

June 29, 2026

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

Subject: Response to CPUC Audit EA2026-1413 - Records Review and Field Inspection Corrective Actions

Dear Mr. Tse,

Roseville Electric Utility (REU) appreciates the opportunity to respond to the CPUC Electric Safety and Reliability Branch audit findings for EA2026-1413. REU has reviewed the records review findings associated with Table 2, the field inspection violations, and the field observations identified in the audit report.

This response provides clarification, corrective action status, and preventive measures. REU takes inspection, maintenance, and corrective action tracking seriously and has focused this response on providing a clear record of the status of each item.

Sincerely,



Jason Grace (Jun 29, 2026 16:41:39 PDT)

Jason Grace
Electric Operations Manager
Roseville Electric Utility
916-774-5643

1. Table 2 Records Review Clarification

REU respectfully clarifies that the “Reported Date” shown on a CMMS preventive maintenance inspection work order is the date the preventive maintenance work order was generated, not the date the field inspection occurred or the date a failed condition was identified. REU commonly generates inspection work orders in advance so the work can be assigned based on workload, availability, and operational priorities.

For that reason, the actual inspection date is the appropriate start date for determining the corrective action timeline. When the records are evaluated using the inspection-related fields from the complete source data previously provided, REU’s reassessment differs from the Table 2 late-open determination for several records.

2. Table 2 Reassessment Summary

REU performed a record-by-record reassessment of the 12 records identified in Table 2 using the original source data, actual inspection dates, work order history, and corrective action records. REU determined that five records required follow-up due to historical corrective action tracking issues, while the remaining records were within the applicable corrective action timeline when evaluated using the proper inspection date.

Original Work order	Asset ID	Corrective Work order	REU Reassessment	Current Status
1571826	PP-1899	3699039	Historical process issue confirmed	Replacement scheduled by end of July, 2026
1572110	SP-0489	3936600	Historical process issue confirmed	Replacement scheduled by end of July, 2026
1579727	SP-0531	3970768	Historical process issue confirmed	Replacement scheduled by end of July, 2026
1593251	PP-2735	3965013	Historical process issue confirmed	Replacement scheduled by end of July, 2026
2395660	JB-0104	4023531	Within applicable timeframe when reviewed against source data	No overdue corrective action identified
2621024	GP-4774	3990103	Within applicable timeframe when reviewed against source data	No overdue corrective action identified
2754330	PP-6767	2788050	Historical process issue confirmed; spreadsheet alignment issue also identified	Completed - pole replaced
3194880	JB-0089	4070155	Within applicable timeframe using actual inspection date	No overdue corrective action identified
3645328	T-1762	4006512	Within applicable timeframe using actual inspection date	No overdue corrective action identified
3645389	JB-0195	4060188	Within applicable timeframe using actual inspection date	No overdue corrective action identified
3645409	P-0815	4060189	Within applicable timeframe using actual inspection date	No overdue corrective action identified
3645496	JB-0789	4070156	Within applicable timeframe using actual inspection date	No overdue corrective action identified

The five records REU acknowledges as requiring corrective follow-up are 1571826, 1572110, 1579727, 1593251, and 2754330. PP-6767, associated with Work order 2754330, has been replaced and the corrective work is complete. The remaining associated poles are scheduled for replacement by the end of July, 2026.

3. Spreadsheet Alignment and Source Data

During the audit data request process, REU provided both source data and a formatted summary dataset to support review. REU identified a row-alignment issue in one of the summary sheets created during formatting. The affected work orders were 2395660, 2621024, and 2754330. The issue was limited to the formatted summary sheet and was not present in the original source records.

REU requests that CPUC rely on the complete original source data, including spreadsheet 5B, when reassessing Table 2. REU can provide a corrected summary table or supporting documentation as needed to assist CPUC with verification.

4. Historical Process Issue and Current Controls

REU identified a historical process issue involving failed intrusive pole test records from an earlier period of CMMS use (2020). At that time, when a pole failed an intrusive test, REU personnel closed the work order after verifying the failure. Through a manual process at that time, a new work order would be created, but in this case was missed. Closure of the work order did not maintain visibility of the pole as an active pending replacement item in the system.

REU has since changed this process. Under the current workflow, when a pole fails an intrusive test, CMMS automatically generates a corrective action work order that remains active and trackable until completion. REU is also working with IT to improve due-date visibility for corrective maintenance work orders, which will provide additional control for monitoring and reporting required completion dates.

In addition, REU notes that its wood pole intrusive inspection cycle exceeds the minimum inspection frequency identified in GO 165. Under GO 165, a wood pole that passes an intrusive inspection does not require another intrusive inspection for 20 years. REU's internal SOP is more conservative and requires intrusive inspection of wood poles on a five-year cycle. This shorter inspection interval provides increased system visibility, allows REU to identify deterioration earlier, and supports timely corrective maintenance planning before pole conditions progress to a higher-risk condition.

REU further notes that, under GO 95, the maximum corrective action timeframe for applicable pole replacement conditions is 59 months (Level 2, non-immediate hazards, non Tier1/2 HFTD). REU's program target is more conservative, with a goal to complete these corrective actions within 36 months. This internal target provides additional margin ahead of the maximum allowable timeframe and supports proactive planning, prioritization, and completion of pole replacement work before the outer compliance limit is reached.

5. Field Inspection Violations - Item 1: GO 95, Rule 44.3, Replacement

REU reviewed the conditions identified under Section IV, Field Inspection Violations, Item 1, associated with GO 95, Rule 44.3. Location 16 has been completed and closed. Locations 6, 17, 21, 32, 39, and 54 remain open but are within the applicable corrective action period and are being tracked in REU's CMMS. These items are in the construction queue, and REU's target is to complete and close each work order before its due date.

Location	Rule / Item	CPUC-Identified Condition / Work order	REU Status	REU Response
6	GO 95 Rule 44.3	Pole top deteriorated; Work order 4031179 open to replace crossarm. Upon review, this pole top is acceptable but it was the crossarm that failed inspection.	Open - within repair period	Work order remains within the applicable corrective action period and is in the construction queue.
16	GO 95 Rule 44.3	Pole top deteriorated and split; open work order 4245585.	Closed	Corrective work has been completed and closed.
17	GO 95 Rule 44.3	Pole failed intrusive test; Work order 3944976 open to replace the pole.	Open - within repair period	Work order remains within the applicable corrective action period and is in the construction queue.

Location	Rule / Item	CPUC-Identified Condition / Work order	REU Status	REU Response
21	GO 95 Rule 44.3	Pole failed intrusive test; Work order 3964174 open to replace the pole.	Open - within repair period	Work order remains within the applicable corrective action period and is in the construction queue.
32	GO 95 Rule 44.3	Pole passed intrusive test in 2021, due for next inspection cycle in 2026. Red tag removed from pole. Work order 4097463 open to inspect & test pole by 12-31-26 (not 06-30-26).	Open - within repair period	Work order remains within the applicable inspection period and is in the inspection queue.
39	GO 95 Rule 44.3	Pole red tagged due to failed intrusive test; Work order 3909505 open to replace the pole.	Open - within repair period	Work order remains within the applicable corrective action period and is in the construction queue.
54	GO 95 Rule 44.3	Deteriorated/split pole top and bottom; Work orders 4180460 (re-inspect) and 4182543 (corrective action) identified.	Open - within repair period	Reinspect failed test. Replacement work remains within the applicable corrective action period and is in the construction queue.

6. Field Inspection Violations - Items 2 through 9

REU reviewed the remaining field inspection violations identified under Items 2 through 9. The table below summarizes the status of each item and the corrective action taken.

Audit Item	Rule	Location(s)	CPUC-Identified Work order(s)	REU Status / Corrective Action
Item 2	GO 95 Rule 51.6-A, High Voltage Marking	10, 17, 33, 53	4245573, 4245590, 4245597, 4245878	All cited locations have been repaired or corrected. Associated work orders are closed.
Item 3	GO 95 Rule 34, Foreign Attachments	10, 15	4245573, 4245582	Location 10 is closed and the third party has been notified. Location 15 is closed.
Item 4	GO 95 Rule 54.6-B, Vertical and Lateral Conductors, Ground Wires	16, 35	4245585, 4245605	Both associated work orders are closed.
Item 5	GO 95 Rule 56.9, Guy Marker / Guy Guard	16	4245585	Associated work order is closed.
Item 6	GO 95 Rule 31.1, Design, Construction, and Maintenance	25	4245593	Associated work order is closed.
Item 7	GO 128 Rule 17.1, Design, Construction, and Maintenance	44	4178983	Associated work order is closed.
Item 8	GO 95 Rule 56.2, Overhead Guys, Anchor Guys, and Span Wires	47, 48	Work order 4245877 identified for Location 48; Work order 4245875 Location 47	Both associated items are closed.
Item 9	GO 95 Rule 56.7-B, Location of Sectionalizing Insulators, Anchor Guys	50	4245880	Associated work order is closed.

These corrective actions were completed to address the cited field conditions and return the affected facilities to an acceptable condition. REU will continue to use CMMS to document corrective work, verify completion, and maintain visibility of open items until closure.

7. Field Observations - Third-Party Safety Hazard Notifications

REU reviewed the third-party field observations identified in Section V of the audit report. REU refers to these as safety hazard notifications. REU confirms that notifications were sent for each cited location requiring third-party notification.

Location	CPUC Observation Summary	Notification Status
7	Communications ground wire exposed and damaged molding.	Safety hazard notification sent.
8	Communications ground wire exposed.	Safety hazard notification sent.
9	Idle communications line on ground and customer cable taped to weatherhead.	Safety hazard notification sent.
19	Low communications service line and damaged customer attachment point; communications riser not properly attached to pole.	Safety hazard notification sent.
20	Cable TV and fiber line contacting at midspan.	Safety hazard notification sent.
22	Two fiber lines contacting due to vegetation strain.	Safety hazard notification sent.
23	Two communications lines contacting.	Safety hazard notification sent.
37	Communications ground wire exposed and damaged molding.	Safety hazard notification sent.
39	Communications lines have vegetation strain/abrasion.	Safety hazard notification sent.
41	Low communications line crossing a driveway.	Safety hazard notification sent.
47	Two slack communications down guys.	Safety hazard notification sent.
58	Idle communications service line hanging down pole.	Safety hazard notification sent.

REU will continue to issue and log third-party safety hazard notifications consistent with GO 95 Rule 18 and REU's established notification process.

Closing

REU appreciates ESRB's review and the opportunity to provide clarification regarding the records review, field inspection violations, and field observations. REU remains committed to maintaining a safe and reliable electric distribution system, completing corrective actions within applicable timeframes, and continuing to improve its inspection and corrective maintenance tracking processes.

REU Response to EA2026-1413

Final Audit Report

2026-06-29

Created:	2026-06-29
By:	Jennifer Gonzales (jngonzales@roseville.ca.us)
Status:	Signed
Transaction ID:	CBJCHBCAABAAKwm5Y2mH0nFVrS9UDKhvulUVODKnVHnE

"REU Response to EA2026-1413" History

-  Document created by Jennifer Gonzales (jngonzales@roseville.ca.us)
2026-06-29 - 11:35:44 PM GMT
-  Document emailed to Jason Grace (jgrace@roseville.ca.us) for signature
2026-06-29 - 11:40:12 PM GMT
-  Email viewed by Jason Grace (jgrace@roseville.ca.us)
2026-06-29 - 11:41:19 PM GMT
-  Document e-signed by Jason Grace (jgrace@roseville.ca.us)
Signature Date: 2026-06-29 - 11:41:39 PM GMT - Time Source: server - Signature Appearance Selected: DRAW
-  Agreement completed.
2026-06-29 - 11:41:39 PM GMT