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

PUBLIC UTILITIES COMMISSION
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April 30, 2026 EA2026-1426

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

SUBJECT: Electric Distribution Audit of PG&E's Fresno Division

Mr. Kushner:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez and Javier Reyes of ESRB conducted an electric distribution audit of PG&E's Fresno Division from January 12-16, 2026. During the audit, ESRB staff conducted field inspections of PG&E's distribution 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 **May 29, 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 Distribution Audit Report for PG&E Fresno Division

Cc: Lee Palmer, Deputy Executive Director, Safety Enforcement, Safety Policy, and Water, CPUC
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CPUC AUDIT FINDINGS
PG&E FRESNO DISTRIBUTION DIVISION
JANUARY 12-16, 2026

I. Records Review

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

- PG&E's Electric Distribution Preventive Maintenance (EDPM) Manual, TD-2305M, Effective October 2020-October 2025.
- PG&E's utility procedures, standards, guidelines, and job aids for electric distribution facility maintenance and inspections.
- PG&E Fresno Division distribution facilities statistics.
- A list of all open, closed, and canceled Electric Corrective (EC) notifications from October 2020-October 2025.
- A list of completed and late patrol and detailed-inspection records from October 2020-October 2025.
- Reliability metrics (SAIDI, SAIFI, CAIDI, and MAIFI) and sustained outages from October 2020-October 2025.
- Distribution facility statistics for PG&E's Fresno Division.
- PG&E Fresno Division Map.
- New construction projects completed from October 2024-October 2025.
- Pole loading and safety factor calculations completed from October 2024-October 2025.
- Third-Party Safety Hazard notifications (TPN) sent and received from October 2020-October 2025.
- Inspector list and training records/courses from October 2020-October 2025.
- Equipment test records from October 2020-October 2025.
- Intrusive pole test records from October 2024-October 2025.
- A list of Comprehensive Pole Inspections (CPI), infrared, aerial drone inspections, and any other non-routine inspections from October 2020-October 2025.
- A list of vegetation management inspection records and tree work orders for distribution circuits from October 2020-October 2025.
- The results of all internal quality management audits from October 2020-October 2025.

II. Records Violations

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

1. General Order (GO) 95, Rule 18-B(1), 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:

- *Type of facility or equipment;*
- *Location, including whether the Safety Hazard or potential violation is located in the High Fire-Threat District;*
- *Accessibility;*
- *Climate;*
- *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.*

(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."

GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment."

ESRB reviewed the late EC notifications within the Fresno Division from October 13, 2020 to October 13, 2025. PG&E's Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines priority codes and associated time frames for EC notifications as follows:

- Priority A – Safety / Emergency Immediate Response

  An emergency is defined as any activity in response to an outage to customer(s) or an unsafe condition requiring immediate response or standby to protect the public.

- Priority B – Urgent Compliance (Due within 3 months)
- Priority E – Compliance (Due 3-12 months)
- Priority F – Compliance (For Regulatory Conditions, the Recommended Repair Date is the due date for the next Inspection (UG = 3 years, OH = 5 years).

PG&E Overhead Inspection Job Aid, TD-2305M-JA02, Rev. 12, Effective February 1, 2024, defines priority codes and associated time frames as follows:

	PG&E Priority	Tier 3	Tier 2/HFRA	Non-HFTD
Level 1: immediate risk of high potential impact to safety and reliability	A	Within 24 hours	Within 24 hours	Within 24 hours
Level 2: at least moderate potential impact	X	Up to 5 days	Up to 5 days	Up to 5 days
	B	Up to 6 months	Up to 6 months	Up to 6 months
	E	Up to 6 months	Up to 12 months	Up to 36 months
Level 3: low potential impact	F	60 months	60 months	60 months

PG&E Overhead Inspection Job Aid, TD-2305M-JA02, Rev. 14, Effective January 14, 2025, defines priority codes and associated time frames as follows:

PG&E Prioritization				
	PG&E Priority	Tier 3	Tier 2/HFRA	Non-HFTD
Level 1: Immediate risk of high potential impact to safety and reliability	A	Within 24 hours	Within 24 hours	Within 24 hours
Level 2: at least moderate potential impact	X	Up to 7 days	Up to 7 days	Up to 7 days
	B	Up to 6 months	Up to 6 months	Up to 6 months
	E	Up to 6 months	Up to 12 months	Up to 36 months
Level 3: low potential impact	F	60 months	60 months	60 months

a. ESRB reviewed the late EC notifications and determined that PG&E did not address a total of 87,441 EC notifications by their assigned due date (Required End Date) out of 139,453 total notifications (62.7% late notifications).[1] Of these 87,441 EC notifications, 14,393 were classified as "late complete", 65,085 were classified as "late open", and 7,963 were classified as "late canceled".

Table 1 below breaks down the 87,441 late EC notifications by the given priority and type.

Table 1: Late EC Notifications

Priority Code	Late Complete	Late Open	Late Canceled	Total Late
A	6,451	156	2,195	**8,802**
X	24	9	90	**123**
B	5,269	162	1,859	**7,290**
E	2,577	55,218	3,326	**61,121**
F	52	9,400	247	**9,699**
H	20	140	246	**406**
Total	**14,393**	**65,085**	**7,963**	**87,441**

Table 2 below identifies the most overdue EC notifications for each priority.

Table 2: Most Overdue Open EC Notifications by Priority

Priority Code	EC Notification #	Number of Days Past Assigned Due Date
A	121533289	1,621
X	131982588	30
B	116707756	2,102

[1] Excel file: *DRU16583_Q03_Atch01_EC_Notification_CONF.xlsx*. PG&E Pre-Audit Data Request (PADR) Response, Question 3.

E	124880324	3,297
F	109946335	2,167
H	116819300	2,090

b. ESRB reviewed EC notifications created within the Fresno Division and identified 3,995 notifications with a Funded Repair Date but missing a Field Safety Reassessment (FSR) Date. This means the original due date (Required End Date) was extended via the Funded Repair Date without a field visit (FSR). Table 3 below breaks down the notifications by Priority Code.

Table 3: Notifications with a Funded Repair Date but Missing an FSR

Priority Code	Closed Notifications	Open Notifications	Total Notifications
A	1,072	96	**1,168**
X	30	5	**35**
B	1,312	124	**1,436**
E	372	656	**1,028**
F	31	285	**316**
H	0	12	**12**
Total	**2,817**	**1,178**	**3,995**

c. PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, Rev. 14, effective January 14, 2025, defines Priority A as "Immediate risk of high potential impact to safety and reliability (due within 24 hours)."

ESRB identified 8,266 Priority A EC notifications (36.9% out of 22,431 total Priority A notifications) created between October 13, 2020 – October 13, 2025 with Required End Dates exceeding two or more days after the notification creation date.

GO 95, Rule 18-B(1)(a)(i) Leve1 1 states "Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority".

PG&E is assigning Priority A notifications deadlines in excess of both TD-2305M-JA02, Job Aid: Overhead Assessment and GO 95, Rule 18-B(1)(a)(i) for Leve1 1 hazards requiring 24-hour completion intervals. Additionally, in cases where PG&E is taking corrective action ("make safe" or temporary repairs) immediately but not completing repairs, PG&E is not reclassifying the EC notifications to a lower priority as required per GO 95, Rule 18-B(1)(a)(i) for Leve1 1 hazards.

d. ESRB reviewed EC notifications created within the Fresno Division and found that 1% of the 139,453 total notifications have incorrect or missing latitudes and longitudes.[2] ESRB asserts that it is pertinent that PG&E record accurate location information of its facilities to ensure facilities are easily located during repair work.

[2] PG&E PADR Response, Question 3.

PG&E shall provide ESRB with its corrective action plan to assure correct location information going forward.

e. PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment establishes the maximum corrective action timeline based on HFTD Tier/HFRA and PG&E Priority Codes. Level 2, PG&E Priority E in Non-HFTD areas allows up to 36 months for corrective action and has no specific entry for non-conformances impacting worker safety. The 36-month corrective action timeline exceeds the 12-month interval required per GO 95, Rule 18-B (1) (ii) (3) for potential violations that compromise worker safety, regardless of if the condition is in an HFTD or not.

f. PG&E's current TD-2305M-JA03, Job Aid: Underground Inspection, Rev. 5, September 9, 2024, instructs inspectors to assign a priority or to prioritize based on condition when non-conformances are found. TD-2305M-JA03 does not provide guidance, define priority levels, or list required corrective action timelines. TD-2305M-JA03 previously used the parent document, PG&E's TD-2305M, to define priorities. However, the current revision of PG&E's TD-2305M does not list priority definitions or required completion intervals.[3]

2. **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."

   GO 165, Section III-B, Standards for Inspection states in part:

   "Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1."

   a. ESRB identified that PG&E had completed 23,172 overhead (OH) patrols and 20,456 OH inspections past their assigned due dates.[4] Table 4 below breaks down the late patrols and inspections by year and total structures late.

Table 4: Late OH Patrols and Inspections

Year	Inspection Type	Total Structures
2020	Inspection	5
2021	Inspection	20,166
2021	Patrol	22,225
2022	Inspection	22
2023	Inspection	263
2023	Patrol	947

[3] ESRB noted this finding in previous audit reports with an earlier revision of TD-2305M-JA03 (Rev 4). This issue still exists with the current revision.
[4] Excel file: *DRU16583_Q04(c)Atch01_FR_Late_P&I.xlsx*. PG&E PADR Response, Question 4c.

b. ESRB reviewed intrusive inspection records within the Fresno Division from October 13, 2024 through October 13, 2025 and found 522 inspection records for wood poles installed prior to 1999 with no inspection record prior to 2024-2025.[5] Per GO 165, Section III-B, effective in 1997, intrusive inspections of wood poles are required within 25 years of the installation date. For example, poles installed in 1998 would require an intrusive inspection by 2023. Therefore, ESRB determined the 522 wood poles installed prior to 1999 with no inspection record prior to 2024 have past due intrusive inspections.

   Furthermore, ESRB noted two intrusive inspection records missing the install date which could not be properly assessed. See Table 5 below for the two intrusive records missing the install date.

Table 5: Intrusive Records missing Install Date

Order Number	Equipment ID	Inspection Date	Install Date
85297870	100714557	7/29/2025	n/a
85297871	103078415	7/30/2025	n/a

3. **GO 128, Rule 17.2, Inspection** states in part:

   "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."

   GO 165, Section III-B, Standards for Inspection states in part:

   "Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1."

   ESRB identified that PG&E had completed 76 underground (UG) patrols and 14 UG inspections past their assigned due dates.[6] Table 6 breaks down the late patrols and inspections by year and total structures late.

Table 6: Late UG Patrols and Inspections

Year	Inspection Type	Total Structures
2024	Patrol	76
2025	Inspection	14

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

[5] Excel file: *DRU16583_Q13_Atch01_FR_PTT_CONF.xlsx*. PG&E PADR Response, Question 13.
[6] I.d.

"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 EDPM Manual, Effective on 8/7/2025, Rev. 4, Section 4, Program Overview and Qualifications states in part:

"Before conducting patrols or inspections, compliance inspectors are required to be current with their journeyman classification and must complete the initial System Inspections training.

Individuals completing aerial patrols and inspections are required to be qualified company representatives. Individuals completing this work receive special training on the maintenance and inspection process, with an emphasis on identifying conditions that negatively impact safety and reliability. They are further trained on how to prioritize all work necessary at each location."

ESRB reviewed PG&E's list of active inspectors and patrolmen in the Fresno Division from October 2020-October 2025, as well as their training/qualification records for this period to qualify them to perform GO 165 inspections. There were 24 inspectors (25 total missing training records) listed that had "No Electronic Training Record Found" as an entry under their course history.[7] Table 7 below shows the total missing training records by year.

Table 7: Missing Training Records

Year	Missing Training Records
2020	21
2021	1
2022	2
2023	1

ESRB sent a Post-Audit Data Request to PG&E for the 25 missing training records. PG&E responded that: "We were unable to locate signed Initial New Compliance Inspector or Refresher training records for 25 training entries. Of these entries, 21 were dated 2020, one was dated 2021, two were dated 2022, and one was dated 2023. Prior to 2021, training records were maintained exclusively in hard-copy format and were not consistently uploaded into the My Learning system, resulting in incomplete electronic record availability. To remediate this control deficiency, the organization has implemented enhanced documentation and record-retention procedures. These enhancements include the use of electronically generated rosters sourced directly from My Learning/SAP. The electronic rosters are now

[7] PG&E PADR Response, Question 11.

systematically uploaded to internal SharePoint repositories, and corresponding hard-copy records are forwarded to ERIM for centralized retention and archival."[8]

ESRB acknowledges that poor paper record keeping may be an explanation for the 2020 missing training records. However, PG&E's response does not address the one (1) inspector in 2021, two (2) inspectors in 2022, and one (1) inspector in 2023 that are missing training records.

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

> *"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."*

PG&E's Utility Bulletin: TD-2305M-JA02-B005, Effective Date: 2/14/2025, Rev. 0, Section 3, Guy Loose Adjust states in part:

> *"The original assessment to determine the acceptable slack on the guy was only looking at a leaning pole scenario, in this scenario the stresses (e.g., bending of pole due to overload) was not considered. ATS has updated the assessment to consider the overload scenario,* ***the bending scenario gives us the limiting slack value, which is at 1.5-foot of slack (worst-case) in all the pole class/lengths evaluated."***

See Figure 1 below from PG&E's TD-2305M-JA02.

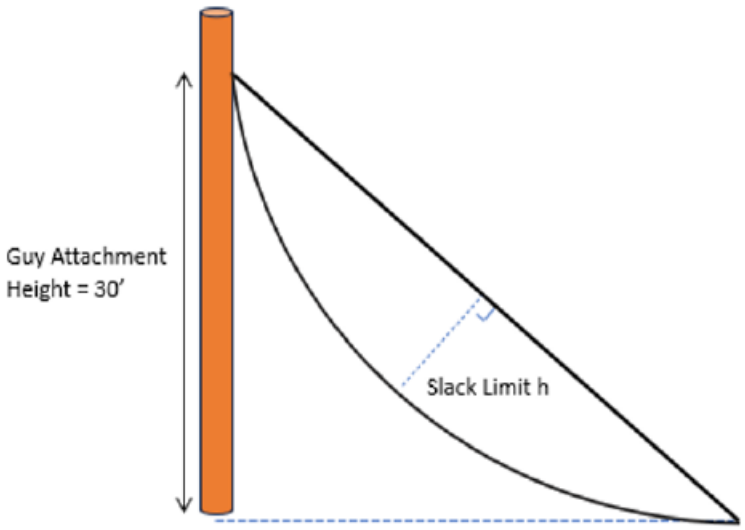

Figure 1: Guy slack limit, TD-2305M-JA02

Per GO 95, Rule 56.2, guys are required to be maintained taut. PG&E's Utility Bulletin: TD-2305M-JA02-B005 allows a deviation from taut by a maximum of one and a half (1.5) feet without regard to length or angle of attachment.

ESRB asserts that PG&E's Utility Bulletin: TD-2305M-JA02-B005 must be revised to

[8] PG&E Fresno Post-Audit Follow-up Data Request, Question 3 Response.

comply with GO 95, Rule 56.2 which requires guys to be maintained taut in all circumstances.

6. **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 of these rules."

   GO 128, Rule 22.4, A Maintenance Program states:

   "A Maintenance Program means a written policy that shall include the following key elements:
   (1) Inspection intervals
   (2) Rejection criteria
   (3) Corrective actions"

   GO 165, Rule III-C, Record Keeping states in part:

   "The utility shall maintain records for (1) at least ten (10) years of patrol and detailed inspection activities, and (2) the life of the pole for intrusive inspection activities. Such records shall be made available to parties or pursuant to Commission rules upon 30 days notice. Commission staff shall be permitted to inspect such records consistent with Public Utilities Code Section 314 (a).

   For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action."

   PG&E's TD-2305M: EDPM Manual, Published on April 1, 2016, Patrols, Performing Underground Patrols states in part:

   "Patrol of secondary enclosure includes only a visual evaluation of the exterior of visible enclosures to identify obvious structural hazards or problems (Do not highlight)."

   GO 128, Rule 32 requires all manholes, handholes, and subsurface equipment to be inspected and maintained according to GO 128, Rule 12.2 and GO 128, Rule 17.2. PG&E's current EDPM Manual (Rev. 4, Published: August 7, 2025) states that patrols of secondary enclosures require only a visual examination of the exterior and does not require the secondary enclosures to be marked (highlighted) or counted on the patrol/inspection map. Additionally, the current EDPM Manual states: *"If a compliance inspector cannot locate or see the secondary enclosure, no safety or reliability issue has been identified. They may continue with the patrol."*[9] PG&E cannot guarantee that UG secondary enclosures are properly inspected and maintained without observing and opening the enclosures during each patrol or inspection. ESRB asserts that failing to locate or view the secondary enclosure does

[9] PG&E EDPM Manual, page 18.

not confirm that no safety or reliability issues exists, as PG&E's EDPM Manual states.

ESRB finds that PG&E cannot guarantee its secondary facilities have been inspected without proper marking and mapping since PG&E's current procedure is to not mark secondary enclosures on their inspection map, stating "Do not highlight and do not count." Furthermore, because PG&E does not record or map secondary enclosures during patrols and inspections, ESRB determined PG&E does not maintain consistent records of completed patrols and inspections.

ESRB finds PG&E in violation of GO 128, Rule 12.2 and GO 128, Rule 17.2 due to its EDPM Manual lacking proper secondary vault inspection procedures which do not ensure their facilities are properly maintained and safe for the public. ESRB also finds PG&E in violation of GO 165, Section III-C for failing to maintain appropriate patrol and inspection records.

ESRB asserts that PG&E must inspect facilities thoroughly for the purpose of ensuring that they are in good condition to conform with GO 128 and 165.

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

> *"A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard.*
>
> *For all particulars not specified in General Order 95, a supply or communications company is in compliance with this rule if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions."*

PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, Rev. 14, Effective: January 14, 2025, Conductor states:

> *"O. Splice under the tie wire or tied into the insulator?*
> *1. (No) No Action*
> *2. (Yes) Repair/Replace E Tag."*

PG&E's current Job Aid, TD-2305M-JA02 allows splices to have no clearance between the insulator and splice. As stated above, the only requirement is that the splice is not under the tie wire or tied into the insulator.

Research shows that repeated flexing of aluminum and other metals beyond their elastic limit causes cyclic fatigue and growth of fatigue cracks.[10] For example, manufacturer specifications for Aluminum Conductor-Steel Reinforced (ACSR) conductors specify a

[10] Fatigue of Aluminum Alloys, ASM Handbook, Volume 2B, Properties and Selection of Aluminum Alloys, Kaufman.

minimum bend radius of 12 diameters to avoid permanent deformation.[11] Compression and automatic splices are more rigid than conductors; therefore, the installation of a splice creates an unbendable section.[12] In addition, fatigue failure of conductor strands occurs at locations where conductor movement is restricted and at splices.[13] Consequently, splices located near insulators create rigid supports that cause increased strain and fatigue on the conductor at the ends of the splices.[14] [15] Based on the aforementioned research, industry best practice dictates a minimum clearance requirement between the insulator and splice.[16]

Previous versions of PG&E's TD-2305M-JA02 procedures, such as Revision 9 (Dated February 1, 2023), required the following: "Create EC to replace conductor whenever when (A) the conductor has splices tied in proximity to insulator (less than 2 ft. from insulator, armor rod or dead end) preventing free movement of splice with conductor."[17]

Per GO 95, Rule 31.1, a supply or communications company is in compliance if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions. Therefore, ESRB finds PG&E in violation of GO 95, Rule 31.1 since its current Job Aid, TD-2305M-JA02 allows less clearance between splices and insulators than accepted industry best practice.

ESRB asserts that PG&E needs to revise Job Aid, TD-2305M-JA02 to comply with accepted industry best practice for splice clearance between insulators and supports.

[11] Southwire, Guide for the Installation of ACSR & ACSR/TW Conductors, p. 4. https://www.southwire.com/medias/sys_master/installation-manuals/installation-manuals/h21/h22/8887676272670/ACSRAndACSRTWConductorsInstallationGuidepdf.pdf
[12] The Use of Splices, Lectromec, Michael Traskos, February, 2024.
[13] Overhead Distribution Line Repair Manual, Preformed Line Products, Fatigue Breaks under Aeolian Vibration.
[14] Id.
[15] ANSI-IEEE Std 524-1980, 10.3.5.
[16] RUS Bulletin 1728F-803, US Dept of Agriculture, Rural Utilities Bulletin.
[17] PG&E TD-2305M-JA02, Rev 9, Published March 23, 2022.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location	Structure ID	Structure Type	GPS Coordinates
1	100857690	Pole	36.776371, -119.781766
2	100856166	Pole	36.776019, -119.781445
3	100856173	Pole	36.776365, -119.781482
4	100856179	Pole	36.776928, -119.781474
5	107197242	Padmount Transformer	36.808808, -119.697128
6	108264797	Padmount Transformer	36.808921, -119.696345
7	103996830	Pole	37.059404, -119.357673
8	103997048	Pole	37.059953, -119.357648
9	104189268	Pole	37.06035, -119.357914
10	103997671	Pole	37.060441, -119.357791
11	104048996	Pole	37.060904, -119.357604
12	104048997	Pole	37.060871, -119.357391
13	103997931	Pole	37.066275, -119.357682
14	103998791	Pole	37.066029, -119.357943
15	103998524	Pole	37.065512, -119.35929
16	103998525	Pole	37.064592, -119.35924
17	103275607	Pole	37.045662, -119.481567
18	100679089	Pole	37.045687, -119.482791
19	104260670	Pole	37.045962, -119.482792
20	100678614	Pole	37.038548, -119.51738
21	104179165	Pole	37.03857, -119.517433
22	100678609	Pole	37.038434, -119.516993
23	100678571	Pole	37.037975, -119.5159
24	103271093	Pole	36.909866, -119.464784
25	103135862	Pole	36.909728, -119.464697
26	103965984	Pole	36.90971, -119.464161
27	103273319	Pole	36.909719, -119.463254
28	103270617	Pole	36.918314, -119.457845
29	103377336	Pole	36.917571, -119.457081
30	100677531	Pole	36.935342, -119.460543

Location	Structure ID	Structure Type	GPS Coordinates
31	100677530	Pole	36.93532, -119.459541
32	100677527	Pole	36.935344, -119.458614
33	100691972	Pole	36.7282, -119.097
34	100691974	Pole	36.728833, -119.097204
35	100691976	Pole	36.729772, -119.097153
36	100691975	Pole	36.729036, -119.096622
37	107189240	Padmount Transformer	36.734464, -119.115939
38	107122985	Vault	36.734404, -119.115981
39	107122978	Vault	36.734386, -119.115872
40	107122989	Padmount Switch	36.735313, -119.117366
41	100702110	Pole	36.705032, -119.367314
42	103266290	Pole	36.705884, -119.367318
43	100702256	Pole	36.706716, -119.367307
44	100777108	Pole	36.723962, -119.515029
45	100776999	Pole	36.724146, -119.515022
46	100777128	Pole	36.724447, -119.513603
47	100815302	Pole	36.700853, -119.54462
48	100815303	Pole	36.700413, -119.544613
49	100815304	Pole	36.700425, -119.544874
50	100815294	Pole	36.700427, -119.545168
51	107145705	UG Transformer	36.712747, -119.569671
52	107218430	Vault	36.712744, -119.569664
53	103852689	Pole	36.78679, -119.668063
54	100780305	Pole	36.786697, -119.668049
55	107168056	Vault	36.81409, -119.669561
56	100876172	Pole	36.445625, -119.801012
57	103894746	Pole	36.445529, -119.800995
58	103895156	Pole	36.445522, -119.801966
59	100876169	Pole	36.445632, -119.801977
60	103895128	Pole	36.445518, -119.80308
61	100744685	Pole	36.302205, -119.786068
62	103148483	Pole	36.302271, -119.785623
63	100744689	Pole	36.3023, -119.785518
64	104277486	Pole	36.295992, -119.789776

Location	Structure ID	Structure Type	GPS Coordinates
65	100750585	Pole	36.295551, -119.789754
66	100750664	Pole	36.295004, -119.789779
67	100716471	Pole	36.429525, -120.103406
68	103240445	Pole	36.429534, -120.103785
69	100716491	Pole	36.429319, -120.102935
70	100716324	Pole	36.429578, -120.102646
71	100732100	Pole	36.528054, -120.098056
72	100732101	Pole	36.528048, -120.098175
73	107163374	Vault	36.828251, -119.823677
74	107094490	UG Transformer	36.828297, -119.823677
75	107141800	UG Transformer	36.828373, -119.822937
76	107098142	Vault	36.828374, -119.822903
77	107216493	UG Transformer	36.828281, -119.825044
78	107163362	Vault	36.82829, -119.825013
79	107174809	Vault	36.860179, -119.778029
80	108196739	Vault	36.860137, -119.778393
81	107200104	UG Transformer	36.861292, -119.779964
82	107133275	UG Transformer	36.861379, -119.780269
83	107171581	Vault	36.861386, -119.78025

IV. Field Inspection Violations

ESRB 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."*

Location	Violation Description
1	Bird nest on primary crossarm.
13	Damaged lightning arrester and loose hardware. PG&E has a late-open EC 130869859 to replace the lightning arrester and tighten the loose hardware, due by 8/13/2025.

Location	Violation Description
17	Improper connector installed. PG&E has a late-open EC 126395868 to replace the pole and connector, due by 6/17/2024.
18	Improper connector installed. PG&E has a late-open EC 126396171 to replace the pole and connector, due by 6/17/2024.
22	Corroded anchor and improper connector. PG&E has a late-open EC 126777303 to replace the anchor and connector, due by 8/8/2024.
24	Copper over aluminum connector. PG&E has an open EC 131310990 to replace the connector, due by 5/27/2026.
31	Improper connector installed. PG&E has a late-open EC 126313215 to replace the connector, due by 6/7/2024.
50	Improper connector installed and missing high-vis strips. PG&E has an open EC 129727067 to replace the connector and install high-vis strips, due by 10/9/2027.
59	Broken transformer bushing covers. PG&E has a late-open EC 127257100 to replace the covers, due by 10/12/2024.
61	PG&E has a late-open EC 121931373 to replace the pole, transformer, transformer leads, and install a secondary spreader bracket, due by 8/21/2022. Additionally, PG&E has an open EC 130849895, due 2/11/2028, to reinforce the pole and cancel the existing notification. However, in the field, ESRB observed the pole already had reinforcement, a new transformer, and a secondary spreader bracket installed. PG&E must improve its recordkeeping.
63	Pole leaning more than 10%. PG&E has a late-open EC 120634844 to replace the pole, due by 3/11/2022.
67	Insulator dead-end cover is loose. PG&E added insulator cover repair to existing EC 122085146.

2. **GO 95, Rule 34, Foreign Attachments** states in part:

"Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner's or owners' consent.

All permanent attachments must be approved by the Commission (see Rule 15.1) and the owner(s) involved."

Location	Violation Description
8	3rd party sign on pole. PG&E removed the sign in field.

3. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 5 Column D** requires:

   The basic minimum allowable vertical clearance of supply conductors between 0-750 V above ground in areas accessible to pedestrians only is 12 feet.

Location	Violation Description
33	Low secondary conductor clearance. PG&E has an open EC 130916935 to adjust conductor sag, due by 2/28/2026.

4. **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 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
3	Pole failed intrusive test. PG&E has a late-open EC 126983122 to replace the pole and crossarm, due by 9/5/2024.
4	Pole is deteriorated/damaged. PG&E has a late-open EC 126982767 to replace the pole, operating numbers, high voltage signage, and loose hardware, due by 9/5/2024.
17	Pole is deteriorated/damaged. PG&E has a late-open EC 126395868 to replace the pole, due by 6/17/2024.
18	Pole is deteriorated and has multiple woodpecker holes. PG&E has a late-open EC 126396171 to replace the pole, due by 6/17/2024.
20	Pole is deteriorated/damaged and has a damaged bird diverter and damaged hardware. PG&E has a late-open EC 126777302 to replace the pole, bird diverter, and hardware, due by 8/8/2024.
22	Woodpecker hole between two primary crossarms and various starter holes requiring assessment. PG&E has a late-open EC notification 126777303 to assess the pole, due by 8/8/2024.
26	Multiple woodpecker holes. PG&E has a late-open EC 123798910 to replace the pole and install new high voltage signage, due by 6/9/2023.

Location	Violation Description
28	Crossarm deteriorated and requires replacement. PG&E has an open EC 131450232 to replace the crossarm, due by 7/9/2026.
30	Pole has multiple woodpecker holes thus requires assessment. PG&E created a new EC 132884764 for woodpecker assessment.
33	Pole is damaged/deteriorated and has a damaged crossarm and deteriorated high voltage signage. PG&E has a late-open EC 126674991 to replace the pole, crossarm, and install signage, due by 7/26/2024.
36	Pole is deteriorated with woodpecker holes and has a damaged conductor. PG&E has a late-open EC 126675337 for conductor repair and pole replacement, due by 7/26/2024.
41	Pole failed intrusive test. PG&E has an open EC 131016804 to replace the pole, due by 3/26/2028.
44	Pole is deteriorated/damaged. PG&E has an open EC 129523057 to replace the pole, due by 8/28/2027.
47	Damaged crossarm and missing high-vis strips. PG&E has a late-open EC 129731963 to replace the crossarm and high-vis strips, due by 10/25/2025. Pole failed intrusive test. PG&E has an open EC 130927887 to replace the pole, due by 3/4/2028.
50	Crossarm is deteriorated/damaged. PG&E has an open EC 129727067 to replace the crossarm, due by 10/9/2027.
67	Pole is deteriorated/damaged and has deteriorated high voltage signage. PG&E has an open EC 122085146 to replace the pole and install signage, due by 9/22/2026.

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
1	Broken high voltage signage. PG&E has an open EC 127027549 to install signage, due by 9/10/2028.

Location	Violation Description
2	High voltage signage deteriorated. PG&E has an open EC 126983238 to install signage, due by 9/5/2028.
24	Top crossarm missing high voltage signage. PG&E added signage to existing EC 131310990 due by 5/27/2026.
31	High voltage signage damaged. PG&E has a late-open EC 126313215 to install signage, due by 6/7/2024.
56	Deteriorated high voltage signage. PG&E has an open EC 127257472 to install signage, due by 10/12/2028.
57	Damaged high voltage signage. PG&E has an open EC 127257569 to install new signage, due by 10/12/2028.
58	Damaged high voltage signage. PG&E has an open EC 127256919 to install new signage, due by 10/12/2028.
65	Missing high voltage signage. PG&E has a late-open EC 111688545 to install signage, due by 3/26/2021.
68	Damaged high voltage signage. PG&E has an open EC 122085129 to install new signage, due by 9/22/2026.
69	High voltage signage damaged/deteriorated.
70	High voltage signage damaged/deteriorated.

6. **GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment."

Location	Violation Description
5	Padmount transformer has a low oil level. PG&E has an open EC 131466522 to refill the oil, due by 7/11/2026.

7. **GO 128, Rule 32.3, Materials and Strength** states:

   "The materials, design and construction of manholes, handholes, subsurface equipment enclosures, and other underground boxes shall be such as to provide sufficient strength to sustain, with a suitable margin of safety, the loads which may reasonably be

imposed on them. Manholes, handholes, and subsurface equipment enclosures in street areas which are subject to vehicular traffic shall be constructed to withstand H–20–44 highway loading as designated by the American Association of State Highway Officials. Floors of manholes shall meet the requirements of Public Utilities Code, Sec. 8054. (Also see Appendix B, Figure 9, and Appendix D.)"

Location	Violation Description
55	Rotted and damaged wooden enclosure. PG&E has an open EC 130943951 to replace the enclosure, due by 3/8/2026.
73	Broken/damaged secondary enclosure. PG&E has an open EC 131268756 to replace the enclosure, due by 5/21/2028.

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	Observations
1	Comms ground wire exposed and damaged ground molding. PG&E created TPN 132862993 to notify the appropriate comms company.
31	Comms riser loose and not properly attached to pole. PG&E added staples to fix the loose riser.
46	Verizon has multiple risers not properly attached and one cut idle riser on a pole (Verizon # VZ106416). PG&E removed the idle line and stapled the two in-service lines to the pole.
54	AT&T handhole has a loose screw and signage sticking out that is creating a tripping hazard. PG&E created TPN 132887714 to

Location	Observations
	notify AT&T.
62	Comms line low clearance, approximately four (4) inches from PG&E service drop. PG&E created TPN 132889148 to notify the appropriate comms company.
63	Comms ground wire exposed and broken ground molding. PG&E has two open TPNs 121931705 and 121947281, created on 8/21/2021 and 8/24/2021, respectively, to notify the appropriate comms company.
72	Idle telephone drop hanging down pole and metal bar attached to pole. PG&E removed the third-party facilities in field.