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

June 30, 2025 EA2025-1245

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

SUBJECT: Electric Distribution Audit of PG&E's Central Coast Division

Mr. Meier:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Joe Murphy, Javier Reyes, and Matthew Yunge of ESRB staff conducted an electric distribution audit of PG&E's Central Coast Division from April 21st through 25th, 2025. 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 General Order (GO) 95, GO 128, and GO 165. A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than July 31, 2025, via 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 Joe Murphy at muj@cpuc.ca.gov or (415) 308-4159

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 Distribution Audit Report for PG&E Central Coast Division

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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PG&E CENTRAL COAST DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
April 21-25, 2025

I. Records Review

During the distribution audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the PG&E's current[1] and previous standards and procedures, and records for PG&E's Central Coast Division:

- TD-2305M, Electric Distribution Preventive Maintenance Manuals, Rev. 2 effective 11/05/2024
- TD-2305M-JA02, Job Aid: Overhead Assessment, January 1, 2020 – December 31, 2024
- TD-2305M-JA03, Job Aid: Underground Inspection, January 1, 2020 – December 31, 2024
- TD-2305M-JA12, Overhead Clearance Evaluation, Rev. 1, March 2013
- TD-2305M-JA13, EC Job Aid: Create, Complete Cancel EC Notifications – Field Employees, Rev 1.2, April 2016
- TD-2305M-JA14, Liquid Fuse Level Check, Rev. 0. August 12, 2022
- TD-2301S, Patrols and Detailed/Intrusive Inspections of Electric Overhead and Underground Distribution Facilities, Rev 1: May 15, 2020
- TD-2305S, Electric Distribution Maintenance Requirements, Rev. 0, January 31, 2020
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, Rev 2: August 02, 2022 and previous revisions
- TD-8123S, Electric System (T/S/D) Patrol, Inspection, and Maintenance Program, Rev. 0, January 31, 2020
- TD-8123M-B001-JA01, Distribution: Priority A Notification Management, Rev. 0, August 20, 20204
- TD-8123S-B001, Level 2 Priority B Tag Management Requirements, Rev. 1, April 29, 2024
- TD-8125S, Level 2 Priority X Electric Corrective (EC) Standard, Rev. 0, March 25, 2024
- CIRT Manual 2024, Rev. n/a, December 1, 2024
- Electric Corrective Notifications list, January 1, 2020 – December 31, 2024
- Patrol and Inspection Records list, January 1, 2020 – December 31, 2024

[1] In response to the PreAudit Data Request, PG&E provided TD-2305M-JA02 Job Aid: Overhead Assessment, Rev. 14, publication 1/6/2025, effective 1/14/2025. This and other manuals that fall outside the audit period and were only reviewed if they addressed a potential finding.

- Central Coast Division Reliability Indexes and Outage list, January 1, 2020 – December 31, 2024
- Central Coast Division New Projects list, January 1, 2024 – December 31, 2024
- Pole Loading Calculations list, January 1, 2024 – December 31, 2024
- Incoming Third-Party Notifications list, January 1, 2020 – December 31, 2024
- Outgoing Third-Party Notifications list, January 1, 2020 – December 31, 2024
- Inspector training records, January 1, 2020 – December 31, 2024
- Equipment test records, January 1, 2020 – December 31, 2024
- Intrusive Inspections, January 1, 2024 – December 31, 2024
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review
- Central Coast Division Quality Management Audit Results, January 1, 2020 – December 31, 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 (1), Maintenance Programs** 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."

PG&E's current TD-2305M, Electric Distribution Preventive Maintenance Manual, Rev. 2, published September 5, 2024, does not define priority codes nor specify time frames for repairs. Revisions of TD-2305M prior to March 29, 2024 listed both priority codes and specified time frames for corrective action.

PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, Rev. 14, page 5, published on January 6, 2025,[2] defines the priority codes and associated time frames for the response/repair action as follows in Figure 1 for overhead facilities:

PG&E Prioritization				
	PG&E Priority	Tier 3	Tier 2/HFRA	Non-HFTD
Level 1: Immediate risk of high potential impact to safety and reliability	A	Within 24 hours	Within 24 hours	Within 24 hours
Level 2: at least moderate potential impact	X	Up to 7 days	Up to 7 days	Up to 7 days
	B	Up to 6 months	Up to 6 months	Up to 6 months
	E	Up to 6 months	Up to 12 months	Up to 36 months
Level 3: low potential impact	F	60 months	60 months	60 months

Figure 1: PG&E Prioritization, TD-2305M-JA02 p. 5

a) PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment establishes maximum corrective action period based on HFTD Tier/HFRA and PG&E Priority. Level 2, PG&E Priority E in Non-HFTD areas allows up to 36 months for corrective action and has no call out for non-conformances affecting worker safety. The 36-month corrective action period exceeds GO 95, Rule 18-B (1) (ii) (3) 12 months

[2] The same PG&E Prioritization table appears in TD-2305M-JA02 Rev. 12 and Rev. 13

for potential violations that compromise worker safety, regardless of if the condition is in HFTD or not.

b) PG&E's current TD-2305M-JA03, Job Aid: Underground Inspection, Rev. 5, September 9, 2024, instructs inspectors to assign a priority or to prioritize based on condition when a non-conformance is found. TD-2305M-JA03 does not provide guidance nor contain definition of priority levels nor correction completion intervals. TD-2305M-JA03 previously used the parent document, PG&E's TD-2305M, to define priorities. The current revision of PG&E's TD-2305M no longer contains priority definitions nor completion intervals.[3]

c) ESRB staff reviewed work orders created within the Central Coast Division from January 1, 2020 through December 31, 2024 and determined that PG&E did not address a total of 60,242 work orders (57.7%)[4] by their required end date.[5] Table 1 below breaks down the 60,242 late work orders by their given priority, and work order status.[6]

Table 1: Late Work Orders in Central Coast Division [7]

Priority Code	Late Work Orders Completed[8]	Late Work Orders Pending*	Late Work Orders Cancelled	Total by Priority
A	7,049	139	991[9]	8,179
X	7	–	1	8
B	3,268	125	621	4,014
E	11,620	27,808	6,669	46,097
F	922	249	773	1,944
Total	**22,866**	**28,321**	**9,055**	**60,242**

* As of December 31, 2024

PG&E shall provide ESRB with its corrective action plan to complete the 28,321 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

[3] ESRB noted this finding in previous audit reports with an earlier revision of TD-2305M-JA03 (Rev 4). The issue still exists with the newer revision.
[4] PG&E reported 104,648 total work orders in the Central Coast division including 333 Priority H work orders. The percentage is based on non-H priority work orders.
[5] DRU15080_Q03_Atch01_Central Coast_WorkOrderHistory_Final_CONF
[6] PG&E data contained 282 records with a Notification Status of "Check Missing Status" (priority B: 255, E: 27). ESRB categorized those based on completion date entry (282 open, 1 completed).
[7] Calculation based on the Required End Date. See **Appendix A** for a table based on the later of Required End Date and Funded Repair Date (Authorized Repair Date).
[8] ESRB noted that 26 Work Orders listed a Notification Status of OPEN but had Work Order completion dates (by priority A: 2, B: 3, E: 20, F: 1). ESRB used a completion date entry, rather than Notification Status, as the indication of order completion.
[9] Includes cancelled work order EC 118899884 which does not have a cancellation date.

Table 2 below identifies the most overdue work orders as of December 31, 2024.

Table 2: Most Overdue Work Orders**

Priority Code	Most Past Due Work Orders (WO#s)	Number of Days Past Due***
A	121753550	1,582
A	126237144	583
B	119826457	1,463
E	118401147	1,638
F	119467500	1,444

**Days past due determined using the Required End Date
***As of December 31, 2024

PG&E identified work order # 121753550 (A-Open) on August 25, 2020, to replace the burned pole with a required end date of September 1, 2020. As of December 31, 2024, the work order is open.

PG&E identified work order #126237144 (A-Open) on May 28, 2023, to replace an underground facility with a required end date on the same date. The notification status is open as of December 31, 2024. The user status is marked as cancelled but no cancellation date is listed.[10]

PG&E identified work order # 119826457 (B-Open) on September 29, 2020, to repair a damaged pothead and riser with a required end date of December 29, 2020. As of December 31, 2024, the work order is open.

PG&E identified work order # 118401147 (E-Open) on January 7, 2020, to replace a decayed pole with a required end date of July 7, 2020. As of December 31, 2024, the work order is open.

PG&E identified work order # 119467500 (F-Open) on July 17, 2020, to replace primary jumpers with a required end date of January 17, 2021. As of December 31, 2024, the work order is open.

d) ESRB staff identified 7,188 late or late pending Central Coast Division Priority A work orders (31.8% of total A Priority work orders) active between January 1, 2020 and December 31, 2024.[11] ESRB noted that 5,443 work orders completed after the required due date were designated by PG&E as "On-Time, Complete".

PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, Rev. 14, page 5, published on January 6, 2025, defines the Priority A as "Immediate risk of high potential impact to safety and reliability (due within 24 hours)."

[10] As the Notification Status for this work order is OPEN and there is no completion date, ESRB included this EC with the Late Pending work orders in Table 1.
[11] DRU15080_Q03_Atch01_Central Coast_update_Work Order History_CONF

Additionally, GO 95 Rule 18 B (1) (a) (i) Leve1 1 states "*Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority*".

e) PG&E states "Priority A notifications include work that is categorized as priority A for cost recovery, not due to Level 1 hazards subject to corrective action timeframes under GO 95 Rule 18. A portion of this work is bundled under multi-year rebuild plans (e.g. Wildfire Rebuilds and Hardening Projects)."[12]

   PG&E's use of Priority A for cost recovery and not due to Level 1 hazards is counter to both PG&E's TD-2305M-JA02, Job Aid and GO 95 Rule 18 B(1)(a)(i). PG&E must properly prioritize by hazard level and not by cost recovery.

f) ESRB staff reviewed work orders created within the Central Coast Division and found 156 work orders (67 open, 89 closed) with erroneous latitude and longitudes.[13] The 15 selected work orders with location errors are listed in Table 3. The full list of open and closed work orders with erroneous latitude and longitudes are listed in Appendix B. The analysis is based on work orders with latitudes and longitudes outside the Central Coast Division. ESRB could not assess the accuracy of work orders with latitudes and longitudes within the Central Coast Division.

Table 3. Selected Work Orders with Locations outside the Central Coast Division

Priority Code	Notification Number	Status	Latitude	Longitude
E	128495764	Open	0	-121.7374743
E	118506859	Open	0	0
E	119032778	Open	0	0
E	119175082	Open	0	0
E	119221030	Open	0	0
F	120687634	Open	0	0
E	120763266	Open	0	0
F	120866331	Open	0	0
E	122048038	Open	0	0
F	122085719	Open	0	0
B	110020993	Closed	36.558108	121.92438
F	110195492	Closed	37.07527	122.01732

[12] In DRU15080_Q03_Atch01_Central Coast_update_Work Order History_CONF, Tab: Column Definitions.
[13] ESRB found 156 open and closed work orders with latitudes and longitudes outside the Central Coast Division (latitudes less than 35.79 or greater than 37.25°, and longitudes less than -122.43 or greater than -120.44°). Additionally, there are 752 cancelled work order with latitudes and longitudes outside the Central Coast Division. All open and closed work orders with lat/long outside the Central Coast Division are shown in **Appendix B**.

Priority Code	Notification Number	Status	Latitude	Longitude
F	110360072	Closed	36.54385	121.92928
F	110415901	Closed	36.57967	121.92072
F	110415906	Closed	36.57969	121.92072

PG&E shall provide ESRB with its corrective action plan to resolve work orders with erroneous locations and its preventive measures to assure correct location information on future work orders.[14]

g) PG&E's current Job Aid TD-2305M-JA13 (EC Job Aid: Create, Complete Cancel EC Notifications – Field Employees, April 2016) lists Priority Levels A, B, E, and F. The procedure does not list Priority Level X which is cited in current TD-2305M-JA02 (Overhead Job Aid, January 2025).[15] Additionally, the corrective action intervals cited in current TD-2305M-JA13 do not align with the values cited in current TD-2305M-JA02. See Table 4.

Table 4: Comparison of Corrective Action Intervals

Priority	2305M-JA13	2305M-JA02
A	Immediate Response	Within 24 hours
X	Not listed	Up to 7 days
B	0-3 Months	Up to 6 months
E	3 to 12 Months	6 to 36 Months[16]
F	UG: 3 Years OH: 5 Years	Up to 60 months

[14] In DRU15531, PG&E notes that "PG&E links EC to the appropriate asset when it is being created in all our technology that generates EC. One of the steps taken before creating the work order tag is to check that the Inspector is at the correct asset in the field. This is done by validating that the barcode on the asset in the field matches the barcode in the GIS for that asset." Per this note, an incorrect work order locations indicates that the GIS file for the asset is in error.

[15] Issue also found in TD2305M-JA02, Job Aid: Overhead Assessment, Rev 12, and Rev 13

[16] TD2305M-JA02, Job Aid: Overhead Assessment, Rev 14, January 6, 2025 Tier 3: Up to 6 months, Tier 2: up to 12 months, Non-HFTD: up to 36 months.

PG&E must update procedures to provide inspectors consistent guidance for non-conformance Priority (Safety Hazard Level) and corrective action intervals.

h) ESRB staff reviewed PG&E's Inspector Training log noted 12 inspectors (4.8 % of 249 inspectors) who had no training records found.[17] [18] [19]

PG&E must provide evidence that all inspectors are trained and qualified to perform the required inspections.

2. GO 165, Section III-C, Record Keeping states in part:

*"The utility shall maintain records for (1) at least ten (10) years of patrol **and** detailed inspection activities, and (2) the life of the pole for intrusive inspection activities."*

PG&E's TD-2305M, Electric Distribution Preventive Maintenance Manual, Rev. 2, Effective November 5, 2024, Section 7.4 Compliance Requirement / Regulatory Commitment, GO 165 Record Retention Guidelines Table 3, Record Retention Matrix lists requirements of 2 inspection cycles or 5 years with minimum record retention of 5 to 10 (years, note: no time unit is specified; in context, years is implied). See Figure 2.

G.O. 165 Record Retention Guidelines

Table 3. Record Retention Matrix

Record Type	Requirement	Minimum Record Retention
OH Inspection Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Inspection cycles or 5 years, whichever is longer	10
UG Inspection Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Inspection cycles or 5 years, whichever is longer	6
OH Patrol Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Patrol cycles or 5 years, whichever is longer	5
UG Patrol Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Patrol cycles or 5 years, whichever is longer	5

Figure 2: GO 165 Record Retention Guidelines, TD-2305M p. 57

Per GO 165, Section III-C, records shall be maintained for at least 10 years for patrol and inspection activities. PG&E's TD-2305M, Electric Distribution Preventive

[17] DRU15080_Q11_Atch01_CC Inspector List_2020-2024_CONF
[18] Out of privacy concerns, the names and LANs of the employees are not listed in this report.
[19] As not all inspection documents contain inspector IDs, it cannot be determined if the 12 inspectors who have no training records conducted inspections.

Maintenance Manual and practices need revision requiring a minimum record retention as prescribed. [20]

3. **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."

Table 1: Distribution Inspection Cycles (Maximum Intervals in Years)

	Patrol		Detailed		Intrusive	
	Urban	Rural	Urban	Rural	Urban	Rural
Transformers						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Switching/Protective Devices						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Regulators/Capacitors						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Overhead Conductor and Cables	1	2[1]	5	5	---	---
Streetlighting	1	2	x	x	---	---
Wood Poles under 15 years	1	2	x	x	---	---
Wood Poles over 15 years which have not been subject to intrusive inspection	1	2	x	x	10	10
Wood Poles which passed intrusive inspection	---	---	---	---	20	20

(1) Patrol inspections in rural areas shall be increased to once per year in Tier 2 and Tier 3 of the High Fire-Threat

[20] ESRB has noted this finding in previous audits since June 2024. ESRB requested a revision date from PG&E to address the inconsistencies listed. PG&E responded that no revision is scheduled outside of a five-year review but is the second revision (publication dates: March 29, 2024, and September 5, 2024) to contain the error.

a. ESRB staff identified that PG&E completed a total of 34,595 patrol and detailed inspections (4.8 %)[21] of padmount/underground (UG) and overhead (OH) electric facilities past their GO 165 required completion date, as shown in Table 5.

Table 5: Late Overhead Patrols and Inspections in Central Coast Division[22]

Year	OH Patrol	OH Detailed Inspection	UG Patrol	UG Detailed Inspection	Total Structures
2020	-	1,691	-	3[23]	1,694
2021	20,191[24]	11,575	-	3[25]	31,769
2022	-	261	-	-	261
2023	868[26]	1	-	1	870
2024*	-	-	1	-	1
Total	**21,059**	**13,528**	**1**	**7**	**34,595**

* Preliminary information, final report due July 1, 2025

b. ESRB requested patrol and detailed inspection records from January 1, 2020 to December 31, 2024 for 5 poles in HFTD Tier 2 and 3 areas to assess PG&E's compliance with GO 165 requirements. In HFTD Tier 2 and 3 areas, patrol inspections are required annually. ESRB staff reviewed inspection records provided in response to our request and found:

Table 6: Patrol and Detailed Inspections of Selected Facilities by Year [27]

SAP Number	101777479	101669578	101669759	101694906	101805653
2020	Yes	Yes	Yes	Yes	Yes
2021	Yes	Yes	Yes	Yes	Yes
2022	Yes	Yes	Yes	Yes	Yes
2023	***No***	***No***	***No***	***No***	***No***
2024	***No***	***No***	***No***	***No***	***No***

i. No inspection was conducted in 2023 for any of the 5 poles requested.
ii. No inspection was conducted in 2024 for any of the 5 poles requested.

PG&E must implement procedures and conduct training to assure that all structures are inspected at the required intervals.

[21] DRU15080_Q04(a)_Atch01_CC PI Data (2020-2024) listing 725566 asset patrols and detailed inspections (531,244 Map Based, 194,322 Asset Based inspections)
[22] DRU15080_Q04(c)_Atch01_CC Late Units (2020-2024)
[23] CGI (cannot get in)
[24] Quantity is actual units in 338 Plat Map grids
[25] CGI (cannot get in)
[26] Quantity is actual units in 24 Plat Map grids
[27] DRU15624_Audit_DR_CPUC_Final

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."

PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, Rev. 14, Effective January 14, 2025 Miscellaneous Other Compelling Abnormal Conditions, Guy Broken/Slack/Corroded states, *"Pole must be straight with Guy no more than an arm's length (3ft) from taut, that does not have significant impact on the structural integrity of the pole."* See Figure 3.

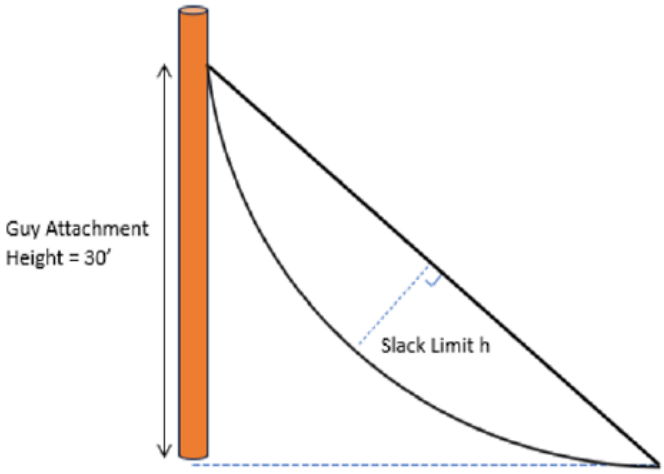

Figure 3: Guy slack limit, TD-2305M-JA02

Per GO 95, Rule 56.2, guys are to be maintained taut. PG&E's TD-2305M-JA02 allows a deviation from taut by as much as 3 feet without regard to length or angle of attachment.

PG&E's TD-2305M-JA02, Job Aid, Miscellaneous Other Compelling Abnormal Conditions, Guy Broken/Slack/Corroded needs revision to comply with GO 95, Rule 56.2 requiring guys to be maintained taut in all circumstances.

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities in PG&E's Central Coast Division, listed in Table 7:

Table 7: Central Coast Division Field Inspection Locations

Location	Structure Type	SAP ID Number	Latitude	Longitude
1	Wood Pole	101724259	36.6329555	-121.6980457
2	Wood Pole	103975807	36.6332033	-121.6981611
3	Wood Pole	101781858	36.6332961	-121.6981282
4	Wood Pole	103309822	36.6333249	-121.6980816
5	Wood Pole	101761742	36.66560	-121.75281
6	Wood Pole	101761741	36.6657968	-121.7533562
7	Wood Pole	101761894	36.6654808	-121.7524946
8	Padmount	107396334	36.660809	-121.7596195
9	Underground Enclosure	107289892	36.6609155	-121.7595726
10	Underground Enclosure	107289895	36.6598765	-121.7594837
11	Underground Enclosure	107303824	35.9048794	-120.9925037
12	Padmount	107334281	35.9040975	-120.99191
13	Wood Pole	104232124	35.880404	-120.9901092
14	Wood Pole	104039609	35.8811484	-120.990707
15	Wood Pole	101705030	35.8815176	-120.9912025
16	Wood Pole	101705026	35.8792903	-120.9896988
17	Wood Pole	101705025	35.8781846	-120.9893461
18	Wood Pole	104251293	35.8989611	-120.9399254
19	Wood Pole	101704395	35.8992576	-120.9422485
20	Wood Pole	101704378	35.9149342	-120.9882963
21	Wood Pole	101764241	35.9153971	-120.98750
22	Wood Pole	101764227	35.9137972	-120.9875819
23	Wood Pole	101705057	35.9125704	-120.987255
24	Wood Pole	103408632	35.8970971	-121.0113275
25	Wood Pole	101704354	35.89708	-121.01264
26	Wood Pole	101704356	35.8970816	-121.0138427
27	Wood Pole	103850053	35.8970835	-121.0111659
28	Wood Pole	101704203	35.9221106	-121.0588857
29	Wood Pole	101704207	35.92219	-121.05717
30	Wood Pole	101704206	35.9219349	-121.0588968
31	Wood Pole	101669574	36.4183134	-121.913065
32	Wood Pole	101669564	36.418734	-121.9115818
33	Wood Pole	101669565	36.4185691	-121.9095017
34	Wood Pole	101777479	36.4181609	-121.9082702
35	Wood Pole	101669579	36.41586	-121.91353
36	Wood Pole	103406589	36.4165427	-121.9122104
37	Wood Pole	101669578	36.4159809	-121.911912
38	Wrapped Pole	104165715	36.4389985	-121.9204934
39	Wrapped Pole	104172709	36.4389985	-121.9204934
40	Wood Pole	101669758	36.4389986	-121.9204934
41	Wood Pole	101669554	36.436504	-121.9191583

Location	Structure Type	SAP ID Number	Latitude	Longitude
42	Wood Pole	101669759	36.4370065	-121.9194031
43	Wood Pole	101669738	36.4600442	-121.9248459
44	Wood Pole	101777013	36.4601332	-121.9243953
45	Underground Enclosure	107281168	36.4670269	-121.8227389
46	Padmount	107321669	36.4670269	-121.8227389
47	Underground Enclosure	107281174	36.4663495	-121.8207645
48	Underground Enclosure	107281171	36.4663495	-121.8207645
49	Underground Enclosure	107314012	36.4658774	-121.8195733
50	Underground Enclosure	107313506	36.4651591	-121.8166403
51	Wood Pole	101694906	36.42672	-121.78667
52	Wood Pole	101753462	36.5318802	-121.8444021
53	Wood Pole	101774643	36.5311509	-121.8443931
54	Wood Pole	101753469	36.53023	-121.84436
55	Wood Pole	101675434	37.0814789	-122.0939049
56	Wood Pole	101805792	37.0812561	-122.0935261
57	Wood Pole	101675431	37.0811996	-122.0932699
58	Wood Pole	101805653	37.081584	-122.0936716
59	Wood Pole	104229557	37.0815519	-122.0933101
60	Underground Enclosure	107380482	37.0508202	-122.07339
61	Padmount	107359224	37.0502625	-122.0740009
62	Underground Enclosure	107389280	37.0510607	-122.0742125
63	Underground Enclosure	107390655	37.0497075	-122.074134
64	Padmount	108232624	37.0497624	-122.0743265
65	Wood Pole	101797410	37.0492839	-122.0742866
66	Wood Pole	101671282	37.04849	-122.0743171
67	Wood Pole	104068206	37.0477587	-122.0743318
68	Wood Pole	104154912	37.0720602	-121.9961102
69	Wood Pole	104050627	37.0717325	-121.9960549
70	Wood Pole	104235534	37.0715773	-121.9961917
71	Wood Pole	104044834	37.0711391	-121.9962339
72	Padmount	107359960	37.0423927	-122.0257111
73	Padmount	107359950	37.0423097	-122.026554
74	Wood Pole	103824076	37.04244	-122.02769
75	Wood Pole	103898984	37.0430218	-122.0265241
76	Underground Enclosure	107386368	37.0518718	-122.0259364
77	Wood Pole	104235738	37.0625887	-121.2279065
78	Wood Pole	101785410	37.0625467	-121.228065
79	Wood Pole	101785409	37.0610457	-121.2226591
80	Wood Pole	104055226	37.0607643	-121.2216864
81	Wood Pole	103447712	37.06178	-121.21906
82	Wood Pole	104136219	37.062777	-121.2166854
83	Wood Pole	103832580	37.0637182	-121.2142245

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 8:

Table 8: GO 95, Rule 31.1 Findings

Location	Finding	Notes
27	Splice under damper.	EC 131150528 created
35	Missing damper.	Could not create EC in field
35	Corroded insulator bracket.	Could not create EC in field
40	Broken bond wire.	EC 131153842 created
42	Loose conductor tie wire.	EC 131153843 created
58	Split cross arm.	EC 131158410 created
81	Missing vibration damper.	EC 131163298 created
81	Damper over splice.	EC 131163298 created

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 grounding conductor from each ground rod to the base of the pole shall not be less than 1 foot below the surface of the ground."

ESRB's finding related to the above rule are listed in Table 9:

Table 9: GO 95, 51.6 A Finding

Location	Finding	Notes
57	Missing High Voltage Sign.	

3. **GO 95, Rule 54.8-B (1) Service Drops, 0 - 750 Volts, Clearances above Ground, Above Public Thoroughfares** states:

"A Service drop conductors shall have a vertical clearance of not less than 18 feet above public thoroughfares, except that this clearance may grade from 18 feet at a position not more than 12 feet horizontally from the curb line to a clearance of not less than 16 feet at the curb line, provided the clearance at the centerline of any public thoroughfare shall in no case be less than 18 feet. Where there are no curbs the foregoing provisions shall apply using the outer limits of possible vehicular movement in lieu of a curb line."

ESRB's finding related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 54.8-B(1) Finding

Location	Finding	Notes
71	Supply drop less than 16 feet above the roadway at curb.	Repaired in field.

4. **GO 95, Rule 54.6-E (2), Risers** states in part:

"All risers from underground cables or other conductors which pass through an unrelated conductor or cable level shall be covered or encased by material as described in Rule 54.6–E1 or by a suitable protective covering as described in Rule 22.8 from a distance of 8 feet "

GO 95, Rule 84.6-D (2), Vertical Runs states in part:

"Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches. "

ESRB's findings related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 54.6-E (2) and 84.6-D (2) Findings

Location	Finding	Notes
19	Loose, unsecured vertical cable	EC 131149522 created
42	Loose antenna cable	

5. **GO 95, Rule 54.6-I Guy Marker, Attachment of Protective Covering** states in part:

> *"Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion–resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position."*

ESRB's finding related to the above rule are listed in Table 12:

Table 12: GO 95, Rule 54.6-I Finding

Location	Finding	Notes
57	Broken moulding.	Repaired in field.

6. **GO 95, Rule 56.7-B Location of Sectionalizing Insulators, Anchor Guys** states in part:

> *"An insulator shall be installed in each anchor guy which is required to be sectionalized by Rule 56.6–A or 56.6–B, so that such insulator is located:*
> *(1) 8 Feet or more above the ground; and*
> *(2) 8 Feet or more below the level of the lowest supply conductor, or 6 feet or more from surface of pole and one foot or more below the level of the lowest supply conductor."*
>
> *"In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule"*

ESRB's findings related to the above rule are listed in Table 13:

Table 13: GO 95, Rule 56.7 B Findings

Location	Finding	Notes
54	Vegetation spanning down guy insulator.	EC 131156200 created.
59	Down guy insulator within proximity of primary supply line.	EC 131158513 created.

7. GO 95, Rule 56.9 Guy Marker (Guy Guard) states:

> *"A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker."*

ESRB's finding related to the above rule are listed in Table 14:

Table 14: GO 95, Rule 56.9 Finding

Location	Finding	Notes
21	Missing down guy marker.	Repaired in field.

8. GO 128, Rule 35.1, Marking and Guarding, Identification of Cables states:

> *"Cables operating at a voltage in excess of 750 volts shall be permanently and clearly identified by tags or other suitable means to indicate their operating voltage and the circuit with which they are normally associated at each manhole or other commonly accessible location of the underground system."*

ESRB's findings related to the above rule are listed in Table 15:

Table 15: GO 128, Rule 35.1 Findings

Location	Finding	Notes
9	Missing voltage tag.	
10	Missing voltage tag.	

9. **GO 95, Rule 18-B (1), Maintenance Programs** 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."

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.

During the field audit, ESRB observed the following existing non-conformances with past due corrective actions.

Table 16: Observed Field Findings with Past Due Work Orders

Loc	Non-conformance	GO / Rule	Existing EC	Due Date
16	Replace pole, decayed	95/49.1 A (1)	123374140	4/2023
21	Replace pole, loose molding, incorrect connector, replace fuse	95/54.6-I	123262923	4/2023
24	Replace pole, woodpecker damage	95/49.1 A (1)	123304016	4/2023
25	Replace pole, woodpecker damage. Conductor clearance, Incorrect connector	95/49.1 A (1) & 31.1	123306340	4/2023
26	Replace pole, woodpecker damage	95/49.1 A (1)	123307685	4/2023
27	Connector Adjustment	95/31.1	123279610	4/2023
28	Replace pole, Incorrect connector	95/49.1 A (1) & 31.1	123385432	4/2023
29	Incorrect connector/ splice closer to pole than damper (Note: splice EC will be cancelled due to new standards)	95/31.1	123386597	4/2023
30	Connector incorrectly installed (Insulink secondary splices on primary)	95/31.1	123385719	4/2023
52	Vegetation overgrown	54.7	124097453	7/2023
53	Vegetation contacting down guy above insulator	56.7-B	112966146	6/2022
54	Vegetation overgrown, overload test	31.1	124097452	7/2023
66	tree overgrown, ground exposed, clearance to tree (note: exposed ground fixed in field)	95/35	121370374	7/2022

10. 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 observed the following non-conformances during the field portion of the audit. PG&E has previously noted these non-conformances and has pending on-time work orders to correct the non-conformances.

Table 17: Observed Field Findings with Pending On-Time Work Orders

Loc	Non-conformance	GO / Rule	Existing EC	Due Date
1	Broken insulator, corroded anchor	95/31.1	101724259	7/2026
17	Cutout/Fuse Damage-Replace	95/31.1	130885041	2/2026
42	High Voltage Sign Missing (Note: to be cancelled due to new standards)	95/51.6-A	123923369	6/2027
51	Leaning pole	95/31.1	121446680	
76	Broken conductor, splice breaking down	95/31.1	129369946	8/2025

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 observed the following third-party safety concerns.

Table 18: Third-Party Audit Observations

Location	Finding	Notes
6	Exposed ground, abandoned ground.	TPN 131145891 created
16	Unauthorized third-party attachment.	Fixed in field.
27	Unauthorized third-party attachment.	Existing TPN.
35	Communication line on ground.	Existing TPNs 120772896, 120886862)
36	Corroded communications down guy, communication line clearance to ground.	TPN 131152922 created

Location	Finding	Notes
37	Low communications span guy over road.	TPN 131152923 created
58	Third-party attachments.	Existing TPN 121544455).
70	Loose vertical communication line.	TPN 131159727 created
74	Loose vertical riser cover (communication line).	Fixed in field.

Appendix A: Late work orders based on Authorized End Date.[28]

Appendix Table A. Late Work Orders by Priority and Type Based on Authorized End Date

Priority Code	Late Work Orders Completed	Late Work Orders Pending *	Late Work Orders Cancelled	Total by Priority
A	2,570 *(7,049)*	2 *(139)*	1,015 *(991)*	3,587
X	7 *(7)*	–	1 *(1)*	8
B	2,572 *(3,268)*	87 *(125)*	573 *(621)*	3,232
E	10,643 *(11,620)*	27,782 *(27,808)*	6,326 *(6,669)*	44,751
F	874 *(922)*	197 *(249)*	811 *(773)*	1,882
Total	**16,666**	**28,068**	**8,726**	**53,460**

* As of December 31, 2024

Note: Values in parentheses based on Required End Date only, not Funded Date.

Appendix B: Open and closed work orders with Locations outside the Central Coast Division.

Appendix Table B. Closed Work Orders with Locations outside the Central Coast Division.

Priority Code	Notification Number	Status	Latitude	Longitude
F	110433564	Closed	36.56895	121.92953
F	110455985	Closed	36.54073	121.91489
A	118461746	Closed	0	0
A	118462617	Closed	0	0
A	118478754	Closed	0	0
A	118484285	Closed	0	0
E	118506859	Open	0	0
A	118544404	Closed	0	0
E	119032778	Open	0	0
A	119034619	Closed	0	0
A	119034841	Closed	0	0

[28] Per DRU15080_Q03_Atch01_Central Coast_WorkOrderHistory_Final_CONF Tab: Column Definitions: "Derived Due Date: Logic: use Funded Repair Date if it exists. Else, use Required End Date"

Priority Code	Notification Number	Status	Latitude	Longitude
B	119079122	Closed	0	0
E	119175082	Open	0	0
A	119200058	Closed	0	0
E	119221030	Open	0	0
A	119304271	Closed	0	0
A	119509413	Closed	0	0
B	119556526	Closed	0	0
A	119570662	Closed	0	0
B	119581869	Closed	0	0
B	119595878	Closed	0	0
B	119595987	Closed	0	0
A	119750341	Closed	0	0
B	119850444	Closed	0	0
B	119936219	Closed	0	0
A	120007654	Closed	0	0
A	120041057	Closed	0	0
A	120043764	Closed	0	0
A	120082372	Closed	0	0
A	120163711	Closed	0	0
B	120192960	Closed	0	0
B	120212689	Closed	0	0
A	120228881	Closed	0	0
B	120234701	Closed	0	0
B	120427369	Closed	0	0
B	120427452	Closed	0	0
A	120456880	Closed	0	0
A	120457013	Closed	0	0
A	120460158	Closed	0	0
A	120463175	Closed	0	0
A	120464692	Closed	0	0
A	120465928	Closed	0	0
A	120491891	Closed	0	0
A	120506887	Closed	0	0
A	120535006	Closed	0	0
B	120536310	Closed	0	0

Priority Code	Notification Number	Status	Latitude	Longitude
B	120536701	Closed	0	0
B	120565507	Closed	0	0
A	120572063	Closed	0	0
B	120617081	Closed	0	0
F	120687634	Open	0	0
E	120763266	Open	0	0
B	120822472	Closed	0	0
F	120866331	Open	0	0
A	121188832	Closed	0	0
B	121333801	Closed	0	0
A	121766849	Closed	0	0
A	121916560	Closed	0	0
A	121917381	Closed	0	0
A	121917382	Closed	0	0
A	121917383	Closed	0	0
A	121917384	Closed	0	0
A	121917385	Closed	0	0
A	121920045	Closed	0	0
E	122048038	Open	0	0
B	122060016	Closed	0	0
F	122085719	Open	0	0
E	122105235	Open	0	0
F	122143308	Open	0	0
A	122151479	Closed	0	0
A	122157477	Closed	0	0
B	122246023	Closed	0	0
A	122495988	Closed	0	0
E	122565942	Open	0	0
F	122603128	Open	0	0
F	122626953	Open	0	0
F	122907285	Open	0	0
A	122993089	Closed	0	0
A	122993184	Closed	0	0
A	123058733	Closed	0	0
B	123069141	Closed	0	0

Priority Code	Notification Number	Status	Latitude	Longitude
A	123453868	Closed	0	0
A	124059120	Closed	0	0
E	124383650	Open	0	0
E	124656613	Open	0	0
A	124773675	Closed	0	0
A	124973535	Closed	0	0
A	125206037	Closed	0	0
A	125408323	Closed	0	0
E	125542608	Open	0	0
E	125799884	Open	0	0
E	126175436	Open	0	0
A	126503355	Closed	0	0
E	126570176	Open	0	0
A	126761692	Closed	0	0
E	127054307	Open	0	0
E	127504991	Open	0	0
A	127553382	Closed	0	0
E	128301825	Open	0	0
E	128301831	Open	0	0
E	128301840	Open	0	0
E	128301980	Open	0	0
E	128302210	Open	0	0
E	128302309	Open	0	0
E	128302480	Open	0	0
E	128302501	Open	0	0
E	128302611	Open	0	0
E	128302902	Open	0	0
E	128354739	Open	0	0
E	128354784	Open	0	0
E	128355080	Open	0	0
E	128355138	Open	0	0
E	128355148	Open	0	0
E	128355202	Open	0	0
F	128355246	Open	0	0
E	128355257	Open	0	0

Priority Code	Notification Number	Status	Latitude	Longitude
F	128355310	Open	0	0
E	128355485	Open	0	0
E	128355604	Open	0	0
E	128355647	Open	0	0
E	128355791	Open	0	0
E	128355847	Open	0	0
E	128355873	Open	0	0
E	128356012	Open	0	0
E	128356057	Open	0	0
E	128398682	Open	0	0
E	128399308	Open	0	0
E	128399865	Open	0	0
E	128401089	Open	0	0
E	128402813	Open	0	0
E	128405025	Open	0	0
F	128458934	Open	0	0
E	128495504	Open	0	0
F	128495706	Open	0	0
E	128495824	Open	0	0
E	128495834	Open	0	0
A	128499367	Closed	0	0
E	128608772	Open	0	0
E	128608834	Open	0	0
E	128609001	Open	0	0
E	128623540	Open	0	0
F	128699201	Open	0	0