

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 14, 2024

EA2024-1187

Jonathan Moulton, P.E.
Managing Director, Power Delivery Asset Management
PacifiCorp
1407 W. North Temple St., Room #275
Salt Lake City, UT 84116

SUBJECT: Electric Distribution Audit of PacifiCorp – Yreka Division

Dear Mr. Moulton:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Nora Nguyen of ESRB staff conducted an electric distribution audit of PacifiCorp's Yreka Division from March 25, 2024 through March 29, 2024. During the audit, ESRB staff conducted field inspections of PacifiCorp'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 July 15, 2024, by electronic copy of all corrective actions and preventive measures taken by PacifiCorp to correct the identified violations and prevent the recurrence of such violations. Please note that ESRB will be posting the audit report and your response to the audit on the CPUC website. If there is any information in your response that you want us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Emiliano Solorio at emiliano.solorio@cpuc.ca.gov or (916) 216-0249.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rickey Tse'.

Rickey Tse, 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 PacifiCorp Yreka Division

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC

Yi (Rocky) Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Nora Nguyen, Utilities Engineer, ESRB, SED, CPUC

**PACIFICORP YREKA DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
MARCH 25 – 29, 2024**

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for PacifiCorp's Yreka Division:

- PacifiCorp's Inspection and Maintenance Procedures
- Open and late work orders from March 2019 to February 2024, completed work orders from March 2019 to February 2024, and cancelled work orders from March 2019 to February 2024
- Patrols and detailed inspections completed March 2019 to February 2024
- Reliability metrics and sustained outages for March 2019 to February 2024
- Statistics on overhead and underground facilities
- Division maps showing approximate locations of the plat maps administered by the division
- New Construction Projects list, March 2023 to February 2024
- Pole Loading Calculations list, March 2023 to February 2024
- Outgoing Third-Party Safety Hazard notifications sent March 2019 to February 2024
- List of inspectors and patrolmen active from March 2019 to February 2024
- Records of all equipment tests completed March 2021 to February 2024

II. Records Violations

ESRB staff observed the following violations during the record review portion of the audit:

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

"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.”*

ESRB’s review of PacifiCorp’s Yreka Division work orders from March 2019 to February 2024 found that PacifiCorp had 78 late-pending work orders, 151 late-closed work orders, and 44 late-removed work orders. Late-pending work orders are work orders that have not been completed by their assigned due date based on their hazard level. Late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Late-removed work orders are work orders that were not corrected or removed from PacifiCorp’s system prior to their assigned due date. Table 1 below breaks down all the 273 late work orders in PacifiCorp’s Yreka Division by hazard level, including the total number of late work orders, which includes the late-pending, late-closed, and late-removed work orders.

Table 1: Yreka Division Late Work Orders

Hazard Levels	Late-Pending Work Orders	Late-Closed Work Orders	Late-Removed Work Orders	Total Late Work Orders
1	–	25	14	39
2	78	126	30	234
3	–	–	–	–
Total	78	151	44	273

The work order for facility point `06246012.0118600 has the longest priority level 1 past due date of 236 days. The work order is for a service drop too low over ground. The work order for facility point `06240004.0098101 has the longest priority level 2 past due date of 1,094 days. The work order is for a climbing space issue.

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’s review of PacifiCorp’s overhead patrols and inspections for the Yreka Division identified a total of 22 late overhead patrols and detailed inspections from March 2019 to February 2024. PacifiCorp completed 15 overhead patrol inspections late and 7 overhead detailed inspections late. The detailed inspection for facility point `06246011.0358600 has the longest past due date of 1,571 days.

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’s review of PacifiCorp’s underground patrols and inspections for the Yreka Division identified a total of 59 late underground patrols and detailed inspections from March 2019 to February 2024. PacifiCorp completed 37 underground patrols late and 22 underground detailed inspections late in the Yreka Division. The patrol inspection for facility point `06245007.0346881 has the longest past due date of 2,271 days. The detailed inspection for facility point `06245007.0346881 has the longest past due date of 1,907 days.

III. Field Inspection

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

Location	Structure Type	Equipment Number (FPNO)	Equipment Location (Address/GPS Coordinates)
1	Pole	`06239004.255100	6213 Dunsmuir Ave. Dunsmuir, CA
2	Pole	`06239004.255200	6205 Dunsmuir Ave. Dunsmuir, CA
3	Pole	`06239004.256207	6120 Dunsmuir Ave. Dunsmuir, CA
4	Pole	`06239004.256206	6107 Dunsmuir Ave. Dunsmuir, CA
5	Pole	`06239004.256205	6101 Dunsmuir Ave. Dunsmuir, CA
6	Pole	`06239004.256214	Dunsmuir Ave. & Branstetter St. Dunsmuir, CA
7	Pole	`06239004.255207	4212 Branstetter St. Dunsmuir, CA
8	Pole	`06239004.0136212	4104 Alpine St. Dunsmuir, CA
9	Pole	`06239004.136211	4103 Alpine St. Dunsmuir, CA
10	Pole	`06239004.136210	4109 Alpine St. Dunsmuir, CA
11	Pole	`06239004.0136209	4111 Alpine St. Dunsmuir, CA
12	Pole	`06239004.135201	4119 Alpine St. Dunsmuir, CA
13	Pole	`06239002.061200	325 E. Minnesota Ave. McCloud, CA
14	Pole	`06239002.061304	317 E. Minnesota Ave. McCloud, CA
15	Pole	`06239002.061302	301 E. Minnesota Ave. McCloud, CA
16	Pole	`06239002.061301	245 E. Minnesota Ave. McCloud, CA
17	Pole	`06239002.060308	237 E. Minnesota Ave. McCloud, CA
18	Pole	`06239002.060307	229 E. Minnesota Ave. McCloud, CA
19	Pole	`06239003.016913	837 Hill St.
20	Pole	`06239003.016909	825 Hill St. McCloud, CA
21	Pole	`06239003.016908	817 Hill St. McCloud, CA

22	Pole	`06240004.167143	616 Mill St. Mt. Shasta, CA
23	Pole	`06240004.167240	612 Mill St. Mt. Shasta, CA
24	Pole	`06240004.167241	612 Forest St. Mt. Shasta, CA
25	Pole	`06240004.166240	515 Forest St. Mt. Shasta, CA
26	Pad-Mount Transformer	`06240004.164384	134 Morgan Way Mt. Shasta, CA
27	Pad-Mount Transformer	`06240004.164280	(41.3097687,-122.3166091)
28	Pad-Mount Transformer	`06240004.164180	111 Morgan Way Mt. Shasta, CA
29	Pole	`06240004.083400	1506 Highland Dr. Mt. Shasta, CA
30	Pole	`06240004.083402	1438 Highland Dr. Mt. Shasta, CA
31	Pole	`06240004.083403	1426 Highland Dr. Mt. Shasta, CA
32	Pole	`06241005.115642	435 Dollar Ave. Weed, CA
33	Pole	`06241005.115641	403 Dollar Ave. Weed, CA
34	Pole	`06241005.115640	355 Dollar Ave. Weed, CA
35	Pole	`06241005.013604	(41.4305252,-122.3739735)
36	Pole	`06241005.014600	(41.4308053,-122.3735172)
37	Pole	`06241005.014642	1475 N. Davis Ave. Weed, CA
38	Pole	`06241005.013642	1460 N. Davis Ave. Weed, CA
39	Pole	`06241005.028342	455 Gilman Ave. Weed, CA
40	Pole	`06241005.028341	491 Gilman Ave. Weed, CA
41	Pad-Mount Transformer	LS-368.127181	5921 Black Bear Ct. Weed, CA
42	Pad-Mount Transformer	127182	5943 Black Bear Rd. Weed, CA
43	Splice Box	127181	5943 Black Bear Rd. Weed, CA
44	Pole	624209.284102	1054 Callahan Rd. Etna, CA
45	Pole	624209.284104	1041 Callahan Rd. Etna, CA
46	Pole	624209.284103	1036 Callahan Rd. Etna, CA

47	Pole	624209.282204	304 Main St. Etna, CA
48	Pole	624209.282206	253 Main St. Etna, CA
49	Pole	624209.282205	305 Main St. Etna, CA
50	Pole	06243009.0025503	237 Newton St. Fort Jones, CA
51	Pole	B14576	237 Newton St. Fort Jones, CA
52	Pole	B14575	313 Newton St. Fort Jones, CA
53	Pole	B6387	1973 Newton St. Fort Jones, CA
54	Pole	B7132	173 Carlock St. Fort Jones, CA
55	Pole	B8867	119 Sterling St. Fort Jones, CA
56	Pole	B6006	213 Sterling St. Fort Jones, CA
57	Pole	624309.029503	213 High St. Fort Jones, CA
58	Pole	624309.029506	113 Sterling St. Fort Jones, CA
59	Pole	B8865	29 Sterling St. Fort Jones, CA
60	Pole	B8864	19 Sterling St. Fort Jones, CA
61	Pad-Mount Transformer	06245006.228081	122 Ridgeview Dr. Montague, CA
62	Pad-Mount Transformer	06245006.228080	101 Ridgeview Dr. Montague, CA
63	Switch Cabinet	06245006.228082	331 N. 6 th St. Montague, CA
64	Pole	06245006.272941	241 S. 13 th St. Montague, CA
65	Pole	06245006.272943	221 S. 13 th St. Montague, CA
66	Pole	06245006.272942	211 S. 13 th St. Montague, CA
67	Pole	06245007.357607	1520 Sandpiper Ct. Yreka, CA
68	Pole	06245007.357604	1528 Sandpiper Ct. Yreka, CA
69	Pole	06245007.357602	1532 Sandpiper Ct. Yreka, CA
70	Pole	06245007.357542	1601 Sandpiper Ct. Yreka, CA

71	Pad-Mount Transformer	06245007.355681	1524 Pyrite Dr. Yreka, CA
72	Pad-Mount Transformer	06245007.035668	1533 Pyrite Dr. Yreka, CA
73	Pad-Mount Transformer	0624500.355881	1360 Nugget Way Yreka, CA
74	Pad-Mount Transformer	355783	1308 Nugget Way Yreka, CA
75	Pole	624507.221340	906 W. Miner St. Yreka, CA
76	Pole	624507.221341	828 W. Miner St. Yreka, CA
77	Pole	624507.2213242	822 W. Miner St. Yreka, CA
78	Pole	07116007.0111403	64413 2 nd Ave. Happy Camp, CA
79	Pole	07116007.111402	64425 2 nd Ave. Happy Camp, CA
80	Pole	07116007.111405	110 Nugget St. Happy Camp, CA
81	Pole	07116007.111301	110 Nugget St. Happy Camp, CA
82	Pole	07116007.113804	115 Reeves St. Happy Camp, CA
83	Pole	07116007.113808	(41.7976570, -123.3779199)
84	Pole	07116007.113809	63805 Head St. Happy Camp, CA
85	Pole	07216007.113906	63731 Head St. Happy Camp, CA
86	Pole	07116007.116702	115 Park Way Happy Camp, CA
87	Pole	07116007.116700	108 Park Way Happy Camp, CA
88	Pole	07116007.116701	(41.7956104, -123.3721954)
89	Switch Cabinet	07116007.0116682	(41.7952057, -123.3725103)
90	Pad-Mount Transformer	07116007.0116680	(41.7951592, -123.3725119)
91	Pole	06246010.153103	(41.8242639, -122.9972595)
92	Pole	06246010.153200	(41.8251351, -122.9978482)
93	Pole	06246010.152201	(41.8252380, -122.9996949)
94	Pole	06246010.152202	(41.8252347, -122.9997358)
95	Switch Cabinet	06246010.241980	(41.8219992, -122.9629279)
96	Switch Cabinet	06246010.139680	28934 Walker Rd. Horse Creek, CA
97	Pole	06246010.139600	28934 Walker Rd.

			Horse Creek, CA
98	Pole	06246010.138601	28934 Walker Rd. Horse creek, CA
99	Pole	06246009.092701	(41.8467827, -122.9064821)
100	Pole	06246009.092700	(41.8470837, -122.9055212)
101	Pole	06246009.114000	(41.8367504, -122.8649042)
102	Pole	06246009.114001	(41.8365104, -122.8645599)
103	Pad-Mount Transformer	06246009.146980	(41.8347590, -122.8605885)
104	Pole	06246009.136800	(41.8389089, -122.8385431)

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

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

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

ESRB’s findings related to the above rule are listed in Table 2:

Table 2: GO 95, Rule 31.1 Findings

Location	Finding
6	Pole `06239004.256214 has an exposed ground wire on pole.
13	Pole `06239002.061200 has woodpecker damage.
22	Pole `06240004.167143 has broken molding for a ground wire. PacifiCorp has an existing work order for repair.
32	Pole `06241005.115642 has an exposed ground wire at the base of pole.
33	Pole `06241005.115641 has ground molding coming off the base of the pole. Molding was repaired in field.
45	Pole `624209.284104 has a ground wire coming out of molding.
64	Pole `06245006.272941 has broken molding for a ground wire.
78	Pole `07116007.0111403 has an existing open work order for exposed ground wire. Molding was repaired in 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.

The top of such sign(s) shall be located between the level of the lowest line conductor, energized in excess of 750 volts, on the pole to no more than 40 inches below that conductor level (see Figure 51-1).

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

ESRB's findings related to the above rule are listed in Table 3:

Table 3: GO 95, Rule 51.6-A Findings

Location	Finding
6	Pole `06239004.256214 has a missing high voltage sign.
18	Pole `06239002.060307 has a damaged high voltage sign.
24	Pole `06240004.167241 has a damaged high voltage sign.
45	Pole `624209.284104 has a missing high voltage sign.
48	Pole `624209.282206 has a missing high voltage sign.
49	Pole `624209.282205 has a damaged high voltage sign.
64	Pole `06245006.272941 has a missing high voltage sign.
65	Pole `06245006.272943 has a missing high voltage sign.
68	Pole `06245007.357604 has a damaged high voltage sign.

V. Observations

1. GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities states in part:

“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property...”

GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

“(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95.”

During the field inspection, ESRB staff observed the following third-party safety concerns listed in Table 4:

Table 4: Third-Party Audit Observations

Location	Observations
1	Pole `06239004.255100 needs communications to transfer their service to new pole.
2	Pole `06239004.255200 needs communications to transfer their service to new pole.
3	Pole `06239004.256207 needs communications to transfer their service to new pole.
4	Pole `06239004.256206 needs communications to transfer their service to new pole.

5	Pole `06239004.256205 needs communications to transfer their service to new pole.
8	Pole `06239004.0136212 needs communications to transfer their service to new pole.
9	Pole `06239004.136211 has a communications wire contacting the down guy above the insulator.
11	Pole `06239004.0136209 needs communications to transfer their service to new pole.
18	Pole `06239002.060307 has an exposed communications ground wire. Communications ground rod is above ground level.
29	Pole `06240004.083400 has a loose communications service drop.
32	Pole `06241005.115642 needs communications to transfer their service to new pole.
39	Pole `06241005.028342 needs communications to transfer their service to new pole.
64	Pole `06245006.272941 has an abandoned communications service drop.
67	Pole `06245007.357607 needs communications to transfer their service to new pole.
70	Pole `06245007.357542 has an abandoned communications service drop.
83	Pole `07116007.113808 has an abandoned communications service drop.