STATE OF CALIFORNIA Gavin Newsom, *Governor*

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

April 11, 2025 EA2025-1290

Timothy Bass, P.E.
Utilities Engineering Manager
Vernon Public Utilities
4305 Santa Fe Avenue Vernon, CA 90058

Subject: Audit of Vernon Public Utilities

Mr. Bass:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), James Miller of my staff conducted an electric distribution audit of Vernon Public Utilities (VPU) from February 10-14, 2025. The audit included a review of VPU's records and field inspections of VPU's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than May 12, 2025, by electronic or hard copy, of all corrective measures taken by VPU 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 James Miller at (213) 660-8898 or James.Miller@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
Eric Wu, Program Manager, Safety and Enforcement Division, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records.
- Late Inspections
- Work Orders Created from Inspections
- Repair Work Orders
- Intrusive Testing Records
- Third Party Notifications
- Pole Loading Calculation Records

II. Records Review – Violations List

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

GO 95, Rule 18-B1, Maintenance Programs, states in part:

> *Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate …*

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

> *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.*

VPU's records indicated that at the end of calendar year 2024, VPU had 20 open overhead work orders that were past VPU's scheduled due date for corrective action.

III. Field Inspections

My staff inspected the following structures during the field inspection portion of the audit:

No.	Facility Identification	Facility Type	Location
1	3976VP	Utility Pole	Vernon
2	1869VP	Utility Pole	Vernon
3	2941VP	Utility Pole	Vernon
4	333396M	Utility Pole	Vernon
5	388666M	Utility Pole	Vernon
6	436974M	Utility Pole	Vernon
7	436974M	Utility Pole	Vernon
8	3993VP	Utility Pole	Vernon
9	333400M	Utility Pole	Vernon
10	337301M	Utility Pole	Vernon
11	389902M	Utility Pole	Vernon
12	337303M	Utility Pole	Vernon
13	337304M	Utility Pole	Vernon
14	337305M	Utility Pole	Vernon
15	337306M	Utility Pole	Vernon
16	337307M	Utility Pole	Vernon
17	1043902H	Utility Pole	Vernon
18	1493VP	Utility Pole	Vernon
19	4670VP	Utility Pole	Vernon
20	4677VP	Utility Pole	Vernon
21	4678VP	Utility Pole	Vernon
22	4679VP	Utility Pole	Vernon
23	5204VP	Utility Pole	Vernon
24	4875VP	Utility Pole	Vernon
25	884407E	Utility Pole	Vernon
26	884406E	Utility Pole	Vernon
27	884405E	Utility Pole	Vernon
28	4268346E	Utility Pole	Vernon
29	847856E	Utility Pole	Vernon
30	884403E	Utility Pole	Vernon
31	4219743E	Utility Pole	Vernon
32	4219744E	Utility Pole	Vernon
33	2377VP	Utility Pole	Vernon
34	2494VP	Utility Pole	Vernon
35	2493VP	Utility Pole	Vernon
36	2578VP	Utility Pole	Vernon
37	EV8862	Utility Pole	Vernon
38	2316VP	Utility Pole	Vernon

39	7447EV	Utility Pole	Vernon
40	3436VP	Utility Pole	Vernon
41	3435VP	Utility Pole	Vernon
42	3434VP	Utility Pole	Vernon
43	4903VP	Utility Pole	Vernon
44	2371VP	Utility Pole	Vernon
45	7225EV	Utility Pole	Vernon
46	8381EV	Utility Pole	Vernon
47	EV8382	Utility Pole	Vernon
48	3262VP	Utility Pole	Vernon
49	4446VP	Utility Pole	Vernon
50	4445VP	Utility Pole	Vernon
51	4444VP	Utility Pole	Vernon
52	4443VP	Utility Pole	Vernon
53	5326VP	Utility Pole	Vernon
54	900345E	Utility Pole	Vernon
55	4646VP	Utility Pole	Vernon
56	3005VP	Utility Pole	Vernon
57	1688VP	Utility Pole	Vernon
58	3827VP	Utility Pole	Vernon
59	3998VP	Utility Pole	Vernon
60	7481VP	Utility Pole	Vernon
61	2003VP	Utility Pole	Vernon
62	5374EV	Utility Pole	Vernon
63	597V	Utility Pole	Vernon
64	5080VP	Utility Pole	Vernon
65	5099VP	Utility Pole	Vernon
66	3052VP	Utility Pole	Vernon
67	3053VP	Utility Pole	Vernon
68	2572VP	Utility Pole	Vernon
69	7016EV	Utility Pole	Vernon
70	1524VP	Utility Pole	Vernon
71	2039VP	Utility Pole	Vernon
72	4138VP	Utility Pole	Vernon
73	1387VP	Utility Pole	Vernon
74	1969VP	Utility Pole	Vernon
75	5513EV	Utility Pole	Vernon
76	3629VP	Utility Pole	Vernon
77	3632VP	Utility Pole	Vernon
78	1261VP	Utility Pole	Vernon
79	3195VP	Utility Pole	Vernon
80	1776751E	Utility Pole	Vernon
81	5165VP	Utility Pole	Vernon

82	3704VP	Utility Pole	Vernon
83	2275VP	Utility Pole	Vernon
84	2111VP	Utility Pole	Vernon
85	2112VP	Utility Pole	Vernon
86	1498VP	Utility Pole	Vernon
87	327V	Utility Pole	Vernon
88	4623VP	Utility Pole	Vernon
89	4622VP	Utility Pole	Vernon
90	4621VP	Utility Pole	Vernon
91	4611VP	Utility Pole	Vernon
92	4608VP	Utility Pole	Vernon
93	4610VP	Utility Pole	Vernon
94	4607VP	Utility Pole	Vernon
95	3381VP	Utility Pole	Vernon
96	4223VP	Utility Pole	Vernon
97	4417VP	Utility Pole	Vernon
98	3272VP	Utility Pole	Vernon
99	3498VP	Utility Pole	Vernon
100	4177VP	Utility Pole	Vernon
101	3487VP	Utility Pole	Vernon
102	3515VP	Utility Pole	Vernon
103	3500VP	Utility Pole	Vernon
104	3499VP	Utility Pole	Vernon
105	V0850	Vault with Gas Switch	Vernon
106	PM2306	Padmounted Transformer	Vernon
107	V0851	Vault with Gas Switch	Vernon
108	PM2312	Padmounted Switch	Vernon
109	PM2304	Padmounted Transformer	Vernon
110	PM2303	Padmounted Transformer	Vernon
111	V0849	Vault with Gas Switch	Vernon
112	V1157	Vault with Gas Switch	Vernon
113	PM2185	Padmounted Transformer	Vernon
114	PM1570VP	Padmounted Transformer	Vernon
115	V1155	Vault	Vernon
116	PM1376	Padmounted Transformer	Vernon
117	PM2391	Padmounted Transformer	Vernon
118	4925 E. 52nd Place	Vault with Splice	Vernon
119	V206	Vault with Gas Switch	Vernon
120	PM2366	Padmounted Transformer	Vernon
121	PM1700	Padmounted Transformer	Vernon
122	PM1560	Padmounted Transformer	Vernon
123	PM2297	Padmounted Transformer	Vernon
124	PM2298	Padmounted Transformer	Vernon

IV. Field Inspection Violations List

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 .*

A VPU down guy wire on each of the following poles was not taut:

- 4219743E
- 327V

A span guy wire between Pole Nos. 4219743E and 4219744E was not taut.

GO 95, Rule 34, Foreign Attachments, states in part:

> *Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*

Unauthorized foreign attachments were observed on the following poles:

- Pole No. 3434VP supported an unauthorized traffic mirror.
- Pole No. 3381VP supported an unauthorized sign advertising a real estate wholesaler enterprise.
- Pole No. 3381VP supported an unauthorized sign of a service offering to purchase semi trucks.
- Pole No. 337301M supported an unauthorized sign advertising a power washing service.

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.*

The following overhead facilities were in need of maintenance:

- The ground moulding on Pole Nos. 337301M and 337304M was damaged at a height of above eight feet.
- The visibility strips on Pole Nos. 5204VP, 1261VP, and 1776751E were damaged.
- The guy guard on Pole No. 847856E was damaged.

GO 95, Rule 56.4, Clearances, Section D, From Guys or Span Wires, Subsection (2), Passing and Attached to Same Pole, states:

> *The radial clearance between different guys, different span wires, or different guys and span wires, attached to the same pole shall not be less than 3 inches.*

Two VPU down guy wires attached to Pole No. 327V were in contact with a VPU span guy wire attached to the same pole.

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.*

"High Voltage" signs on each of the following poles were either missing or damaged:

- 388666M
- 4219743E
- 900345E
- 7481VP

GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:

> *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.*

The following padmounted equipment was in need of maintenance:

- Padmounted Transformer PM1700 presented with a small patch of corrosion on the interior of its housing.
- The historical high temperature gauge of Padmounted Transformer PM2298 was not functional.