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

April 12, 2023 EA2023-1041

Vincent Tanguay, Senior Director
Electric Compliance, Electric Engineering
Pacific Gas & Electric Company (PG&E)
300 Lakeside Dr., Oakland, CA 94612

SUBJECT: Electric Distribution Audit of PG&E's De Anza Division

Dear Mr. Tanguay:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell and Joe Murphy of ESRB staff conducted an electric distribution audit of PG&E's De Anza Division from February 13 to February 17, 2023. During the audit, ESRB staff conducted field inspections of PG&E's distribution facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than May 10, 2023, by electronic copy of all corrective actions and preventive measures taken by PG&E to correct the identified violations and prevent the recurrence of such violations.

The response should indicate the date of each remedial action and preventive measure taken for the violations and observations. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Section II and IV of the enclosed Audit Report. Please also provide records of the third-party notifications for the field observations listed in Section V of the enclosed Audit Report.

If you have any questions concerning this audit, please contact Samuel Mandell at (916) 217-8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Electric Distribution Audit Report for PG&E De Anza Division

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC

Nika Kjensli, Program Manager, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Rickey Tse, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC
Joe Murphy, Utilities Engineer, ESRB, SED, CPUC

PG&E DE ANZA DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
February 13-17, 2023

I. Records Review

During the audit, ESRB staff reviewed the following records:

- PG&E's inspection and maintenance procedures.
    - Electric Distribution Preventive Maintenance Manual, April 1, 2016.
- Overhead and underground facilities statistics.
- Completed work orders with notifications, canceled work orders with notifications, and open work orders with notifications from December 2017 to December 2022.
- Patrol and detailed inspection records from December 2017 to December 2022.
- Reliability metrics and sustained outages from December 2017 to December 2022.
- De Anza Division map.
- New Construction projects (both overhead and underground) from December 2021 to December 2022.
- Pole loading and safety factor calculations completed from December 2021 to December 2022.
- Third Party Safety Hazard notifications sent and received from December 2017 to December 2022.
- Inspector list from December 2017 to December 2022 and inspector qualifications.
- Equipment test records from December 2017 to December 2022.
- Intrusive inspection records from December 2021 to December 2022.
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

II. Records Violations

1. **General Order (GO) 95, Rule 18-B(1), Maintenance Programs** states in part:

    "Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.

    Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate:
    - *Type of facility or equipment;*
    - *Location, including whether the Safety Hazard or potential violation is located in the High Fire-Threat District;*
    - *Accessibility;*
    - *Climate;*
    - *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.*

    (a) 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.*
  EXCEPTION – Potential violations specified in Appendix J or subsequently approved through Commission processes, including…. The condition's record in the auditable maintenance program must indicate the relevant exception and the date of the corrective action."

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 the late Electric Corrective (EC) notifications within the De Anza Division from December 19, 2017 to December 20, 2022. PG&E's Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines priority codes and associated time frames for EC notifications 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 the late EC notifications and determined that PG&E did not address a total of 11,546 EC notifications by their required end date. Of these 11,546 EC notifications, 11,430 were classified as "late non-exempt" and 116 were classified as "late-exempt".

Per GO 95, Rule 18B(1)(b), *"Correction times may be extended under reasonable circumstances, such as: third party refusal, customer issue, no access, permits required, system emergencies (e.g. fires, severe weather conditions)."* PG&E classifies EC notifications under these circumstances as "late-exempt" as they are exempted from completion by their assigned due date.

Table 1 below breaks down the 11,546 late EC notifications by the given priority, including the total number of late EC notifications, non-exempt/exempt late EC notifications, and late canceled EC notifications, which are included in the total.

Table 1: Late EC Notifications

Priority Code	Total # Late EC Notifications	Total # Late Non-Exempt	Total # Late Exempt	Total # Late Cancelled[1]
A	164	162	2	74
B	1,335	1,221	114	534
E	9,968	9,968	-	1,551
F	79	79	-	12
Total	11,546	11,430	116	2,171

Of the 11,430 non-exempt late EC notifications, PG&E completed one priority A notification 8 months past its assigned due date. Table 2 below identifies the most overdue non-exempt EC notifications for each priority.

[1] Total # Late Cancelled is a subset of the late EC notifications and includes items which were exempt, non-exempt, or found already completed.

Table 2: Most Overdue EC Notifications

Priority Code	EC Notification #	Number of Days Past Assigned Due Date
A	114707218	239
B	117279554	1,177
E	114121990	1460
F	114282503	1,359

PG&E identified EC notification #114707218 on June 17, 2018 for a conductor clearance adjustment with a required end date of July 08, 2018. PG&E did not complete the work until March 04, 2019.

PG&E identified EC notification #117279554 on May 20, 2019 for a pole replacement with a required end date of September 30, 2019. EC notification #117279554 was still open as of December 20, 2022.

PG&E identified EC notification #114121990 on December 21, 2017 for a pole replacement with a required end date of October 15, 2019. EC notification #114121990 was still open as of December 20, 2022.

PG&E identified EC notification #114282503 on February 07, 2018 to replace a missing/damaged 'High Voltage' sign with a required end date of April 01, 2019. EC notification #114282503 was still open as of December 20, 2022.

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 in part:

> *"Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1."*

ESRB identified that PG&E had completed a total of 5,346 overhead patrols and inspections past their assigned due dates in the last two years. Table 3 below breaks down the late overhead patrols and inspections by year and total structures late.

Table 3: Late Overhead Patrols and Inspections

Year	Inspection Type	Total Structures
2021	Inspection	4,905
2021	Patrol	438
2022	Inspection	3

3. **GO 128, Rule 17.2, Inspection** states in part:

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

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

   "Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1."

   ESRB identified that PG&E completed one 2022 underground inspection past its assigned due date:

   - Plat Map F1417 – Inspection was due on May 28, 2022 per GO 165. PG&E completed the inspection on June 02, 2022.

III. Field Inspection

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

Loc #	SAP #	Structure Type	Structure Latitude	Structure Longitude	City
01	107412968	UG-Switch	37.32280278	-122.0192194	Cupertino
02	107282967	UG-Padmount Transformer	37.32233056	-122.0194694	Cupertino
03	107266109	UG-Padmount Transformer	37.32151111	-122.0189139	Cupertino
04	100528213	OH-Wood Pole	37.33948889	-122.0338222	Cupertino
05	100528214	OH-Wood Pole	37.33948611	-122.0326778	Cupertino
06	100528215	OH-Wood Pole	37.33950833	-122.0327083	Cupertino
07	100519434	OH-Wood Pole	37.12355	-121.9297028	Los Gatos
08	100519107	OH-Wood Pole	37.12343331	-121.9293833	Los Gatos
09	104132178	OH-Wood Pole	37.12344444	-121.9286639	Los Gatos
10	100519445	OH-Wood Pole	37.12293889	-121.9285194	Los Gatos
11	100519446	OH-Wood Pole	37.12245556	-121.9279556	Los Gatos
12	100518403	OH-Wood Pole	37.14351389	-121.9962306	Los Gatos
13	100518403	OH-Wood Pole	37.14349694	-121.9962303	Los Gatos
14	103994261	OH-Wood Pole	37.19865	-122.0125056	Los Gatos
15	100550005	OH-Wood Pole	37.19845556	-122.0121778	Los Gatos
16	103993454	OH-Wood Pole	37.1984	-122.0117333	Los Gatos
17	103993458	OH-Wood Pole	37.19834444	-122.0117417	Los Gatos
18	100539561	OH-Wood Pole	37.19797778	-122.0112917	Los Gatos
19	100539562	OH-Wood Pole	37.19754444	-122.0109778	Los Gatos
20	100539563	OH-Wood Pole	37.19732222	-122.0106417	Los Gatos
21	100539564	OH-Wood Pole	37.19693333	-122.0106194	Los Gatos
22	100546936	OH-Wood Pole	37.21935278	-121.974075	Los Gatos
23	100525900	OH-Wood Pole	37.21899722	-121.9738694	Los Gatos
24	100548298	OH-Wood Pole	37.218625	-121.9736028	Los Gatos
25	100525410	OH-Wood Pole	37.21838333	-121.9733583	Los Gatos
26	100513818	OH-Wood Pole	37.24586944	-122.0266028	Saratoga
27	100513817	OH-Wood Pole	37.24568611	-122.0268167	Saratoga
28	100513816	OH-Wood Pole	37.24510556	-122.0272	Saratoga
29	100513814	OH-Wood Pole	37.24485278	-122.0275028	Saratoga
30	100513828	OH-Wood Pole	37.24448333	-122.0278778	Saratoga
31	100553962	OH-Wood Pole	37.24418889	-122.0283361	Saratoga
32	100513831	OH-Wood Pole	37.24405	-122.0282972	Saratoga
33	100513827	OH-Wood Pole	37.24417778	-122.0275806	Saratoga
34	104140798	OH-Wood Pole	37.25234722	-122.0204694	Saratoga
35	104135645	OH-Wood Pole	37.25239444	-122.0205222	Saratoga
36	100542569	OH-Wood Pole	37.25254167	-122.020025	Saratoga
37	100551342	OH-Wood Pole	37.25337222	-122.0200667	Saratoga

Loc #	SAP #	Structure Type	Structure Latitude	Structure Longitude	City
38	100552178	OH-Wood Pole	37.25345278	-122.0200944	Saratoga
39	100540124	OH-Wood Pole	37.25466944	-122.0196917	Saratoga
40	100513497	OH-Wood Pole	37.26474722	-122.0495306	Saratoga
41	100513499	OH-Wood Pole	37.26468333	-122.04905	Saratoga
42	100513502	OH-Wood Pole	37.26548889	-122.0491778	Saratoga
43	100513498	OH-Wood Pole	37.26483611	-122.0499417	Saratoga
44	104144569	OH-Wood Pole	37.27518056	-122.0685667	Saratoga
45	100526134	OH-Wood Pole	37.275081	-122.068032	Saratoga
46	100526128	OH-Wood Pole	37.27629444	-122.0684972	Saratoga
47	104138397	OH-Wood Pole	37.27682222	-122.0684972	Saratoga
48	103978191	OH-Wood Pole	37.28691389	-122.0794	Saratoga
49	100526100	OH-Wood Pole	37.28705556	-122.0793444	Saratoga
50	100522101	OH-Wood Pole	37.28625833	-122.0790028	Saratoga
51	107501528	UG-Junction Box	37.42546389	-122.0936056	Mountain View
52	107273899	UG-Padmount Transformer	37.42569722	-122.0940333	Mountain View
53	107267535	UG-Padmount Transformer	37.42469444	-122.0941472	Mountain View
54	100509578	OH-Wood Pole	37.42486111	-122.0934361	Mountain View
55	100509577	OH-Wood Pole	37.42425556	-122.0934917	Mountain View
56	100509576	OH-Wood Pole	37.42349722	-122.0935528	Mountain View
57	100509575	OH-Wood Pole	37.42236389	-122.0936444	Mountain View
58	100508872	OH-Wood Pole	37.39998889	-122.1131972	Mountain View
59	100508823	OH-Wood Pole	37.39967778	-122.11325	Mountain View
60	100508821	OH-Wood Pole	37.39928889	-122.1131972	Mountain View
61	100508822	OH-Wood Pole	37.39952778	-122.1129222	Mountain View
62	100508873	OH-Wood Pole	37.39994444	-122.1125194	Mountain View
63	100509228	OH-Wood Pole	37.39105556	-122.11535	Los Altos
64	100509229	OH-Wood Pole	37.39124722	-122.1155389	Los Altos
65	100509230	OH-Wood Pole	37.391425	-122.1161278	Los Altos
66	100509231	OH-Wood Pole	37.39138333	-122.1163028	Los Altos
67	100509232	OH-Wood Pole	37.39132222	-122.1162722	Los Altos
68	100509233	OH-Wood Pole	37.39073611	-122.11625	Los Altos
69	103547009	OH-Metal Pole	37.39011667	-122.1162194	Los Altos

Loc #	SAP #	Structure Type	Structure Latitude	Structure Longitude	City
70	103547015	OH-Metal Pole	37.38949167	-122.1163028	Los Altos
71	100511049	OH-Wood Pole	37.374725	-122.1020361	Los Altos
72	100511050	OH-Wood Pole	37.37461111	-122.1014111	Los Altos
73	100543736	OH-Wood Pole	37.37449167	-122.1006833	Los Altos
74	107301113	UG-Manhole	37.36179722	-122.0997778	Los Altos
75	100518788	OH-Wood Pole	37.36190278	-122.0999	Los Altos
76	100549651	OH-Wood Pole	37.36191944	-122.0999444	Los Altos
77	100547918	OH-Wood Pole	37.36246944	-122.1372222	Los Altos
78	100526918	OH-Wood Pole	37.28922778	-121.9807056	Campbell
79	100527185	OH-Wood Pole	37.28159722	-121.9628139	Campbell
80	100527189	OH-Wood Pole	37.28160556	-121.9629667	Campbell
81	100527186	OH-Wood Pole	37.28144722	-121.9627611	Campbell
82	103790029	OH-Wood Pole	37.28200278	-121.9625167	Campbell
83	104119865	OH-Wood Pole	37.28236389	-121.9625556	Campbell
84	100540234	OH-Wood Pole	37.27946917	-121.9575194	Campbell
85	100540160	OH-Wood Pole	37.27945	-121.9584194	Campbell
86	100540161	OH-Wood Pole	37.27945833	-121.9587639	Campbell
87	100540162	OH-Wood Pole	37.27948056	-121.9591361	Campbell

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

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

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

   1.1. Pole SAP # 100528215 (Location 6) at 530 La Conner Dr, Sunnyvale: Improper connection, splice within 2 feet of insulator.

   1.2. Pole SAP # 100513828 (Location 30) at 15401 Madrone Hill Rd, Saratoga: Decayed crossarm on pole. PG&E created EC 125506069.

   1.3. Pole SAP # 100526134 (Location 45) at rear of 20145 Orchard Meadow Dr, Saratoga: Buried anchor. Will be addressed with existing pole replacement EC 117162811.

   1.4. Pole SAP # 120781720 (Location 48) across from 13326 Stevens Canyon Rd, Cupertino: Improper connection, splice within 2 feet of insulator. PG&E created EC 125512734 in the field.

   1.5. Pole SAP # 100527185 (Location 79) at 383 Virginia Ave, Campbell: Exposed ground rod. PG&E corrected in the field.

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

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

   2.1. Pole SAP # 100525410 (Location 25) at 13 Highland Ave, Los Gatos: Clovis: High Voltage sign missing, PG&E corrected in the field.

   2.2. Pole SAP # 100509233 (Location 68) at 53 Alma Ct, Los Altos: High Voltage sign is deteriorated. PG&E created EC 125574695 in the field.

3. **GO 128, Rule 35.3, Warning Signs** states:

"Warning signs indicating high voltage shall be installed on an interior surface, or barrier if present, inside the entrance of vaults, manholes, handholes, pad mounted transformer compartments, and other above ground enclosures containing exposed live parts above 750 volts. Such warning signs shall also be installed on an exterior surface of all such pad mounted transformer compartments and other above ground enclosures. Such signs shall be clearly visible to a person in position to open any such access door, other opening, or barrier."

Underground Switch SAP # 107412968 (Location 1) at 19780 Stevens Creek Blvd, Cupertino: High Voltage warning sign on cover in poor condition (broken). PG&E corrected during audit.

4. **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."

4.1. Pole SAP # 100539561 (Location 18) at 19420 Beardsley Rd, Los Gatos: Guy slack. PG&E corrected in the field.

4.2. Pole SAP # 100553962 (Location 31) at 15461 Madrone Hill Rd, Saratoga: Guy slack. PG&E created EC 125506106 in the field.

4.3. Pole SAP # 100513831 (Location 32) at 1 pole south of Location 31, Saratoga: Guy slack. PG&E created EC 125506029 in the field.

4.4. Pole SAP # 104135645 (Location 35) at 14855 Farwell Ave, Saratoga: Secondary guy slack. PG&E corrected in the field.

4.5. Pole SAP# 103790029 (Location 82) across from 333 Virginia Ave, Campbell: Down guy strained by vegetation. PG&E created EC 125521109 in the field.

5. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 3 Column A states in part:**

"The basic minimum allowable vertical clearance of a span wire, overhead guy, and messenger crossing or along thoroughfares in urban districts or crossing thoroughfares in rural districts is 18 feet. Exception (j) reduces the clearance to 16 feet for driveways in rural districts."

Pole SAP # 100546936 (Location 22) at 48 Jackson St, Los Gatos: Down guy measured 14'8" over center of road.

6. **GO 95, Rule 56.6-A, Guys in Proximity to Supply Conductors of Less than 35,500 Volts states in part:**

"All portions of guys within both a vertical distance of 8 feet from the level of supply conductors of less than 35,500 volts and a radial distance of 6 feet from the surface of wood poles or structures shall not be grounded, through anchors or otherwise. Where necessary to avoid the grounding of such portions, guys shall be sectionalized by means of insulators installed at locations as specified in Rule 56.7."

6.1. Pole SAP # 100519446 (Location 11) at 24325 Loma Prieta Ave, Los Gatos: Vegetation contacting above guy insulator. PG&E corrected in the field.

6.2. Pole SAP # 103993454 (Location 16) at 19428 Beardsley Rd, Los Gatos: Vegetation contacting above guy insulator. PG&E corrected in the field.

6.3. Pole SAP # 100509229 (Location 64) at 23 Alma Ct, Los Altos: Vegetation contacting above guy insulator. PG&E created EC 125514338 in the field.

7. **GO 95, Rule 18 Section B (1) iii, Maintenance Programs** states in part:

"Level 3 – Any risk of low potential impact to safety or reliability: Take corrective action within 60 months…"

7.1. Pole SAP # 100509228 (Location 63) at 20 Alma Ct, Los Altos: Slack guy and vegetation contacting above guy insulator. PG&E previously identified on EC 110070557 created February 12, 2015 with a required end date of February 12, 2020.

7.2. Pole SAP # 100509232 (Location 67) at 41 Alma Ct, Los Altos: Corroded guy anchor. PG&E previously identified on EC 110138827 created in 2015 with a required end date in 2020.

8. **GO 95, Rule 37, Minimum Clearances of Wires from Other Wires, Table 2, Case 19 Column C** states in part:

"The minimum allowable radial separation for guys and span wires passing communication conductors on the same pole is 3 inches."

Pole SAP # 100527186 (Location 80) at 383 Virginia Ave, Campbell: Down guy and communications line are in contact with each other. PG&E created EC 125521090 in the field.

9. **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."*

9.1. Padmount Transformer SAP # 107282967 (Location 2) at 19772 Stevens Creek Blvd, Cupertino: Corrosion damage on bottom of enclosure. PG&E created EC 125494713 in the field.

9.2. Padmount Transformer SAP # 107273899 (Location 52) at 2375 Garcia Ave, Mountain View: Existing EC 120484994 for low oil level is past due since February 01, 2022. PG&E escalated the past due tag to Priority B.

V. Observations

1. ESRB staff observed the following third-party potential safety concerns during the field inspection:

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.

1.1. The pole at 530 La Conner Dr, Sunnyvale (Location 4) has a low communications

riser and an abandoned service. PG&E created Third Party Notification (TPN) 124595456 during the audit.

1.2. The communication wires and guy are down in the creek on the pole at Lat 37.14349694 Long -121.9962303 (Location 13). PG&E created TPN 125501160 during the audit.

1.3. Communication riser is not secure to the base of the pole at 15374 Madrone Hill Rd, Saratoga (Location 29). PG&E created TPN 125506066 during the audit.

1.4. Low clearance communications lines at the pole at 15401 Madrone Hill Rd, Saratoga (Location 30). PG&E created TPN 12506111 created during the audit.

1.5. Communication guy anchor pulled out of the ground at 15461 Madrone Hill Rd, Saratoga (Location 31). PG&E created TPN 12506109 during the audit.

1.6. Communication wire hanging off the pole at 14000 Pike Rd, Saratoga (Location 42). PG&E created TPN 12507766 during the audit.

1.7. Loose communications wire and low communication riser at 933 Sherwood Ave, Los Altos (Location 61). PG&E created TPN 125513607 and 125513646 during the audit.

1.8. Communication guy hanging on the pole at 23 Alma Ct, Los Altos (Location 64). PG&E created TPN 125514467 during the audit.

1.9. Communication riser cover is damaged at 53 Alma Ct, Los Altos (Location 68). PG&E created TPN 125514904 during the audit.

1.10. Loose communication wires, slack down guy, and low riser cover at 501 San Luis Ave, Los Altos (Location 71). PG&E created TPN 125515261 during the audit.

1.11. Loose communication wires at 426 Budd Ave, Campbell (Location 84). PG&E created TPN 125521387 during the audit.

1.12. Loose communication wires at 511 Budd Ave, Campbell (Location 87). PG&E created TPN 125521398 during the audit.