate ignition risk. The WSIP inspections led to a significant increase in the volume of notifications.

Along with the WSIP inspections, other programs added notifications to the backlog such as Pole Test and Treat (PT&T), Post-Event Patrols, Patrol Inspections, and Infrared Inspections. At the end of 2022, we had approximately 260,000 notifications in our distribution HFRA/HFTD backlog. Most of the outstanding tags are Priority E and F tags. E and F tags represent conditions considered to have a moderate (E tag) or low (F tag) potential safety or reliability impact.

We have developed a plan to reduce the wildfire risk associated with the backlog of ignition-risk tags in HFTD/HFRA by 77 percent at the end of the 2023-2025 Wildfire Mitigation Plan (WMP) cycle. We submitted details of the work plan in PG&E's 2023-2025 WMP R1.

Our highest priority is to complete all A and B tags based on required compliance dates:

- Priority A tags require response by taking corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority; and
- Priority B tags are addressed within 3 months for potential violations that create risk of at least moderate potential impact to safety or reliability.
- We divide remaining notifications into two groups: (1) ignition risk notifications in the HFTD/HFRA; and (2) non-ignition risk notifications in the HFTD/HFRA. Ignition risk notifications in HFTD/HFRA areas are the highest priority in this group of notifications.
- In 2023, new HFTD/HFRA ignition risk tags (EC Notifications identified after January 1, 2023) will be completed in compliance with GO 95 rule 18 timelines, barring external factors; and
- Tags identified prior to 2023 will be prioritized by considering risk. We will bundle work by isolation zones in 2023 to reduce customer impact and improve operational efficiency and safer coworker conditions. We will reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA by 48 percent.

ESRB Review: PG&E has provided a comprehensive plan to address its late EC notifications especially ignition risk notifications in HFTDs & HFRA. ESRB agrees.

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

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
A	117476796	1,054
B	114673465	1,270
E	116862612	1,176
F	116804567	857

PG&E identified work order #117476796 on June 20, 2019, to repair a damaged conductor with a required end date of July 11, 2019. PG&E did not complete the work until May 10, 2022.

PG&E Response:

We created EC Notification 117476796 and the work was completed for this notification on June 28, 2019; however, it was left open in our system of record (SAP) until closed by the SAP analyst on June 14, 2022.

ESRB Review: ESRB acknowledges the work was completed but the notification was left open.

PG&E identified work order #114673465 on June 7, 2018, to replace a broken conductor with a required end date of December 31, 2018. PG&E did not complete the work until June 23, 2022.

PG&E Response:

We created EC Notification 114673465 to replace a broken street light conductor. The work was completed in the field on September 18, 2018; however, the notification was left open in our system of record (SAP) until closed by the SAP analyst on June 27, 2022.

ESRB Review: ESRB acknowledges the work was completed but the notification was left open.

PG&E identified work order #116862612 on March 29, 2019, to replace a decaying pole with a required end date of September 25, 2019. PG&E did not complete the work until December 14, 2022.

PG&E Response:

We created EC Notification 116862612 to replace a decayed pole. This notification was left open in our system of record (SAP) until closed by the SAP analyst on December 15, 2022. The job was being reviewed for overlapping system hardening work from June 2019-August 2019. It was released to normal workflow on August 14, 2019. Estimating began the design phase which continued until February 19, 2021, and then was reassigned within estimating on April 15, 2021. The estimator reached out to the Job Owner for the pole to determine if it was an Idle Facility, which it was determined that it was not an idle facility. On May 14, 2021, estimating requested a second notification be

created for the addition of a clearance pole due to the service span length exceeding 150 feet. We completed the pole replacement and clearance pole installation on December 14, 2022.

ESRB Review: ESRB acknowledges the work was completed.

PG&E identified work order #116804567 on March 21, 2019, to trim overgrown vegetation on the guy wire with a required end date of March 21, 2020. PG&E did not complete this work until July 26, 2022.

PG&E Response:

We created EC Notification 116804567 on March 21, 2019, for vegetation. This notification was originally assigned as a Priority F with 60 months for completion. On June 15, 2021, we performed a Field Safety Reassessment (FSR), determined that there were no immediate hazards, and that the 60-month timeframe for completion was still applicable. The work was completed on July 26, 2022.

ESRB Review: ESRB acknowledges the work was completed.

2. GO 95, Rule 31.2, Inspection of Lines states in part:

“Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.”

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

“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.”

2.1 ESRB staff identified that PG&E completed a total of 50 detailed overhead inspections in non-HFTD of electric facilities past their GO 165 required completion date, as shown in the worksheet of Attachment 1.

2.2 Additionally, ESRB staff found that PG&E completed a total of 910 overhead patrols past their GO 165 required completion date for the following maps:

Table 3: Maps of Overhead Patrol Completed Past Due Dates

Map	Due Date	Completion Date
B0923	4/9/2021	8/6/2021
C1105	4/10/2021	11/23/2021
B2125	4/12/2021	10/20/2021
B0922	4/13/2021	11/2/2021
C1218	4/13/2021	10/22/2021
B1916	4/15/2021	11/2/2021
B1923	4/16/2021	10/29/2021
C1219	4/16/2021	10/27/2021
C1201	4/21/2021	11/24/2021
E0707	5/19/2021	10/29/2021
C1009	6/6/2021	11/2/2021

PG&E Response:

In 2021, 50 Overhead (OH) detailed inspections identified on Attachment 1 in the Diablo division were late as a result of our WMP commitment in 2020 to prioritize our detailed inspections in HFTD areas prior to peak fire season. This change in inspection priorities, focusing on High Fire Threat Districts (HFTDs), resulted in missing the GO 165 deadlines. These inspections were completed by

the end of 2021. We have addressed this situation by ensuring the that our workplans reflect both the WMP commitment dates and the GO 165 due dates. The 910 assets identified on Table 3 for OH Patrol Maps were also a result of the explanation above. On July 1, 2022, the late inspections and patrols were included in our 2021 GO 165 Annual Report.

ESRB Review: ESRB acknowledges PG&E's explanation for the late patrol and detailed inspections.

III. Field Inspection

During the field inspection, ESRB inspected locations listed in Table 4:

Table 4: List of Field Inspection Locations

Location #	SAP #	Structure Type	Structure Location/Address
1	100459057	Wood Pole	5455 Alhambra Valley Rd. Martinez, CA
2	100458167	Wood Pole	5451 Alhambra Valley Rd. Martinez, CA
3	100459171	Wood Pole	5440 Alhambra Valley Rd. Martinez, CA
4	107936133	Splice Box	5225 Alhambra Valley Rd. Martinez, CA
5	103039967	Wood Pole	5225 Alhambra Valley Rd. Martinez, CA
6	100459268	Wood Pole	5225 Alhambra Valley Rd. Martinez, CA
7	100459266	Wood Pole	5231 Alhambra Valley Rd. Martinez, CA
8	100447582	Wood Pole	204 Riley Dr. Pacheco, CA
9	100447570	Wood Pole	208 Riley Dr. Pacheco, CA
10	100447557	Wood Pole	212 Riley Dr. Pacheco, CA
11	107892693	Splice box	1539 N. Main St. Walnut Creek, CA
12	107892693	Sub-Surface Junction box	1535 N. Main St. Walnut Creek, CA
13	107874493	Sub-Surface Switch & Transformer	1515 N. Main St. Walnut Creek, CA
14	107947086	Sub-Surface Transformer	1516 Bonanza St. Walnut Creek, CA
15	107943371	Sub-Surface Switch & Interrupter	2103 N. Main St. Walnut Creek, CA
16	107986592	Sub-Surface Switch	2103 N. Main St. Walnut Creek, CA
17	108227552	Pad mount Transformer	2050 N. Main St. Walnut Creek, CA
18	107902719	Sub-Surface Transformer	2050 N. Main St. Walnut Creek, CA

Location #	SAP #	Structure Type	Structure Location/Address
19	107910150	Sub-Surface Switch	2050 N. Main St. Walnut Creek, CA
20	108227551	Sub-Surface Switch & Interrupter	2050 N. Main St. Walnut Creek, CA
21	107900262	Sub-Surface Switch	2050 N. Main St. Walnut Creek, CA
22	100477776	Wood Pole	1035 Hook Ave. Pleasant Hill, CA
23	100477777	Splice Box	1029 Hook Ave. Pleasant Hill, CA
24	100477778	Wood Pole	1027 Hook Ave. Pleasant Hill, CA
25	100477780	Wood Pole	1023 Hook Ave. Pleasant Hill, CA
26	100477782	Wood Pole	1017 Hook Ave. Pleasant Hill, CA
27	100477783	Wood Pole	1013 Hook Ave. Pleasant Hill, CA
28	100477775	Wood Pole	1008 Hook Ave. Pleasant Hill, CA
29	100477786	Wood Pole	1006 Hook Ave. Pleasant Hill, CA
30	100462007	Wood Pole	1537 N. Marta Dr. Pleasant Hill, CA
31	100462013	Wood Pole	1543 N. Marta Dr. Pleasant Hill, CA
32	100462015	Wood Pole	1613 N. Marta Dr. Pleasant Hill, CA
33	100462018	Wood Pole	1619 N. Marta Dr. Pleasant Hill, CA
34	100462017	Wood Pole	1637 N. Marta Dr. Pleasant Hill, CA
35	103812662	Wood Pole	70 La Encinal Orinda, CA
36	100486737	Wood Pole	66 La Encinal Orinda, CA
37	103978429	Wood Pole	64 La Encinal Orinda, CA
38	103978430	Wood Pole	65 La Encinal Orinda, CA

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
39	103978431	Wood Pole	54 La Encinal Orinda, CA
40	103978432	Wood Pole	41 La Encinal Orinda, CA
41	103978433	Wood Pole	50 La Encinal Orinda, CA
42	100505002	Wood Pole	153 Ardilla Rd. Orinda, CA
43	100487221	Wood Pole	1 Ardilla Rd. Orinda, CA
44	100487218	Wood Pole	7 Ardilla Rd. Orinda, CA
45	103775026	Wood Pole	7 Ardilla Rd. Orinda, CA
46	104137698	Wood Pole	15 Ardilla Rd. Orinda, CA
47	107987313	Sub-Surface Switch	23 Altarinda Rd. Orinda, CA
48	107913139	Sub-Surface Transformer	102 Ravenhill Rd. Orinda, CA
49	107818323	Sub-Surface Transformer	126 Ravenhill Rd. Orinda, CA
50	107858677	Sub-Surface Junction Box	151 Ravenhill Rd. Orinda, CA
51	107868797	Sub-Surface Transformer	157 Ravenhill Rd. Orinda, CA
52	107957486	Sub-Surface Transformer	174 Ravenhill Rd. Orinda, CA
53	100496053	Wood Pole	518 Morgan Territory Rd. Clayton, CA
54	100496047	Wood Pole	(37.87208056, -121.8563528)
55	100496072	Wood Pole	(37.87105278, -121.8568417)
56	103778292	Wood Pole	(37.87104444, -121.8569111)
57	100496067	Wood Pole	(37.87083056, -121.8570417)
58	100496061	Wood Pole	(37.87034167, -121.8578556)

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
59	100469320	Wood Pole	5577 Morningside Dr. Clayton, CA
60	100469307	Wood Pole	5571 Morningside Dr. Clayton, CA
61	100469289	Wood Pole	5567 Morningside Dr. Clayton, CA
62	100469044	Wood Pole	5567 Morningside Dr. Clayton, CA
63	100451473	Wood Pole	160 Army St. Pittsburg, CA
64	100451468	Wood Pole	178 Army St. Pittsburg, CA
65	100451567	Wood Pole	190 Army St. Pittsburg, CA
66	100451464	Wood Pole	380 Mac Arthur Ave. Pittsburg, CA
67	100451458	Wood Pole	364 Mac Arthur Ave. Pittsburg, CA
68	100451476	Wood Pole	154 Army St. Pittsburg, CA
69	103768117	Wood Pole	136 Army St. Pittsburg, CA
70	100451495	Wood Pole	130 Army St. Pittsburg, CA
71	107917281	Sub-Surface Transformer	1731 Fairhaven Ct. Oakley, CA
72	107974661	Sub-Surface Transformer	1773 Fairhaven Ct. Oakley, CA
73	107882083	Sub-Surface Transformer	1813 Fairhaven Way Oakley, CA
74	107928566	Splice Box	75 Thyme Ct. Oakley, CA
75	107894852	Splice Box	55 Thyme Ct. Oakley, CA
76	107740192	Splice Box	45 Thyme Ct. Oakley, CA
77	107815605	Splice Box	15 Thyme Ct. Oakley, CA

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
78	100470977	Wood Pole	121 Amador Ct. Oakley, CA
79	100470978	Wood Pole	(37.97948889, -121.6891778)
80	103035964	Wood Pole	(37.97964444, -121.6891861)
81	103763455	Wood Pole	463 Honey Ln. Oakley, CA
82	100470968	Wood Pole	(37.979775, -121.6898722)
83	100470965	Wood Pole	(37.97975278, -121.6901944)
84	103763469	Wood Pole	(37.97976944, -121.6905972)

IV. Field Inspection – Violations List

ESRB observed the following violations during the field inspection:

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

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

ESRB's findings are listed in Table 5.

Table 5: GO 95, Rule 31.1 Findings

Location	Finding	Notes
7	Pole had a loose visibility strip on the pole.	PG&E corrected the finding in the field.
8	Ground wire was exposed. Ground molding was missing. The anchor for guy wire was buried. Loose guy wire.	
9	There was an abandoned communication service drop.	

26	Ground wire was exposed.	PG&E corrected the finding in the field.
27	There was vegetation contact found above the insulator on down guy wire. Pole had a broken visibility strip.	PG&E corrected the findings in the field.
29	There was vegetation contact found above the insulator on down guy wire.	PG&E has existing EC notification 121802909 to correct the vegetation contact found above the insulator on down guy wire.
30	The pole had a significant lean.	PG&E has existing EC notification 123994674 to replace the pole.
31	The crossarm was rotten/decayed.	PG&E has existing EC notification 123994287 to replace the crossarm.
32	The anchor for guy wire was buried.	PG&E has existing EC notification 123994179 to replace the guy wire anchor.
33	The crossarm was rotten/decayed.	PG&E has existing EC notification 123994114 to replace the crossarm.
34	The pole had a significant lean. The crossarm was rotten/decayed. The pole was missing visibility strips.	PG&E has existing EC notification 123994166 to replace the pole.
43	The anchor for guy wire was buried. The guy wire was loose.	PG&E has existing EC notification 123971511 to correct the guy wire.
44	Pole was leaning.	PG&E has existing EC notification 121549379 to adjust the lean.
54	Pole was broken/damaged.	PG&E has existing EC notification 117133169 to replace the pole.
55	Pole was broken/damaged.	PG&E has existing EC notification 117129897 to replace the pole.
57	The anchor for guy wire was buried. Pole was decayed.	PG&E has existing EC notification 117129892 to replace the pole.
61	There was a low pole step on the pole.	PG&E corrected the finding in the field.
62	Guy marker was not on outer guy wire. Woodpecker holes were found near the top of the pole.	

66	The crossarm was rotten/decayed. Insulator on crossarm was broken.	PG&E has existing EC notification 124686310 for replacement.
67	The crossarm was rotten/decayed. Pole was rotten/decayed.	PG&E has existing EC notification 124686118 for replacement.
69	Service drop was not meeting roof clearance requirements.	
70	Guy wire was loose. Guy wire was corroded.	PG&E has existing EC notification 124687920 for replacement.
77	Street light cover at base was not on.	PG&E corrected the finding in the field.
78	The anchor for guy wire was buried. There was a low pole step on the pole.	PG&E has existing EC notification 119711124 for corrections.
79	There was a low pole step on the pole.	PG&E has existing EC notification 119711091 for correction.
82	The anchor for guy wire was buried.	PG&E corrected the finding in the field.

PG&E Response:

Location 7: We disagree with the finding that we are out of compliance due to the loose high-visibility strips. As per GO 95, Rule 18, Appendix I, the dangling communication cable did not pose an immediate risk of high potential impact to safety or reliability and would have been found during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site.

ESRB Review: ESRB's finding for Location 7 noted loose high-visibility strips. PG&E's response cited "loose communication cable" which was not ESRB findings. If PG&E's reference to "loose communication cable" was in error, and PG&E's intention was that loose high-visibility strips do not pose an immediate risk of high potential impact to safety, ESRB's finding due to loose high-visibility strips is still valid. ESRB inspects to all aspects of the General Orders, regardless of Hazard Level. PG&E's response that the non-compliance would have been found during its monitored Asset Inspection Cycle is speculative and assumes the condition did not exist during the previous Asset Inspection Cycle. ESRB acknowledges that the finding was corrected during the audit.

Location 8: We disagree with the finding that we are out of compliance due to the ground wire exposed, missing molding, and buried anchor as it did not pose an immediate risk of high potential impact to safety or reliability and would have been identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector

corrected the condition on site by replacing the mold cover, corrected the buried anchor, and later adjusted the loose guy wire.

ESRB Review: The PG&E response indicates that the exposed ground wire, missing molding, and buried anchor did not pose an immediate risk of high potential impact to safety. PG&E does not dispute that the observed issue were non-conformances. ESRB's findings are still valid. ESRB inspects to all aspects of the General Orders, regardless of Hazard Level. PG&E's response that the non-compliance would have been found during its monitored Asset Inspection Cycle is speculative and assumes the condition did not exist during the previous Asset Inspection Cycle. ESRB acknowledges that the finding was corrected during the audit.

Location 9: We disagree with the finding that we are out of compliance due to a dangling communications cable in proximity to the service drop. As per GO 95, Rule 18, Appendix I, the dangling communication cable did not pose an immediate risk of high potential impact to safety or reliability and would have been found during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector created a Third Party Notification 126081812 in regard to the dangling communications cable.

ESRB Review: The PG&E response indicates that the proximity of the service drop to dangling communication cable did not pose an immediate risk of high potential impact to safety. PG&E does not dispute that the observed issue were non-conformances. ESRB's findings are still valid. ESRB inspects to all aspects of the General Orders, regardless of Hazard Level. PG&E's response that the non-compliance would have been found during its monitored Asset Inspection Cycle is speculative and assumes the condition did not exist during the previous Asset Inspection Cycle. ESRB acknowledges that PG&E created a Third Party Notification for the issue.

Location 26: We agree with the finding that we are out of compliance due to an exposed ground wire. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site by replacing the mold cover.

ESRB Review: ESRB accepts PG&E's response and acknowledges that finding was corrected during the audit.

Location 27: We disagree with the finding that we are out of compliance due to the overgrown vegetation above the guy insulator and broken high-visibility strip. As per GO 95, Rule 18, Appendix I, the overgrown vegetation above the guy insulator and broken high-visibility strip did not pose an immediate risk of high potential impact to safety or reliability and would have been found during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector corrected the condition on site by trimming the overgrown vegetation and replaced the broken visibility strip.

Commented [TR1]: So PG&E disagrees with an exposed ground wire for Location 8 above, but agrees with the same defect here??

ESRB Review: The PG&E response indicates that the overgrown vegetation above the guy insulator and broken high-visibility strip did not pose an immediate risk of high potential impact to safety. PG&E does not dispute that the observed issue were non-conformances. ESRB's findings are still valid. ESRB inspects to all aspects of the General Orders, regardless of Hazard Level. PG&E's response that the non-compliance would have been found during its monitored Asset Inspection Cycle is speculative and assumes the condition did not exist during the previous Asset Inspection Cycle. ESRB acknowledges that the finding was corrected during the audit.

Location 29: We disagree with the finding that we are out of compliance due to vegetation being in contact with guy wire, above the insulator. During the CPUC Audit, our Division Compliance Inspector pointed out that we have a preexisting EC Notification 121802909 for vegetation clearance. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 30: We disagree with the finding that we may be out of compliance due to a leaning pole. This pole does not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we have a preexisting EC Notification 123994674 for a pole replacement. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 31: We disagree with the finding that we are out of compliance due to a decayed crossarm. The decayed crossarm does not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 123994287 to replace the crossarm. This condition will be addressed in accordance with the time period set forth by GO 95 Rule 18, Appendix I.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 32: We disagree with the finding that we are out of compliance due to a buried anchor. As per GO 95, Rule 18, Appendix I, the buried anchor did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 123994179 to replace the buried anchor. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 33: We disagree with the finding that we are out of compliance due to decayed crossarm. As per GO 95, Rule 18, Appendix I, the decayed crossarm did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 123994114 to replace the crossarm. This condition will be addressed in accordance with the time period set forth by GO 95 Rule 18, Appendix I.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 34: We disagree with the finding that we are out of compliance due to a leaning pole, a rotten/decayed crossarm, and missing visibility strips. As per GO 95, Rule 18, Appendix I, the leaning pole, a rotten/decayed crossarm, and missing visibility strips did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 123994166 to replace the pole that includes replacement of crossarm and missing visibility strips. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the leaning pole and decayed cross arm non-compliances. While the missing visibility strips were not noted in the EC, ESRB accepts that PG&E will correct the missing visibility strips with the other repairs.

Location 43: We disagree with the finding that we are out of compliance due to a slack guy wire and buried anchor. As per GO 95, Rule 18, Appendix I, the slack guy wire and buried anchor do not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. This location had a preexisting EC Notification 123971511 to adjust the loose guy and correct the buried anchor. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 44: We disagree with the finding that we are out of out of compliance due to a leaning pole. As per GO 95, Rule 18, Appendix I, the leaning pole does not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. This pole had a preexisting EC Notification 121549379 to adjust/correct the leaning pole and will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 54: We disagree with the finding that we are out of compliance due to a broken/damaged pole. As per GO 95, Rule 18, Appendix I, the broken/damaged pole does not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset

Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 117133169 to replace the pole. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: EC Notification 117133169 required noted repairs to be completed by April 2022. Repairs were not completed by April 2022. PG&E conducted a Field Safety Review (Reassessment) in July 2022, three months after the initial EC required action to be taken. ESRB finds that PG&E did not address the non-compliance in a timely manner.

Location 55: We disagree with the finding that we are out of compliance due to a broken/damaged pole. As per GO 95, Rule 18, Appendix I, the broken/damaged pole does not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 117129897 to replace the pole. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: EC Notification 117129897 required noted repairs to be completed by April 2022. Repairs were not completed by April 2022. PG&E conducted a Field Safety Review (Reassessment) in July 2022, three months after the initial EC required action to be taken. ESRB finds that PG&E did not address the non-compliance in a timely manner.

Location 57: We disagree with the finding that we are out of compliance due to a broken/damaged pole and buried anchor. As per GO 95, Rule 18, Appendix I, the broken/damaged pole does not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 117129892 to replace the pole which includes correcting the buried anchor. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: EC Notification 117129892 required noted repairs to be completed by April 2020. Repairs were not completed by April 2020. PG&E conducted a Field Safety Review (Reassessment) in June 2020, two months after the initial EC required action to be taken. PG&E conducted another Field Safety Review (Reassessment) in May 2021 with repairs to be completed by May 2022. PG&E conducted another FSR in July 2022, two months after the May 2022 FSR required action to be taken. ESRB finds that PG&E did not address the non-compliance in a timely manner.

Location 61: We agree with the finding that we are out of compliance due to a low pole step. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site.

ESRB Review: ESRB accepts PG&E's response and acknowledges that finding was corrected during the audit.

Location 62: We disagree with the finding that we are out of compliance due to a missing guy marker and woodpecker hole damage. As per GO 95, Rule 18, Appendix I, the missing guy marker and woodpecker hole damage did not pose an immediate risk of high potential impact to safety or reliability and would have been identified during its monitored Asset Inspection Cycle. During the CPUC Audit of this location, our Division Compliance Inspector created an EC Notification 126080425 to replace missing guy marker and assess woodpecker damage. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: The PG&E response indicates that the missing guy marker and woodpecker hole damage did not pose an immediate risk of high potential impact to safety. PG&E does not dispute that the observed issue were non-conformances. ESRB's findings are still valid. ESRB inspects to all aspects of the General Orders, regardless of Hazard Level. PG&E's response that the non-compliance would have been found during its monitored Asset Inspection Cycle is speculative and assumes the condition did not exist during the previous Asset Inspection Cycle. ESRB acknowledges that PG&E created EC notification 126080425 to correct the non-compliance.

Location 66: We disagree with the finding that we are out of compliance due to a rotten/decayed crossarm and broken insulator. As per GO 95, Rule 18, Appendix I, the rotten/decayed crossarm and broken insulator do not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 124686310 to replace the crossarm and insulator. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 67: We disagree with the finding that we are out of compliance due to a rotten/decayed pole and crossarm. As per GO 95, Rule 18, Appendix I, the rotten/decayed pole and crossarm do not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 124686118 to replace the pole which includes a crossarm replacement. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 69: We agree with the finding that we are out of compliance due to clearance requirements for the service drop. During the CPUC Audit of this location, our Division Compliance Inspector created an EC Notification 126079274 to correct the service drop condition. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that EC Notification 126079274 to correct the service drop condition was created during the audit.

Location 70: We disagree with the finding that we are out of compliance due to a slack and corroded guy wire. As per GO 95, Rule 18, Appendix I, the slack and corroded guy wire did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. This location had a preexisting EC Notification 124687920 to replace the guy wire. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 77: We disagree with the finding that we are out of compliance due a street light cover not being secured to the base of a pole. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site by replacing the securing the street light cover.

ESRB Review: The PG&E response indicates that the street light cover not being secured to the base of a pole did not pose an immediate risk of high potential impact to safety. PG&E does not dispute that the observed issue were non-conformances. ESRB's findings are still valid. ESRB inspects to all aspects of the General Orders, regardless of Hazard Level. ESRB acknowledges that the finding was corrected during the audit.

Location 78: We disagree with the finding that we are out of compliance due to low climbing step and a buried anchor. As per GO 95, Rule 18, Appendix I, the low climbing step and a buried anchor did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 119711124 for pole step clearance and to replace the buried anchor. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 79: We disagree with the finding that we are out of compliance due to a low climbing step. As per GO 95, Rule 18, Appendix I, a low climbing step does not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 119711091 to correct the low climbing step. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 82: We disagree with the finding that we are out of compliance due to a buried anchor. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on

site by exposing the buried anchor.

ESRB Review: The PG&E response indicates that the buried anchor did not pose an immediate risk of high potential impact to safety. PG&E does not dispute that the observed issue were non-conformances. ESRB's findings are still valid. ESRB inspects to all aspects of the General Orders, regardless of Hazard Level. ESRB acknowledges that the finding was corrected during the audit.

2. General Order 95, Rule 31.6 – Abandoned Lines states:

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

ESRB's findings are listed in Table 6:

Table 6: GO 95, Rule 31.6 Findings

Location	Finding	Notes
2	There are abandoned service drops coming out of the transformer.	

Location 2: We disagree with the finding that we are out of compliance due to an abandoned service drop coming out of the transformer. The temporary disconnected service coming out of the transformer did not pose a hazard (i.e. near primary lines) and could potentially be used as a connection point in the future.

ESRB Review: The PG&E response indicates that abandoned service drop could be used as a potential future connection point. During the audit, PG&E personnel agreed that the service was abandoned rather than idle. No future service was identified. If a line could potentially be used as a connection point at any time in the future, then no service would be considered abandoned. ESRB believes the finding of a non-compliance is still valid.

3. General Order 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."

ESRB's findings are listed in Table 7:

Table 7: GO 95, Rule 35 Findings

Location	Finding	Notes
36	Tree causing strain on service drops.	PG&E has existing EC notification 121620123 to correct vegetation strain.
44	Tree causing strain on service drops.	PG&E has existing EC notification 121549379 to correct vegetation strain.
45	Tree causing strain on service drops.	PG&E has existing EC notification 121549173 to correct vegetation strain.
61	Vegetation strain on guy wire.	PG&E has existing EC notification 111649233 to correct vegetation strain.
63	Vegetation strain on guy wire.	PG&E has existing EC notification 124687151 to correct vegetation strain.
68	Vegetation strain on messenger wire.	PG&E has existing EC notification 124687275 to correct vegetation strain.
69	Vegetation was overgrown on messenger wire.	

PG&E Response:

Location 36: We disagree with the finding that we are out of compliance due to a vegetation strain on service drop. As per GO 95, Rule 18, Appendix I, the vegetation strain did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 121620123 to trim vegetation that will resolve the strain on the service drop. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 44: We disagree with the finding that we are out of compliance due to a vegetation strain on service drop. As per GO 95, Rule 18, Appendix I, the vegetation strain did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 121549379 to trim vegetation that will resolve the strain on the service drop. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 45: We disagree with the finding that we are out of compliance due to a vegetation strain on service drop. As per GO 95, Rule 18, Appendix I, vegetation strain did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 121549173 to trim vegetation that will resolve the strain on the service drop. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 61: We disagree with the finding that we are out of compliance due to a vegetation strain on guy wire. As per GO 95, Rule 18, Appendix I, the vegetation strain did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 111649233 to trim vegetation that will resolve the strain on the guy wire. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 63: We disagree with the finding that we are out of compliance due to a vegetation strain on guy wire. As per GO 95, Rule 18, Appendix I, vegetation strain did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 124687151 to trim vegetation that will resolve the strain on the guy wire. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 68: We disagree with the finding that we are out of compliance due to a vegetation strain on span guy (messenger wire). As per GO 95, Rule 18, Appendix I, vegetation strain did not pose an immediate risk of high potential impact to safety or reliability and was identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector pointed out that we had a preexisting EC Notification 124687275 to trim vegetation that will resolve the strain on the span guy. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB acknowledges that PG&E had an EC Notification to correct the non-compliance.

Location 69: We agree with the finding that we are out of compliance due to a vegetation strain on

span guy (messenger wire). During the CPUC Audit of this location, our Division Compliance Inspector created an EC Notification 126079274 to trim overgrown vegetation. This situation will be addressed according to the timelines set forth in GO 95, Rule 18.

ESRB Review: ESRB accepts PG&E's response that the facility was out of compliance and acknowledges that an EC was created to correct the non-compliance.

4. 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.”

ESRB's findings are listed in Table 8:

Table 8: GO 95, Rule 18-A Findings

Location	Finding	Notes
3	Broken communication ground wire and molding.	
5	Loose communication conductor found on the pole. Communication riser is damaged.	
29	Communications ground wire was exposed. Communications ground molding was broken.	
34	There was an abandoned communication service drop.	
35	Communications service drop needs a riser. Communications service drop was not secured to	

	the pole.	
38	Communications needs to transfer services to new pole.	
40	Communications box was dangling on the communications line. Communications needs to transfer services to new pole.	
41	Communications needs to transfer services to new pole.	
46	Communications guy was wrapped around pole. Communications needs to transfer services to new pole.	
58	Communications service drop was not secured to the pole.	
59	There was an abandoned communication service drop.	
60	Communications service drop was not secured to the pole. Communications equipment was laying on the ground near pole.	
69	Communications service drop in contact with guy wire and guy wire insulator. Communications service drop is attached to the electrical weatherhead.	
70	Communications service drop is attached to the electrical weatherhead.	
79	There was an abandoned communication service drop.	
80	Communications service drop was loose on line. Communications riser was loose.	
82	The communications guy wire anchor was buried.	

Location 3: We disagree with the finding that we are out of compliance due to Broken communication ground wire and molding. Our Division Compliance Inspector created a Third Party Notification 126571113 for a broken communication ground.

ESRB acknowledges that a Third Party Notification was issued.

Location 5: We disagree with the finding that we are out of compliance due to a loose communication conductor and damaged communication riser. The CPUC observed an abandoned communication service. We confirmed that a preexisting Third Party Notification 119001265 was sent to AT&T on 5/12/2020.

ESRB acknowledges that this is a third-party issue and that an existing Third Party Notification was issued.

Location 29: We disagree with the finding that we are out of compliance due to an exposed communications ground wire. Our Division Compliance Inspector created a Third Party Notification 126082898 to repair the exposed communications ground.

ESRB acknowledges that a Third Party Notification was issued.

Location 34: We disagree with the finding that we are out of compliance due to an abandoned communication service drop. Our Division Compliance Inspector created a Third Party Notification 126084503 to remove idle service.

ESRB acknowledges that a Third Party Notification was issued.

Location 35: We disagree with the finding that we are out of compliance due to an unsecured communications riser. Our Division Compliance Inspector created a Third Party Notification 126081592 to address the communications riser.

ESRB acknowledges that a Third Party Notification was issued.

Location 38: We disagree with the finding that we are out of compliance due to a transfer of service for communications to a new pole. We confirmed that the notice to transfer communication facilities was submitted on May 29, 2020, upon completion of construction (Joint Pole Form 48).

ESRB acknowledges that this is a third-party issue and that an existing Third Party Notification was issued.

Location 40: We disagree with the finding that we are out of compliance due to a transfer of service for communications to a new pole and a dangling communications box. We confirmed that the notice to transfer communication facilities was submitted on May 29, 2020, to AT&T upon completion of construction (Joint Pole Form 48). Additionally, in 2021 and 2022, we re-submitted Third Party Notifications 121710244, 121620091, 123921472 and 123898945 for transferring of communications service and a dangling AT&T communications box.

ESRB acknowledges that this is a third-party issue and that an existing Third Party Notification was issued.

Location 41: We disagree with the finding that we are out of compliance due to a transfer of service for communications to a new pole. We confirmed that the notice to transfer communication facilities was submitted on May 29, 2020, upon completion of construction (Joint Pole Form 48).

ESRB acknowledges that this is a third-party issue and that an existing Third Party Notification was issued.

Location 46: We disagree with the finding that we are out of compliance due to a transfer of service for communications to a new pole and communications guy. We confirmed that the notice to transfer communication facilities was sent to Construction upon completion of construction (Joint Pole Form 48). The communications guy condition will be addressed upon transfer of service.

ESRB acknowledges that this is a third-party issue and that an existing Third Party Notification was issued.

Location 58: We disagree with the finding that we are out of compliance due to an unsecure communications service drop. Our Division Compliance Inspector created a Third Party Notification 126080684 to address the communications service drop.

ESRB acknowledges that a Third Party Notification was issued.

Location 59: We disagree with the finding that we are out of compliance due to an abandoned communications service drop. We confirmed that a Third Party Notification 121749851 request was created to remove an abandoned telephone cable.

ESRB acknowledges that this is a third-party issue and that an existing Third Party Notification was issued.

Location 60: We disagree with the finding that we are out of compliance due to an unsecured communications service drop and abandoned communications equipment left on the ground near

the pole. Our Division Compliance Inspector created a Third Party Notification 126080531 to address the communications findings.

ESRB acknowledges that a Third Party Notification was issued.

Location 69: We disagree with the finding that we are out of compliance due to 1) a communications service drop found to be connected to a weatherhead and 2) a communications service found in contact with the guy wire insulator. We confirmed that a Third Party Notification (124687378) was created to reroute the communication service drop from touching the span guy. Additionally, our Division Compliance Inspector created a Third Party Notification 126079142 to remove the communication service from the weather head.

ESRB acknowledges that a Third Party Notification was issued.

Location 70: We disagree with the finding that we are out of compliance due to a communications service drop found to be connected to a weatherhead. Our Division Compliance Inspector created a Third Party Notification 126079020 to remove the communication service from the weather head.

ESRB acknowledges that a Third Party Notification was issued.

Location 79: We disagree with the finding that we are out of compliance due to an abandoned communications service drop. Our Division Compliance Inspector created a Third Party Notification 126079052 to remove an abandoned telephone cable.

ESRB acknowledges that a Third Party Notification was issued.

Location 80: We disagree with the finding that we are out of compliance due to a loose communications service drop and loose riser. Our Division Compliance Inspector created a Third Party Notification 126098124 to address communications findings.

ESRB acknowledges that a Third Party Notification was issued.

Location 82: We disagree with the finding that we are out of compliance due to a buried communications guy wire anchor. Our Division Compliance Inspector created a Third Party Notification 126078863 to address communications findings.

ESRB acknowledges that a Third Party Notification was issued.

5. GO 128, Rule 17.1, Design, Construction and Maintenance states:

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

ESRB’s findings are listed in Table 9:

Table 9: GO 128, Rule 17.1 Findings

Location	Finding	Notes
13	Cracked insulation found on secondary conductors. Cracked insulation found on bus bars.	
15	Capacitor caps were missing on elbow connections.	PG&E corrected the finding in the field.
16	Foreign object was found on elbow connection.	PG&E corrected the finding in the field.
47	Lid frame was broken. Lid frame was not secured upon arrival. Top cap had an opening and needs replacement.	
48	The transformer oil level was high. A primary phase conductor was missing a voltage indicator tag.	
50	A primary phase conductor was missing a voltage indicator tag.	

Location 13: We disagree with the finding that we are out of compliance due to cracked insulation found on underground secondary conductors and busbars. This condition did not pose an immediate risk of high potential impact to safety or reliability and would have been identified during its monitored Asset Inspection Cycle. Our Division Compliance Inspector created an EC Notification 126082159 to address the underground condition.

ESRB Review: The PG&E response indicates that the cracked insulation found on underground secondary conductors and busbars did not pose an immediate risk of high potential impact to safety. PG&E does not dispute that the observed issue were non-conformances. ESRB’s findings are

still valid. ESRB inspects to all aspects of the General Orders, regardless of Hazard Level. PG&E's response that the non-compliance would have been found during its monitored Asset Inspection Cycle is speculative and assumes the condition did not exist during the previous Asset Inspection Cycle.

Location 15: We disagree with the finding that we are out of compliance due to missing capacitor caps on underground elbow connections. This condition did not pose an immediate risk of high potential impact to safety or reliability and would have been identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site.

ESRB Review: The PG&E response indicates that the capacitor cap missing from the underground elbow connection did not pose an immediate risk of high potential impact to safety. While ESRB considers worker exposure to high voltage to an unexpected place as a safety hazard, PG&E does not dispute that the observed issue were non-conformances. ESRB's findings are still valid. ESRB inspects to all aspects of the General Orders, regardless of Hazard Level. PG&E's response that the non-compliance would have been found during its monitored Asset Inspection Cycle is speculative and assumes the condition did not exist during the previous Asset Inspection Cycle. ESRB acknowledges that the finding was corrected during the audit.

Location 16: We disagree with the finding that we are out of compliance due to a foreign object being found on an underground elbow connection. This condition did not pose an immediate risk of high potential impact to safety or reliability and would have been identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site by removing the foreign object (Sharpie Pen) out of the vault.

ESRB Review: The PG&E response indicates that a foreign object contacting the underground elbow connection did not pose an immediate risk of high potential impact to safety. PG&E does not dispute that the observed issue were non-conformances. ESRB's findings are still valid. ESRB inspects to all aspects of the General Orders, regardless of Hazard Level. PG&E's response that the non-compliance would have been found during its monitored Asset Inspection Cycle is speculative and assumes the condition did not exist during the previous Asset Inspection Cycle. ESRB acknowledges that the finding was corrected during the audit.

Location 47: We agree with the finding that we are out of compliance due to the lid frame to the underground vault found to be unsecured and broken upon arrival. Our Division Compliance Inspector created an EC Notification 126081095 to make repairs.

ESRB Review: ESRB accepts PG&E's response that the facility was out of compliance and acknowledges that an EC was created to correct the non-compliance.

Location 48: We agree with the finding that we are out of compliance due to 1) the transformer oil level found to be high and 2) a missing voltage tag from the primary phase conductor. Our Division Compliance Inspector identified that the transformer temperature gage read high, not that the oil level was high. We created EC Notification 126081026 to perform an overload test on the transformer.

ESRB Review: ESRB accepts PG&E's response that the facility was out of compliance and acknowledges that an EC was created to correct the non-compliance.

Location 50: We agree with the finding that we are out of compliance due to a missing voltage tag from the primary phase conductor.

ESRB Review: ESRB accepts PG&E's response that the facility was out of compliance. PG&E did not indicate what corrective action will be taken.

6. 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 are listed in Table 10:

Table 10: GO 128, Rule 17.8 Findings

Location	Finding	Notes
14	No mark of ownership found on vault cover.	PG&E corrected the finding in the field.

Location 14: We disagree with the finding that we are out of compliance due to an unmarked utility vault cover. There was a mark of ownership found on the vault; however, it was a faded utility ownership marking that was not clearly legible. During the audit, our Division Compliance Inspector installed a new high voltage sticker that reflects PG&E ownership. Additionally, we created an EC Notification 126082324 to weld a metal high voltage marking with PG&E ownership.

ESRB Review: The PG&E response indicates that a mark of ownership was faded rather than missing. ESRB found the markings to be in such a state that hinders the identification of the vault by persons performing work in the vicinity. ESRB acknowledges that the finding was temporarily corrected during the audit and that an EC was created for a permanent repair.