PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
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February 24, 2025 TA2024-1298

Jerrod Meier
Director - Electric Regulatory Compliance
Pacific Gas and Electric Company (PG&E)
300 Lakeside Drive
Oakland, CA 94612

SUBJECT: Electric Transmission Audit of PG&E Lakeville Headquarters (HQ)

Mr. Meier:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Mathew Yunge, Javier Reyes, and Gordon Szeto of ESRB staff conducted an electric transmission audit of PG&E Lakeville HQ from December 2, 2024 through December 6, 2024. During the audit, ESRB staff conducted field inspections of PG&E's transmission 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 March 24, 2025, 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. 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 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 Matthew Yunge at (415) 603-9828 or Matthew.Yunge@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Electric Transmission Audit Report for PG&E Lakeville HQ

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC

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PACIFIC GAS AND ELECTRIC COMPANY (PG&E) LAKEVILLE HQ ELECTRIC TRANSMISSION AUDIT FINDINGS DECEMBER 2-6, 2024

I. Records Review

During the audit, ESRB staff reviewed the following records:

- PG&E's Electric Transmission Preventive Maintenance (ETPM) Manual, TD-1001M, Revisions 4-5.
- PG&E's utility procedures, standards, guidelines, and job aids for electric transmission facility inspections.
- Overhead transmission facilities statistics.
- PG&E Lakeville HQ Service Territory Map and list of all transmission facilities owned or jointly owned by PG&E.
- Patrol, detailed, aerial, climbing, infrared, drone, and helicopter inspection records from December 2019 to December 2024.
- Third Party Safety Hazard notifications sent and received from November 2019 to June 2024.
- PG&E's utility procedures, standards, guidelines, and job aids for electric transmission vegetation management.
- A list of vegetation management inspection records and tree work orders for transmission circuits from November 2019 to November 2024.
- PG&E's policies and procedures related to transmission right-of-way maintenance, and associated performance records from January 2020 to October 2024.
- PG&E's policies and procedures for insulator washing, and associated performance records from March 2021 to July 2024.
- PG&E's policies and procedures for pole intrusive tests, foundation tests, and all other tests related to transmissions structure safety, and associated performance records from March 2021 to August 2024.
- A list of non-routine patrols for electric transmission facilities from October 2019 to March 2024.
- PG&E's policies and procedures for assigning priority levels to transmission deficiencies from January 2020 to October 2024.
- A list of all open, closed, and canceled notifications from April 2017 to October 2024.
- Pole loading and safety factor calculations completed from October 2023 to October 2024.
- New construction projects completed from September 2023 to October 2024.
- PG&E's utility standard and procedures for transmission work verification and vegetation management quality control (QC) and quality assurance (QA).
- The results of all internal quality management audits from July 2021 to October 2024.
- A list of PG&E inspector training courses from March 2019 to March 2024.

II. Records Violations

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

PG&E's ETPM establishes when corrective actions for problems must be completed. For the time period reviewed in this audit two versions of the ETPM are relevant. PG&E's last two versions of its ETPM, Revision 4, effective November 20, 2018, and Revision 5, effective August 31, 2020, define the priority codes and associated due dates for the corrective actions shown in **Table 1** and **Table 2** below. Additionally, PG&E Utility Procedure TD-8123P-103 provides guidance for setting priority codes on and after January 3, 2023.

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

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

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

Priority Code[3]	Priority Description
A[4]	The condition is urgent and requires **immediate** response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date will be 30 days to allow time for post-construction processes and notification close-out.
	Corrective action is required within **3 months** from the date the condition is identified. The condition must be reported to the transmission line supervisor as soon as practical.

[1] QCRs must report immediately any "Priority Code A" abnormal condition to the transmission line supervisor and GCC.
[2] In addition, QCRs must report any "Priority Code B" condition to the transmission line supervisor as soon as practical, to ensure that correction occurs within the appropriate time.
[3] Refer to 2.3.5.2, "Priority Code Due Dates for High Fire Risk Conditions within HFTDs" and 2.3.5.3, "Priority Code Due Dates for Non-Fire Risk Conditions within HFTDs."
[4] QCRs must report immediately any "Priority Code A" abnormal condition to the transmission line supervisor, and the transmission supervisor or QCR contacts GCC.

B[5]	
E	Corrective action is required within **12 months** from the date the condition is identified. ***EXCEPT FOR ITEMS WITHIN HFTD TIER 3 ARE REQUIRED WITHIN 6 MONTHS.***[6]
F	Corrective action is recommended within **24 months** from the date the condition is identified, (due beyond 12 months, not to exceed 24 months). ***EXCEPT FOR ITEMS WITHIN HFTD TIER 3 ARE REQUIRED WITHIN 6 MONTHS AND WITHIN HFTD TIER 2 ARE REQUIRED WITHIN 12 MONTHS.***[7]

Table 3. PG&E TD-8123P-103, Rev 1, Published on 1/1/2024, Electric Transmission Line Guidance for Setting Priority Codes

Priority Code	G.O. 95, Rule 18 Level	Priority Description – Time Frame[8]
A	1	The condition is urgent and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date is 30 days – to allow time for post-construction processes and notification close-out.
B	-	Not used for maintenance corrective action priority.
E	2	Corrective action is required, as follows: • Within 6 months for HFTD Tier 3[9] • Within 12 months for HFTD Tier 2/HFRA/Zone 1[10] • Within 12 months for potential violations that compromise worker safety Within 36 months for all other potential violations.
F	3	Corrective action is required within 60 months.

a. ESRB's review of PG&E's Line Corrective (LC) notifications from

[5] In addition, QCRs must report any "Priority Code B" condition to the transmission linesupervisor as soon as practical, to ensure that correction occurs within the appropriate time.
[6] If the condition in the HFTD Tier 3 does NOT create a fire risk (non-threatening) the corrective action is required within 12 months.
[7] If the condition in the HFTD Tier 3 OR Tier 2 does NOT create a fire risk (non-threatening) the corrective action is required within 24 months.
[8] Time frames listed are "Not to Exceed" and QCR/CIRT may define time frames according to site-specific conditions.
[9] IF the condition in the HFTD Tier 3 OR Tier 2/HFRA/Zone 1 does **not** create a fire risk (non-threatening), THEN the corrective action is required **within 36 months**.
[10] IF the condition in the HFTD Tier 3 OR Tier 2/HFRA/Zone 1 does **not** create a fire risk (non-threatening), THEN the corrective action is required **within 36 months**.

"DRU14516_Q16_Atch01_Lakeville Master List of Notifications" found a total of 2,111 late LC notifications. **Table 4** below breaks down the late notifications by priority and type (late-closed, late-open, and late-canceled). Late-closed notifications are notifications that were completed past their assigned due date based on their priority code. Late-open notifications are incomplete notifications that were not completed by their assigned due date based on their priority code. Late-canceled notifications are notifications that were canceled after their assigned due date based on their priority code.

Table 4. Number of Late Notifications by Priority and Type[11]

Priority Code	Late Closed Notifications	Late Open Notifications	Late Canceled Notifications	Total Late Notifications
A	1	0	6	**7**
B	29	0	10	**39**
E	1854	419	341	**2614**
F	113	21	28	**162**
Total	**1997**	**440**	**385**	**2822**

b. **Table 5** below shows the most overdue notifications for each Priority Code.

Table 5. Most Overdue Notifications

Priority Code[12]	Notification Number	Status	Completion Date	Due Date	Days Late[13]
A	127550610	Closed	2/3/2024	12/04/2023	61
B	123207482	Closed	11/3/2022	6/24/2022	132
E	115586529	Closed	4/11/2023	12/21/2019	1207
F	117506064	Closed	2/21/2024	6/29/2021	967

c. ESRB found in its review of "DRU14516_Q12_Atch06_Insulator Wash" that the following seventeen notifications for washing insulators were performed late per PG&E's assigned required end date.

Table 6. Late Insulator Wash Notifications

Notification Number	Priority Code	Notification Date	Due Date	Completion Date
122242290	E	10/21/2021	4/21/2022	

[11] Due dates are assumed to be the Required End Date unless a Funded Repair Date is available. Additionally, Priority F and Priority E work orders that were created before January 1, 2023 are considered late if they are not completed by the date per the timeframes established in PG&E's ETPM Rev 4 or Rev 5.
[12] Current Priority Code provided by PG&E.
[13] Days late are determined to be the difference between the Completion Date (or March 1, 2024 if the notification was open) and the Required End Date (or Funded Repair Date if one was provided).

Notification Number	Priority Code	Notification Date	Due Date	Completion Date
122265873	E	10/27/2021	10/27/2022	
123797213	E	6/9/2022	12/9/2022	10/18/2023
121609160	E	6/18/2021	12/18/2021	9/24/2022
121593234	E	6/23/2021	12/23/2021	9/24/2022
120700600	E	3/27/2021	3/27/2024	
126018715	E	4/21/2023	4/21/2024	
120914522	E	5/1/2021	5/1/2024	
121527561	E	6/12/2021	6/12/2024	
121541779	E	6/15/2021	6/15/2024	
121541854	E	6/15/2021	6/15/2024	
121526846	E	6/10/2021	6/10/2022	8/23/2022
122079072	E	9/21/2021	9/21/2024	
122079141	E	9/21/2021	9/21/2024	
120951461	E	5/7/2021	5/7/2022	6/22/2022
120951472	E	5/7/2021	5/7/2022	6/22/2022
121629018	E	6/29/2021	12/29/2021	1/24/2022

d. ESRB found 73 work orders that had no Reassessment Dates despite having different initial and current priority codes. Examples are shown below in **Table 7**.

Table 7. Notifications Reassessed With No Reassessment Date

Notification Number	Original Priority Code	Current Priority Code	Notification Date
117226742	E	B	2019-04-24
117122173	F	E	2019-04-27
117160133	F	E	2019-05-02
117191788	B	E	2019-05-06
117191321	B	E	2019-05-07
117227351	B	E	2019-05-10
117323710	E	F	2019-05-14
117339631	E	F	2019-05-29
117429634	F	E	2019-05-30
117436686	F	E	2019-06-04

III. Field Inspection

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

Table 8. Audit Locations

Location Number	Structure Type	ID	Circuit	Approximate Longitude, Latitude
1	Wood pole	000/015	Monte Rio - Fulton	-122.77350482, 38.49671609
2	Wood pole	000/015	Fulton - Windsor	-122.77298463, 38.49677641
3	Wood pole	000/016	Fulton - Windsor	-122.77324103, 38.4970847
4	Wood pole	038/002	Fort Ross - Gualala	-123.30497146, 38.6238461
5	Metal pole	038/003	Fort Ross - Gualala	-123.30573785, 38.62445193
6	Metal pole	021/005	Fulton - Hopland	-122.9219557, 38.74878752
7	Metal pole	021/006	Fulton - Hopland	-122.92414038, 38.75075568
8	Metal tower	001/006	Geysers #12 - Fulton	-122.76710244, 38.79582143
9	Metal tower	001/009	Geysers #13 Tap	-122.75588698, 38.77811162
10	Metal tower	001/010	Geysers #13 Tap	-122.75943904, 38.77903837
11	Metal tower	004/021	Geysers #12 - Fulton	-122.75643338, 38.75924893
12	Wood pole	011/015	Windsor - Fitch Mountain	-122.86135636, 38.63246155
13	Metal pole	011/014	Windsor - Fitch Mountain	-122.86086956, 38.63189161
14	Metal pole	011/013	Windsor - Fitch Mountain	-122.86063883, 38.63137169
15	Wood Pole	011/003	Fulton - Hopland	-122.85298603, 38.62624185
16	Wood pole	0110/002	Fulton - Hopland	-122.85243361, 38.6258176
17	Wood pole	000/017	Fitch Mountain 1	-122.8518571, 38.60622445
18	Wood pole	000/015	Fitch Mountain 1	-122.8517281, 38.60522308

Location Number	Structure Type	ID	Circuit	Approximate Longitude, Latitude
19	Wood pole	000/013	Fitch Mountain 1	-122.85170162, 38.60424909
20	Wood pole	000/012	Sonoma - Pueblo	-122.45311001, 38.27518839
21	Wood pole	000/013	Sonoma - Pueblo	-122.45230898, 38.27511416
22	Wood pole	007/010	Sonoma - Pueblo	-122.34121306, 38.30096566
23	Wood pole	007/009	Sonoma - Pueblo	-122.34174053, 38.30029294
24	Wood pole	007/011	Sonoma - Pueblo	-122.34061952, 38.30178322
25	Wood pole	007/012	Sonoma - Pueblo	-122.34004423, 38.30278391
26	Wood pole	011/006	Sonoma - Pueblo	-122.28653441, 38.30312336
27	Wood Pole	011/007	Sonoma - Pueblo	-122.28604027, 38.30278794
28	Wood pole	011/008	Sonoma - Pueblo	-122.28578676, 38.30253557
29	Wood pole	011/005	Sonoma - Pueblo	-122.28692989, 38.30355117
30	Wood pole	011/004	Sonoma – Pueblo	-122.2873511, 38.30403946
31	Wood pole	016/015	Sonoma - Pueblo	-122.27336909, 38.34714613
32	Wood pole	016/014A	Sonoma - Pueblo	-122.27329471, 38.34686192
33	Wood pole	016/014	Sonoma - Pueblo	-122.27312755, 38.34630777
34	Wood pole	A014/005	Fulton - Pueblo	-122.29765749, 38.36719701
35	Wood pole	A014/004	Fulton - Pueblo	-122.29848687, 38.36792677
36	Wood pole	A003/006	Fulton - Pueblo	-122.40439807, 38.48269468
37	Metal tower	011/056	Fulton - Pueblo	-122.20022742, 38.50909247
38	Wood pole	000/005	Monticello Ph Tap	-122.09920946, 38.51389331

Location Number	Structure Type	ID	Circuit	Approximate Longitude, Latitude
39	Wood pole	000/006	Monticello Ph Tap	-122.09861397, 38.51423131
40	Wood pole	016/118	Ignacio - Alto - Sausalito #1	-122.49952447, 37.86254473
41	Wood pole	016/116	Ignacio - Alto - Sausalito #2	-122.49965779, 37.86262485
42	Wood pole	016/117	Ignacio – Alto - Sausalito #2	-122.49925128, 37.86311537
43	Wood pole	016/119	Ignacio - Alto - Sausalito #1	-122.49908258, 37.86313009
44	Wood pole	016/173	Ignacio - Alto	-122.52476088, 37.91010553
45	Wood pole	016/174	Ignacio - Alto	-122.5250918, 37.90946009
46	Wood pole	008/086	Ignacio - Bolinas #1	-122.65390351, 38.0117467
47	Metal pole	008/085A	Ignacio - Bolinas #1	-122.65397436, 38.01195847
48	Wood pole	001/015	Ignacio - Bolinas #2	-122.56652949, 38.07468771
49	Wood pole	001/019	Ignacio - Bolinas #1	-122.5656059, 38.07481774
50	Metal tower	036/174	Lakeville - Ignacio #2	-122.52307534, 38.12508324
51	Metal tower	036/173	Lakeville – Ignacio #2	-122.52105121, 38.12810695
52	Wood Pole	A005/015	Lakeville #2	-122.60056604, 38.18575372
53	Wood pole	A002/051	Lakeville #2	-122.61096128, 38.23237459
54	Wood pole	A002/052	Lakeville #2	-122.61133526, 38.23205188
55	Metall tower	032/179	Bahia - Moraga	-122.14408426, 38.08873234
56	Metal tower	001/008	Parkway - Moraga	-122.20782104, 38.12483313
57	Metal tower	028/123	Ignacio - Sobrante	-122.19940667, 38.16811466

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

Table 9. GO 95, Rule 31.1 Violations

Location	Violation Description
1	Distribution crossarm bracket looks loose.
1	This pole is missing one visibility strip. Repaired on site.
2	Pole has woodpecker hole.
3	Visibility strips missing one strip. Repaired on site.
8	There is significant rust at the top of the tower. There is an existing tag to repaint the tower from March 15, 2019.
9	Rust on the tower bolts. There is an existing tag #116744882 for paint that was created on March 15, 2019.
11	One of the tower's foundation columns is beginning to erode.
15	Dirty insulators at transmission level and distribution level. PG&E had already noted the issue in an existing work order that was later updated for a full pole replacement.
17	Pole cracking at distribution hardware. There is an existing tag to replace pole.
18	Woodpecker holes that are out of compliance with PG&E's standards. There is an existing repair tag.
22	Pole in poor condition. Covered by existing tag.
23	Wood pole needs fiberglass rods. There is an existing tag.
25	Pole needs fiberglass rods. There is an existing tag.
26	Pole needs fiberglass rods. There is an existing tag.
28	Pole needs fiberglass rods. There is an existing tag.
36	There is a non-compliant woodpecker hole a few feet above primary crossarm.
42	Pole has a tilting crossarm. There is an existing tag to reframe.

Location	Violation Description
53	Box on pole is too low.

2. **GO 95, Rule 44.3, Replacement** states in part:

"Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade "C" construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one."

Table 10.GO 95, Rule 44.3 Violations

Location	Violation Description
27	Pole splitting at top bolt. There is an existing tag to replace the pole.
27	Pole has two long and wide diagonal cracks. There is an existing tag to replace the pole.
44	Top of pole starting to split.
45	Lowest crossarm on pole is deteriorating and touching distribution down guy.
45	Hole in middle primary crossarm. There is an existing tag #121943719.
53	There is a long split through distribution crossarm.

3. **GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, Use** states in part:

"Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."

Table 11.GO 95, Rule 56.2 Violations

Location	Violation Description
18	There is a slack down guy at the distribution level.
28	Slack span guy.

4. **GO 95, Rule 51.6-A, Marking and Guarding** 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."

Table 12. GO 95, Rule 51.6-A Violations

Location	Violation Description
5	High voltage sign has deteriorated. There is already existing tag.
23	High voltage sign is deteriorated.
32	Faded high voltage signs on both sides of the pole. There is an existing tag.
43	High voltage sign extremely faded and illegible.
53	High voltage signs faded and illegible on both distribution crossarms.

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

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

Table 13. GO 95, Rule 51.6-B Violations

Location	Violation Description
11	Anticlimb guards are too short. PG&E has revised its standard to bring towers up to the required standards during maintenance activities.
37	No anticlimb guard present. There is an existing tag.
50	Anticlimb guards are too short. PG&E has revised its standard to bring towers up to the required standards during maintenance activities.
51	No climb guards on the tower. The tower is in an area where pedestrians can access the tower.
56	Anticlimb guards are too short. PG&E has revised its standard to bring towers up to the required standards during maintenance activities.
57	Anticlimb guards are too short. PG&E has revised its standard to bring towers up to the required standards during maintenance activities.

6. **GO 95, Rule 61.6-A,** states in part:

"All towers shall be equipped with signs designed to warn the public of the danger of climbing same. Additionally, such signs shall include a graphic depiction of the dangers of falling or electrocution associated with climbing the towers. Such signs shall be placed and arranged so that they may be read from the four corners of the tower. Such signs shall be neither less than 8 feet nor more than 20 feet above the ground except where the lowest horizontal member of the tower is more than 20 feet above the ground in which case the sign shall be not more than 30 feet above the ground.

When a fence or wall is used as a barrier around a tower (Rule 61.6-B), it shall be equipped with signs designed to warn the public of the danger of unauthorized entry. Warning signs shall be installed at every gate and at intervals of not more than 100 feet along each fence or wall that is used as a barrier. When warning signs are installed on barrier fencing or walls, no signs are required to be installed on the tower or structure."

Table 14. GO 95, Rule 61.6-A Violations

Location	Violation Description
11	There is no warning sign on the tower.
55	No warning signs on the tower. PG&E stated that the work will be bundled with the existing foundation tag.

V. Observations

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

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

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

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

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

days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95."

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

Table 15. Third-party safety concerns

Location	Violation Description
1	Uncovered riser below 8 feet above the ground.
15	Exposed communication risers at base of pole.
16	Buddy pole at the communication level.
16	Exposed communication riser at base of pole.
16	Abandoned guy wire.
17	Exposed communication ground wire.
17	Slack down guy.
19	Exposed ground.
21	Loose riser cover at ground.
27	Pole splitting at connection to a down guy wire. There is an existing tag to replace the pole.
31	Exposed riser at pole base.
35	Exposed riser.
52	Exposed riser.
52	Buried down guy anchor.
52	Anchor guy missing a guy marker.