

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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January 13, 2026

TA2025-1326

Jon Moulton
Managing Director, Power Delivery Asset Management
Pacificorp, Pacific Power
North Temple Office, Room #275,
Salt Lake City, UT

SUBJECT: Electric Transmission Audit Report for PacifiCorp Klamath Falls Division

Mr. Moulton:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Nora Nguyen, Samuel Mandell, and Javier Ochoa Reyes of ESRB staff conducted an electric transmission audit of PacifiCorp's Klamath Falls Division from October 20, 2025 through October 24, 2025. During the audit, ESRB staff conducted field inspections of PacifiCorp's transmission facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than February 13, 2026, by electronic copy of all corrective actions and preventive measures taken by PacifiCorp to correct the identified violations and prevent the recurrence of such violations.

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

If you have any questions concerning this audit, please contact Nora Nguyen at (628) 255-0111 or nora.nguyen@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink.

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

Enclosure: CPUC Electric Transmission Audit Report for PacifiCorp Klamath Falls Division

Cc: Lee Palmer, Deputy Executive Director, Safety and Enforcement Division (SED), Safety Policy Division, Water Division, CPUC
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Brian Pagel, Director, Asset Planning Manager, PacifiCorp
Travis Rocha, Field Inspection Support Manager, PacifiCorp

PacifiCorp Klamath Falls Division
Electric Transmission Audit Findings
October 20 – October 24, 2025

I. Records Review

During the audit, ESRB staff reviewed the following records:

- A map and general description of PacifiCorp's Klamath Falls transmission system.
- List of all Klamath Falls Division transmission circuits and facilities.
- PacifiCorp's Detailed Inspections for T & D Lines, Asset Management Policy No. 009, Revision R14 (1/22/2025)
- PacifiCorp's Visual Assurance Inspections – Safety Patrol of Transmission and Distribution Lines, Asset Management Policy No. 011, Revision R15 (2/25/2025)
- PacifiCorp's Wood Pole Test & Treatment Transmission and Distribution Lines, Asset Management Policy No. 013, Revision 22 (1/22/2025)
- PacifiCorp's Clearance Table, Grandfathering Matrix, FAQ and Dropdown Codes, Policy No. 069, Revision 28 (12/20/2024)
- PacifiCorp's Helicopter Standard Operating Procedure for Line Inspections, Facility Inspection Procedure No. 203, Revision 3 (1/8/2018)
- PacifiCorp's Transmission and Distribution System Condition Priorities and Correction Timeframes, Asset Management Procedure No. 292, Revision 4 (1/22/2025)
- PacifiCorp 2025 GO95 Training Manual (12/16/2024)
- PacifiCorp 2025 GO95 Transmission Training Guide
- PacifiCorp Inspection Records January 1, 2020 to August 8, 2025
- PacifiCorp Work Order Records from August 25, 2021 to August 25, 2025
- PacifiCorp Qualification/ Certification and Training Records for Field Inspection and Vegetation Management Employees/ Contractors
- PacifiCorp Drone Procedure Guide, Version 1.1 (10/12/2023)
- PacifiCorp Vegetation Management Records from August 25, 2023 to August 25, 2025
- PacifiCorp Transmission & Distribution Vegetation Management Program, Standard Operating Procedures, Revision 8 (8/29/2024)
- Samples of PacifiCorp Klamath Falls Transmission Pole Replacements from August 25, 2023 to August 25, 2025
- PacifiCorp Pole Loading Calculation Records from August 25, 2023 to August 25, 2025

II. Records Violations

ESRB staff found the following violations during the records review portion of the audit:

1. General Order (GO) 95, Rule 18-B, Maintenance Programs states in part:

“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.

(a) The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

- (i) Level 1 -- An immediate risk of high potential impact to safety or reliability:*
 - Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
- (ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*
 - Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*
- (iii) Level 3 -- Any risk of low potential impact to safety or reliability:*
 - Take corrective action within 60 months subject to the exception specified below.”*

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

“Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

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

PacifiCorp's Transmission and Distribution System Condition Priorities and Correction Timeframes, Asset Management Policy No. 292 establishes due dates for corrective actions in California. Table 1 shows the most updated version that includes Priority I, added in May 2024, to indicate immediate action required.

Table 1. PacifiCorp Correction Time Periods for California

GO 95 Priority	Company Priority	Energy Release Risk ¹	CA Suggested Correction Period			GO 95 Compliance Requirements ²		
			Non-Tier	Tier 2	Tier 3	Non-Tier	Tier 2	Tier 3
Level 1	I ³	All	Immediately	Immediately	Immediately	Immediately	Immediately	Immediately
Level 2	A	Y	30 days	30 days	30 days	12 months	12 months	6 months
	A	N	30 days	30 days	30 days	12 months	12 months	12 months
Level 2	B	Y	36 months	6 months	6 months	36 months	12 months	6 months
	B	N	36 months	36 months	36 months	36 months	36 months	36 months
Level 3	C	N	36 months	36 months	36 months	60 months	60 months	60 months

ESRB staff reviewed work orders created within PacifiCorp's Klamath Falls Division from August 25, 2021 to August 25, 2025 and determined that PacifiCorp did not address a total 51 of 550 work orders by their required assigned due date (9.3%). Table 2 below breaks down the 51 late work orders by their assigned priority, including the total number of late work orders completed, open (pending completion), and removed work orders, which are included in the total.

Table 2. Number of Late Work Orders by Priority and Type

Priority Code	Late Closed Conditions	Late Open Conditions ⁴	Late Removed Conditions	Total Late Conditions
I	0	0	0	0
A	0	0	0	0
B	19	26	6	51
C	0	0	0	0
Total	19	26	6	51

Table 3 shows the most overdue open notifications.

¹ Energy Release Risks are determined and distinguished in Procedure 069. These conditions may pose a fire risk

² Compliance period in accordance with GO 95. "A" priority may compromise worker safety and correction period is shown as 12 months instead of 36 months. Before June 30, 2019, when the correction time periods were modified to account for the High Fire Threat District, correction time period was immediately for Level 1 and 59 months for Level 2. No time period was established for Level 3 priorities.

³ Imminent Threat conditions were created May 2024 to differentiate conditions that require immediate repair.

⁴ Open Late Conditions were based on August 25, 2025, determined by the max range of the requested work order data.

Table 3. Most Overdue Pending Notifications

Priority Code	Notification Number	Creation Date	Due Date	Days Late ⁵
B	715148266-52759-ADMIN-03_31_2022-INSULDMG-1	3/31/2022	3/31/2025	147
B	341937059-68059-DETAIL-06_28_2022-GO95MLD-1	6/28/2022	6/30/2025	56
B	427015438-5969-DETAIL-06_28_2022-GO95MLD-1	6/28/2022	6/30/2025	56
B	85379488-49520-DTLTRT-06_28_2022-GO95MLD-1	6/28/2022	6/30/2025	56

PacifiCorp commented in the Pre-Audit Data Request (PADR) response that the condition completion was deferred due to waiting for safe access in spring/summer 2025. PacifiCorp cited fire encroachments, de-energization of transmission lines, and lack of available resources as reasons for preventing completion at the time. PacifiCorp plans to complete all late outstanding conditions by 12/31/2025.

2. GO 165, Section IV, Transmission Facilities states in part:

“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).”

Table 4. Past Due Inspections and Patrols by Type

Inspection Type	Inspections Past Due Date	Total Percent Past Due Inspections
Patrol	1	0.004%
Detailed	690	35.5%
Intrusive	27	1.7%

Table 4 shows the number of late inspections performed after the assigned inspection interval cycle passed. ESRB’s analysis of PacifiCorp’s inspection records utilizes a 2-year cycle for patrol inspections, 5-year cycle between detailed inspections, and 20-year cycle for intrusive, as required by GO 165, Section IV and PacifiCorp’s Policy 001. ESRB notes that current PacifiCorp Policy 001, updated

⁵ Days late are determined to be the difference between August 25, 2025 and the Corrective Action Due Date.

May 5, 2025, requires patrol (visual assurance) inspections follow a 1-year cycle. The late inspections in Table 4 reflect the inspection intervals used during the relevant audit range.

3. GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

“(2) Where a communications company’s or an electric utility’s (Company A’s) actions result in potential violations of GO 95 for another entity (Company B), that entity’s (Company B’s) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.”

In the Pre-Audit Data Request response, PacifiCorp did not provide any records of outgoing or incoming third-party notifications. PacifiCorp stated that they “did not send out any third-party Level One Hazards during the specified period in the request... [and] has never received a safety notification from another entity in California.” During the field portion of the audit, ESRB and PacifiCorp observed multiple GO 95 violations by third-party utility companies. For example, an unidentified cable company transferred their facilities to a replacement pole but left the buddy pole and abandoned wires behind, violating GO 95, Rule 31.6, Abandoned Lines. At present, PacifiCorp only notifies a third-party when the violation creates a “Level One Hazard.” However, all potential GO violations require PacifiCorp to send a documented notice to the third-party within 180 days of the discovery. PacifiCorp should remediate their procedure to include all potential third-party violations as reportable pursuant to GO 95, Rule 18-A.

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities:

Table 5. Audit Locations

Location Number	ID	Circuit	Latitude / Longitude
1	2/7	668004/02	(41.8783628, -121.9959885)
2	3/7	668004/02	(41.8774087, -121.9960147)
3	4/7	668004/02	(41.8764231, -121.9960006)
4	27/24	668004/00	(41.9669939, -121.9110752)
5	28/24	668004/00	(41.9670467, -121.9099781)
6	29/24	668004/00	(41.9670554, -121.9088600)
7	1/25	668004/00	(41.9670447, -121.9076657)
8	2/25	668004/00	(41.9670485, -121.9064748)
9	14/14	668041/00	(41.8689554, -121.7100637)
10	13/14	668041/00	(41.8690715, -121.7111641)
11	12/14	668041/00	(41.8691601, -121.7122624)
12	11/14	668041/00	(41.8692555, -121.7133471)
13	10/14	668041/00	(41.8693421, -121.7144417)
14	18/2	668005/03	(41.9980580, -121.5641153)
15	1/3	668005/03	(41.9971962, -121.5641492)
16	1X/3	668005/03	(41.9968857, -121.5641582)
17	5/27	668041/00	(41.9536902, -121.5337054)
18	6/27	668041/00	(41.9536810, -121.5325467)
19	9/29	668041/00	(41.9537271, -121.4897310)
20	3/25	668005/00	(41.9970197, -121.4105411)
21	3A/25	668005/00	(41.9970123, -121.4096992)
22	4/25	668005/00	(41.9970035, -121.4089301)
23	5/25	668005/00	(41.9969871, -121.4084530)
24	6/25	668005/00	(41.9969896, -121.4073942)

Location Number	ID	Circuit	Latitude / Longitude
25	7/25	668005/00	(41.9969789, -121.4062911)
26	8/25	668005/00	(41.9962942, -121.4062901)
27	8/28	668005/00	(41.9545103, -121.4062948)
28	9/28	668005/00	(41.9538231, -121.4062717)
29	10/28	668005/00	(41.9530878, -121.4063012)
30	11/32	668005/00	(41.9002764, -121.3985365)
31	10/32	668005/00	(41.9009789, -121.3985791)
32	9/32	668005/00	(41.9016307, -121.3985600)
33	8/32	668005/00	(41.9023492, -121.3985818)
34	3/15	668064/00	(41.7955294, -121.2959746)
35	5/20	668064/00	(41.7195197, -121.2904405)
36	7/63	668005/00	(41.5295009, -121.1221808)
37	8/63	668005/00	(41.5291317, -121.1204089)
38	13/22	668036/00	(41.9140920, -120.3287794)
39	12/22	668036/00	(41.9150460, -120.3284012)
40	5/23	668036/00	(41.9074957, -120.3317674)
41	6/23	668036/00	(41.9064091, -120.3322649)
42	7/23	668036/00	(41.9053985, -120.3327722)
43	10/32	668036/00	(41.7825038, -120.3713065)
44	9/32	668036/00	(41.7835071, -120.3720283)
45	5/53	668036/00	(41.5245168, -120.4793090)
46	10/54	668036/00	(41.5111332, -120.4953794)
47	9/54	668036/00	(41.5114216, -120.4942921)
48	8/54	668036/00	(41.5118025, -120.4931978)
49	7/54	668036/00	(41.5121419, -120.4921108)
50	10/98	668005/00	(41.5009919, -120.5335550)
51	9/98	668005/00	(41.5015838, -120.5333739)
52	11/97	668005/00	(41.5054355, -120.5446073)
53	10/97	668005/00	(41.5054210, -120.5454365)

Location Number	ID	Circuit	Latitude / Longitude
54	9/97	668005/00	(41.5054127, -120.5464131)
55	8/95	668005/00	(41.4961196, -120.5738904)
56	9/95	668005/00	(41.4969463, -120.5738883)
57	8/94	668005/00	(41.4885850, -120.5799012)
58	7/94 but ID in field was 7/95	668005/00	(41.4885702, -120.5809576)
59	8/93	668005/00	(41.4879641, -120.5990964)
60	7/93	668005/00	(41.4879265, -120.6000509)
61	4/92	668005/00	(41.4846850, -120.6233868)
62	3/92	668005/00	(41.4843776, -120.6247782)
63	6 /84	668005/00	(41.4644913, -120.7593105)
64	5/84	668005/00	(41.4643820, -120.7597859)

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

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

“Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

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.”

Table 6. GO 95, Rule 31.1 Violations

Location	Violation Description
2	Pole identification marker is broken.
7	Broken cross arm brace at distribution level. There is an existing work order.
12	Pole identification marker is broken.
16	Broken ground moulding on distribution level.
20	Broken ground moulding.
25	There is a birds' nest near the primary jumper at the distribution level.
31	Missing insulating bob on down guy due to proximity to primary conductor. There is an existing work order.
37	Pole identification marker is missing.
41	Pole identification marker is broken.
50	Pole identification marker is broken.
55	Exposed ground from detached moulding. There is a late existing work order due 8/31/2025.
58	Pole identification marker is incorrect. Pole is 7/94 but ID in field was 7/95.
63	Down guy insulator does not meet minimum clearance from distribution. Pole is set to be replaced.

2. GO 95, Rule 51.6-A, High Voltage Marking states in part:

“Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words

“HIGH VOLTAGE”, or pair of signs showing the words “HIGH” and “VOLTAGE”, not more than six (6) inches in height with letters not less than 3 inches in height. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.

The top of such sign(s) shall be located between the level of the lowest line conductor, energized in excess of 750 volts, on the pole to no more than 40 inches below that conductor level.”

Table 7. GO 95, Rule 51.6-A Violations

Location	Violation Description
12	Missing high voltage sign.
13	Missing high voltage sign.
16	Missing high voltage sign.
20	Missing high voltage sign.
22	Broken high voltage sign at distribution level.
37	Missing high voltage sign.
39	Missing high voltage sign.
40	Missing high voltage sign.
41	Missing high voltage sign.
42	Missing high voltage sign.
48	High voltage sign is installed too low; approximately 10 feet below conductor.
50	Missing high voltage sign.
55	Missing high voltage sign.
56	Missing high voltage sign.
57	Missing high voltage sign.
58	Missing high voltage sign.
59	Missing high voltage sign. Pole is set to be replaced.
62	Missing high voltage sign.
63	Missing high voltage sign. Pole is set to be replaced.
64	Missing high voltage sign. Pole is set to be replaced.

3. GO 95, Rule 59.4-A, Grounding, states in part:

“The grounding conductor from each ground rod to the base of the pole shall not be less than 1 foot below the surface of the ground.”

Table 8. GO 95, Rule 59.4-A Violations

Location	Violation Description
33	Exposed ground rod
57	Exposed ground rod. There is a late existing work order due 8/31/2025.

4. GO 95, Rule 61.6-A, Marking states in part:

“All towers shall be equipped with signs designed to warn the public of the danger of climbing same. Additionally, such signs shall include a graphic depiction of the dangers of falling or electrocution associated with climbing the towers. Such signs shall be placed and arranged so that they may be read from the four corners of the tower.”

Table 9. GO 95, Rule 61.6-A Violation

Location	Violation Description
35	Warning sign on lattice structure is detached; found nearby on ground.

5. GO 95, Rule 18-B, Maintenance Programs states in part:

“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules.”

PacifiCorp shall provide ESRB with a plan to correct each of the findings noted above.

V. Third Party Violations and Observations

1. GO 95, Rule 18, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property...”

GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

“(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO 95.”

ESRB observed the following third-party violations during the field portion of the audit.

Table 10. GO 95, Rule 18 Third-Party Violations

Location	Violation Description
46	Frontier fiber line is outside the riser and exposed.
52	Missing down guy marker for electric distribution belonging to Surprise Valley Electric Co.
54	Foreign antenna attached to pole.
56	Unknown cable company buddy pole and abandoned wires.