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

February 24, 2025 EA2024-1288

Kevin Short
General Manager
Anza Electric Cooperative
P.O. Box 391909, 58470 Highway 371
Anza, CA 92539

Subject: Electric distribution audit of Anza Electric Cooperative

Mr. Short:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Jose Lastra of my staff conducted an electric distribution audit of Anza Electric Cooperative (AEC) from October 7-11, 2024. The audit included a review of AEC's records and field inspections of AEC's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). Included with this letter is a copy of the audit findings that itemize the violations discovered during the audit. Please advise me no later than March 24, 2025, by electronic or hard copy, of all corrective measures taken by AEC to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Jose Lastra (213) 507-1438 or jose.lastra@cpuc.ca.gov.

Sincerely,

Fadi Daye

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

Enclosures: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Derek Fong, Senior Utilities Engineer, SED, ESRB, CPUC
Jose Lastra, Utilities Engineer, SED, ESRB, CPUC

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

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

II. Records Review – Violations List

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

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

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

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

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

AEC's records indicated that from May 2022 to September 2024, AEC completed 5,825 patrol or detailed inspections past AEC's scheduled due date.

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

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

GO 128, Rule 17.2, Inspection, states:

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

AEC's records indicated that from May 2022 to September 2024, AEC completed 1,028 underground inspections past AEC's scheduled due date.

III. Field Inspections

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

No.	Structure ID.	Type of Structure	Location
1	O12312	Pole	Anza
2	O12313	Pole	Anza
3	O12314	Pole	Anza
4	O12315	Pole	Anza
5	O12316	Pole	Anza
6	O12317	Pole	Anza
7	8497	Pole	Anza
8	8498	Pole	Anza
9	O12313	Pole	Anza
10	O12319	Pole	Anza
11	5589	Pole	Anza
12	O12320	Pole	Anza
13	O12321	Pole	Anza
14	O12322	Pole	Anza
15	O12323	Pole	Anza
16	7030	Pole	Anza
17	O12160	Pole	Lake Riverside
18	O12161	Pole	Aguanga
19	Adjacent to O12161	Pedestal	Aguanga
20	11283	Pole	Aguanga
21	11284	Pole	Aguanga
22	8563	Pole	Aguanga
23	8562	Pole	Aguanga
24	9560	Pole	Aguanga
25	8561	Pole	Aguanga
26	Adjacent to 8561	Pedestal	Aguanga
27	8560	Pole	Aguanga
28	8559	Pole	Aguanga
29	Adjacent to 8559	Pedestal	Aguanga
30	8558	Pole	Aguanga
31	Adjacent to 8558	Pedestal	Aguanga
32	11678	Pole	Aguanga
33	11677	Pole	Aguanga
34	7593	Pole	Aguanga
35	Adjacent to 7593	Pedestal	Aguanga
36	7594	Pole	Aguanga
37	7584	Pole	Aguanga
38	7585	Pole	Aguanga
39	7586	Pole	Aguanga
40	7587	Pole	Aguanga

41	7588	Pole	Aguanga
42	Adjacent to 7588	Pedestal	Aguanga
43	7589	Pole	Aguanga
44	7590	Pole	Aguanga
45	3268	Padmount Transformer	Aguanga
46	O12175	Pole	Aguanga
47	O12166	Pole	Aguanga
48	O12178	Pole	Aguanga
49	8766	Pole	Aguanga
50	8765	Pole	Aguanga
51	11660	Pole	Garner Valley
52	2889	Pole	Garner Valley
53	2890	Pole	Garner Valley
54	11847	Pole	Garner Valley
55	10287	Pole	Garner Valley
56	11850	Pole	Garner Valley
57	10286	Pole	Garner Valley
58	1776	Pole	Garner Valley
59	1778	Pole	Garner Valley
60	1779	Pole	Garner Valley
61	1787	Pole	Garner Valley
62	1788	Pole	Garner Valley
63	1789	Pole	Garner Valley
64	5692	Pole	Garner Valley
65	6634	Pole	Garner Valley
66	1791	Pole	Garner Valley
67	1792	Pole	Garner Valley
68	1793	Pole	Garner Valley
69	1794	Pole	Garner Valley
70	O12105	Pole	Pinon Pines
71	456	Pole	Pinon Pines
72	3029	Pole	Pinon Pines
73	8307	Pole	Pinon Pines
74	453	Pole	Pinon Pines
75	451	Pole	Pinon Pines
76	452	Pole	Pinon Pines
77	448	Pole	Pinon Pines
78	449	Pole	Pinon Pines
79	411	Pole	Pinon Pines
80	409	Pole	Pinon Pines
81	410	Pole	Pinon Pines
82	435	Pole	Pinon Pines
83	408	Pole	Pinon Pines
84	429	Pole	Pinon Pines
85	430	Pole	Pinon Pines

86	7250	Pole	Pinon Pines
87	431	Pole	Pinon Pines
88	11669	Pole	Pinon Pines
89	433	Pole	Pinon Pines
90	434	Pole	Pinon Pines
91	TR-32	Padmount	Anza
92	TR-31	Padmount	Anza
93	TR-30	Padmount	Anza
94	TR-28	Padmount	Anza
95	TR-29	Padmount	Anza
96	TR-25	Padmount	Anza
97	TR-24	Padmount	Anza
98	TR-19	Padmount	Anza
99	4695	Padmount Transformer	Anza

IV. Field Inspection Violations List

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

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

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

AEC's facilities on the following poles required maintenance:

- Pole 8561: the identification tag of the pole was covered by a riser
- Pole 7589: the identification tag of the pole was damaged and illegible; additionally, the ground wire and ground rod were exposed at the base of the pole

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be 3 inches.

The radial clearance between an AEC down guy wire and a third-party communications conductor on Pole 11283 was less than 3 inches.

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

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

The high voltage signs on each of the following AEC poles were damaged:

- O12317
- O12323
- 1792
- 408
- O12319
- 7030
- 1793
- 429
- 5589
- 1791
- 453
- 433

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

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

The ground moulding attached to each of the following poles was damaged:

- 8559
- 8558
- 7584
- 7588
- 7589
- 7590
- 2890
- 411
- 433

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

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

The climbing space on Pole 410 was obstructed by vegetation.

GO 95, Rule 54.8-C4: Clearances between Supply Service Drops and Other Conductors, From Communication Service Drops, states in part:

> *The radial clearance between supply service drop conductors and communication service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.*

The radial clearance between an AEC service drop and a third-party communications service drop on Pole 429 was less than 12 inches within 15 feet of the point of attachment to the home.

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.*

The down guy wire supporting each of the following poles was not taut:

- Pole 11677
- Pole 1778
- Pole 408