STATE OF CALIFORNIA GAVIN C. NEWSOM., *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 7, 2026 TA2025-1399

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

SUBJECT: Electric Transmission Audit of PG&E Eureka Headquarters (HQ)

Mr. Kushner:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez and Nora Nguyen of ESRB conducted an electric transmission audit of PG&E's Eureka HQ from August 5-7, 2025. During the audit, ESRB staff conducted field inspections of PG&E'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 5, 2026**, by electronic copy of all corrective actions and preventive measures taken by PG&E to correct the identified violations and prevent the recurrence of such violations.

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

If you have any questions concerning this audit, please contact Brandon Vazquez at (628) 249-2867 or Brandon.Vazquez@cpuc.ca.gov.

Sincerely,

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

Enclosure: CPUC Electric Transmission Audit Report for PG&E Eureka HQ

Cc: Lee Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy, and Water, CPUC
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CPUC AUDIT FINDINGS
PG&E EUREKA TRANSMISSION HQ
AUGUST 5-7, 2025

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) reviewed the following records:

- PG&E's Electric Transmission Preventive Maintenance (ETPM) Manual, TD-1001M, Effective June 2020-June 2025.
- PG&E's utility procedures, standards, guidelines, and job aids for electric transmission facility inspections.
- PG&E Eureka HQ transmission facilities statistics.
- PG&E Eureka HQ Service Territory Map and list of all transmission facilities owned or jointly-owned by PG&E.
- Patrol, detailed, aerial, climbing, infrared, drone, and helicopter inspection records from June 2020-June 2025.
- Third Party Safety Hazard notifications sent and received from June 2020-June 2025.
- PG&E's utility procedures, standards, guidelines, and job aids for electric transmission vegetation management.
- A list of vegetation management inspection records and tree work orders for transmission circuits from June 2020-June 2025.
- PG&E's policies and procedures related to transmission right-of-way maintenance, and associated performance records from June 2021-June 2025.
- PG&E's policies and procedures for insulator washing, and associated performance records from June 2021-June 2025.
- PG&E's policies and procedures for pole intrusive tests, foundation tests, and all other tests related to transmission structure safety, and associated performance records from June 2021-June 2025.
- A list of non-routine patrols for electric transmission facilities from June 2020-June 2025.
- PG&E's policies and procedures for assigning priority levels to transmission deficiencies from June 2021-June 2025.
- A list of all open, closed, and canceled Line Corrective (LC) notifications from June 2021-June 2025.
- Pole loading and safety factor calculations completed from June 2024-June 2025.
- New construction projects completed from June 2024-June 2025.
- PG&E's utility standard and procedures for transmission work verification and vegetation management quality control (QC) and quality assurance (QA).
- The results of all internal quality management audits from June 2020-June 2025.
- A list of PG&E inspector training records and courses from June 2020-June 2025.

II. Records Violations

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

1. **General Order (GO) 95, Rule 18-B1(a), Maintenance Programs** states in part:

> *"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."*

PG&E's ETPM and Utility Procedure TD-8123P-103 establish when corrective actions for safety hazards and infractions must be completed. For the time period ESRB reviewed, only the most recent version, Revision 5 [1], of the ETPM is applicable. Priority Codes and associated due dates for corrective actions as defined by the ETPM, Rev. 5 are listed in Table 1. Additionally, PG&E Utility Procedure TD-8123P-103, Rev. 0 and Rev. 1, provide guidance for setting priority codes effective January 3, 2023 through March

[1] Revision date: 8/31/2020

17, 2025 [2], shown in Table 2. Finally, PG&E Utility Procedure TD-8123P-103, Rev. 2, provides updated guidance for setting priority codes effective March 18, 2025, listed in Table 3.[3]

Table 1: PG&E ETPM TD-1001M, Rev. 5, Priority Codes through 1/2/2023

Priority Code[4]	Priority Description
A[5]	The condition is urgent and requires **immediate** response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date will be 30 days to allow time for post-construction processes and notification close-out.
B [6]	Corrective action is required within **3 months** from the date the condition is identified. The condition must be reported to the transmission line supervisor as soon as practical.
E	Corrective action is required within **12 months** from the date the condition is identified. ***EXCEPT FOR ITEMS WITHIN HFTD TIER 3 ARE REQUIRED WITHIN 6 MONTHS.***[7]
F	Corrective action is recommended within **24 months** from the date the condition is identified, (due beyond 12 months, not to exceed 24 months). ***EXCEPT FOR ITEMS WITHIN HFTD TIER 3 ARE REQUIRED WITHIN 6 MONTHS AND WITHIN HFTD TIER 2 ARE REQUIRED WITHIN 12 MONTHS.***[8]

[2] Rev. 0 published and effective 1/3/2023, Rev. 1 published and effective 1/1/2024.
[3] Rev. 2 published 2/6/2025, effective 3/18/2025.
[4] Refer to 2.3.5.2, "Priority Code Due Dates for High Fire Risk Conditions within HFTDs" and 2.3.5.3, "Priority Code Due Dates for Non-Fire Risk Conditions within HFTDs."
[5] Footnote from the ETPM: "QCRs must report immediately any "Priority Code A" abnormal condition to the transmission line supervisor, and the transmission supervisor or QCR contacts GCC."
[6] Footnote from the ETPM: "In addition, QCRs must report any "Priority Code B" condition to the transmission linesupervisor as soon as practical, to ensure that correction occurs within the appropriate time."
[7] Footnote from the ETPM: "If the condition in the HFTD Tier 3 does NOT create a fire risk (non-threatening) the corrective action is required within 12 months."
[8] I.d.

Table 2: PG&E Utility Procedure TD-8123P-103, Rev. 0 and Rev. 1, Electric Transmission Line Guidance for Setting Priority Codes since 3/17/2023

Priority Code	G.O. 95, Rule 18 Level	Priority Description – Time Frame[9]
A	1	The condition is urgent and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date is 30 days – to allow time for post-construction processes and notification close-out.
B	-	Not used for maintenance corrective action priority.
E	2	Corrective action is required, as follows: • Within 6 months for HFTD Tier 3[10] • Within 12 months for HFTD Tier 2/HFRA/Zone 1[11] • Within 12 months for potential violations that compromise worker safety • Within **36 months** for all other potential violations.
F	3	Corrective action is required within 60 months.

[9] Footnote from TD-8123P-103: "Time frames listed are "Not to Exceed" and QCR/CIRT may define time frames according to site-specific conditions."
[10] Footnote from TD-8123P-103: "IF the condition in the HFTD Tier 3 OR Tier 2/HFRA/Zone 1 does **not** create a fire risk (non-threatening), THEN the corrective action is required **within 36 months**."
[11] I.d.

Table 3: PG&E Utility Procedure TD-8123P-103, Rev. 2, Electric Transmission Line Guidance for Setting Priority Codes since 3/18/2025

Priority Code	G.O. 95, Rule 18 Level	Priority Description – Time Frame[12]
A	1	Immediately make safe, including standby as necessary, and then complete **one** of the following: *(i)* Full/permanent repair within 14 days, SAP due date is 30 days to allow time for notification close-out. *(ii)* Temporary repair within 14 days, SAP due date is 30 days to allow time for notification close-out. Create a second notification for permanent repairs with a lower priority. Cross-reference each LC in the longtext. *(iii)* Seek extended duration (if applicable under CPUC G.O. 95, Rule 18 B(1)(b)). Contact M&C Compliance within 3 days of notification creation for further instruction. If extension is denied, complete either (i) or (ii) above.
B	-	Not used for maintenance corrective action priority.
E	2	Corrective action is required, as follows: • Within 6 months for HFTD Tier 3[13] • Within 12 months for HFTD Tier 2/HFRA/Zone 1[14] • Within 12 months for potential violations that compromise worker safety • Within **36 months** for all other potential violations.
F	3	Corrective action is required within 60 months.

a. ESRB staff reviewed LC notifications created within Eureka HQ from June 2021-June 2025 and determined that PG&E did not complete a total of 2,026 out of 7,408 LC notifications (5,607 open/closed and 1,801 canceled) by their Required End Date (27.3%).[15] Table 4 below breaks down the 2,026 late LC notifications by their assigned priority, including the total number of late-complete, late-open, and late-canceled, which are included in the total.

[12] Footnote from TD-8123P-103: "Time frames listed are "Not to Exceed" and QCR/CIRT may define time frames according to site-specific conditions."
[13] Footnote from TD-8123P-103: "IF the condition in the HFTD Tier 3 OR Tier 2/HFRA/Zone 1 does **not** create a fire risk (non-threatening), THEN the corrective action is required **within 36 months**."
[14] I.d.
[15] DRU15855_Q16_Atch01_Eureka Master List of Notifications.xlsx received July 2, 2025.

Table 4: Number of Late Notifications by Priority and Type [16]

Priority Code[17]	Late-Closed Notifications	Late-Open Notifications	Late-Canceled Notifications	Total Late Notifications
A	4	0	7	**11**
B	26	0	3	**29**
E	1,305	402	264	**1,971**
F	0	0	15	**15**
Total	**1,335**	**402**	**289**	**2,026**

Table 5 below lists the most overdue notifications by Priority Code. ESRB did not identify any late-open or late-closed Priority F LC Notifications.

Table 5: Most Overdue Open/Closed LC Notifications

Priority Code[18]	Notification #	Completion Date	Required End Date	Status	Days Late[19]
A	121749653	8/15/2024	8/17/2021	Closed	1,094
B	121585909	9/3/2022	9/23/2021	Closed	345
E	122080312	-	3/21/2022	Open	1,170
F	-	-	-	-	-

PG&E shall provide ESRB with its corrective action plan to complete the 402 late-open notifications and its preventive measures to prevent late notifications going forward.

b. ETPM TD-1001M Rev. 5 effective through 1/2/2023 states *"(Priority Code E) corrective action is required within **12 months** from the date the condition is identified, except for items within HFTD Tier 3 are required within 6 months."* ESRB staff reviewed LC notifications within Eureka HQ created under ETPM TD-1001M Rev. 5 from August 31, 2020 through January 2, 2023 and determined that PG&E established Required End Dates later than the 12 months required for Priority E notifications. TD-8123P-103, Rev 0 and 1, Table 2, changed certain Priority E repair intervals from 12 months to **36 months** effective after January 3, 2023. However, for the Priority E repairs issued before the procedural change, the repair interval should still be 12 months. PG&E either initially assigned incorrect due dates or extended the due dates without a Field Safety Reassessment.

PG&E's Utility Procedure: TD-8123P-103 Electric Transmission Line Guidance for Setting Priority Codes provides guidance for establishing priorities and due dates for new notifications but does not address extending due dates on existing notifications.

[16] Calculation based on PG&E's Required End Date. The total does not include notifications where the Required End Date was incorrectly assigned as noted in Violation 1b.
[17] Current Priority Code provided by PG&E.
[18] Id.
[19] Days late are determined to be the difference between the Completion Date (or June 3, 2025 for open notifications) and the Required End Date.

PG&E's Utility Procedure: TD-8123P-101 Transmission Line Corrective (LC) Notification Maintenance Strategy addresses notifications that become late and outlines the Field Safety Reassessment (FSR) process. An FSR requires a qualified electrical worker (QEW) to confirm the current condition of the facility.[20]

PG&E's Utility Procedure: TD-1001P-10 Transmission Centralized Inspection Review Team (CIRT) outlines the review and prioritization of incoming notifications.[21] The procedure does not allow extension of due dates after a notification is created unless an FSR has been conducted by a QEW.

Neither TD-8123P-101 nor TD-1001P-10 allow for changing the end date when Job Aid guidance revises the standard repair interval for similar repairs without an FSR. Unless the site has been inspected by conducting an FSR, the required end date should not be changed.

The LC notifications referenced in Tables 6 and 7 have no FSR date or justification. Table 6 breaks down the 144 notifications with incorrectly established Required End Dates by status.

Table 6: Priority E Notifications with Incorrect Required End Dates

Open	Closed	Total
121	23	**144**

Table 7 shows several examples of notifications with due dates that exceed ETPM TD-1001M requirements for Priority E notifications.

Table 7: Selected Notifications with Required End Dates exceeding PG&E ETPM TD-1001M

Priority Code [22]	Notification Number	Notification Date	Required End Date	Status	Required Interval (Months)	Days Past Required Interval	Days Past Required End Date
E	124079999	7/13/2022	7/18/2023	Open	12	5	686
E	121636243	6/25/2021	6/25/2024	Open	12	731	343
E	121623099	6/28/2021	6/28/2024	Open	12	731	340
E	121930462	8/19/2021	8/19/2024	Open	12	731	288

Furthermore, ESRB identified 12 total LC notification in Tier 3 HTFDs with Required End Dates exceeding 6 months (184 days). Table 8 below lists the 12 Tier 3 notifications with incorrect Required End Dates.

[20] DRU15641_Q02_Atch11_TD-8123P-101 (Rev 2, 2024) Section 4.6.1.
[21] DRU15641_Q02_Atch01_TD-1001P-10 (Rev 1, 2023) Redacted_CONF Section 2.1.1.
[22] Current Priority Code provided by PG&E.

Table 8: Tier 3 HFTD Priority E Notifications Exceeding 6 months (184 days)

Notification #	Current Priority	Notification Date	Completed On Date	Required End Date	Days > 184 Days	Funded Repair Date	FSR Date	Reason for FSR
121813105	E	7/27/2021	9/14/2023	7/27/2024	1096		4/27/2022	Time-Dependent
123350789	E	4/5/2022	10/9/2024	4/5/2025	1096		6/11/2022	Time-Dependent
125992927	E	4/13/2023		4/13/2026	1096			
125993388	E	4/13/2023		4/13/2026	1096			
125977884	E	4/24/2023	12/6/2023	4/24/2026	1096			
125977929	E	4/24/2023		4/24/2026	1096			
126240421	E	5/18/2023		5/18/2026	1096			
126329328	E	6/5/2023		6/5/2026	1096			
128499516	E	4/2/2024		10/2/2025	548	11/5/2025		
128343365	E	3/21/2024	3/11/2025	3/21/2025	365			
128902182	E	5/11/2024		5/11/2025	365			
129209959	E	7/11/2024		7/11/2025	365	7/29/2025		

PG&E shall provide ESRB with its corrective action plan to review all open priority E notifications for appropriate Required End Dates.

c. ESRB reviewed LC notifications created within Eureka HQ and identified 1,163 notifications with a Funded Repair Date but missing a FSR Date and reason. This means the original due date (Required End Date) was extended via the Funded Repair Date without a field visit (FSR) or proper justification. Table 9 below breaks down the notifications by Priority Code.

Table 9: Notifications with a Funded Repair Date Missing FSRs and Reasons

Priority Code	Closed Notifications	Open Notifications	Total Notifications
A	3	0	**3**
B	2	0	**2**
E	854	301	**1,155**
F	3	0	**3**
Total	**862**	**301**	**1,163**

d. ESRB reviewed LC notifications created within Eureka HQ and found 4 notifications (1 open, 2 closed, and 1 canceled) with incorrect latitudes and longitudes. Notifications on transmission lines that extend outside Eureka HQ are listed in Table 10 below. ESRB was unable to assess the accuracy of notifications with latitudes and longitudes within Eureka HQ.

Table 10: Notifications with Locations outside Eureka HQ

Priority Code	Notification #	Status	Latitude	Longitude
E	121824017	Closed	36.722550000000	-121.604310000000
E	121976700	Open	37.780416000000	-121.626466000000
E	126283421	Closed	37.055468000000	-120.747641000000
E	126283367	Canceled	37.055468000000	-120.747641000000

PG&E shall provide ESRB with its corrective action plan to resolve the four notifications with incorrect locations noted above and its preventive measures to assure correct location information going forward.

e. ESRB staff reviewed notifications created within Eureka HQ and found 15 notifications where PG&E lowered the priority codes (four Priority B lowered to E and 11 Priority E lowered to F). The 11 Priority E notifications lowered to Priority F have no FSR Date or reason. These are summarized in Table 11 below.

Table 11: Lowered Priority Codes

Notification #	Original Priority	Current Priority	Notification Date	Completed On Date	Required End Date	Funded Repair Date	FSR Date	Reason for FSR
123326568	B	E	4/13/2022	5/20/2023	7/13/2022	7/13/2023	4/13/2023	Time-Dependent
123658869	B	E	5/21/2022		11/21/2022	12/3/2025	1/23/2023	Non-Time Dependent
123658886	B	E	5/21/2022		11/21/2022	12/3/2025	1/23/2023	Non-Time Dependent
123658911	B	E	5/21/2022		11/21/2022	12/3/2025	1/23/2023	Non-Time Dependent
124146730	E	F	7/22/2022	6/11/2024	7/22/2027			
126114801	E	F	5/8/2023		5/8/2028			
126117961	E	F	5/9/2023	2/17/2024	5/9/2028			
126125353	E	F	5/9/2023		5/9/2028			
126126503	E	F	5/9/2023		5/9/2028			
126268757	E	F	5/19/2023		5/19/2028			
126291939	E	F	5/25/2023	6/15/2024	5/25/2028			
126401418	E	F	6/19/2023		6/19/2028			
126413054	E	F	6/20/2023		6/20/2028			
126491392	E	F	6/24/2023	8/30/2024	6/24/2028			
126906436	E	F	8/24/2023		8/24/2028			

PG&E shall provide ESRB with the method used to reassess the priority of each of the 15 notifications.

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."

   PG&E's Utility Procedure TD-8123P-100, Rev. 2, Transmission Patrols and Enhanced Inspection Frequency Guidelines, Section 3.3 assigns the inspection intervals shown in Table 12 below.

Table 12: Overhead Enhanced Inspection and Patrol Baseline Frequencies

Voltage (kV)	Inspection Type	Structure Type	Non-HFTD (Years)	HFTD Tier 3, Tier 2, Zone 1, and HFRA (Years)	DCPP/Morro Bay/ WECC Lines (Years)
500	Detail ground and aerial	Steel	3	3	Annually
	Climbing	Steel (critical)	3 (and as triggered)	3	Annually
		Steel (non-critical)	12 (and as triggered)	3	Annually
230 115 70 60	Detailed ground and/or aerial	Steel or wood	5 (at least one method)	3	Annually
	Climbing or aerial lift	Steel or wood	As triggered	As triggered	As triggered
All Voltages	High Water Table Inspection (Bay Waters Foundation)	Steel	5	NA	NA
	Infrared	Steel or wood	5 (and as triggered)	Tier 3 – Annually Tier 2, Zone 1, and HFRA – 3	Annually
	Patrol	Annually, unless enhanced inspected. See Appendix A on Page 10 for DCPP and Morro Bay lines requiring quarterly patrol.			

a. ESRB reviewed inspection records from Eureka HQ[23] and found 57 structure inspections conducted past PG&E's Inspection Due Date. Table 13 below lists the late inspections.

[23] DRU15855_Q07_Atch01 _202Y Inspections (Y, year: 0-5)

Table 13: Late Inspections by Year and Type

Inspection Year	Enhanced Inspections	Air +	Total
2023	4	44	**48**
2024	4	5	**9**
Total	**8**	**49**	**57**

PG&E shall provide ESRB with its corrective action plan to complete inspections by their required due date going forward.

b. ESRB reviewed inspection records from Eureka HQ and found four (4) circuits where the prior routine patrol has a gap of three (3) years and 134 circuits in HFTD/Zone 1/HFRA areas where the prior enhanced inspection has a gap of four to five (4-5) years. PG&E Utility Procedure TD-8123P-100, Rev. 2, Transmission Patrols and Enhanced Inspection Frequency Guidelines, Section 3.3 requires annual routine patrols unless a facility has received an enhanced inspection and requires enhanced inspections every three (3) years in HFTD, Zone 1, and HFRA areas. Tables 14 and 15 below list the routine patrol and enhanced inspection records with noncompliant intervals.

Table 14: Routine Patrol Records with 3 Year Gaps

Patrol Years	Total
2023 Patrol Record (2020 Prior Patrol)	1
2024 Patrol Record (2021 Prior Patrol)	2
2025 Patrol Record (2022 Prior Patrol)	1
Total	**4**

Table 15: Enhanced Inspection Records with 4-5 Year Gaps

Inspection Years	Total
2024 Inspection Record (2020 Prior Inspection)	76
2025 Inspection Record (2020-2021 Prior Inspection)	58
Total	**134**

Additionally, ESRB identified 362 Circuits missing a prior enhanced inspection during the inspection years listed in Table 16.

Table 16: Enhanced Inspection Records Missing a Prior Inspection

Inspection Year	Total
2023	285
2024	6
2025	71
Total	**362**

PG&E shall provide ESRB with its corrective action plan to assure that routine patrol and enhanced (detailed) inspections of all circuits occur at the required intervals. Note: Since these are circuit inspections and each host circuit has multiple structures, the total number of structures not inspected is the sum of all structures on each host circuit listed.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location	Structure ID	Structure Type	GPS Coordinates
1	Humboldt Bay-Rio Dell Junction 60kV, 4/4	Wood Pole	40.722905, -124.179294
2	Humboldt Bay-Rio Dell Junction 60kV, 4/3	Wood Pole	40.723788, -124.179541
3	Humboldt Bay-Rio Dell Junction 60kV, 4/2	Wood Pole	40.72474, -124.179842
4	Humboldt Bay-Humboldt 1 115kV, 0/4 | Guest: Humboldt Bay-Humboldt 2 60kV	Steel Tower	40.73738, -124.197285
5	Humboldt Bay-Eureka 60kV, 0/11	Wood Pole	40.737436, -124.196606
6	Humboldt Bay-Humboldt 1 60kV, 0/12	Steel Pole	40.737343, -124.196504
7	Humboldt Bay-Rio Dell Junction 60kV, 2/0	Wood Pole	40.737242, -124.19648
8	Humboldt-Eureka 60kV, 3/4	Wood Pole	40.78042, -124.172562
9	Humboldt-Eureka 60kV, 3/3	Wood Pole	40.780405, -124.171478
10	Humboldt Bay-Humboldt 1 60kV, 0/9	Wood Pole	40.779545, -124.171476
11	Humboldt-Eureka 60kV, 3/8	Wood Pole	40.781416, -124.176082
12	Humboldt-Eureka 60kV, 3/9	Wood Pole	40.782263, -124.176072
13	Humboldt-Bridgeville 115kV, 110/3	H-Frame Steel	40.760732, -124.013818
14	Humboldt-Maple Creek 60kV, 6/2	3 Pole Steel Structure	40.761044, -124.01413
15	Humboldt-Trinity 115kV, 108/3	H-Frame Steel	40.76116, -124.01405
16	Humboldt-Trinity 115kV, 108/2	H-Frame Wood	40.761066, -124.012496
17	Humboldt-Maple Creek 60kV, 6/3	Steel Pole	40.760839, -124.013143
18	Humboldt-Bridgeville 115kV, 110/2	H-Frame Steel	40.760652, -124.013206
19	Humboldt-Bridgeville 115kV, 108/1	Steel Pole	40.748713, -123.97371
20	Essex Junction-Arcata/Fairhaven 60kV, 0/10	Wood Pole	40.859641, -124.0789
21	Essex Junction-Arcata/Fairhaven 60kV, 0/11	Wood Pole	40.860548, -124.078936
22	Maple Creek-Hoopa 60kV, 20/14	Wood Pole	40.956576, -123.643024
23	Maple Creek-Hoopa 60kV, 20/15	Wood Pole	40.957666, -123.642937

24	Maple Creek-Hoopa 60kV, 15/2	Steel Pole	40.910072, -123.706113
25	Maple Creek-Hoopa 60kV, 15/3	Wood Pole	40.911163, -123.705376
26	Maple Creek-Hoopa 60kV, 15/4	Steel Pole	40.912417, -123.704474
27	Maple Creek-Hoopa 60kV, 13/2	Steel Pole	40.904617, -123.742888
28	Blue Lake Tap 60kV, 3/5	Wood Pole	40.884203, -123.980535
29	Blue Lake Tap 60kV, 3/6	Wood Pole	40.883507, -123.980558
30	Blue Lake Tap 60kV, 3/7	Wood Pole	40.88282, -123.980534
31	Blue Chip Milling Tap 60kV, 0/5	Wood Pole	40.897438, -124.00946
32	Blue Chip Milling Tap 60kV, 0/6	Wood Pole	40.897438, -124.008303
33	Blue Chip Milling Tap 60kV, 0/7	Wood Pole	40.897119, -124.007951
34	Essex Junction-Orick 60kV, 0/8	Wood Pole	40.913571, -124.031457
35	Essex Junction-Orick 60kV, 0/7	Wood Pole	40.912358, -124.031629
36	Essex Junction-Orick 60kV, 0/6	Wood Pole	40.911398, -124.031955
37	Essex Junction-Orick 60kV, 0/5	Wood Pole	40.910537, -124.032282
38	Essex Junction-Arcata-Fairhaven 60kV, 3/7	Wood Pole	40.8946, -124.041416
39	Janes Creek Tap 60kV, 1/10	Wood Pole	40.905223, -124.072019
40	Janes Creek Tap 60kV, 1/9	Wood Pole	40.905049, -124.072015
41	Humboldt 1 60kV, 11/5	Wood Pole	40.90491, -124.070966
42	Humboldt 1 60kV, 1/8	Wood Pole	40.904996, -124.070949
43	Humboldt Bay-Rio Dell Junction 60kV, 15/11	Wood Pole	40.58857, -124.130163
44	Humboldt Bay-Rio Dell Junction 60kV, 15/12	Wood Pole	40.587969, -124.12899
45	Rio Dell Tap 60kV, 0/9	Wood Pole	40.545107, -124.08643
46	Rio Dell Tap 60kV, 0/8	Steel Pole	40.544758, -124.084789
47	Rio Dell Junction-Bridgeville 60kV, 20/8	Wood Pole	40.541449, -124.063689
48	Rio Dell Junction-Bridgeville 60kV, 20/7	Steel Pole	40.541465, -124.063788
49	Rio Dell Junction-Bridgeville 60kV, 20/6	Wood Pole	40.541458, -124.063974
50	Rio Dell Junction-Bridgeville 60kV, 20/5A	Steel Pole	40.541503, -124.064134
51	Rio Dell Junction-Bridgeville 60kV, 20/5	Wood Pole	40.541566, -124.065299
52	Rio Dell Junction-Bridgeville 60kV, 24/7	Steel Pole	40.512909, -124.008314
53	Rio Dell Junction-Bridgeville 60kV, 24/8	Wood Pole	40.513243, -124.006913

54	Rio Dell Junction-Bridgeville 60kV, 24/9	Wood Pole	40.513199, -124.005549
55	Rio Dell Junction-Bridgeville 60kV, 24/10	Wood Pole	40.513068, -124.004057
56	Rio Dell Junction-Bridgeville 60kV, 24/11	Wood Pole	40.512996, -124.002673
57	Bridgeville-Garberville 60kV, 6/2	Wood Pole	40.414612, -123.759323
58	Bridgeville-Garberville 60kV, 0/1	Steel Pole	40.479094, -123.77999
59	Rio Dell Junction-Bridgeville 60kV, 40/7	Wood Pole	40.479211, -123.780123
60	Rio Dell Junction-Bridgeville 60kV, 6/1	Steel Pole	40.415286, -123.759561
61	Rio Dell Junction-Bridgeville 60kV, 28/11	Steel Pole	40.477368, -123.969743
62	Rio Dell Junction-Bridgeville 60kV, 28/9	Wood Pole	40.478987, -123.970854
63	Rio Dell Junction-Bridgeville 60kV, 28/8	Wood Pole	40.48018, -123.970877
64	Rio Dell Junction-Bridgeville 60kV, 28/10	Wood Pole	40.477987, -123.970575

IV. Field Inspection Violations

ESRB observed the following violations during the field inspection:

1. **GO 95, Rule 44.3, Replacement** states:

> *"Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade "C" construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one."*

Location	Violation Description
1	Pole deteriorated with a large vertical crack. PG&E has a late-open LC 119374377 to replace the pole with a due date of 7/15/2021.
2	Pole deteriorated and decayed. PG&E has a late-open LC 120852913 to replace the pole with a due date of 4/20/2024.
7	Pole is deteriorated. PG&E has a late-open LC 119369372 to replace the pole due by 7/14/2025.
8	Pole is deteriorated. PG&E has an open LC 127293244 to replace the pole due by 10/17/2026.

16	Wood pole structure is deteriorated and damaged with several cracks on the southern pole. PG&E has one open LC 128482874 to replace the entire structure and another open LC 128393840 to replace the southern pole both due by 10/31/2025.
20	Pole is deteriorated. PG&E has an open LC 129621238 to replace the pole due by 10/2/2027.
22	Pole is overloaded and bowing. PG&E has an open LC 131108993 to replace the pole due by 10/15/2025.
33	Pole is deteriorated. PG&E has an open LC 131210727 to replace the pole, due by 5/7/2028.
34	Pole is deteriorated. PG&E has an open LC 124689231 to replace the pole, due by 10/11/2025.
49	Pole is deteriorated. PG&E has an open LC 124544249 to replace the pole, due by 9/21/2025.
51	Pole is deteriorated. PG&E has an open LC 124598770 to replace the pole, due by 9/30/2025.
55	Pole is deteriorated. PG&E has a late-open LC 128499920 to replace the pole and insulators, due by 4/9/2025.
59	Pole is deteriorated and bowing at the top. PG&E has an open LC 131418459 to replace the pole, due by 5/22/2026.

2. **GO 95, Rule 51.6-B, Guarding** states in part:

"Where the pole or structure is of latticed metal or of similar construction and supports supply conductors in excess of 750 volts and is located in urban districts, or in rural areas adjacent to schools, dwellings, permanent or seasonal camps, or in orchards, or near roads, or trails which are frequently traveled, a barrier shall be so located on the pole or structure as to prevent easy climbing. If the bottom of the barrier is within 12 feet of the ground line, the top shall not be less than 15 feet above the ground line, but in no event shall the barrier be less than 8 feet in length. If the bottom of the barrier is more than 12 feet above the ground line, it shall not be less than 6 feet in length."

Location	Violation Description
4	Anti-climb guards are undersized. PG&E created a new LC 131565773 to replace the anti-climb guards.

3. **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."

Location	Violation Description
9	South-facing transmission insulators have jumpers laying on the pins. PG&E created a new LC 131566556 to repair the jumpers.
12	Insulators require replacement. PG&E has an open LC 131433694 to replace the insulators, due by 7/5/2028.
13	Missing label on overhead ground wire/fiber optic (OPGW) fiber cable. PG&E has an open LC 128395599 to add a label due by 3/20/2027.
18	OPGW fiber line missing All Dielectric Self-Supporting cable (ADSS) label. PG&E has an open LC 131313565 to add a label.
21	Vegetation impacting access to pole. PG&E has an open LC 129722256 to remove the vegetation around the pole.
21	Horizontal insulators are mossy/contaminated.
27	Pole base requires backfill. PG&E has an open LC 128077894 to backfill it, due by 1/23/2029.
31	Pole requires a replumb. PG&E has an open LC 131210725 to replumb the pole, due by 5/7/2028.
32	Anchor requires repair. PG&E has an open LC 131210685 to repair the anchor, due by 5/7/2028.
32	Overgrown vegetation around pole and down guys. PG&E has an open LC 129562489 to trim the vegetation.
33	Insulators require repair. PG&E has an open LC 129533266 to repair the insulators, due by 8/9/2029.
34	Insulators are covered in moss. PG&E has a late-open LC 119769758 to replace the insulators, due by 9/15/2023.
35	Buried anchor. PG&E has an open LC 131477497 to dig out the anchor, due by 7/15/2028.
36	Moss covered insulators. PG&E has an open LC 124688158 to replace the insulators, due by 10/11/2025.
39	Pole requires a replumb. PG&E has an open LC 131066105 to replumb it, due by 4/9/2028.
42	Overgrown vegetation around pole. PG&E has an open LC 131477298 to trim the vegetation, due by 7/15/2028.
42	Moss covered insulators. PG&E created a new LC 131572972 to replace the insulators.
43	Down guys missing fiberglass insulators. PG&E has an open LC 120908346 to replace the down guys, due by 4/30/2026.
43	Insulators are contaminated. PG&E has a late-open LC 121997438 to replace the insulators, due by 8/27/2024.
47	Replace hardware and missing bonding from crossarm to crossarm. PG&E has an open LC 131383251 to replace the hardware and bonding, due by 6/16/2030.
48	Carlotta Switch 49 requires adjustment. PG&E has an open LC 131383437 to adjust the switch, due by 6/16/2026.

55	Moss covered insulators. PG&E has a late-open LC 128499920 to replace the pole and insulators, due by 4/9/2025.

4. **GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 19 Column I** states:

   "The basic minimum allowable radial separation between guys and conductors between 75,000-150,000 Volts supported on the same pole is 24 inches."

Location	Violation Description
13	PG&E down guy is less than 24 inches from 115 kV line. PG&E has an open LC 128170051 to fix the clearance infraction.

5. **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 (see Figure 51–1)."

Location	Violation Description
18	High voltage signs are incorrectly installed at the conductor level. PG&E has an open LC 128353234 to install new high voltage signs below the conductor level, due by 3/20/2029.
43	Missing high voltage signage. PG&E created a new LC to install signage.

6. **GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 1 Column F** states:

   "The basic minimum allowable clearance between guys and conductors between 7,500-20,000 Volts not supported on the same pole is 36 inches."

Location	Violation Description
19	Transmission down guy clearance from 12 kV PG&E distribution line on a separate pole is low.

7. **GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, Use** states:

"Where mechanical loads imposed on poles, towers, or structures are greater than can be supported with safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.

Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire load, the pole below the point of guy attachment acting merely as a strut.

Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."

Location	Violation Description
24	All down guys are slacked. PG&E has an open LC 131240688 to repull the down guys, due by 11/13/2025.
26	Pole requires down guy due to pole lean. PG&E has an open LC 131240715 to install a down guy, due by 11/13/2025.
35	PG&E distribution guy is slacked.

8. **GO 95, Rule 56.6-D, Guys Exposed to 22,500 Volts or More** states:

"Guys exposed to conductors of 22,500 volts or more shall not be sectionalized and shall be securely grounded (by means of ground wires, anchor guys, or attachments to securely grounded metal poles or structures).

EXCEPTED from the above requirements are:

(1) Guys, all or any portions thereof, which are required to be sectionalized in accordance with Rule 56.6–A because of proximity of wood poles and supply conductors of less than 22,500 volts or in accordance with Rule 56.6–B;"

Location	Violation Description
35	Down guy missing insulator. PG&E has a late-open LC 119373009 to replace the down guy, due by 7/15/2025.

9. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 4 Column F** states:

"The basic minimum allowable vertical clearance of supply conductors between 22.5-300 kV above ground along thoroughfares in rural districts or across other areas capable of being traversed by vehicles or agricultural equipment is 30 feet."

Location	Violation Description
45	60kV transmission line is less than 30 feet above ground. PG&E has an open LC 126961417 to replace the pole with new hardware and framing to correct the clearance infraction, due by 8/31/2028.
46	60kV transmission line is less than 30 feet above ground. PG&E has an open LC 126961432 to correct the clearance deviation, due by 8/31/2028.

V. Field Observations

ESRB staff observed the following third-party potential safety concerns during the field inspection. PG&E must issue third-party notifications to the respective utilities for these findings.

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 GO95.

Note: Each pole owner must be able to determine all other pole owners on poles it owns. Each pole owner must be able to determine all authorized entities that attach equipment on its portion of a pole."

Location	Violation Description
3	AT&T slack down guy.
22	Low idle comms line.
30	Comcast needs to transfer its facilities to the new pole. There is also a section of old pole hanging and attached to the new pole.