

CPUC SUBSTATION AUDIT FINDINGS REPORT RESPONSE
PG&E Cupertino Headquarters
January 27 – 31, 2025

I. Records Review

During the substation audit, Electric Safety and Reliability Branch (ESRB) reviewed the following standards, procedures, and records for PG&E's Cupertino Headquarters (HQ):

- List of all PG&E substations in the Cupertino HQ
- Map showing all PG&E substations in the Cupertino HQ
- PG&E Substation Maintenance and Construction (SM&C) Manual, Utility Standard: TD-3322M, Revision 11, with attachments 1 through 11
- PG&E Utility Standard: TD-3328P, Revision 0, with attachments 2 through 4
- PG&E Mobile Substation Equipment – Maintenance and Operating Procedures, Utility Standard: TD-3468P-01, Revision 2, with attachments 1 through 3
- PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S, Revision 9, with attachments 2 through 12
- PG&E Substation Supplemental Inspection Program, Utility Standard: TD-3328S, Revision 3, with attachment 1
- PG&E Substation Asset Performance Management (APM) Process, Utility Procedure: TD-3320P-36, Revision 0
- PG&E Substation SAP Work Management System (WMS) Process, Utility Procedure: TD-3320P-12, Revision 7, with attachments 2, 4 through 6, 12, and 14
- PG&E Substation Fire Protection Systems and Equipment – Inspection, Test and Maintenance: TD-3320P-07, Revision 3
- PG&E Substation General Work Procedures, Utility Standard: TD-3320S, Revision 2
- Explanation of PG&E inspector training policies
- List of all substation inspections conducted in the last five years for Cupertino HQ
- List of all open/pending, completed, cancelled, and late work orders and maintenance items in the previous five years (2020-2024)
- Equipment lists for ESRB selected substations
- Single-line diagrams of ESRB selected substations
- Last two visual inspection checklists for ESRB selected substations
- List of transformer banks that operated beyond nameplate capacity for the last five years (2020-2024) for ESRB selected substations.
- Infrared Testing records for ESRB selected substations in the last two years
- Most recent oil sample test results for ESRB selected substations
- Most recent electric test results for ESRB selected substations
- Training records for all substation inspection and maintenance personnel in the past five years (2020-2024)
- Other relevant substation inspections for the past five years (2020-2024) for ESRB selected substations
- Internal audit findings for Cupertino HQ for the past five years (2020-2024)

II. Records Violations

ESRB observed the following violations during the records review portion of the audit:

1. General Order (GO) 174, Rule 12, General states in part:

“Design, construction and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

- a. PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S,¹ establishes PG&E’s required end dates and out-of-compliance dates as follows:

Table 1: Due Dates Per Priority Code

Priority Code	Required End Date	Out-of-Compliance Date
A	Within 30 days	Close notifications after removing the hazard [make safe] with either permanent or temporary repairs within 30 days. Create a new lower priority notification immediately for any remaining work that will exceed 30 days.
B	Within 90 days	The out-of-compliance date is the 1 st day of the 2 nd month following the month in which the required end date occurs.
E	Within 365 days	The out-of-compliance date is the 1 st day of the year following the year in which the required end date occurs.
F	Greater than 365 days	There is no out-of-compliance date. This work will be completed when it is operationally efficient to perform the work.

Based on Table 1 above, ESRB noted that out of a total of 7,128 Line Corrective (LC) notifications, 7 (0.1%) were closed after their out-of-compliance date. Therefore, PG&E did not perform maintenance in accordance with the accepted good practices described in Utility Standard TD-3322S for these 7 LC notifications. See Table 2 below for the past-due LC notifications.

Table 2: Overdue LC Notifications

Substation	Notification #	Priority	Notification Date	Completion Date	Out-of-Compliance Date	Out-of-Compliance Date per Record	Days Late
Whisman	124176538	B	7/26/2022	3/8/2023	12/1/2022	12/1/2022	98
River Oaks	126504359	B	6/23/2023	12/15/2023	11/1/2023	11/1/2023	45
Ames	126656821	B	7/21/2023	1/13/2024	12/1/2023	12/1/2023	44
Los Gatos	126838649	B	8/14/2023	1/23/2024	1/1/2024	1/1/2024	22
El Patio	126944507	B	8/28/2023	1/29/2024	1/1/2024	1/1/2024	29
Yerba Buena	127991899	B	1/2/2024	6/11/2024	6/1/2024	6/1/2024	11
Metcalf	128512564	B	4/10/2024	10/16/2024	9/1/2024	9/1/2024	47

¹ PG&E Utility Standard TD-3322S, August 3, 2023, Revision 9.

PG&E Response:

We agree that we completed the above seven priority B LC notifications past the Out-of-Compliance (OOC) date. These notifications were scheduled and completed at the earliest opportunity.

- b. ESRB questions on Data Request (DR) 18 Infrared Inspections, and DR 19 Most Recent Oil Samples, were provided to PG&E prior to the field audit on January 24, 2025. PG&E provided Responses to ESRB in DRU15032 on February 13, 2025. On DR 18 Infrared Inspection responses, three of the Completed Re-inspections were completed late and two of the Re-inspections have pending completions that may be overdue as identified in Table 3 below.

Table 3: Overdue Infrared Inspection Notifications

Substation	Notification #	Priority	Notification Date	Completion Date	Out-of-Compliance Date	Days Late
Britton	126297319	B	5/31/2023	12/10/2023	10/1/2023	71
Milpitas	126939420	B	8/28/2023	1/17/2024	1/1/2024	16
Milpitas	126939428	B	8/28/2023	7/29/2024	1/1/2024	211
Monta Vista	129280263	B	7/23/2024	Pending Completion	12/1/2024	To Be Determined
San Jose A	129193757	B	7/9/2024	Pending Completion	12/1/2024	To Be Determined

PG&E Response:

We agree that the five LC notifications listed above are either pending completion and are past due or were completed past due.

Additionally, LC notification, 129280263, was completed 44 days past the out-of-compliance date on January 14, 2025, and LC notification, 129193757, is still pending completion.

- c. On PG&E Response to DR 20 Most Recent Electrical Tests, ESRB notes there were inconsistencies in how the Circuit Breaker (CB) contact erosion calculations were performed. In accordance with the Electrical Test Records Instructions for Vacuum Circuit Breakers: The Percentage of Contact Erosion = (Reference Dimension – Circuit Breaker Closed Measurement)/0.125.

In several cases (Britton Substation Westinghouse CB 1112, El Patio Substation CB 1114/2, Evergreen Substation CB 2105, Hicks Substation CB 2102, Milpitas Substation CB 2100, Saratoga Substation CB 1100 and Wolfe Substation CB 1108/2 and CB 1104), the results were multiplied by a factor of 100, giving results of up to 40% contact erosion. The results are shown in Table 4 below.

Table 4 Circuit Breaker Contact Erosion Calculation Results

Substation	Circuit Breaker (CB) #	Reference Dimension (in) Phase			CB Closed Measurement (in) Phase			% Contact Erosion Per Record Phase		% Contact Erosion Correct Result Phase		
		A	B	C	A	B	C	A	B	A	B	C
Britton	CB1112	4.045	4.200		4.090	4.209		36	7	0.36	0.072	
		4.091			4.121			24		0.24		
El Patio	CB1114/2	1.021	1.009		1.029	1.015		6.4	4.8	0.064	0.048	
		1.014			1.015			1.6		0.008		
Evergreen	CB2105	1.420	1.420		1.440	1.420		16	16	0.160	0.000	
		1.380			1.400			16		0.160		
Hicks	CB2102	2.191	2.187		2.141	2.174		40	10	0.400	0.104	
		2.145			2.140			4		0.040		
Milpitas	CB2100	0.581	0.582		0.575	0.580		4.80	1.60	0.048	0.016	
		0.576			0.570			4.80		0.048		
Saratoga	CB1100	0.937	0.968		0.933	0.991		3.0	18	0.032	0.184	
		0.968			0.989			16		0.168		
Wolfe	CB1108/2	1.516	1.520		1.493	1.521		18.4	-0.8	0.184	-0.008	
		1.594			1.583			10.4		0.088		
Wolfe	CB1104	1.531	1.562		1.493	1.527		30	28	0.304	0.280	0
		1.437			1.437			12				

This would imply a significant amount of Circuit Breaker contact erosion. Other substation circuit breaker contact erosion calculations did not include the factor of 100.

Calculational errors were noted in some other substations (e.g., Swift Substation CB 1100 and El Patio CB 1400). PG&E should review the contact erosion calculations in the Electrical Test records provided in DR 20 and correct any errors found in them.

PG&E Response:

We have reviewed the mechanism service documentation and agree there are inconsistencies with the contact erosion calculations. The calculated erosion should be multiplied by 100 to get the percentage of contact erosion. We have created CAP # 131171319 to review the contact erosion calculation, update any incorrect test records, coordinate training with the maintenance headquarters and create a plan to prevent this issue from happening in the future.

Additionally, while some measurements indicate higher levels of contact erosion, these circuit breakers do not pose a safety or reliability risk, as the results remain within the acceptable erosion limits. Per TD-3322S-03 "Circuit Breakers," the erosion limit is 75% or above. Once the erosion limit is reached or exceeds 75%, the circuit breaker interrupters or the entire circuit breaker will be evaluated for replacement. However, the circuit breaker may remain in service temporarily if the contact wear is between 75% and 95% while the asset manager determines the work needed.

- d. For Transformer Bank 1 at the San Jose B Substation, there were existing open LC Tags for Bird Mitigation Protection (LC#128167311 dated 2/12/24) and Bushing Replacement (LC#128208799 dated 2/20/24). During the field audit, the Cupertino Substation Division field personnel reported that both items were completed in June 2024. However, the SAP record shows that the LC Tags are

still open. The SAP records should be updated to close these items out.

PG&E Response:

We agree that both LC notifications were still open during the time of the field audit. SAP has been updated to reflect that LC notification, 128167311, was completed on February 12, 2024, and LC notification, 128208799, was completed on April 29, 2024.

II. Field Inspection

During the field inspection, ESRB inspected the following 16 substations:

Substation	City
Wolfe Substation	Cupertino
Saratoga Substation	Saratoga
Llagas Substation	Gilroy
Morgan Hill Substation	Morgan Hill
Metcalf Substation	San Jose
El Patio Substation	San Jose
Hicks Substation	San Jose
Edendale Substation	San Jose
Evergreen Substation	San Jose
San Jose A Substation	San Jose
San Jose B Substation	San Jose
Mabury Substation	San Jose
Trimble Substation	San Jose
Milpitas Substation	Milpitas
Britton Substation	Sunnyvale
Monta Vista Substation	Cupertino

III. Field Inspection – Violations List

ESRB noted the following violations of GO 174, Rule 12 during the field inspection:

GO 174, Rule 12, General states in part:

“...Substations shall be designed, constructed and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service

Design, construction, and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

PG&E Response:

We appreciate the insight and feedback from the ESRB, as well as the support in helping us achieve our stand that everyone and everything is always safe. We agree with 40 of the ESRB’s findings of violation and are committed to remedying these issues and strive to reduce and eliminate such findings in the future.

We do not believe 87 of the field observations qualify as violations of GO 174, Rule 12. Our Substation Inspection Program focuses on monthly and bi-monthly station inspections, along with our Enhanced Inspections (EI), Quality Verification (QV) audits, and Annual Infrared (IR) inspections. These different levels of visual and technical assessments are conducted to indicate abnormal conditions before the equipment fails and to prevent unsafe events. Eighty-Five of the ESRB’s observations made during the field audit portion of the audit were previously identified and properly recorded in our system of record (SAP) as abnormal conditions during planned inspections. Each of these notifications were identified timely by our qualified electrical workers (QEWs) and scheduled for the appropriate corrective action in accordance with our maintenance standard/procedures and per GO 174 requirements. The remaining two observations noted by ESRB during the field audit portion do not present any safety or reliability concerns and therefore do not require the creation of notifications. Therefore, we do not believe that these 87 findings qualify as GO 174, Rule 12 violations.

1. Wolfe Substation

1.1 Circuit Breaker 162 had an Oil Leak. Existing LC Tag#130788506.



PG&E Response:

We agree an oil leak was present on breaker 162 at Wolfe Substation. This nonconformance has a pre-existing LC notification, 130788506, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

1.2 Transformer Bank 2 had an Oil Leak at Radiator Flange. Existing LC Tag#130788501.



PG&E Response:

We agree that an oil leak was present on Bank 2 radiator flange at Wolfe Substation. This nonconformance had a pre-existing LC notification, 130788501, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and was completed on April 21, 2025.

1.3 Transformer Bank 2 had Paper Trapped Inside Fan. Fixed in Field.



PG&E Response:

The cited violation pertains to Transformer Bank 1, not Transformer Bank 2. We agree with the finding of paper in the high side fan of Transformer Bank 1 at Wolfe Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

1.4 Transformer Bank 2 had Additional Oil Leaks at Load Tap Changer Conservator Tank Drain Valve and Fault Pressure Device Drain Valve.



PG&E Response:

The cited violation pertains to Bank 1, not Bank 2. We agree with the finding of oil residue on Transformer Bank 1 Load Tap Changer (LTC) oil conservator at Wolfe Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

1.5 The Perimeter Fence had Gap Greater than 6 Inches Depth. PG&E Fixed in Field.



PG&E Response:

We agree with the finding of a squirrel hole under the perimeter fence at Wolfe Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

1.6 The Perimeter Fence had Several Sets of Warning Signs Posted Inside Fence.



PG&E Response:

We agree that signage was posted inside the fence at Wolfe Substation. This nonconformance had a pre-existing LC notification, 130788877, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed timely on February 19, 2025.

2. Saratoga Substation

2.1 Transformer Bank 3 Had Branch Inside Radiator.



PG&E Response:

We agree with the finding of a branch inside the radiator of Transformer Bank 3 at Saratoga Substation. We created LC notification, 131181252, added it to the workplan and will be completed based on current work prioritization and material availability.

3. Llagas Substation

3.1 Circuit Breaker 112 has an Oil leak on Hydraulic Line. Existing LC Tag#130109005.



PG&E Response:

We agree an oil leak was present at Circuit Breaker 112 at Llagas Substation. This nonconformance has a pre-existing LC notification, 130109005, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

3.2 The Perimeter Fence had Warning Signs Posted Inside Fence. Existing LC Tag#130108978.



PG&E Response:

We agree that signage was posted inside the fence at Llagas Substation. This nonconformance has a pre-existing LC notification 130108978, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

4. Morgan Hill Substation

4.1 Battery had Corrosion. Existing LC Tag#129517567.



PG&E Response:

We agree that a battery had corrosion at Morgan Hill Substation. This nonconformance had a pre-existing LC notification, 129517567, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on February 18, 2025.

4.2 Transformer Bank 2 Nitrogen Bottle Missing Second Strap. PG&E Fixed in Field.



PG&E Response:

We agree that the nitrogen bottle in Transformer Bank 2 is missing the second strap at Morgan Hill Substation. This nonconformance had a pre-existing LC notification, 129522611, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures. However, this was corrected onsite by PG&E QEW on the day of the field audit.

4.3 Transformer Bank 2 Had Wasp Nest. PG&E Fixed in Field.



PG&E Response:

We agree with the finding of a wasp nest found in Transformer Bank 2 at Morgan Hill Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

4.4 Transformer Bank 2 Had Oil Leak Mitigation. Existing LC Tag#130774181.



PG&E Response:

We agree that Transformer Bank 2 had an oil leak at Morgan Hill Substation. This nonconformance has a pre-existing LC notification, 130774181, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

4.5 Circuit Breaker 172 had Oil Protection Berm Breach. Existing LC Tag#124924236.



PG&E Response:

We agree that Circuit Breaker 172 had an oil protection berm breach at Morgan Hill Substation. This nonconformance has a pre-existing LC notification, 124924236, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

4.6 Circuit Breaker 182 had Birds Nest. Existing LC Tag#129522212.



PG&E Response:

The cited violation references Circuit Breaker 182, however, this is the 115kV Bus F C-Phase CCVT. Nonetheless, we agree a bird's nest was present on the 115kV Bus F C-Phase CCVT at Morgan Hill Substation. This nonconformance had a pre-existing LC notification, 129522212, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and was not past due. However, the bird's nest was removed on February 8, 2025.

4.7 Transformer Bank 1 Had Bird Nest. PG&E Fixed in Field.



PG&E Response:

We agree with the finding of a bird's nest on Transformer Bank 1 at Morgan Hill Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

4.8 Perimeter Fence had Warning Signs Posted Inside Fence. Existing LC Tag#130108978.



PG&E Response:

The cited violation pertains to Llagas Substation, not Morgan Hill Substation. The correct LC notification for the referenced violation is LC notification 129517975. Nonetheless, we agree with the finding that the perimeter fence had warning signs posted inside the fence at Morgan Hill Substation. This nonconformance had a pre-existing LC notification, 129517975, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and was not past due. However, the signage was corrected on February 24, 2025.

5. Metcalf Substation

5.1 Transformer Bank 11 Phase C Two Fans Not Working Existing LC Tag#128582602.



PG&E Response:

We agree that two fans on Transformer Bank 11 C-Phase were not working at Metcalf Substation. This nonconformance has a pre-existing LC notification, 128582602, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

5.2 Transformer Bank 11 Phase C Oil Leak Mitigation Upper Manway Existing LC Tag#129715835.



PG&E Response:

We agree that Transformer Bank 11 C-Phase has an oil leak mitigation on the upper manway at Metcalf Substation. This nonconformance has a pre-existing LC notification, 129715835, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures.

5.3 Transformer Bank 12 Phase A Oil Leak Mitigation Existing LC Tag#130780077.



PG&E Response:

The cited violation pertains to San Mateo Substation, not Metcalf Substation. The correct LC notification is 130783098 for the referenced violation. Nonetheless, we agree with the finding that Transformer Bank 12 A-Phase has an oil leak mitigation at Metcalf Substation. This nonconformance had a pre-existing LC notification, 130783098, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and was not past due. However, this work was completed on April 23, 2025.

5.4 Transformer Bank 12 Phase B Oil Leak Mitigation Existing LC Tag#130783098.



PG&E Response:

We agree with the finding that Transformer Bank 12 B-Phase B has an oil leak at Metcalf Substation. This nonconformance had a pre-existing LC notification, 130783098, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and was not past due and was completed on April 23, 2025.

5.5 Transformer Bank 12 Phase B Conservator Tank Pressure Gauge Malfunction. Existing LC Tag#129692396 PG&E Fixed in Field.



PG&E Response:

We agree with the finding that Transformer Bank 12 B-Phase conservator tank pressure gauge had a malfunction at Metcalf Substation. This nonconformance had a pre-existing LC notification, 129692396, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was scheduled to be worked in accordance with our maintenance procedures and was corrected onsite by PG&E QEW on the day of the field audit.

5.6 Transformer Bank 13 Phase B Oil Leak Mitigation Kelman Gas Analyzer Existing LC Tag#130713051.



PG&E Response:

We agree that Transformer Bank 13 B-Phase had an oil leak mitigation on the Kelman gas analyzer at Metcalf Substation. This nonconformance had a pre-existing LC notification, 130713051, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked on in accordance with our maintenance procedures and was not past due. This LC notification was completed on April 23, 2025.

5.7 Transformer Bank 13 Phase B Oil Leak Mitigation Pump Flange Existing LC
Tag#130783076.

**PG&E Response:**

We agree that Transformer Bank 13 B-Phase had an oil leak at Metcalf Substation. This nonconformance had a pre-existing notification, 130783076, that was established in our system of record SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and was completed on April 23, 2025.

5.8 Transformer Bank 13 Phase B Birds Nest Radiator Fan Power Cord.



PG&E Response:

We agree that a bird's nest was found near Transformer Bank 13 B-Phase radiator fan power cord at Metcalf Substation. However, we do not agree that this finding qualifies as a violation of GO 174, Rule 12 as the location of this bird's nest does not pose a safety or reliability risk.

5.9 Transformer Bank 13 Phase C Oil Leak Mitigation Upper Flange Existing LC Tag#130783071.



PG&E Response:

The previously provided LC notification, 130783071, was cancelled as it was a duplicate of LC notification 130783097. We agree that Transformer Bank 13 C-Phase had an oil leak on the upper flange at Metcalf Substation. This nonconformance had a pre-existing LC notification, 130783097, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and not past due. This LC notification was completed on April 23, 2025.

5.10 Transformer Bank 4 Oil Leak Mitigation Existing LC Tag#130116644.



PG&E Response:

We agree that Transformer Bank 4 has an oil leak mitigation at Metcalf Substation. This nonconformance has a pre-existing LC notification, 130116644, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures.

5.11 Transfer Bank Spare Oil Leak at Oil Filter Conservator Connection. PG&E Fixed in Field.



PG&E Response:

We agree with the finding of Transformer Bank Spare oil leak at the oil filter conservator connection at Metcalf Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

5.12 Transfer Bank 1A Oil Leak Mitigation at Conservator Drain Valve Existing LC Tag#130713052.



PG&E Response:

We agree that Transformer Bank 1A has an oil leak mitigation at the conservator drain at Metcalf Substation. This nonconformance has a pre-existing LC notification, 130713052, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

5.13 Transformer Bank 2 Phase C Desiccant Need Replacement.



PG&E Response:

We agree that Transformer Bank 2 C-Phase had a desiccant that needed replacement at Metcalf Substation. This nonconformance had a pre-existing LC notification, 130535711, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and completed on March 19, 2025.

5.14 Transformer Bank 2 Phase C Oil Leak Mitigation at Top Flange Existing LC Tag#130116641.



PG&E Response:

We agree that Transformer Bank 2 C-Phase has an oil leak mitigation at top flange at Metcalf Substation. This nonconformance has a pre-existing LC notification, 130116641, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

5.15 Transformer Bank 2 Phase B Desiccant Need Replacement.



PG&E Response:

We agree that Transformer Bank 2 B-Phase had a desiccant that needed replacement at Metcalf Substation. This nonconformance had a pre-existing LC notification, 130535711, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on March 19, 2025.

5.16 Transformer Bank 2 Phase B Oil Leak Mitigation at Top Flange Existing LC Tag#130116640.



PG&E Response:

We agree that Transformer Bank 2 B-Phase has an oil leak at top flange at Metcalf Substation. This nonconformance has a pre-existing LC notification, 130116640, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

5.17 Transformer Bank 2 Phase A Desiccant Need Replacement. Existing Tag#130535711 Will be Changed to Also Cover Banks 2B and 2C.



PG&E Response:

We agree that Transformer Bank 2 A-Phase had a desiccant that needed replacement at Metcalf Substation. This nonconformance had a pre-existing LC notification, 130535711, that was established in

our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and the desiccant for all 3 phases was changed out on March 19, 2025.

5.18 Transformer Bank 2 Phase A Oil Leak Top Flange Existing LC Tag#130783075.



PG&E Response:

The previously provided LC notification, 130783075, was cancelled because it was a duplicate of LC notification 130783072. We agree that Transformer Bank 2 A-Phase has an oil leak at the top of flange at Metcalf Substation. This nonconformance has a pre-existing LC notification, 130783072, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

5.19 Battery Room Eyewash Missing Expiration Date Existing LC Tag#129670378.



PG&E Response:

We agree the battery room eyewash is missing an expiration date at Metcalf Substation. This nonconformance had a pre-existing LC notification, 129670378, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on March 6, 2025.

6. El Patio Substation

6.1 The Nitrogen Bottle for Transformer Bank 1 was Empty and no Nitrogen pressure at transformer top. PG&E replaced the Empty Bottle and Fixed in Field.



PG&E Response:

We agree with the finding that the nitrogen bottle for Transformer Bank 1 was empty and there was no nitrogen pressure at the top of the transformer at Metcalf Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

6.2 Transformer Bank 1 Sample Drain Valve Oil Leak Mitigation Existing LC Tag#129692374.



PG&E Response:

We agree that Transformer Bank 1 sample drain valve had an oil leak at El Patio Substation. This nonconformance had a pre-existing LC notification, 129692374, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on February 14, 2025.

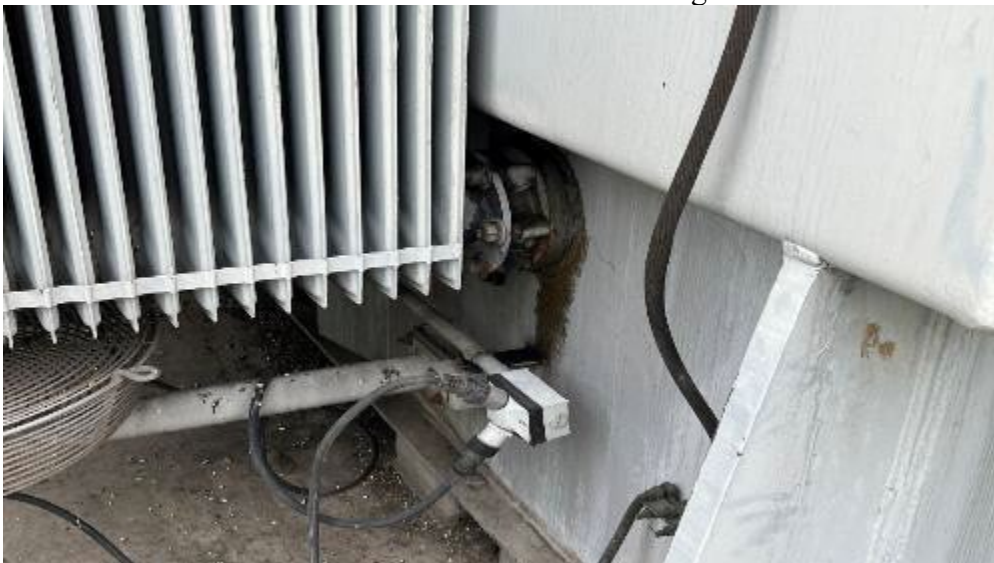
6.3 Transformer Bank 2 Two Fans Not Working



PG&E Response:

We agree with the finding that Transformer Bank 2 has two fans that are not working at El Patio Substation. We created LC notification 130804601, added it to the workplan and will be completed based on current work prioritization and material availability.

6.4 Transformer Bank 2 Oil Leak at Lower Flange



PG&E Response:

We agree with the finding of the oil stain on the lower flange at Transformer Bank 2 at El Patio Substation. We created LC notification 130804603, added it to the workplan and will be completed based on current work prioritization and material availability.

6.5 Perimeter Security Fence had Cut Ground Connection Due to Recent Vandalism



PG&E Response:

We agree with the finding of the cut ground at the perimeter security fence at El Patio Substation. We created LC notification 130804581, added it to the workplan and will be completed based on current work prioritization and material availability.

6.6 Perimeter Security Fence has Signs Posted Inside Existing LC Tag#130739987.



PG&E Response:

We agree that the perimeter security fence has signs posted inside at El Patio Substation. This nonconformance has a pre-existing LC notification, 130739987, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

7. Hicks Substation

7.1 Transformer Bank 5 Nitrogen Bottle Needs 2nd Strap. PG&E Fixed in Field.



PG&E Response:

We agree with the finding of Transformer Bank 5 Nitrogen Bottle needing a second strap at Hicks Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

7.2 Transformer Bank 1 Oil Leak Mitigation Existing LC Tag#130535753.



PG&E Response:

We agree that Transformer Bank 1 has an oil leak at Hicks Substation. This nonconformance has a pre-existing LC notification, 130535753, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12, since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

7.3 Transformer Bank 4 Oil Leak Mitigation Existing LC Tag#130535750.



PG&E Response:

We agree that Transformer Bank 4 had oil leak mitigation at Hicks Substation. This nonconformance had a pre-existing LC notification, 130535750, established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on March 5, 2025.

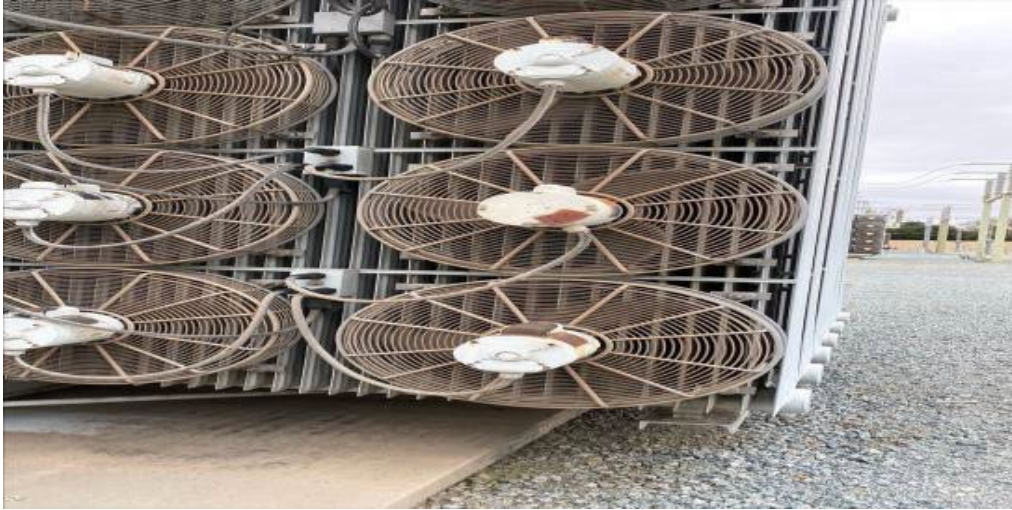
7.4 Transformer Bank 2 had an Oil Leak Mitigation Existing LC Tag#130535749.



PG&E Response:

We agree that Transformer Bank 2 had an oil leak mitigation at Hicks Substation. This nonconformance had a pre-existing LC notification, 130535749, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on February 14, 2025.

7.5 Transformer Bank 3 One Fan Not Working. PG&E Fixed in Field.



PG&E Response:

We agree with the finding that one fan on Transformer Bank 3 was not working at Hicks Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

8. Edenvale Substation

8.1 Circuit Breaker 162 Had a Bird Nest, Existing LC Tag#130791806.



PG&E Response:

We agree a bird's nest was present on circuit breaker 162 at Edenvale Substation. This nonconformance had a pre-existing LC notification, 130791806, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on February 3, 2025.

8.2 Transformer Bank 4 Desiccant Needs to be Replaced.



PG&E Response:

We agree with the finding that the desiccant needed replacement on Transformer Bank 4 at Edenvale Substation. We created LC notification 130804605, added it to the workplan and it was completed on March 17, 2025.

8.3 Transformer Bank 3 has Oil Leak at Lower Sampling Valve, Existing LC Tag#129384420.



PG&E Response:

We agree that oil was present below the sampling valve on Transformer Bank 3 at Edenvale Substation. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since we believe the oil present on the ground was only residual from a recent TDA sample that was completed on LC notification 129384420 on January 15, 2025.

8.4 Transformer Bank 2 Nitrogen Bottle Needs 2nd Strap. PG&E Fixed in Field.



PG&E Response:

We agree that a nitrogen bottle on Transformer Bank 2 needed a second strap at Edenvale Substation. This nonconformance had a pre-existing LC notification, 129618263, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on March 17, 2025.

8.5 Transformer Bank 2 Fan has Rag Trapped in Radiator Fins. PG&E Fixed in Field.



PG&E Response:

We agree with the finding that the Transformer Bank 2 fan had a rag trapped in the radiator fins at Edenvale Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

8.6 Transformer Bank 2 has Oil Leak Mitigation at Sample Valve. Existing LC Tag#130791809.



PG&E Response:

We agree that Transformer Bank 2 has an oil leak at the sample valve at Edenvale Substation. This nonconformance has a pre-existing LC notification, 130791809, that was established in our system of

record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

8.7 Transformer Bank 2 Need Animal Protection Tape at Bushing. Existing LC Tag#130791886.



PG&E Response:

We agree that Transformer Bank 2 needs animal protection tape on bushing at Edenvale Substation. This nonconformance has a pre-existing LC notification, 130791886, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

8.8 Transformer Bank 1 One Fan Not Working. Existing LC Tag#129632500.



PG&E Response:

We agree a fan was not working on Transformer Bank 1 at Edenvale Substation. This nonconformance has a pre-existing LC notification, 129632500, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

9. Evergreen Substation

9.1 Circuit Breaker 32 Has Bird Nest. Existing LC Tag#129590697.



PG&E Response:

We agree that a bird's nest was present on Circuit Breaker 32 at Evergreen Substation. This nonconformance had a pre-existing LC notification, 129590697, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174,

Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and completed on February 4, 2025.

9.2 Transformer Bank 1 Phase B 3 Fans Not Working Left Side



PG&E Response:

We agree with the finding that 3 fans on the left side of Transformer Bank 1 B-Phase were not working at Evergreen Substation. We created LC notification 130804663, added it to the workplan and it was completed on March 30, 2025.

9.3 Transformer Bank 1 Phase B Oil Leak Mitigation. Existing LC Tag#129590535.



PG&E Response:

We agree that Transformer Bank 1 B-Phase has an oil leak at Evergreen Substation. This nonconformance has a pre-existing LC notification, 129590535, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is

not past due.

9.4 Transformer Bank 1 Phase A Oil Leak Mitigation. Existing LC Tag#129590535.



PG&E Response:

We agree that Transformer Bank 1 A-Phase has an oil leak mitigation at Evergreen Substation. This nonconformance has a pre-existing LC notification, 129590535, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

9.5 Transformer Bank 1 Spare Nitrogen Bottle Empty. Existing LC Tag#129590535.



PG&E Response:

The cited violation references LC notification 129590535, which is for the Transformer Bank 1 oil leaks at Evergreen Substation. The correct LC notification for the referenced violation is LC notification 129590350. Nonetheless, we agree with the finding that Transformer Bank 1 spare had an empty nitrogen bottle at Evergreen Substation. This nonconformance had a pre-existing LC notification, 129590350, that

was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and completed on February 24, 2025.

9.6 Transformer Bank 1 Spare Oil Leak Mitigation. Existing LC Tag#129590535.



PG&E Response:

We agree that Transformer Bank 1 spare has an oil leak at Evergreen Substation. This nonconformance has a pre-existing LC notification, 129590535, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

9.7 Circuit Breaker 172 Hydraulic Oil Leak Mitigation. Existing LC Tag#129590532.



PG&E Response:

We agree that circuit breaker 172 has a hydraulic oil leak at Evergreen Substation. This nonconformance has a pre-existing LC notification, 129590532, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

9.8 Transformer Bank 3 Oil Leak Mitigation. Existing LC Tag#129590690.



PG&E Response:

We agree that Transformer Bank 3 has an oil leak at Evergreen Substation. This nonconformance has a pre-existing LC notification, 129590690, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

9.9 Transformer Bank 2 Load Tap Changer (LTC) Temperature Gauge Hard to Read.



PG&E Response:

We agree with the finding that the LTC temperature gauge on Transformer Bank 2 is hard to read at Evergreen Substation. We created LC notification 131181059, added it to the workplan and will be completed based on current work prioritization and material availability.

9.10 Transformer Banks 2 and 3 Neutral Reactor Missing Label. As a best practice, it should have labels to be consistent with Edendale Substation which has LC Tag #129619844.



PG&E Response:

We agree that Transformer Banks 2 and 3 have a neutral reactor label missing at Evergreen Substation. We created LC notifications 130821828 and 130821827, added them to the workplan and will be

completed based on current work prioritization.

10. San Jose A Substation

10.1 Bird Nest at Circuit Breaker 332. PG&E Fixed in Field.



PG&E Response:

We agree with the finding of a bird's nest present on circuit breaker 332 at San Jose A Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

10.2 Transformer Bank 2 Oil Leak Mitigation at Main Oil Valve. Existing LC Tag#130718285.



PG&E Response:

The cited violation pertains to Transformer Bank 3 and not Transformer Bank 2. Nonetheless, we agree that Transformer Bank 3 had an oil leak mitigation at the main valve at San Jose A Substation. This nonconformance had a pre-existing LC notification, 130718285, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174,

Rule 12 since this LC notification was worked on in accordance with our maintenance procedures and completed on April 9, 2025.

10.3 Transformer Bank 2 Oil Filter Line Leak. Existing LC Tag#130718286.



PG&E Response:

The cited violation pertains to Transformer Bank 3 and not Transformer Bank 2. Nonetheless, we agree that Transformer Bank 3 had an oil filter line leak at San Jose A Substation. This nonconformance had a pre-existing LC notification, 130718286, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on April 9, 2025.

10.4 Transformer Bank 1 Oil Leak at Main Oil Pump Valve.



PG&E Response:

We agree with the finding that Transformer Bank 1 has an oil leak at the main oil pump valve at San Jose A Substation. We created LC notification 130805232, added it to the workplan and will be completed based on current work prioritization and material availability.

10.5 Transformer Bank 1 Cracked Glass Bushing Oil Level Gauge. Existing LC Tag#129389739.



PG&E Response:

We agree that Transformer Bank 1 has a cracked glass on the bushing oil level gauge at San Jose A Substation. This nonconformance has a pre-existing LC notification, 129389739, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

10.6 Transformer Bank 1 Rust. Existing LC Tag#129389229.



PG&E Response:

We agree that Transformer Bank 1 has rust at San Jose A Substation. This nonconformance has a pre-existing LC notification, 129389229, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

10.7 Transformer Bank 2 Oil Leak at Main Oil Pump Valve. Existing LC Tag#130718282.



PG&E Response:

We agree that Transformer Bank 2 has an oil leak at the main oil valve at San Jose A Substation. This nonconformance has a pre-existing LC notification, 130718282, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

10.8 Transformer Bank 4 Desiccant Near End of Life Need Replacement.



PG&E Response:

We agree with the finding that Transformer Bank 4 has a desiccant needing replacement at San Jose A Substation. We created notification LC 131181250, added it to the workplan and will be completed based on current work prioritization and material availability.

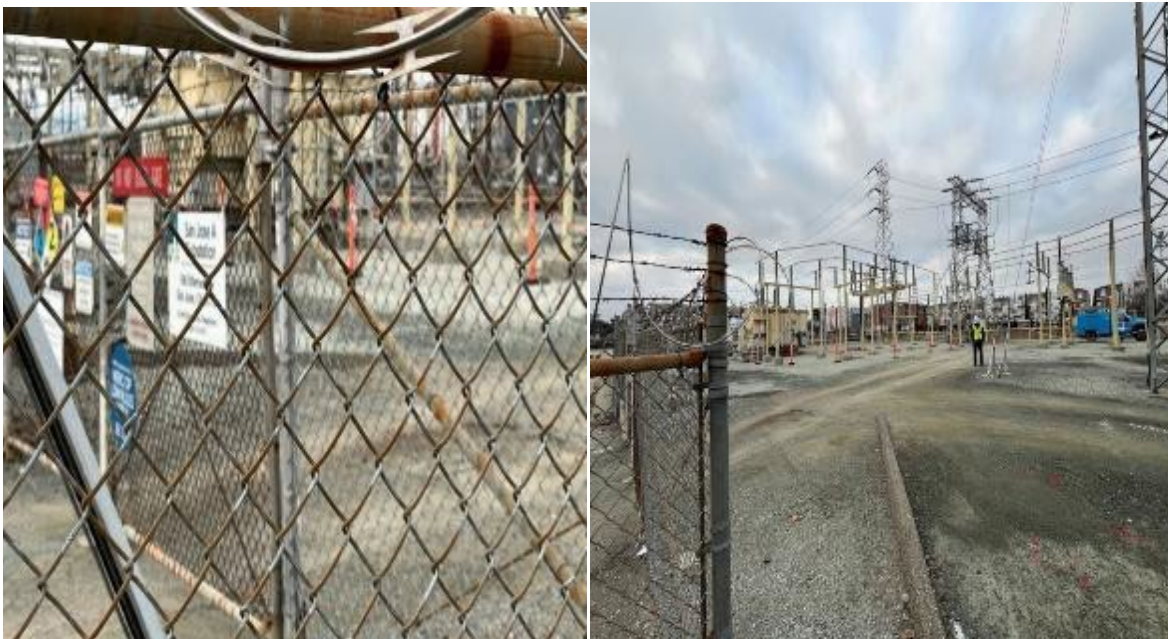
10.9 Perimeter Security Fence Signs Installed Inside Fence Existing LC Tag#130719763, Ground Rod Missing Northeast Corner Existing LC Tag#129390970.



PG&E Response:

We agree that the perimeter security fence signs are installed inside the fence and the ground rod is missing at San Jose A Substation. These nonconformances have pre-existing LC notifications, 130719763 (fence signs) and 129390970 (ground rod), that were established in our system of record, SAP, prior to the field audit. We do not agree that these findings qualify as a violation of GO 174, Rule 12 since these LC notifications are being worked in accordance with our maintenance procedures and is not past due.

10.10 Ground Rod Missing Entrance Gate Left Side Post



PG&E Response:

We agree that the ground rod is missing at the entrance gate (left side post) at San Jose A Substation. This nonconformance has a pre-existing LC notification, 129390970, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

11. San Jose B Substation

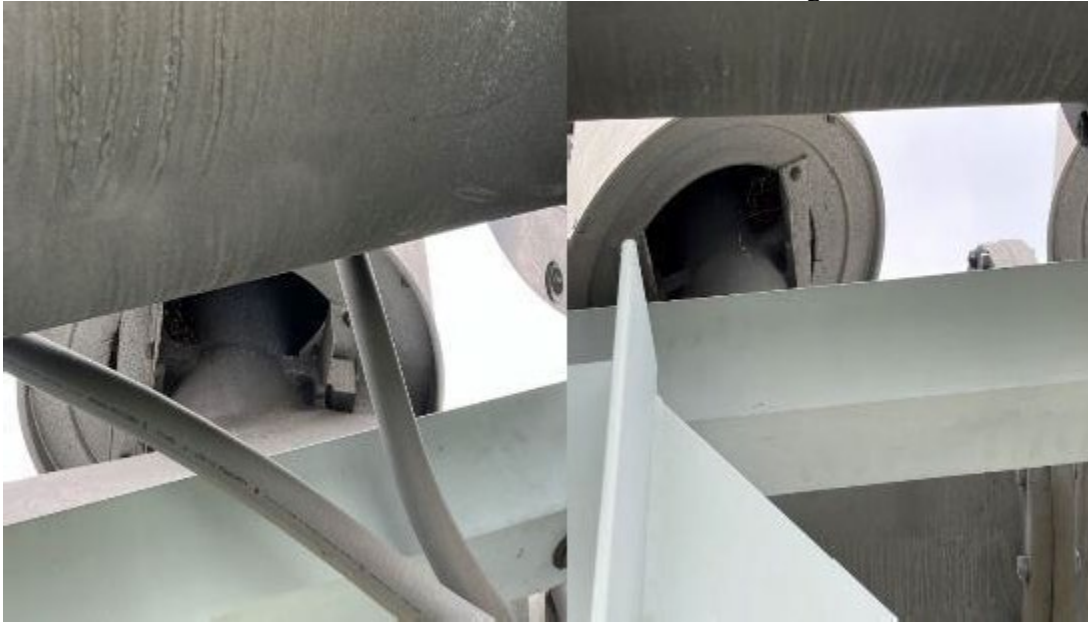
11.1 Circuit Breaker 142 has Faded Semaphore. Existing LC Tag#130791452.



PG&E Response:

We agree that Circuit Breaker 142 has a faded semaphore at San Jose B Substation. This nonconformance had a pre-existing LC notification, 130791452, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on February 24, 2025.

11.2 Circuit Breaker 182 has 2 Birds Nests Middle Bushing. PG&E Fixed in Field.



PG&E Response:

We agree with the finding of a bird's nest in the middle bushing of Circuit Breaker 182 at San Jose B Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

11.3 Circuit Breaker 162 Pressure Gauges Were Not Readable. Existing LC Tag#130791449 to Reinstall Pressure Gauges.



PG&E Response:

We agree that the pressure gauges on Circuit Breaker 162 were not readable at San Jose B Substation. This nonconformance had a pre-existing LC notification, 130791449, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and

completed on February 24, 2025.

11.4 Battery Room Fan Was Not Operational. Created New LC Tag#130806140.



PG&E Response:

We agree that the battery room fan was not operational at San Jose B Substation. We created LC notification 130806140, added it to the workplan, and completed it on February 21, 2025.

11.5 Transformer Bank 1 Wasp Nest. PG&E Fixed in Field.



PG&E Response:

We agree with the finding of a wasp nest on Transformer Bank 1 at San Jose B Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

11.6 Transformer Bank 2 Nitrogen Bottle Not Secured With 2nd Strap. PG&E Fixed in Field.



PG&E Response:

We agree with the finding that the nitrogen bottle on Transformer Bank 2 was not secured with a second strap at San Jose B Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

11.7 Transformer Bank 2 Oil Leak Mitigation Existing LC Tag#130791408, Oil Filter Not Running Existing LC Tag#129391900, Oil Residue on Conduit Existing LC Tag#129389768.



PG&E Response:

We agree that Transformer Bank 2 had an oil leak, the oil filter was not running, and there was oil residue on the conduit at San Jose B Substation. These nonconformance all had pre-existing LC notifications 130791408, 129391900, and 129389768, that were established in our system of record, SAP, prior to the field audit. We do not agree that any of these findings qualify as a violation of GO 174, Rule 12 since LC notification 130791408 was completed on March 30, 2025, and LC notification 129391900 was completed on February 24, 2025. LC notification 129389768 is being worked in accordance with our maintenance procedures and is not past due.

11.8 Transformer Bank 2 Animal Guard Damaged. Existing LC Tag#129390991.



PG&E Response:

We agree that the animal guard is damaged on Transformer Bank 2 at San Jose B Substation. This nonconformance has a pre-existing LC notification, 129390991, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

11.9 Transformer Bank 2 Fan Covers Rusted. Existing LC Tag#129389760.



PG&E Response:

We agree that the fan covers on Transformer Bank 2 are rusted at San Jose B Substation. This nonconformance has a pre-existing LC notification, 129389760, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174,

Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

11.10 Transformer Bank 3 Fan Not Working. Existing LC Tag#130791434.



PG&E Response:

The cited violation pertains to Pitt 7 Powerhouse and not San Jose B Substation. The correct LC notification for the referenced violation is 130791454. Nonetheless, we agree that the fan on Transformer Bank 3 was not working at San Jose B Substation. This nonconformance had a pre-existing LC notification, 130791454, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and completed on April 12, 2025.

11.11 Circuit Breaker 1110/2 Faded Counter. Existing LC Tag#128451938.



PG&E Response:

We agree that Circuit Breaker 1110/2 has a faded counter at San Jose B Substation. This nonconformance has a pre-existing LC notification, 128451938, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

12. Mabury Substation

12.1 Transformer Bank 2 Oil Leak Mitigation. Existing LC Tag#130535745.



PG&E Response:

We agree that Transformer Bank 2 had an oil leak at Mabury Substation. This nonconformance had a pre-existing LC notification, 130535745, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was being worked in accordance with our maintenance procedures and was completed on April 21, 2025.

12.2 Circuit Breaker 72 Oil Leak Mitigation. Existing LC Tag#129395916.



PG&E Response:

We agree that Circuit Breaker 72 has an oil leak at Mabury Substation. This nonconformance has a pre-existing LC notification, 129395916, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

12.3 Transformer Bank 1 Phase C Oil Leak Mitigation. Existing LC Tag#130732652.



PG&E Response:

We agree that Transformer Bank 1 C-Phase has an oil leak at Mabury Substation. This nonconformance has a pre-existing LC notification, 130732652, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

12.4 Transformer Bank 1 Phase B Oil Leak Mitigation. Existing LC Tag#130732701.



PG&E Response:

We agree that Transformer Bank 1 B-Phase has an oil leak at Mabury Substation. This nonconformance has a pre-existing LC notification, 130732701, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

12.5 Transformer Bank 1 Phase A Oil Leak Mitigation. Existing LC Tag#130732657



PG&E Response:

We agree that Transformer Bank 1 A-Phase has an oil leak at Mabury Substation. This nonconformance has a pre-existing LC notification, 130732657, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

12.6 Voltage Regulator 1 Fan Not Working.



PG&E Response:

We agree with the finding that the Voltage Regulator 1 Fan was not working at Mabury Substation. We created LC notification 130807635 and, added it to the workplan, and it was completed on April 12, 2025.

12.7 Battery Room Corrosion on Cells. Existing LC Tag#130713366.



PG&E Response:

We agree that the battery room had corrosion on cells at Mabury Substation. This nonconformance has a pre-existing LC notification, 130713366, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

12.8 Perimeter Security Fence Signs Installed Inside Fence.



PG&E Response:

We agree with the finding that the perimeter fence signs are installed on the inside of the fence at Mabury Substation. We created notification 130808062, added it to the workplan and it will be completed based on current work prioritization and material availability.

12.9 Perimeter Security Fence Ground Rod Missing Front Gate Right Side Post.



PG&E Response:

We agree with the finding that ground rods are missing on the perimeter fence at Mabury Substation. We created LC notification 130808060, added it to the workplan, and it will be completed based on current work prioritization and material availability.

12.10 Perimeter Security Fence Ground Rods Missing at Substation Back Corner Posts.



PG&E Response:

We agree with the finding that ground rods are missing on the perimeter fence at Mabury Substation. We created LC notification 130808060, added it to the workplan, and it will be completed based on current work prioritization and material availability.

13. Trimble Substation

13.1 Circuit Breaker 332 Oil Leak Hydraulic Line to Counter.



PG&E Response:

We agree that Circuit Breaker 332 has a hydraulic line oil leak at Trimble Substation. We created LC notification 131062030, added it to the workplan, and it will be completed based on current work prioritization and material availability.

13.2 Circuit Breaker 312 Oil Leak Hydraulic Line. Existing LC Tag#130712304.



PG&E Response:

The cited violation references Circuit Breaker 312, but the nonconformance was observed at Circuit Breaker 322. Nonetheless, we agree that Circuit Breaker 322 has a hydraulic line oil leak at Trimble Substation. This nonconformance has a pre-existing LC notification, 130712304, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

13.3 Transformer Bank 5 Birds Nest in Radiator. PG&E Fixed in Field.



PG&E Response:

We agree with the finding of a bird's nest in the radiator of Transformer Bank 5 at Trimble Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

13.4 Transformer Bank 3 Low Nitrogen Pressure. Existing LC Tag#130712672 PG&E Fixed in Field by adding Nitrogen to 0.5 psig.



PG&E Response:

The cited violation for LC notification 130712672 is incorrect as that LC notification is for Belmont Substation. The correct LC notification for the referenced violation is 130712674. Nonetheless, we agree that Transformer Bank 3 had low nitrogen pressure at Trimble Substation. This nonconformance had a pre-existing LC notification, 130712674, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and this issue was corrected onsite by PG&E QEW on the day of the field audit.

13.5 Rust on Fan Cover and Support Structure



PG&E Response:

We agree that there is the presence of rust on the fan cover and support structure at Trimble Substation. However, we do not agree that this finding qualifies as a violation of GO 174, Rule 12 as this level of rust does not warrant creation of an LC notification and does not pose a safety or reliability risk.

13.6 Transformer Bank 3 Oil Leak Mitigation. Existing LC Tag#130703901.



PG&E Response:

We agree that Transformer Bank 3 has an oil leak at Trimble Substation. This nonconformance has a pre-existing LC notification, 130703901, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

13.7 Transformer Bank 2 Oil Leak Mitigation at Filter. Existing LC Tag#130712699.



PG&E Response:

We agree that Transformer Bank 2 had an oil leak at Trimble Substation. This nonconformance had a pre-existing LC notification, 130712699, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and was completed on March 6, 2025.

13.8 Transformer Bank 1 Oil Leak Mitigation at Main Drain Valve. Existing LC Tag#130712698.



PG&E Response:

The listed LC notification, 130712698, is incorrect. The correct LC notification for the referenced violation is 129724698. We agree that Transformer Bank 1 had an oil leak at Trimble Substation. This nonconformance had a pre-existing LC notification, 129724698, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and was completed on February 19, 2025.

14. Milpitas Substation

14.1 Transformer Bank 1 Oil Leak Mitigation. Existing LC Tag#130712698.

**PG&E Response:**

The listed LC notification 130712698 is incorrect. The correct LC notification for the referenced violation is 130791392. Nonetheless, we agree that Transformer Bank 1 had an oil leak mitigation at Milpitas Substation. This nonconformance had a pre-existing LC notification, 130791392, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and was completed on April 2, 2025.

14.2 Transformer Bank 1 Desiccant Near End of Life Need Replacement



PG&E Response:

We agree with the finding that the Transformer Bank 1 desiccant is near the end of life and needs replacement at Milpitas Substation. We created LC notification 130828292, added it to the workplan, and this work completed on April 27, 2025.

14.3 Transformer Bank 2 Oil Left Corner of Transformer.



PG&E Response:

We agree with the finding that Transformer Bank 2 had oil on the left corner of the transformer at Milpitas Substation. We created LC notification 130828290, added it to the workplan, and it was completed on April 2, 2025.

14.4 Transformer Bank 3 Oil Leak Mitigation. Existing LC Tag#130116554.



PG&E Response:

We agree that Transformer Bank 3 had an oil leak at Milpitas Substation. This nonconformance had a pre-existing LC notification, 130116554, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on March 19, 2025.

14.5 Transformer Bank 4 Oil Left Corner of Transformer.



PG&E Response:

We agree with the finding that Transformer Bank 4 has oil on the left corner of the transformer at Milpitas Substation. We created LC notification 131181251, added it to the workplan, and it will be completed based on current work prioritization and material availability.

14.6 Transformer Bank 5 Low Nitrogen Pressure 0 psig. Existing LC Tag#128045443 dated 1/9/24 for possible Nitrogen Leak Repair. PG&E added Nitrogen to 0.5 psig in the field. Two most recent inspections on 10/10/24 and 12/5/24 had Nitrogen pressure inside transformer of 1.0 and 0.5 psig, respectively. Coupled with the 0 psig measurement on 1/30/25 supports a Nitrogen Leak in the transformer.



PG&E Response:

We agree that Transformer Bank 5 had a nitrogen leak at Milpitas Substation. This nonconformance had a pre-existing LC notification, 128045443, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on February 22, 2025.

14.7 The Security Perimeter Fence Southwest Corner Ground Wire Not Connected to New Fence Post.



PG&E Response:

We agree with the finding that the ground wire is not connected to the new fence post on the security perimeter fence at the southwest corner at Milpitas Substation. We created LC notification 130828291, added it to the workplan, and it will be completed based on current work prioritization and material availability.

15. Britton Substation

15.1 Battery had corrosion on terminal post of cells 60, 44 and 40. PG&E Fixed in Field.



PG&E Response:

We agree with the finding that the batteries had corrosion on the terminal post of cells 60, 44 and 40 at Britton Substation. This issue was corrected onsite by PG&E QEW on the day of the field audit.

15.2 Transformer Bank 1 Oil Leak Mitigation. Existing LC Tag#124733582.



PG&E Response:

The initial LC notification that we provided ESRB was incorrect. The correct LC notification is 130864093. We agree that Transformer Bank 1 has an oil leak at Britton Substation. We created LC notification 130864093, added it to the workplan, and it will be completed based on current work prioritization and material availability.

15.3 Transformer Bank 2 Oil Leak Mitigation. Existing LC Tag#130732362.



PG&E Response:

We agree that Transformer Bank 2 had an oil leak at Britton Substation. This nonconformance had a pre-existing LC notification, 130732362, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked on in accordance with our maintenance procedures and completed on March 10, 2025.

16. Monta Vista Substation

16.1 Upper Section of Substation 230 kV to 115 kV. Battery Corrosion Existing LC Tag#129789020.



PG&E Response:

We agree that there is battery corrosion at the upper section of substation 230kV to 115kV at Monta Vista Substation. This nonconformance had a pre-existing LC notification, 129789020, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification was worked in accordance with our maintenance procedures and completed on January 30, 2025.

16.2 230 kV Bus Support Structure Near Circuit Breaker 252 had Bird of Prey Nest. New LC Tag#130810650.



PG&E Response:

We agree with the finding of a bird's nest on the 230 kV bus support structure near Circuit Breaker 252 at Monta Vista Substation. We created LC notification 130810650, added it to the workplan, and it will be completed based on current work prioritization and material availability.

16.3 Transformer Bank 2 Had 6 Fans Not Working. Existing LC Tag#130116554.



PG&E Response:

The cited violation for LC notification 130116554 is incorrect as that notification is for Milpitas Substation. The correct LC notification is 130535742. We agree with the finding that Transformer Bank 2 has 6 fans that are not working at Monta Vita Substation. This nonconformance has a pre-existing LC notification, 130535742, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

16.4 Transformer Bank 2 Oil Leak Mitigation. Existing LC Tag#130777293.



PG&E Response:

We agree that Transformer Bank 2 has an oil leak at Monta Vista Substation. This nonconformance has a pre-existing LC notification, 130777293, that was established in our system of record, SAP, prior to the

field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

16.5 Transformer Bank 4 Oil Leak Mitigation. Existing LC Tag#130777294.



PG&E Response:

We agree that Transformer Bank 4 has an oil leak at Monta Vista Substation. This nonconformance has a pre-existing LC notification, 130777294, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

16.6 Transformer Bank 3 Fan Not Working. Existing LC Tag#130535715.



PG&E Response:

We agree that the fan on Transformer Bank 3 is not working at Monta Vista Substation. This nonconformance has a pre-existing LC notification, 130535715, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

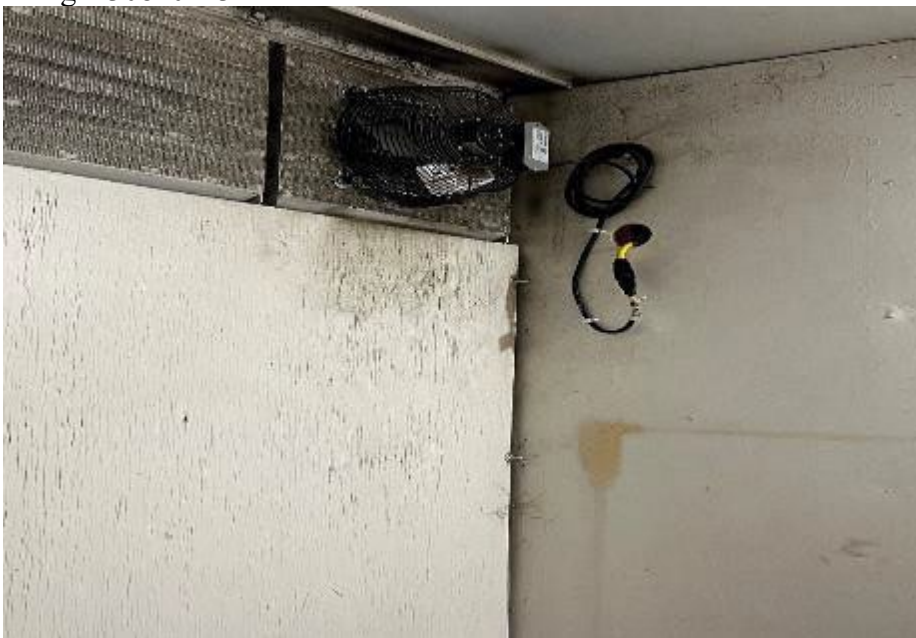
16.7 Transformer Bank 3 Oil Leak Mitigation. Existing LC Tag#130777299.



PG&E Response:

We agree that Transformer Bank 3 has an oil leak at Monta Vista Substation. This nonconformance has a pre-existing LC notification, 130777299, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.

16.8 Low Section of Substation 115 kV to 60 kV. Battery Room Fan Not Working. New LC Tag#130810113.



PG&E Response:

The cited violation LC notification 130810113 is incorrect. The correct LC notification is 130810112. We agree with the finding that the battery room fan is not working at Monta Vista Substation. We created LC notification 130810112, added it to the workplan, and it will be completed based on current work prioritization and material availability.

16.9 Perimeter Security Fence Signs Installed Inside Fence. Existing LC Tag#129531740.



PG&E Response:

We agree that the perimeter security fence signs are installed inside the fence at Monta Vista Substation. This nonconformance has a pre-existing LC notification, 129531740, that was established in our system of record, SAP, prior to the field audit. We do not agree that this finding qualifies as a violation of GO 174, Rule 12 since this LC notification is being worked in accordance with our maintenance procedures and is not past due.