PUBLIC UTILITIES COMMISSION
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November 19, 2025 EA2025-1323

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

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

Mr. Kushner:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Joe Murphy and Javier Reyes of ESRB staff conducted an electric distribution audit of PG&E's Peninsula Division from August 25th through 29th, 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 December 22, 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 Peninsula Division

Cc: Lee Palmer, Deputy Executive Director, Safety and Enforcement Division (SED), Safety Policy Division, Water Division, CPUC
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PG&E PENINSULA DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
August 25-29, 2025

I. Records Review

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

- TD-2305M, Electric Distribution Preventive Maintenance Manuals, Rev. 2 effective 11/05/2024 [1]
- TD-2305M-JA02, Job Aid: Overhead Assessment, April 1, 2020 – March 31, 2025
- TD-2305M-JA03, Job Aid: Underground Inspection, April 1, 2020 – March 31, 2025
- TD-2305M-JA13, EC Job Aid: Management of EC Notifications, Rev 2, July 1, 2025
- 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 1, 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
- Electric Corrective Notifications list, April 1, 2020 – March 31, 2025
- Patrol and Inspection Records list, April 1, 2020 – March 31, 2025
- Peninsula Division Reliability Indexes and Outage list, April 1, 2020 – March 31, 2025
- Peninsula Division New Projects list, April 1, 2024 – March 31, 2025
- Pole Loading Calculations list, April 1, 2024 – March 31, 2025
- Incoming Third-Party Notifications list, April 1, 2020 – March 31, 2025

[1] In response to the PreAudit Data Request, PG&E provided a newly revised EDPM TD-2305M, published and effective 4/30/2025. The manuals fall outside the audit review period and but were reviewed if it addressed a potential finding.

- Outgoing Third-Party Notifications list, April 1, 2020 – March 31, 2025
- Inspector training records, April 1, 2020 – March 31, 2025
- Equipment test records, April 1, 2020 – March 31, 2025
- Intrusive Inspections, April 1, 2024 – March 31, 2025
- Peninsula Division Quality Management Audit Results, April 1, 2020 – March 31, 2025

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, effective 11/05/2024 [2] does not address 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,[3] 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

[2] ESRB reviewed TD-2305M, Rev 3 (April 30, 2025) and notes that Priority A, B and X are listed and comprehensively addressed, Priority E and F are not addressed.
[3] The same PG&E Prioritization table appears in TD-2305M-JA02 Rev. 12 and Rev. 13

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 for potential violations that compromise worker safety, regardless of if the condition is in an 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.[4]

c) ESRB staff reviewed work orders created within the Peninsula Division from April 1, 2020 through March 31, 2025 and determined that PG&E did not address a total of 39,801 work orders (55.5%)[5] by their Required End Date.[6] Table 1 below breaks down the 39,801 late work orders by their given priority and work order status.

Table 1: Late Work Orders in Peninsula Division [7]

Priority Code	Late Work Orders Completed	Late Work Orders Pending*	Late Work Orders Cancelled[8]	Total by Priority
A	4,572	0	770	5,342
X	16	0	3	19
B	3,333	102	470	3,905
E	4,804	21,738	2,790	29,332
F	223	834	124	1,181
H	0	8	14	22
Total	**12,948**	**22,682**	**4,171**	**39,801**

* As of March 31, 2025

PG&E shall provide ESRB with its corrective action plan to complete the 22,682 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Table 2 below identifies the most overdue work orders as of March 31, 2025.

[4] 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.
[5] PG&E reported 71,703 total work orders in the Peninsula division including 30 Priority H work orders.
[6] DRU15860_Q03_Atch01_EC Notifications_CONF
[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] Late Work Orders Cancelled are those work orders with cancelation dates after the Required End Date.

Table 2: Most Overdue Work Orders**

Priority Code	Most Past Due Work Orders (WO#s)	Number of Days Past Due***
B	113828184	1,825
E	116735753	2,029
F	112605054	1,894
H	117231230	1,638

**Days past due determined using the Required End Date
***As of March 31, 2025

PG&E identified work order # 113828184 (B-Open) on November 19, 2017, to repair a broken enclosure with a required end date of April 1, 2020. As of March 31, 2025, the work order is open.[9]

PG&E identified work order # 116735753 (E-Open) on March 14, 2019, to replace a decayed pole in a Tier 3 High Fire Threat District (HFTD) with a required end date of September 10, 2019. As of March 31, 2025, the work order is open.

PG&E identified work order # 112605054 (F-Open) on January 23, 2017, to remove an idle facility with a required end date of January 23, 2020. As of March 31, 2025, the work order is open.

PG&E identified work order # 117231230 (H-Open) on May 14, 2019, for tree work with a required end date of May 14, 2020. As of March 31, 2025, the work order is open. [10]

d) 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)."

ESRB staff identified 6,986 [11] Peninsula Division Priority A work orders (46.3% of total A Priority work orders) active between April 1, 2020 and March 31, 2025 with Required End Dates two or more days beyond the work order creation date.[12]

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*".

PG&E is creating Priority A work order deadlines in excess of both TD-2305M-JA02, Job Aid: Overhead Assessment and GO 95 Rule 18 B (1) (a) (i) for Leve1 1 hazards of 24 hours. Where PG&E is taking corrective "make safe" action

[9] An Authorized Repaired Date of December 14, 2023, is shown for EC 113828184
[10] An Authorized Repaired Date of May 31, 2021, is shown for EC 117231230
[11] Based on Required End Dates. ESRB identified 5,137 Priority A work orders (32.1%) with Authorized End Dates two or more days beyond the work order creation date.
[12] DRU15860_Q03_Atch01_EC Notifications_CONF

immediately but not completing repairs, PG&E is not reclassifying work orders to a lower priority as required by GO 95 Rule 18 B (1) (a) (i) for Leve1 1 hazards.

e) ESRB staff reviewed work orders created within the Peninsula Division and found 19 work orders (10 open, 9 closed) with erroneous latitude and longitudes. Open work orders with location errors are listed in Table 3. 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 Peninsula Division. [13] ESRB could not assess the accuracy of work orders with latitudes and longitudes within the Peninsula Division.

Table 3. Open Work Orders with Incorrect Locations

Priority Code	Notification Number	Status	Latitude	Longitude
F	122153285	OPEN	0	0
F	123057167	OPEN	0	0
E	129585606	OPEN	0	0
F	120908705	OPEN	0	0
E	120534346	OPEN	0	0
E	121420863	OPEN	0	0
E	126659778	OPEN	0	0
E	126776519	OPEN	0	0
E	126659778	OPEN	0	0
E	126776519	OPEN	0	0

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]

f) ESRB staff reviewed PG&E's Inspector Training log and noted 13 inspectors (8.3% of 156 inspectors) who had no electronic training records found.[15] [16] ESRB

[13] Cancelled work orders were excluded from this analysis

[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] DRU15860_Q11_Atch01_PN Inspector List 2020-2025_CONF

[16] As not all inspection data contain inspector IDs, it cannot be determined how many of the 13 inspectors who have no training records conducted inspections.

randomly selected 57 inspection records and found 12 inspections conducted by 2 inspectors with no training records. [17]

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 current TD-2305M, Electric Distribution Preventive Maintenance Manual, Rev. 3, Effective April 30, 2025, Section 8.2.1 Additional Information / Record Retention Requirements, 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.

8.2.1. 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. 47

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 Maintenance Manual and practices need revision requiring a minimum record retention as prescribed. [18]

[17] PG&E Follow UP DR Response, DRU16340, Questions 7 and 8, in Plat Maps D0225 E0902, G0916, B0512, B0518, B0513 over various years 2020 to 2024, OH Patrol, UG Patrol and Detailed Inspections.
[18] 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 this is the third revision (publication dates: March 29, 2024, September 5, 2024, April 30, 2025) to contain the error.

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

a. ESRB staff identified that PG&E completed a total of 1,315 patrol and detailed inspections (0.3 %) [19] of padmount/underground (UG) and overhead (OH) electric facilities past their GO 165 required completion date, as shown in Table 4.

[19] DRU15860_Q04a_Atch01_P&I_CONF lists 443,149 asset patrols and detailed inspections (359,658 Map Based, 83,491 Asset Based inspections)

Table 4: Late Overhead Patrols and Inspections in Peninsula Division[20]

Year	OH Patrol	OH Detailed Inspection	UG Patrol	UG Detailed Inspection	Total Structures
2020	-	29	-	-	29
2021	131 [21]	1,070	-	-	1,201
2022	-	2	-	-	2
2023	70 [22]	-	-	-	70
2024	-	-	-	13 [23]	13
2025*	-	-	-	-	0
Total	**201**	**1,101**	**-**	**13**	**1,315**

* Preliminary information, final report due July 1, 2026

b. ESRB reviewed intrusive inspections records within the Peninsula Division from April 1, 2024 to March 31, 2025 and found 2 late inspections.[24] Intrusive inspections of wood pole must be completed with 25 years of installation.[25] The late intrusive inspections are noted in Table 5.

Table 5: Late Intrusive Inspections

SAP Number	Installation Date	Inspection Date	Previous Inspection Date	Required Inspection Date
100277882	1/1/1997	11/5/2024	None	1/1/2022
104111989	1/1/1996	7/17/2024	None	1/1/2021

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

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.

[20] DRU15860_Q04c_Atch01_Late P&I
[21] Quantity is actual units in 5 Plat Map grids
[22] Quantity is actual units in 1 Plat Map grid
[23] Quantity is actual units in 1 Plat Map grid
[24] DRU15860_Q13_Atch01_PN-PTT 06.03.2024-06.02.2025_CONF
[25] GO 165 Table 1 requires poles more than 15 years old to be inspected within 10 years, a total of 25 years.

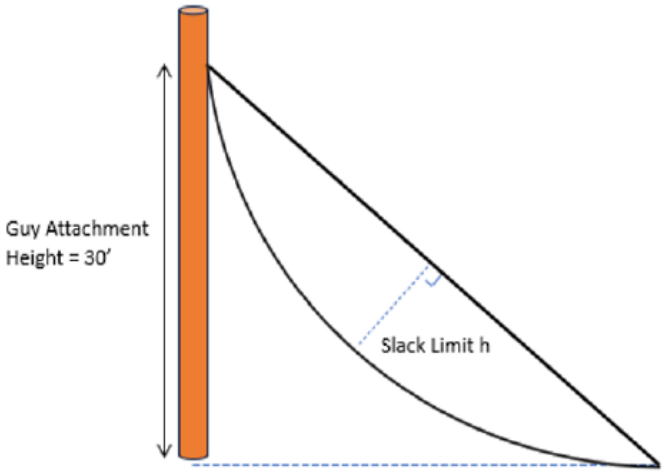

Figure 3: Guy slack limit, TD-2305M-JA02

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.

5. **GO 128, Rule 17.2, Inspection** states:

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

GO 128, Rule 22.4, A Maintenance Program states:

"A Maintenance Program means a written policy that shall include the following key elements:

(1) Inspection intervals
(2) Rejection criteria
(3) Corrective actions"

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).

For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action."

PG&E's TD-2305M: Electric Distribution Preventative Maintenance (EDPM) Manual (Revision: April 1, 2016), Patrols, Performing Underground Patrols states in part:

"Patrol of secondary enclosure includes only a visual evaluation of the exterior of visible enclosures to identify obvious structural hazards or problems (Do not highlight)."

GO 128, Rule 32 requires all manholes, handholes, and subsurface equipment to be inspected and maintained according to GO 128, Rule 12.2 and GO 128, Rule 17.2. PG&E's current EDPM Manual (Revision: April 30, 2025) states that patrols of secondary enclosures require only a visual examination of the exterior and does not require the secondary enclosures to be marked on the patrol/inspection map. The current EDPM Manual also states "*If a compliance inspector cannot locate or see the secondary enclosure, no safety or reliability issue has been identified. They may continue with the patrol.*"[26] PG&E cannot guarantee the underground secondary enclosures are inspected and maintained appropriately without viewing and opening the enclosures during each patrol or inspection. Failing to locate or view the secondary enclosure does not confirm there are no safety or reliability issues, as their EDPM Manual states.

PG&E's current EDPM Manual (Revision: April 30, 2025) also states that "*Before the map/MP is signed off as complete, all applicable electric distribution facilities in the geographic area of the plat map/MP are patrolled, even if they are not mapped.*"[27] PG&E cannot guarantee that their secondary facilities have been inspected without mapping and PG&E does not call out the secondary enclosures on their inspection sheets, stating "*Do not highlight*", so there is no way to confirm which facility inspections have been completed or any issues that have been identified. Additionally, since PG&E does not record or map the secondary enclosures during their patrols and inspections, they do not maintain consistent records of the inspections performed.

PG&E's procedures and practices do not require patrols and detailed inspections to include all secondary enclosures, and secondary enclosures are not mapped during patrols and inspections so there is no verification that PG&E has inspected all facilities in their system. ESRB finds PG&E in violation of GO 128, Rule 12.2 and GO 128, Rule 17.2 because their EDPM Manual regarding secondary vault inspection does not ensure their system is maintained appropriately and safely for the public. ESRB also finds PG&E in violation of GO 165 Rule III-C for failing to maintain the appropriate patrol and inspection records.

[26] PG&E TD-2305M, page 23
[27] PG&E TD-2305M, page 16

In support of the above finding, ESRB reviewed patrol and detailed inspection records of secondary facilities from April 1, 2020 to March 31, 2025 for selected locations to assess PG&E's compliance with GO 165 inspection requirements. [28]

i. SAP 107381864, UG Vault. No mark of ownership is present on the vault enclosure, and the lid lacked an adequate number of fasteners
    1. Inspections were conducted:
        a. Detailed inspection on June 2, 2023 failed to note the non-conformance.
        b. Patrol inspections (Plat Grid B518) on May 8, 2024 and January 9, 2025 failed to note the non-conformance.

ii. SAP 107593389, UG Vault. No mark of ownership is present on the vault enclosure.
    1. Inspections were conducted:
        a. Detailed inspection on June 2, 2023 failed to note the non-conformance.
        b. Patrol inspections (Plat Grid B518) on May 8, 2024 and January 9, 2025 failed to note the non-conformance.

Based on conditions observed during the field audit, such as levels of oxidation and age of pavement, these conditions predate the patrol and detailed inspections noted above.

PG&E must inspect facilities thoroughly for the purpose of ensuring that they are in good condition to conform with these rules.

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

> *"A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard.*
>
> *For all particulars not specified in General Order 95, a supply or communications company is in compliance with this rule if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions."*

PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, Rev. 14, Effective January 14, 2025 Conductor p. 120 states,

[28] Additionally, SAP 107534338, an UG Primary Vault also found to have no visible mark of ownership. PG&E audit staff found the pavement had covered the ID plate. The pavement was several years old. Patrol and detailed underground inspections were conducted in 2023 and 2024 respectively.

"O. Splice under the tie wire or tied into the insulator?
1. (No) No Action
2. (Yes) Repair/Replace E Tag."

PG&E's current Job Aid allow splices to have no clearance between the insulator (support) and the splice. As noted above, the only requirements are that the splice is not under the tie wire nor tied into the insulator.

Manufacturer specifications require a minimum bend radius of 12 diameters to avoid permanent deformation of ACSR conductors.[29] Repeated flexing of aluminum and other metals beyond their elastic limit causes cyclic fatigue and fatigue crack growth.[30] Compression and automatic splices are more rigid than the adjoining wire and the installation of a splice creates an unbendable section. [31] Splices in proximity to insulators create rigid supports where strain and fatigue on the conductor are increased at the ends of the splices. [32] [33] Fatigue breakage of conductor strands occurs at points where the conductor movement is restricted and at rigid splices. [34] Industry practice is to have a minimum clearance between the insulator (support) and a splice.[35]

Previous versions of PG&E's TD-2305M-JA02 procedures, until through February 1, 2023 (Revision 9) called for "*Create EC to replace conductor whenever when (A) the conductor has splices tied in proximity to insulator (less than 2 ft. from insulator, armor rod or dead end) preventing free movement of splice with conductor.*" [36]

Splices in contact with insulators do not allow free movement of splices with the conductors.[37]

Per GO 95, Rule 31.1, a supply or communications company is in compliance with this rule if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions. PG&E's current Job Aid allows less clearance between splices and insulators than accepted good practice.

PG&E's TD-2305M-JA02, Job Aid, Conductors, needs revision to comply with accepted good practice with respect to splice clearance to insulators and supports.

[29] Southwire, Guide for the Installation of ACSR & ACSR/TW Conductors, p. 4. https://www.southwire.com/medias/sys_master/installation-manuals/installation-manuals/h21/h22/8887676272670/ACSRAndACSRTWConductorsInstallationGuidepdf.pdf
[30] Fatigue of Aluminum Alloys, ASM Handbook, Volume 2B, Properties and Selection of Aluminum Alloys, Kaufman
[31] The Use of Splices, Lectromec, Michael Traskos, February, 2024.
[32] ANSI-IEEE Std 524-1980, 10.3.5
[33] Overhead Distribution Line Repair Manual, Preformed Line Products, Fatigue Breaks under Aeolian Vibration
[34] Ibid.
[35] RUS Bulletin 1728F-803, US Dept of Agriculture, Rural Utilities Bulletin
[36] PG&E's TD-2305M-JA02, Rev 9, Release date March 23, 2022.
[37] PG&E's TD-2305M-JA02, Rev 14, Release date January 6, 2025, Conductor, Section N p. 120 .

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

> *"For all particulars not specified in General Order 95, a supply or communications company is in compliance with this rule if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions."*
>
> PG&E is part of the Northern California Joint Pole Association (NCJPA). NCJPA Operations/Routine Handbook (January 1, 2023), Section 18.7 Form 48 – Memorandum Notice of Joint Pole Work states: *"It is recommended that the Form 48 and the Courtesy Draft Final are sent to the pole owners of record within 60 days of work being completed."*
>
> PG&E exceeded the 60-day notification at the following two locations:
>
> a. SAP 104263409, Form 48 uploaded on 9/19/2025
> i. work completed prior to April 1, 2020
>
> b. SAP 104259252, Form 48 uploaded on 9/19/2025
> i. work completed prior to April 2, 2020
>
> Pole tenants and joint owners require notification to transfer facilities in a timely manner, per the NCJPA, within 60 days. Delays in timely notification to other utilities do not allow other utilities to maintain their facilities properly and causes abandoned poles to remain. PG&E needs to comply with the intention of utility agreements.

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities in PG&E's Peninsula Division, listed in Table 6:

Table 6: Peninsula Division Field Inspection Locations

Location	Structure Type	SAP ID Number	Latitude	Longitude
1	Padmount	107377724	37.51541	-122.20118
2	Padmount	107377824	37.51541	-122.20118
3	Padmount	107312806	37.51541	-122.20118
4	Padmount	107368081	37.51591	-122.20307
5	Padmount	107312813	37.51511	-122.20327
6	Padmount	107377727	37.51507	-122.20329
7	Wood pole	104255401	37.47548	-122.20117
8	Wood pole	100319706	37.47519	-122.20137
9	Wood pole	100298164	37.47481	-122.20163
10	Wood pole	100272660	37.39305	-122.19558
11	Wood pole	100272652	37.39258	-122.19604
12	Wood pole	100305926	37.39239	-122.19636
13	Wood pole	100272602	37.39823	-122.19386
14	Wood pole	100272601	37.39781	-122.19379
15	Wood pole	104142079	37.25066	-122.38316
16	Wood pole	100264009	37.24951	-122.38263
17	Wood pole	100264008	37.24986	-122.38266
18	Wood pole	100264007	37.25023	-122.38273
19	Wood pole	100264002	37.25144	-122.38299
20	Wood pole	100295785	37.27404	-122.3844
21	Wood pole	100295784	37.25023	-122.38273
22	Wood pole	100295782	37.27561	-122.38354
23	Wood pole	100267419	37.22078	-122.40601
24	Wood pole	103367084	37.22091	-122.40652
25	UG Secondary	107548132	37.22091	-122.40652
26	Wood pole	100319939	37.22116	-122.40643
27	Wood pole	100311044	37.29257	-122.23038
28	Wood pole	100267353	37.29261	-122.23125
29	Wood pole	100267354	37.29329	-122.23023
30	Wood pole	100267355	37.29298	-122.22946
31	Wood pole	103577351	37.37379	-122.21267
32	Wood pole	103817645	37.37393	-122.21261
33	UG Vault	108175359	37.37393	-122.21261
34	Wood pole	100270184	37.37391	-122.21208
35	Wood pole	104229666	37.37395	-122.21159
36	Wood pole	104187283	37.32821	-122.20326
37	Wood pole	100267834	37.32845	-122.20281

Location	Structure Type	SAP ID Number	Latitude	Longitude
38	Wood pole	100267835	37.32756	-122.20177
39	Wood pole	104106432	37.32866	-122.20405
40	Wood pole	103947131	37.32516	-122.20289
41	Wood pole	102351414	37.32527	-122.20224
42	Wood pole	103894521	37.32489	-122.20164
43	Wood pole	100277103	37.3861	-122.23625
44	Wood pole	100277104	37.3854	-122.23571
45	Wood pole	100277106	37.38523	-122.23553
46	Wood pole	100277108	37.38483	-122.23523
47	Wood pole	100272293	37.38833	-122.21061
48	Wood pole	100310280	37.3888	-122.22763
49	Wood pole	104263409	37.38796	-122.22685
50	Wood pole	100270100	37.37556	-122.21801
51	Wood pole	100270098	37.3756	-122.21851
52	Wood pole	100262665	37.56391	-122.32969
53	Wood pole	104265651	37.56419	-122.32962
54	Wood pole	100262667	37.56454	-122.32941
55	Wood pole	103067564	37.56454	-122.32941
56	Wood pole	100310122	37.56477	-122.32916
57	UG Vault	107642146	37.56483	-122.33029
58	Wood pole	100263426	37.55047	-122.3398
59	Wood pole	100263427	37.54994	-122.34011
60	Wood pole	100312705	37.54953	-122.34009
61	Wood pole	100263425	37.54931	-122.33997
62	Wood pole	100305546	37.55949	-122.35413
63	Wood pole	100264183	37.5593	-122.35435
64	Wood pole	100264175	37.55911	-122.35465
65	Wood pole	104156652	37.55920	-122.35423
66	Wood pole	100305795	37.52185	-122.34063
67	Wood pole	100305797	37.52203	-122.34127
68	Wood pole	100302450	37.52225	-122.3418
69	Wood pole	100302449	37.5225	-122.34233
70	Wood pole	100302448	37.52303	-122.34269
71	Padmount	107319998	37.55142	-122.36711
72	UG Vault	107534338	37.55142	-122.36711
73	UG Vault	107513308	37.55138	-122.36723
74	UG Vault	107381864	37.55134	-122.36723
75	Wood pole	103569224	37.55498	-122.37848
76	UG Vault	107593389	37.55497	-122.37848
77	UG Vault	108169351	37.55494	-122.37865
78	Wood pole	104259252	37.64134	-122.41084
79	Wood pole	100285105	37.64136	-122.41083
80	UG Vault	RW131515276	37.64111	-122.41076
81	Padmount	108349392	37.64111	-122.41076

Location	Structure Type	SAP ID Number	Latitude	Longitude
82	Wood pole	100285104	37.6413	-122.41124
83	Wood pole	100285100	37.64128	-122.41137
84	Wood pole	104106126	37.66387	-122.38663
85	Wood pole	100286593	37.66386	-122.3867
86	Padmount	107315886	37.66321	-122.38712
87	Padmount	107315931	37.66335	-122.38721
88	Manhole	107404459	37.66335	-122.38697
89	UG Vault	108258839	37.67571	-122.38635
90	UG Vault	107569703	37.6758	-122.38634
91	UG Vault	108302085	37.67588	-122.38631
92	Padmount	107364352	37.67672	-122.38603

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 7:

Table 7: GO 95, Rule 31.1 Findings

Location	Finding	Notes
10	Loose animal guard.	Fixed in field.
62	Open animal guard.	Added to EC 123445261
63	Unlocked control box.	Fixed in field.
82	Unlocked control box.	Fixed in field

2. **GO 95, Rule 38, Table 2, Case 19 D Minimum Clearances of Wires from Other Wires** states in part:

> *"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind.*
>
> *Guys and span wires passing conductors supported on the same poles, 0 – 750 Volts (Including Service Drops): 3 inches"*

ESRB's findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 38, Table 2 Findings

Location	Finding	Notes
7	Conductor clearance to guy less than 3 inches.	Fixed in field.
60	Conductor clearance to guy less than 3 inches.	Fixed in field.

3. **GO 95, Rule 49.1 A (1), Poles, Towers and Other Structures, Strength** states:

"Wood poles shall be of sound timber."

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

Table 9: GO 95, 49.1 A (1) Finding

Location	Finding	Notes
47	Woodpecker holes greater than 3-inch diameter, second hold more than 12 ft from end.	

4. **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 is listed in Table 10:

Table 10: GO 95, 51.6 A Finding

Location	Finding	Notes
59	Missing High Voltage Sign.	Added to EC 117085003

5. **GO 95, Rule 51.7, Stepping (see Rule 91.3 C)** states in part:

"Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step…"

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

Table 11: GO 95, 51.7 Findings

Location	Finding	Notes
34	Low pole step.	Fixed in field.
67	Low pole step.	Fixed in field.
69	Low/bent pole step.	Fixed in field.

6. **GO 95, Rule 54.6 B Vertical and Lateral Conductors, Ground wires** states in part:

> *"That portion of the ground wire attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering…"*

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

Table 12: GO 95, Rule 54.6 B Finding

Location	Finding	Notes
34	Exposed ground, broken moulding.	Fixed in field.

7. **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 findings related to the above rule are listed in Table 13:

Table 13: GO 95, Rule 54.8-B(1) Findings

Location	Finding	Notes
9	Supply drops less than 16 feet above the roadway at curb. (Two service drops)	Fixed in field.
52	Supply drop less than 16 feet above the roadway at curb.	Added to EC 124218840

8. **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."*

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

Table 14: GO 95, Rule 56.2 Finding

Location	Finding	Notes
27	Slack down guy.	

9. **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 15:

Table 15: GO 95, Rule 56.7 B Findings

Location	Finding	Notes
11	Vegetation spanning down guy insulator.	Fixed in field.
13	Vegetation spanning down guy insulator.	
14	Vegetation spanning down guy insulator.	Fixed in field.
47	Vegetation spanning down guy insulator.	Fixed in field.

10. 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 is listed in Table 16:

Table 16: GO 95, Rule 56.9 Finding

Location	Finding	Notes
15	Missing down guy marker.	Fixed in field.

11. GO 95, Rule 59.4 A (1) (a) Grounding, Material and Size, Grounding Conductors states:

> *"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. marker."*

ESRB's finding related to the above rule is listed in Table 17:

Table 17: GO 95, Rule 59.4 A (1) (a) Finding

Location	Finding	Notes
54	Exposed ground rod.	Fixed in field.

12. 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."*

PG&E's Job Aid: UG Inspection TD-2305-JA03 (Revision: September 9, 2024), Section 16, p. 43 states:

> *"Make every effort to install bolts in all available bolting locations. If not, all bolt locations are in working order, there must be a minimum of two bolts properly installed on opposite corners of the enclosure."*

ESRB's findings related to the above rule are listed in Table 18:

Table 18: GO 128, Rule 17.1 Findings

Location	Finding	Notes
72	Raised corner on enclosure cover.	Fixed in field.
74	Only two bolts installed to secure enclosure cover. Both on same edge.	Fixed in field.

13. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

> *"Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity."*

ESRB's findings related to the above rule are listed in Table 19:

Table 19: GO 128, Rule 17.8 Findings

Location	Finding	Notes
72	Missing ownership mark.	Fixed in field, new label installed.
74	Missing ownership mark.	Fixed in field, new label installed.
76	Missing ownership mark (under pavement).	Fixed in field, new label installed.

14. 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 finding related to the above rule is listed in Table 20:

Table 20: GO 128, Rule 35.1 Finding

Location	Finding	Notes
80	Missing voltage tag.	Fixed in field regarding voltage marking. Note: PG&E procedures also require cables to be marked for Phase. EC 131667613 created to mark cables by Phase.

15. 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 21: Observed Field Findings with Past Due Work Orders[38]

Loc	Non-conformance	GO / Rule	Existing EC	Due Date
17	Replace transformer	95/31.1	120794891	4/2022
18	Pole lean/replace	95/49.1 A (1)	120794681	4/2022
20	Woodpecker damage	95/49.1 A (1)	127032574	9/2024
22	Broken pole, conductor, guy	95/49.1 A (1)	127278703	10/2024
31	Guy overgrown, conductor, anchor.	95/56.7 B	127399476	11/2024
34	X Arm, connector, woodpecker damage	95/31.1	118650276	12/2022
50	Insulator, fuse, marker	95/31.1	127408246	11/2024
51	Leaning	95/31.1	119875213	10/2024
52	Incorrect connector, guy, low pole step, high sign	95/31.1	124218840	8/2023
54	Replace pole, conductor clearance	95/49.1 A (1)	124219744	8/2023

[38] ESRB acknowledges that these late work orders have been previously accounted for in Record finding number 1c except for Locations 64 and 70. This list is prepared to provide a full account of non-conformances found during the field audit of Peninsula Distribution facilities. Locations 64 and 70 have due dates after the record close date. The field audit found that these two work orders had not been completed by their required due dates.

Loc	Non-conformance	GO / Rule	Existing EC	Due Date
55	Anchor, slack guy, low pole step, guy overgrown	95/56.2 95/51.7 95/56.7 B	124219835	8/2023
56	Replace pole, X-arm, XFMR, cutouts, underarm bus	95/49.1 A (1) 95/31.1	124219904	8/2023
58	Anchor, veg, conductor clearance, X-arm, guy, strain, pole step, connector	95/31.1	126024176	12/2023 5/2024
59	XFRM, cut outs, conductor clearance, fuse, expose ground, guy marker	95/49.1 A (1)	117085003	10/2023 4/2023
60	Pole replacement, replace guy, molding	95/49.1 A (1) 95/31.1	126019584	9/2024
61	Pole replacement, replace insulators, X-arm, under arm bus, ground, anchor, idle photo sensor, pole step	95/49.1 A (1)	126019171	4/2024
62	Replace pole	95/49.1 A (1)	123445261	8/2024
63	Replace pole, down guy	95/31.1	123444137	8/2024
64	Cut out clearance impaired, insulator broken, conductor with improper connector	95/31.1	129339749	8/2025[39]
70	Replace X-arm, connector	95/31.1	129294380	7/2025[40]
79	X-arm Replacement	95/31.1	122172246	4/2022
82	Pole Replacement	95/49.1 A (1)	120422398	1/2022
83	Leaning Pole	95/31.1	122171236	10/2022

16. 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.

[39] Noted as open and past the required due date during the field audit. This record was not included in count of late work orders in Record finding 1c as it became late after the audit record review period.
[40] Ibid.

Table 22: Observed Field Findings with Pending On-Time Work Orders

Loc	Non-conformance	GO / Rule	Existing EC	Due Date
11	Pole replacement	95/49.1 A (1)	119715919	2/2026
13	Incorrect connectors on primary (Insulink)	95/31.1	119690416	1/2026
15	Decayed, replace pole	95/49.1 A (1)	128732519	4/2027
29	Replace fuse/cut outs, to switch repair	95/31.1	129486183	9/2025
40	Loose HW	95/31.1	129839859	11/2025
66	Replace switch	95/31.1	100305795	10/2025
79	Pole Replacement	95/49.1 A (1)	128925653	5/2027
83	Pole Replacement	95/49.1 A (1)	128925562	5/2027

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 23: Third-Party Audit Observations

Location	Finding	Notes
7	Low communications lines over road. Abandoned communications lines on pole.	
12	Open communications riser cover	Fixed in field.
13	Loose, unsupported vertical communications line on pole	
14	Loose, unsupported vertical communications line on pole	
16	Third party attachment	

Location	Finding	Notes
17	Third party attachment	
18	Low communication line over road	
20	Abandoned communications lines	Existing TPNs: 128700738 126911400.
22	Vegetation strain on communications conductors	Existing TPNs: 129130097 127278692
24	Loose, unsupported vertical communications line on pole	
32	Loose, unsupported vertical communications line on pole	
35	Facility transfer to new pole incomplete	
44	Abandoned pole butt. Loose span guy.	
47	Loose, unsupported vertical communications line on pole. Abandoned communications lines	
50	Abandoned communications drops	Fixed in field
52	Low communications service drop	
56	Lifted communications riser cover	Fixed in field
58	Low communications service drop	Fixed in field.
59	Vegetation strain on communications conductors	Existing TPNs: 126023745 126032608.
60	Broken communications lashing. Decayed x-arm. Vegetation overgrowing down guy.	Existing TPNs: 126019582 126019629.
61	Decayed x-arm. Slack down guy.	Existing TPNs: 126019170 126026689.

Location	Finding	Notes
63	Loose, unsupported vertical communications line on pole	
65	Facility transfer to new pole incomplete.	TPN 131662309 created
70	Loose, unsupported vertical communications line on pole	TPN 131663255created
82	Lifted communications riser cover. Loose, unsupported vertical communications line on pole Exposed ground conductor.	TPN 131667689created
83	Exposed ground conductor.	Existing TPNs: 122171265, 122187224.
85	Loose, unsupported communications line on pole	TPN 131668154 created

Appendix A: Late work orders based on Authorized End Date.[41]

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	820 *(4,572)*	0 (0)	623 *(770)*	1,443
X	16 (16)	0 (0)	3 (3)	19
B	2,935 *(3,333)*	75 *(102)*	447 *(470)*	3,457
E	4,339 *(4,804)*	21,700 *(21,738)*	2,682 *(2,790)*	28,721
F	203 *(223)*	789 *(834)*	124 (124)	1,116
H	0 (0)	8 (8)	13 *(14)*	21
Total	**8,313**	**22,572**	**3,892**	**34,777** *(39,801)*

* As of March 31, 2025

Note: Values in parentheses based on Required End Date only, not Funded Date. *Italics for values* that differ between Required End Date and Authorized End Date.

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

Appendix Table B. Closed Work Orders with incorrect locations.

Priority Code	Notification Number	Status	Latitude	Longitude
B	122525448	COMP	0	0
A	123055531	COMP	0	0
A	120542654	COMP	0	0
A	122251815	COMP	0	0
A	119800214	COMP	0	0
A	119682017	COMP	0	0
A	120645094	COMP	0	0
B	120139133	COMP	0	0
A	122053514	COMP	0	0

[41] Per DRU15860_Q03_Atch01_EC Notifications_CONF Tab: Column Definitions: "Derived Due Date: Logic: use Funded Repair Date if it exists. Else, use Required End Date"