

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 11, 2025

TA2025-1271

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 Beach Cities District

Ms. Kaminsky:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Kyle King of my Staff conducted a transmission audit of SDG&E's Beach Cities District on April 21-25, 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). A copy of the audit findings itemizing the violations is enclosed. 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 Kyle King at (213) 222-3260 or Kyle.King@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

Enclosure: 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, Supervisor, ESRB, CPUC
Kyle King, Utilities Engineer, ESRB, 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, Standards for Inspection, states:

Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines. Each utility shall maintain records of inspection and maintenance activities. Commission staff shall be permitted to inspect records and procedures consistent with Public Utilities Code Section 314 (a).

GO 95, Rule 31.2, Inspection of Lines, states in part:

Lines shall be inspected frequently and thoroughly for the purpose of insuring that they are in good condition so as to conform with these rules.

SDG&E's records indicate that from January 2023 to March 2025, SDG&E completed 31 overhead detailed inspections past SDG&E's scheduled due date.

GO 165, Section IV, Standards for Inspection, states:

Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines. Each utility shall maintain records of inspection and maintenance activities. Commission staff shall be permitted to inspect records and procedures consistent with Public Utilities Code Section 314 (a).

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 these rules.

SDG&E's records indicate that from January 2023 to March 2025, SDG&E completed 24 underground detailed inspections past SDG&E's scheduled due date.

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 2023 to March 2025, SDG&E did not complete 438 overhead work orders by SDG&E's own scheduled due date for corrective action.

III. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	Z96115	Pole	San Diego
2	Z96114	Pole	San Diego
3	Z96113	Pole	San Diego
4	Z96112	Pole	San Diego
5	Z96111	Pole	San Diego
6	Z91814	Pole	San Diego
7	Z92625	Pole	San Diego
8	Z91815	Pole	San Diego
9	Z91816	Pole	San Diego
10	Z731124	Pole	San Diego
11	Z96117	Pole	San Diego
12	Z96116	Pole	San Diego
13	Z96118	Pole	San Diego
14	Z731128	Pole	San Diego
15	Z96119	Pole	San Diego
16	Z731127	Pole	San Diego
17	Z679568	Pole	San Diego
18	Z731125	Pole	San Diego
19	Z91812	Pole	San Diego
20	Z731126	Pole	San Diego
21	Z91811	Pole	San Diego
22	Z96121	Pole	San Diego
23	Z91810	Pole	San Diego
24	Z91809	Pole	San Diego
25	Z191709	Pole	San Diego
26	Z91808	Pole	San Diego
27	Z91806	Pole	San Diego
28	Z93401	Pole	San Diego
29	Z93402	Pole	San Diego
30	Z93403	Pole	San Diego
31	Z93405	Pole	San Diego
32	Z731129	Pole	San Diego
33	Z96450	Pole	San Diego
34	Z96451	Pole	San Diego
35	Z96452	Pole	San Diego
36	Z96453	Pole	San Diego
37	Z96669	Pole	San Diego
38	Z91116	Pole	San Diego
39	Z94531	Pole	San Diego
40	Z91117	Pole	San Diego
41	Z91118	Pole	San Diego
42	Z91119	Pole	San Diego
43	Z91120	Pole	San Diego

44	Z91121	Pole	San Diego
45	U100226	Underground Vault	San Diego
46	U100227	Underground Vault	San Diego
47	U100225	Underground Vault	San Diego
48	U100221	Underground Vault	San Diego
49	Z33229	Pole	San Diego
50	Z33239	Pole	San Diego
51	Z95912	Lattice Tower	San Diego
52	U100223	Underground Vault	San Diego
53	U100224	Underground Vault	San Diego
54	U100221	Underground Vault	San Diego
55	M101386	Underground Vault	San Diego
56	U120750	Underground Vault	San Diego
57	Z479537	Pole	San Diego
58	Z479007	Pole	San Diego
59	Z479576	Pole	San Diego
60	Z479006	Pole	San Diego
61	Z479538	Pole	San Diego
62	Z479008	Pole	San Diego
63	Z479009	Pole	San Diego
64	Z479539	Pole	San Diego
65	Z479010	Pole	San Diego
66	Z479542	Pole	San Diego
67	Z479012	Pole	San Diego
68	Z479013	Lattice Tower	San Diego
69	Z479543	Lattice Tower	San Diego
70	Z479014	Lattice Tower	San Diego
71	Z479544	Lattice Tower	San Diego
72	Z479015	Lattice Tower	San Diego
73	Z479545	Lattice Tower	San Diego
74	Z479016	Lattice Tower	San Diego
75	Z479546	Lattice Tower	San Diego
76	Z835576	Pole	San Diego
77	Z731247	Pole	San Diego
78	Z731246	Pole	San Diego
79	Z731243	Pole	San Diego
80	Z731244	Pole	San Diego
81	Z730723	Pole	San Diego
82	Z2053769892	Pole	San Diego
83	Z730782	Pole	San Diego
84	Z730760	Pole	San Diego
85	Z730722	Pole	San Diego
86	Z731295	Pole	San Diego
87	Z731283	Pole	San Diego
88	Z2069269952	Pole	San Diego
89	Z730767	Pole	San Diego
90	Z730769	Pole	San Diego
91	Z730773	Pole	San Diego
92	Z730764	Pole	San Diego

93	Z730774	Pole	San Diego
94	Z730770	Pole	San Diego
95	Z2317769649	Pole	San Diego
96	Z2318369676	Pole	San Diego
97	Z2319069703	Pole	San Diego
98	Z2319569729	Pole	San Diego
99	Z2320469755	Pole	San Diego
100	Z2321369790	Pole	San Diego
101	Z2321669860	Pole	San Diego
102	Z730203	Pole	San Diego
103	Z730204	Underground Vault	San Diego
104	Z2326369873	Underground Vault	San Diego
105	Z730205	Underground Vault	San Diego
106	Z2326369930	Pole	San Diego
107	Z731426	Pole	San Diego
108	Z2317269629	Pole	San Diego
109	Z730260	Pole	San Diego
110	Z2315069594	Pole	San Diego
111	Z2315369647	Pole	San Diego

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection portion of the audit:

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 sign on Pole Z96118 was damaged.