

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 25, 2025

EA2025-1291

Rainie Torrance  
Utility Manager  
City of Needles  
817 Third Street  
Needles, CA 92363

Subject: Audit of The City of Needles Electric Department

Ms. Torrance:

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 The City of Needles electric distribution system from March 10, 2025 to March 14, 2025. The audit included a review of The City of Needles' records and field inspections of its 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 July 25, 2025, by electronic or hard copy, of all corrective measures taken by the city 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](mailto:James.Miller@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "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, Electric Safety and Reliability Branch, 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:

- Utility Statistics including miles of overhead line and underground cable, number of overhead and underground facilities, and number of customers served
- 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, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards, Section (A)(1), states:**

*Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities. Upon completion of the corrective action, the company's records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years.*

#### **GO 95, Rule 18, Section (B), Maintenance Programs, states:**

*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 auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities.*

The City of Needles was unable to provide CPUC staff with a current maintenance program or procedure and was also unable to provide any work order records for calendar year 2024.

#### **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.*

**GO 95, Rule 35, Vegetation Management,** states in part:

*Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions, shall be maintained. (Also see Appendix E for tree trimming guidelines.) These requirements apply to all overhead electrical supply and communication facilities that are covered by this General Order, including facilities on lands owned and maintained by California state and local agencies.*

**GO 165, Rule 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. Such records shall be made available to parties or pursuant to Commission rules upon 30 days notice. Commission staff shall be permitted to inspect such records consistent with Public Utilities Code Section 314 (a).*

The City of Needles was unable to provide CPUC staff with a current inspection program or procedure for its overhead facilities and was unable to provide any patrol or detailed inspection records for calendar years 2023 or 2024. The city of Needles was also unable to provide any vegetation management records nor intrusive testing records for its poles in calendar year 2024.

**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:

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

**GO 165, Rule 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. Such*

*records shall be made available to parties or pursuant to Commission rules upon 30 days notice. Commission staff shall be permitted to inspect such records consistent with Public Utilities Code Section 314 (a).*

The City of Needles was unable to provide CPUC staff with a current inspection program or procedure for its underground facilities and was unable to provide any underground inspection records for calendar years 2023 or 2024.

### III. Field Inspections

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

No.	Facility Identification	Facility Type	Location
1	4242N	Pole	Needles
2	Southwest of Previous (No ID Tag)	H-Frame	Needles
3	Southwest of Previous (No ID Tag)	H-Frame	Needles
4	4241N	Pole	Needles
5	1334N	Pole	Needles
6	1301N	Pole	Needles
7	4453N	Pole	Needles
8	1331N	Pole	Needles
9	4236N	Pole	Needles
10	4234N	Pole	Needles
11	Northeast of Previous (No ID Tag)	H-Frame	Needles
12	4659N	Pole	Needles
13	1380N	Pole	Needles
14	1365N	Pole	Needles
15	4658N	Pole	Needles
16	4618N	Pole	Needles
17	4602N	Pole	Needles
18	0586N	Pole	Needles
19	0587N	Pole	Needles
20	0588N	Pole	Needles
21	0589N	Pole	Needles
22	3328N	Pole	Needles
23	0592N	Pole	Needles
24	2313N	Pole	Needles
25	2163N	Pole	Needles
26	0596N	Pole	Needles
27	0601N	Pole	Needles
28	0603N	Pole	Needles
29	0604N	Pole	Needles
30	3542N	Pole	Needles
31	3553N	Pole	Needles
32	3554N	Pole	Needles
33	3545N	Pole	Needles
34	1165N	Pole	Needles

35	3543N	Pole	Needles
36	West of Previous (No ID Tag)	Pole	Needles
37	3535N	Pole	Needles
38	1180N	Pole	Needles
39	3572N	Pole	Needles
40	3571N	Pole	Needles
41	3567N	Pole	Needles
42	1178N	Pole	Needles
43	3566N	Pole	Needles
44	3559N	Pole	Needles
45	3564N	Pole	Needles
46	3560N	Pole	Needles
47	5271N	Pole	Needles
48	5246N	Pole	Needles
49	4640N	Pole	Needles
50	1172N	Pole	Needles
51	4687	Padmounted Transformer	Needles
52	3748	Padmounted Transformer	Needles
53	3750	Padmounted Transformer	Needles
54	3749	Padmounted Transformer	Needles
55	4029	Padmounted Transformer	Needles
56	3862	Padmounted Transformer	Needles
57	4644	Padmounted Transformer	Needles
58	4571	Padmounted Transformer	Needles
59	4555	Padmounted Transformer	Needles
60	4570	Padmounted Transformer	Needles
61	4559	Padmounted Transformer	Needles
62	126 Beach Drive (No ID Label)	Padmounted Transformer	Needles
63	4556	Padmounted Transformer	Needles
64	4558	Padmounted Transformer	Needles
65	5003	Padmounted	Needles

		Transformer	
66	3409	Padmounted Transformer	Needles
67	4030	Padmounted Transformer	Needles
68	3864	Padmounted Transformer	Needles
69	1214 Beach Drive (No ID Label)	Padmounted Transformer	Needles
70	4681	Padmounted Transformer	Needles
71	3708	Padmounted Transformer	Needles
72	4632	Padmounted Transformer	Needles
73	3284	Padmounted Transformer	Needles

#### **IV. Field Inspection Violations List**

##### **GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:**

*The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.*

The lowest pole step on Pole No. 0603N was located at a height of less than eight feet above an easily-climbable short cinderblock wall.

##### **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 required of maintenance:

- A transformer on Pole No. 4453N had significant exterior corrosion.
- Multiple transformers on Pole No. 4602N had significant exterior corrosion.
- Pole No. 3545N was missing a section of its ground wire due to an apparent act of vandalism.
- A pole-to-pole secondary triplex between Pole No. 3566N and Pole No. 3559N was unraveling.
- The ground moulding on Pole No. 3564N was damaged.
- A down guy wire attached to Pole No. 4234N was excessively long. Approximately ten feet of the wire extended beyond the guy anchor and lay on the ground.

##### **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 poles were missing or damaged:

- |         |         |         |
|---------|---------|---------|
| • 1331N | • 0586N | • 0592N |
| • 4236N | • 0588N | • 2313N |



- 0596N
- 0601N
- 0603N
- 0604N
- 3542N
- 3553N
- 3554N
- 3545N
- 1165N
- 3535N
- 1180N
- 3571N
- 5246N
- 4640N

**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 underground or surface-level equipment was in need of maintenance:

- Padmounted Transformer No. 4644 was leaking oil.
- Padmounted Transformer No. 3284 had corrosion around its base and was leaking oil.
- Padmounted Transformer No. 4681 had a damaged locking mechanism. The transformer could not be opened by Needles staff during the audit, and CPUC staff was unable to inspect its interior.