

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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June 11, 2025

TA2025-1270

Jennifer Kaminsky
Manager – Electric Assets & Compliance
San Diego Gas and Electric (SDG&E)
8315 Century Park Court, Suite CP22B
San Diego, CA 92123

Subject: Transmission audit of SDG&E's Northeast District

Ms. Kaminsky:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Jose Lastra of my staff conducted a transmission audit of SDG&E's Northeast District from February 3-7, 2025. The audit included a review of SDG&E's inspection and maintenance records and a field inspection of SDG&E's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). Included with this letter is a copy of the audit findings that itemize the violations discovered during the audit. Please advise me no later than July 11, 2025, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Jose Lastra at (213) 507-1438 or jose.lastra@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosures: Audit Findings

Cc: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC
Jose Lastra, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Circuit facility inspection records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Tower Structure Analysis Records
- Safety hazard notifications.
- Intrusive test records
- SDG&E's documented inspection program.

II. Records Review – Violations List

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

GO 165, Section IV, Transmission Facilities, states:

Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines.

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.

SDG&E's records indicated that from January 2020 to December 2024, SDG&E completed 126 detailed inspections past SDG&E's scheduled due date.¹

¹ SDG&E completed 126 overhead detail inspections that exceeded the end of the calendar year in which the next inspection was due.

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

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

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

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.

SDG&E's records indicated that from January 2020 to December 2024, SDG&E completed 5 overhead work orders past SDG&E's scheduled due date for corrective action. Additionally, SDG&E completed 1 overhead work order that exceeded their own required due date for a secondary assessment. Finally, as of the date of the audit, SDG&E had 1 open overhead work order that was past SDG&E's scheduled due date for corrective action.

III. Field Inspections

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

No.	Structure ID.	Type of Structure	Location
1	Z12547	Pole	Escondido
2	Z12548	Pole	Escondido
3	Z215712	Pole	Escondido
4	Z114254	Pole	Escondido
5	Z114256	Pole	Escondido
6	Z211827	Pole	Escondido
7	Z212613	Pole	Escondido
8	207038S	Pole	Escondido
9	Z212612	Pole	Escondido
10	Z210912	Pole	Escondido
11	P412739	Pole	Escondido
12	Z111793	Pole	Escondido
13	Z411031	Pole	Escondido
14	Z111792	Pole	Escondido
15	Z111791	Pole	Escondido
16	Z317652	Pole	Escondido
17	P207036S	Pole	Escondido
18	Z254235	Engineered Steel Pole	Rincon
19	Z115187	Engineered Steel Pole	Rincon
20	Z14811	Engineered Steel Pole	Rincon
21	Z247132	Engineered Steel Pole	Rincon
22	Z416156, TL 6926	Engineered Steel Pole	Rincon
23	Z416156, TL 683	Engineered Steel Pole	Rincon
24	Z293922, TL 6926	Engineered Steel Pole	Rincon
25	Z416157, TL 683	Engineered Steel Pole	Rincon
26	Z416157, TL 6926	Engineered Steel Pole	Rincon
27	Z416158, TL 683	Engineered Steel Pole	Rincon
28	Z416158, TL 6926	Engineered Steel Pole	Rincon
29	Z518432	Direct Buried Steel Pole	Rincon
30	Z613528	Direct Buried Steel Pole	Rincon
31	Z518433	Direct Buried Steel Pole	Rincon
32	Z518434	Direct Buried Steel Pole	Rincon
33	Z518435	Direct Buried Steel Pole	Rincon
34	Z518436	Direct Buried Steel Pole	Rincon

35	Z518437	Direct Buried Steel Pole	Rincon
36	Z210492	Direct Buried Steel Pole	Rincon
37	Z12910	H-Frame	Escondido
38	Z714148	Direct Buried Steel Pole	Escondido
39	Z12917	Wood Pole	Escondido
40	Z415219	Wood Pole	Escondido
41	Z415206	Wood Pole	Escondido
42	P415209	Wood Pole	Escondido
43	Z12919	Wood Pole	Escondido
44	P414865	Wood Pole	Escondido
45	P316115	Wood Pole	Escondido
46	Z13318	Wood Pole	Escondido
47	Z12920	Wood Pole	Escondido
48	Z13317	Wood Pole	Escondido
49	Z12921	Wood Pole	Escondido
50	Z13316	Wood Pole	Escondido
51	Z12922	Direct Buried Steel Pole	Escondido
52	Z13315	Direct Buried Steel Pole	Escondido
53	Z12923	Direct Buried Steel Pole	Escondido
54	Z219553	Direct Buried Steel Pole	Escondido
55	U108681	Vault	Escondido
56	Z203303, TL 6930	Engineered Steel Pole	Escondido
57	Z203303, TL 679	Engineered Steel Pole	Escondido
58	Z202020	Engineered Steel Pole	Escondido
59	Z202015, TL 23014	Engineered Steel Pole	Escondido
60	Z202015, TL 23015	Engineered Steel Pole	Escondido
61	Z198359, TL 689	Engineered Steel Pole	Escondido
62	Z198359, TL 6934	Engineered Steel Pole	Escondido
63	M121049	Vault	Escondido
64	Z202018	Engineered Steel Pole	Escondido
65	Z202012, TL 23011	Engineered Steel Pole	Escondido
66	Z202012, TL23072	Engineered Steel Pole	Escondido
67	U610865	Vault	Escondido
68	Z198360	Engineered Steel Pole	Escondido
69	U108684	Vault	Escondido
70	M121048	Vault	Escondido
71	U108863	Vault	Escondido
72	Z202014, TL 23015	Engineered Steel Pole	Escondido

73	Z202014, TL 23014	Engineered Steel Pole	Escondido
74	M121047	Vault	Escondido
75	Z473549, TL 13820	H-Frame	San Diego - Scripps Ranch
76	Z873142, TL 23051	Engineered Steel Pole	San Diego - Scripps Ranch
77	Z873142, TL 6920	Engineered Steel Pole	San Diego - Scripps Ranch
78	Z873141, TL 6920	Engineered Steel Pole	San Diego - Scripps Ranch
79	Z873141, TL 23051	Engineered Steel Pole	San Diego - Scripps Ranch
80	Z473548, TL 13820	H-Frame	San Diego - Scripps Ranch
81	Z473547, TL 13820	H-Frame	San Diego - Scripps Ranch
82	Z873140, TL 6920	Engineered Steel Pole	San Diego - Scripps Ranch
83	Z873140, TL 23051	Engineered Steel Pole	San Diego - Scripps Ranch
84	Z473546, TL 13820	H-Frame (3 pole)	San Diego - Scripps Ranch
85	Z473545, TL 13820	H-Frame	San Diego - Scripps Ranch
86	Z873139, TL 23051	Engineered Steel Pole	San Diego - Scripps Ranch
87	Z873139, TL 6920	Engineered Steel Pole	San Diego - Scripps Ranch
88	Z473544, TL 13820	H-Frame	San Diego - Scripps Ranch
89	Z112695, TL 616	Engineered Steel Pole	Rancho Santa Fe
90	Z610123, TL 13804	Direct Buried Steel Pole	Rancho Santa Fe
91	Z519187, TL 13804	Engineered Steel Pole (H-Frame)	Rancho Santa Fe
92	Z519758, TL 23004	Steel Lattice Tower	Rancho Santa Fe
93	Z519758, TL 23001	Steel Lattice Tower	Rancho Santa Fe

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections portion of the audit.

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.

Pole Z212612 had a 3 ft deep hole, partially exposing the base

GO 95, Rule 51.6, Marking and Guarding, High Voltage Marking of Poles, states in part:

Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words “HIGH VOLTAGE”, or pair of signs showing the words “HIGH” and “VOLTAGE”, not more than six (6) inches in height with letters not less than 3 inches in height. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.

The high voltage signs on each of the following SDG&E poles were damaged:

- Z415219
- Z13317
- Z473544
- Z415206
- Z13316
- Z13318
- Z473547

GO 95, Rule 54.6-B, Ground Wires, states in part:

That portion of the ground wires 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 (see Rule 22.8).

The ground moulding attached to Pole Z12917 was damaged.