

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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September 29, 2026

SA2026-1453

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

SUBJECT: Electric Substation Audit of PG&E Moss Landing Headquarters

Mr. Kushner:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Monica Hoskins and Samuel Mandell of ESRB staff conducted an electric substation audit of PG&E Moss Landing Headquarters from July 20 through July 24, 2026. During the audit, ESRB staff conducted field inspections of PG&E's substation facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order 174. A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than October 28, 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 Monica Hoskins at monica.hoskins@cpuc.ca.gov or (415) 652-1847.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rickey Tse".

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

Enclosure: CPUC Electric Substation Audit Report for PG&E Moss Landing

Cc: Lee Palmer, Deputy Executive Director, Safety Policy Division, Water Division, CPUC
Koko Tomassian, Director, Safety and Enforcement Division (SED), CPUC
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CPUC SUBSTATION AUDIT FINDINGS

PG&E Moss Landing Headquarters

July 20 – 24, 2026

I. Records Review

During the substation audit, Electric Safety and Reliability Branch (ESRB) reviewed the following standards, procedures, and records for PG&E's Moss Landing Headquarters (HQ):

- List of all PG&E substations in the Moss Landing HQ
- Map showing all PG&E substations in the Moss Landing HQ
- PG&E Substation Maintenance and Construction (SM&C) Manual, Utility Standard: TD-3322M, Revision 11, with attachments 1 through 12
- PG&E Inspection Procedures, Utility Standard: TD-3328P, standards 1 through 5
- PG&E Mobile Substation Equipment – Maintenance and Operating Procedures, Utility Standard: TD-3468P-01, Revision 3, with attachments 1 through 3
- PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S, Revision 10 and Revision 11, with attachments 1 through 13
- PG&E Substation Supplemental Inspection Program, Utility Standard: TD-3328S, Revision 3, with attachments 1 through 3 and 5
- PG&E Substation Asset Performance Management (APM) Process, Utility Procedure: TD-3320P-36, Revision 1
- PG&E Substation SAP Work Management System (WMS) Process, Utility Procedure: TD-3320P-12, Revision 8, with attachments 2, 4 through 6, 12, and 14
- Explanation of PG&E inspector training policies
- List of all substation inspections conducted in Moss Landing HQ from April 2024 to May 2026
- List of all open/pending, completed, cancelled, and late work orders and maintenance items from April 2024 to May 2026
- Equipment lists for ESRB selected substations
- Single-line diagrams of ESRB selected substations
- Last two visual inspection checklists for ESRB selected substations
- List of transformer banks that operated beyond nameplate capacity from April 2024 to May 2026 for ESRB selected substations.
- Infrared Testing records for ESRB selected substations from April 2024 to May 2026
- Four most recent oil sample test results for ESRB selected substations
- Four most recent electric test results for ESRB selected substations
- Training records for all substation and maintenance personnel from April 2024 to May 2026
- Other relevant substation inspections from April 2024 to May 2026 for ESRB selected substations
- Internal audit findings for Moss landing HQ from April 2024 to May 2026

II. Records Violations

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

General Order (GO) 174, Rule 12, General states in part:

“Design, construction and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

GO 174, Rule 33, Records states:

“33.1 Electronic or hard copy records of completed inspections shall include, at a minimum:

- *Inspector name or identification*
- *Inspection date*
- *Brief description of identified discrepancies*
- *Condition rating (where applicable)*
- *Scheduled date of corrective action (where applicable)*

33.2 Electronic or hard copy records of completed Inspections shall be retained for not less than five (5) years.”

1. PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S¹, establishes PG&E’s required end dates and out-of-compliance dates as follows:

Table 1: Due Dates Per Priority Code

Priority Code	Required End Date	Out-of-Compliance Date
A	Within 30 days	Close notifications (after removing the hazard [make safe] with either permanent or temporary repairs) within 30 days. Create a new lower priority notification immediately for any remaining work that will exceed 30 days.
B	Within 90 days	The out-of-compliance date is the first day of the second month following the month in which the repair date occurs.
E	Within 365 days	The out-of-compliance date is the first day of the year following the year in which the repair date occurs.
F	Greater than 365 days	There is no out-of-compliance date. This work will be completed when it is operationally efficient to perform the work.

- a. ESRB reviewed the Line Corrective (LC) notifications in the Moss Landing HQ from April 2024 to May 2026. Based on Table 1 above, ESRB noted that of the total 5,081 corrective and preventative completed, cancelled, and open LC notifications, PG&E

¹ PG&E Utility Standard TD-3322S, March 5, 2026, Revision 11.

completed 21 (0.41%) notifications after their out-of-compliance dates, as of May 25, 2026. Therefore, PG&E did not perform maintenance in accordance with accepted good practices described in Utility Standard TD-3322S. Table 2 below breaks down the late closed work orders by priority and type.

Table 2: Overdue LC Notifications

Priority Code	Late Open Notifications: Corrective	Late Closed Notifications: Corrective	Late Closed Notifications: Preventative	Total by Priority
A	–	–	–	–
B	–	1	–	1
E	4	12	4	20
Total	4	13	4	21

- b. ESRB noted that of the total 1,902 corrective LC notifications, PG&E had 50 (2.63%) notifications with the notification date after the completion date. Table 3 below breaks down these work orders by priority and type.

Table 3: LC Notifications with Notification Dates after Completion Date

Priority Code	Cancelled Notifications	Closed Notifications	Total by Priority
A	2	2	4
B	21	9	30
E	9	6	15
F	1	–	1
Total	33	17	50

2. PG&E’s Substation Maintenance and Construction Manual, Substation Inspections, Utility Standard: TD-3322M-01² establishes PG&E’s requirements for substation inspections.

Section II-A.3, Inspection Schedule and Documentation states in part:

“Use Company Form TD-3322M-F02, “Substation Condition Assessment Checklist” (see Section IX., “Forms”), to report the conditions of the substation facility and equipment. Complete information for each item on the checklist is provided in this section in the same order as it appears on the checklist. Review these inspection requirements before completing TD-3322M-F02. Each item checked on the form indicates the complete description of that item has been confirmed.”

² PG&E Utility Standard TD3322M-01, March 2, 2024, Revision 12

Section V-B.11, Ventilation and Sump Pump Equipment states:

“Ensure all exhaust fans, as well as seasonal air conditioners, heaters, and sump pumps, are in good working order.”

On March 12, 2026, PG&E conducted a monthly visual inspection of the Ford Ord Substation. The inspection identified an issue with the Heating, Ventilation, and Air Conditioning (HVAC) system, stating in the comments “HVAC system in 60kV control room is not working. Need contractor to troubleshoot and repair.” However, the inspector incorrectly marked this item as “1-No Problems Found” in the inspection checklist.

3. PG&E’s Substation Maintenance and Construction Manual, Substation Inspections, Utility Standard: TD-3322M-01³, establishes PG&E’s requirements for substation inspections.

Section V-A.23, Equipment Numbers and Nameplates states:

“Ensure all equipment and apparatus are identified with the appropriate signs and labels.”

Section V-B.12.a, Posted Substation Single-Line Diagrams states:

“Ensure the station’s single-line diagram is current, posted., and legible...”

PG&E’s Substation Issue for Construction (IFC) to Onsite As-Built Incorporation (OAI) Process, Utility Standard: TD-3330P-12⁴, states in part:

“Following this procedure ensures that all electric substations are maintained to correctly reflect the current status of installed equipment...”

- 4.1 *Within 3 business days after receiving the FCD transmittal from the responsible group, As-Built Desk personnel CHECK that the drawings on the transmittal are accurate and uploaded to the As-Built Drawing SharePoint site...*
2. *IF the as-built package is complete, THEN PROCEED as follows:*
 - h. *The responsible engineer SCHEDULES the as-built incorporation/as-built (OAI/AB) review meeting with the responsible group to ensure it is completed within 14 days of the As-Built Complete (ABC) date, if applicable.*

³ PG&E Utility Standard TD-3322M-1, March 4, 2024, Revision 12

⁴ PG&E Utility Standard TD-3330P-12, December 8, 2021, Revision 4

6.1 *Within 14 days from the ABC date, the RE MEETS onsite with the responsible groups to validate that all red/green marks are captured on the drawings correctly and to conduct an as-built review meeting, if applicable.*

1. *IF no issues are found, THEN the responsible group PERFORMS the following tasks:*
 - a. *INCORPORATES one set of updated as- as-built drawings on tear resistant paper into the existing set onsite.*
 - b. *POSTS one C-size copy of the single-line diagram at the substation.”*

PG&E’s Electric Substation Engineering Services, Utility Standard: TD-3331S⁵, Section 13, As-Built Documentation states in part:

“Include any submitted field corrections to the SLD and SLMR for as-built updates with the field photo(s) to confirm that the equipment is installed and in service.”

PG&E requires single-line diagrams (SLD) to be updated within 14 days of the As-Built Complete (ABC) date and that field corrections on the SLD are confirmed with photos. Each of the 55 substations in the Moss Landing HQ is inspected monthly or bimonthly by PG&E, and the inspection checklist requires the nameplates and the SLD at each substation to be checked. During the field audit, ESRB visited 23 substations and identified six SLDs and/or nameplates that were out of date (specified in Section IV). PG&E must ensure that all nameplates in the substation align with the SLD and ensure that the SLD is updated to reflect the conditions in the field for all substations.

4. PG&E Substation Maintenance and Construction Manual, Circuit Breakers, Utility Standard: TD-3322M-03⁶, establishes PG&E’s required actions for maintaining, installing, and testing circuit breakers in substations.

Section 3-IV.M.3, Circuit Breaker Contact Resistance Readings states in part:

“See Table 1 For circuit breaker contact resistance readings. Also, refer to the contact resistance specifications in the manufacturers’ instructions. The listed ranges represent the minimum and maximum resistance reported.

Circuit Breaker Manufacturer and Type	Current Rating in A	Voltage Rating in kV	Resistance Range in Micro-Ohms (μΩ)
Westinghouse			
R1	600	15.5	50-200
R1	1200	21	50-200

- b. *Any readings found to be outside this range and any showing a more than 25% difference of the lowest reading between phases or heads are abnormal. They*

⁵ PG&E Utility Standard TD-3331S, October 1, 2024, Revision 0

⁶ PG&E Utility Standard TD-3322M-03, May 5, 2022, Revision 11

indicate a problem that should be corrected or referred to the local substation field specialist.”

PG&E performed a breaker overhaul on Westinghouse R-1 Distribution Vacuum Breaker 1102 at the Gabilan Substation on July 18, 2025. The contact resistance results were as follows:

A Phase – 150.6 $\mu\Omega$

B Phase – 229.2 $\mu\Omega$

C Phase – 162.3 $\mu\Omega$

The contact resistance for B Phase is greater than the allowable maximum of 200 $\mu\Omega$ listed in Table 1 of the Substation Maintenance and Construction Manual. Additionally, the allowable difference between the phases is 37.65 $\mu\Omega$ (25% of the lowest Phase A resistance). There is a 78.6 $\mu\Omega$ difference between A Phase and B Phase and a 66.2 $\mu\Omega$ difference between B Phase and C Phase, both of which are greater than the allowable contact resistance difference.

5. PG&E’s Substation Maintenance and Construction Manual, Infrared Inspections, Utility Standard: TD-3322M-09⁷ details PG&E’s maintenance procedures for Infrared Inspections as follows:

Section III-H.1.a, Substation Infrared Inspection Form states:

“When thermal anomalies are identified through an IR inspection, document this information in the APM remote software. During tech down procedures, use Form TD-3322M-F80, “Substation Infrared Inspection.” Submit the form with attached images to the substation maintenance supervisor, who schedules the necessary follow-up inspections and repairs.”

On April 3, 2025, PG&E conducted an annual infrared (IR) inspection of the Industrial Acres Substation. During the IR inspection, PG&E identified hot spots on Air Switch (ARSW) 412/3, ARSW 413/3, and ARSW 411/5 in the FLIR IR inspection sheet, and PG&E created a Priority B tag for the three hot spots for reinspection in 90 days. However the ARSW 413/3 hot spot is not listed in the IR checklist for the 2025 annual inspection, and the statistics/photos of the ARSW 413/3 hot spot are missing from the FLIR annual IR inspection sheet.

6. PG&E Substation Maintenance and Construction Manual, Insulating Oil, Utility Standard: TD-3322M-10⁸, establishes PG&E’s required actions for oil testing condition codes.

Section II-F.3, TDA and TDA+ Condition Code Actions Table states the following for Dissolved Gas Analysis (DGA):

⁷ PG&E Utility Standard TD3322M-09, April 6, 2023, Revision 11

⁸ PG&E Utility Standard TD-3322M-10, April 6, 2025, Revision 10

Analysis Category	Basis	Code 1 (Normal)	Code 2 (Alert)	Code 3 (Warning)	Code 4 (Alarm)
DGA Result	TOA Normalized Energy Intensity Method (NEI)	1) Retest in 1 year	1) Retest in 1 year	1) Retest in 180 days	1) Retest in 30 days
		2) No follow-up action required	2) No follow-up action required	2) Further diagnostics and matrix considerations discussed and documented at monthly meetings with (WM&P, SAI, and SAS) for action plan, if required	

- a. PG&E oil sample testing of Transformer Bank 1 (Equipment #41013222) at the King City Substation on February 13, 2026 resulted in a DGA Code 4. PG&E's Substation Maintenance and Construction Manual, Table 9 "Condition Code Action Table" states that a retest in 30 days is required for DGA Code 4. The retest was due by March 15, 2026, however, PG&E did not perform retesting for this equipment until March 24, 2026.⁹
- b. PG&E oil sample testing of Transformer Bank 3 (Equipment #43208015) at the King City Substation on September 16, 2022 resulted in a DGA Code 3. PG&E's Substation Maintenance and Construction Manual, Table 9 "Condition Code Action Table" states that a retest in 180 days is required for DGA Code 3. The retest was due by March 15, 2023, however, PG&E did not perform retesting for this equipment until June 26, 2023.¹⁰
- c. PG&E oil sample testing of Transformer Bank 1 (Equipment #41015577) at the Viejo Substation on February 5, 2026 resulted in a DGA Code 4. PG&E's Substation Maintenance and Construction Manual, Table 9 "Condition Code Action Table" states that a retest in 30 days is required for DGA Code 4. The retest was due by March 7, 2026, however, PG&E did not perform the requested LTC inspection until April 19, 2026.¹¹

⁹ The sample collected on March 24, 2026 initially received a DGA Code 4, however after reanalysis using recently modified PG&E/NEI DGA norms the results were updated to a DGA Code 2. (Post-Audit Data Request Response)

¹⁰ The sample tested on June 26, 2023 received a DGA Code 1. (Pre-Audit Data Request Response Question 19)

¹¹ During the LTC Inspection on April 19, 2026 under LC #133273430 new oil was added and the new oil received DGA Code 1 after resampling on April 21, 2026. (Post-Audit Data Request Response)

III. Field Inspection

During the field inspection, ESRB inspected the following 23 substations:

Substation	City
Dolan Road Substation	Moss Landing
Castroville Substation	Castroville
Industrial Acres Station	Salinas
Otter Substation	Carmel
Viejo Substation	Monterey
Pacific Grove Substation	Pacific Grove
Navy Lab Substation	Monterey
Ford Ord Substation	Fort Ord
Gabilan Substation	Salinas
King City Substation	King City
Los Ositos Substation	Monterey
Los Coches Substation	Greenfield
Gonzales Substation	Gonzales
Tres Pinos Substation	Tres Pinos
San Benito Substation	Moss Landing
Big Basin Substation	Santa Cruz
Ben Lomond Substation	Santa Cruz
Arana Substation	Santa Cruz
Paul Sweet Substation	Santa Cruz
Rob Roy Substation	Watsonville
Casserly Substation	Watsonville
Laureles Substation	Salinas
Del Monte Substation	Monterey

IV. Field Inspection – Violations List

ESRB noted the following violations of GO 174, Rule 12 during the field inspection:

GO 174, Rule 12, General states in part:

“...Substations shall be designed, constructed and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service.

Design, construction, and maintenance should be performed in accordance with accepted good practices for the given local conditions known at the time by those responsible.”

1. Castroville Substation

- 1.1. The station single line diagram (SLD) in the control room needs to be updated. The control room has Revision 9 of the SLD, however there is a more updated Revision 10 available.¹²
- 1.2. Station Service Transformer and AC Panel show signs of rust and corrosion and are in need of replacement. PG&E has existing Notification #118264647 for this issue.



¹² PG&E Substation Maintenance and Construction Manual for Substation Inspections states “Ensure the station’s single-line diagram is **current**, posted, and legible”

2. Industrial Acres Station

- 2.1. The station has exposed and unsecured conductors. PG&E has an existing Capital Job #74052882 for station upgrades.



- 2.2. Circuit Breaker 412 shows signs of an oil weep and has oil residue. PG&E has existing Notification #133701808 for this issue.



3. Otter Substation

- 3.1. The station does not meet the wildfire defensible space Zone 1 clearance requirement of 30 feet.¹³



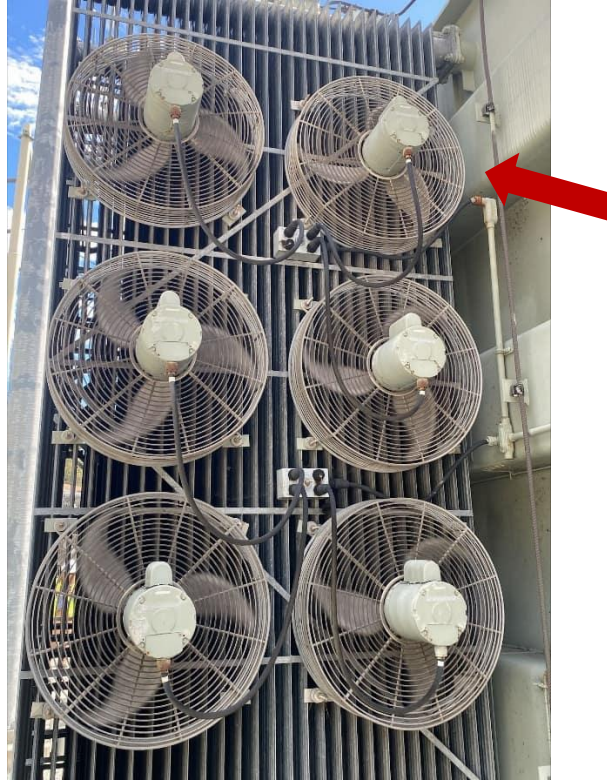
- 3.2. Regulator 1 B Phase shows signs of an oil leak and has oil residue. PG&E has existing Notification #133694441 for this issue.



¹³ PG&E Substation Maintenance and Construction Manual for Substation Inspections states “**ZONE 1** – The Clean Zone creates a firebreak by removing all vegetation and combustibles at a minimum circumference of 30 feet around the substation as measured from all outermost buildings or equipment.”

4. Viejo Substation

- 4.1. Transformer Bank 1 has a broken fan. PG&E has existing Notification #133577248 for this issue.



- 4.2. Transformer Bank 2 has a broken fan. PG&E has existing Notification #133577249 for this issue.



4.3. Del Monte Viejo 60kV Potential Transformer A Phase insulator is dirty. PG&E has existing Notification #133569296 for this issue.



4.4. Del Monte Viejo 60kV Potential Transformer B Phase insulator is dirty. PG&E has existing Notification #133569254 for this issue.



4.5. Del Monte Viejo 60kV Potential Transformer C Phase insulator is dirty. PG&E has existing Notification #133569257 for this issue.



4.6. Monterey-Viejo 60kV Potential Transformer A Phase insulator is dirty. PG&E has existing Notification #133569281 for this issue.



4.7. Monterey-Viejo 60kV Potential Transformer B Phase insulator is dirty. PG&E has existing Notification #133569282 for this issue.



4.8. Monterey-Viejo 60kV Potential Transformer C Phase insulator is dirty. PG&E has existing Notification #133569250 for this issue.



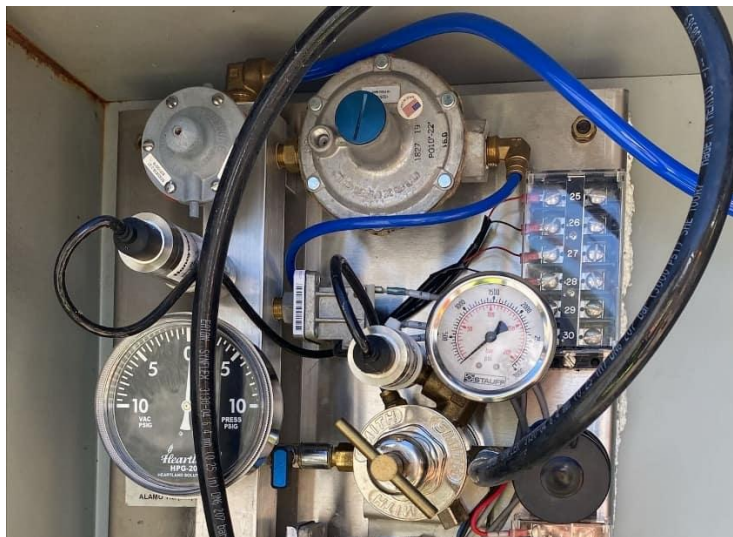
5. Navy Lab Substation

5.1. The station single line diagram (SLD) in the control room needs to be updated. The control room has Revision 1 of the SLD, however there is a more updated Revision 2 available.¹⁴

5.2. Transformer Bank 1 A Phase needs a new nitrogen bottle. PG&E added a new nitrogen bottle in the field.



5.3. Transformer Bank 1 C Phase needs a new nitrogen bottle. PG&E added a new nitrogen bottle in the field.



¹⁴ PG&E Substation Maintenance and Construction Manual for Substation Inspections states “Ensure the station’s single-line diagram is **current**, posted, and legible”

6. Ford Ord Substation

- 6.1. The station single line diagrams (SLD) in the control rooms are out of date however the latest Revision 9 is on site. The updated SLD must be posted in each control room.¹⁵ PG&E has existing Notification #133701690 to update the SLD created on July 9, 2026.
- 6.2. Transformer Bank 2 conservator tank shows signs of rust and corrosion. PG&E has existing Notification #133521412 for this issue.



- 6.3. High Voltage Circuit Breaker 52 Potential Transformer C Phase shows signs of rust and corrosion. PG&E has existing Notification #133594427 for this issue.



¹⁵ PG&E Substation Maintenance and Construction Manual for Substation Inspections states “Ensure the station’s single-line diagram is current, **posted**, and legible”

7. Gabilan Substation

- 7.1. Transformer Bank 1 has an oil weep. PG&E has existing Notification #126488740 for this issue created on July 9, 2026.



- 7.2. Transformer Bank 1 has a broken fan. PG&E has existing Notification #133701875 for this issue.



8. King City Substation

8.1. Transformer Bank 3 has a broken fan.



9. Los Ositos Substation

9.1. Transformer Bank 1 radiator has an active bird's nest. PG&E has existing Notification #133701320 for this issue.



9.2. Transformer Bank 1 shows signs of rust and corrosion on the oil filtration system. PG&E has existing Notification #133638679 for this issue.



9.3 Circuit Breaker 2101 shows signs of rust and corrosion. PG&E has existing Notification #133623515 for this issue.



10. Los Coches Substation

10.1. The station and station perimeter fence have soil erosion. PG&E has existing Notification #133538375 for this issue.



10.2. The station perimeter fence has gaps and accessibility concerns. PG&E has existing Notification #128519699 for this issue.



10.3. The station support structures show signs of rust and are in need of replacement. PG&E has existing Capital Job #74073780 for this issue.



10.4. Transformer Bank 2 B Phase has a broken fan. PG&E has existing Notification #133657688 for this issue.

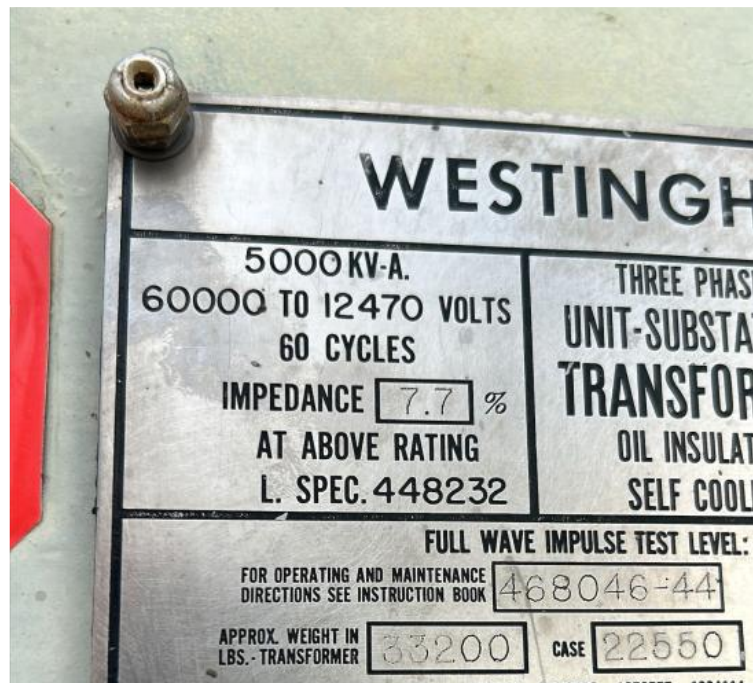


10.5. Potential Transformer 82 A Phase shows signs of rust and corrosion. PG&E has existing Notification #126905339 for this issue.



11. Gonzales Substation

11.1. The station single line diagram (SLD) needs to be updated. Transformer Bank 3 nameplate does not have a fan rating and only lists 5,000kVA, however the SLD lists 5,600kVA and 7,000kVA. Transformer Bank 4 nameplate lists high voltage as 60,000V, however the SLD lists high voltage as 66,000V.



11.2. Transformer Bank 3 B Phase bushing has a cracked gauge.



11.3. Transformer Bank 3 radiator has an oil weep. PG&E has existing Notification #133697406 for this issue.



11.4. Transformer Bank 4 oil filtration system has an oil weep. PG&E has existing Notification #133538196 for this issue.



11.5. 60kV Potential Transformers A Phase, B Phase, and C Phase have faded labels. PG&E has existing Notification #133716580 for this issue.



11.6. 60kV Potential Transformers A Phase, B Phase, and C Phase show signs of rust and corrosion. PG&E mitigated this issue in the field.

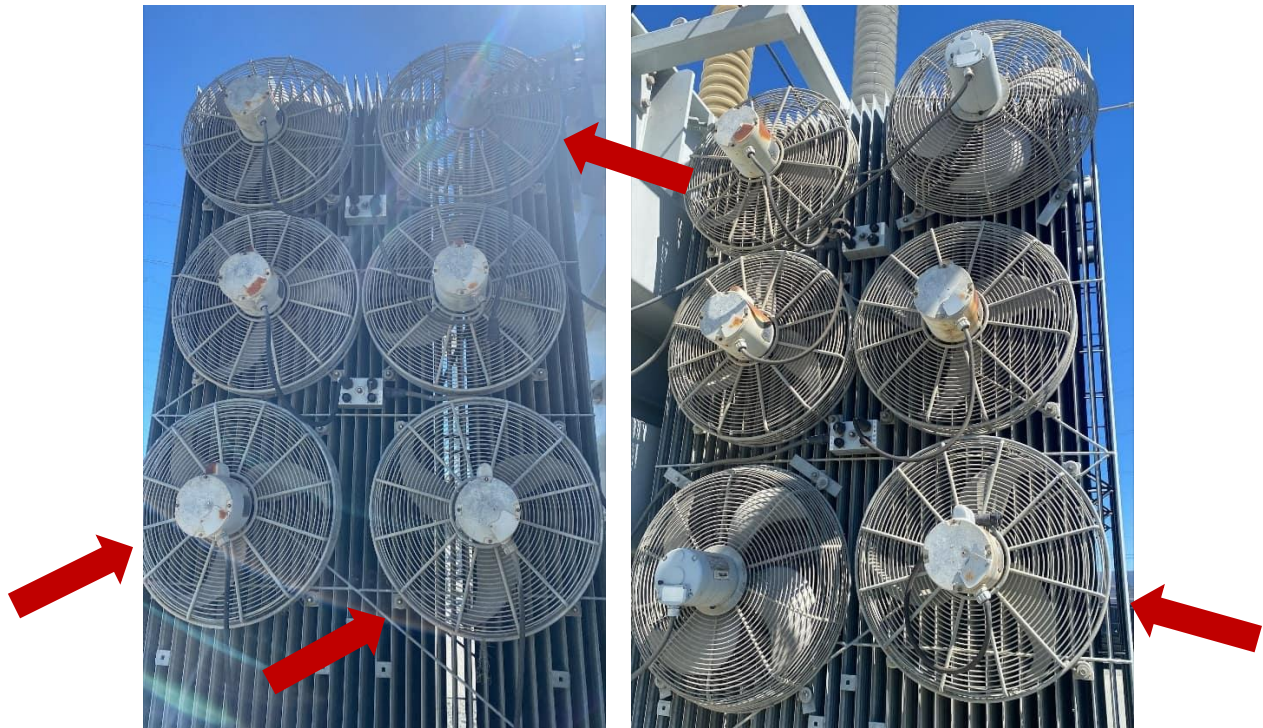


12. San Benito Substation

12.1. Station battery room has inoperable fans. PG&E has existing Notification #133702408 for this issue.



12.2. Transformer Bank 1 has four broken fans. PG&E has existing Notification #133493094 for this issue.



12.3. Transformer Bank 1 has an oil leak. PG&E has existing Notification #133288554 for this issue.



12.4. Transformer Bank 1 radiator has an active bird's nest. PG&E has existing Notification #133514283 for this issue.



13. Big Basin Substation

13.1. The station single line diagram (SLD) needs to be updated. Regulator 1 nameplate lists 416.3kVA for each of the three phases, however, the SLD lists 300kVA for each phase.



14. Ben Lomond Substation

14.1. The station signs are inside of the fence. PG&E has existing Notification #133701595 for this issue.



15. Arana Substation

15.1. The station has trees encroaching on and hanging over the perimeter fence. PG&E has existing Notification #133721360 for this issue.



15.2. Regulator 2 Bypass C Switch is missing a target plate. PG&E has existing Notification #133721363 for this issue.



16. Paul Sweet Substation

16.1. Transformer Bank 1 label in the control room needs to be attached. PG&E attached the nameplate in the field.



16.2. Circuit Breaker 2106 has a faded counter. PG&E has existing Notification #133564621 for this issue.



17. Rob Roy Substation

17.1. Transformer Bank 1 has a broken fan. PG&E has existing Notification #133760327 for this issue.



17.2. Transformer Bank 1 has an oil weep. PG&E has existing Notification #133736096 for this issue.



17.3. Transformer Bank 1 has a damaged berm and asphalt debris on site. PG&E has existing Notification #133764062 for this issue.



17.4. Bus Potential Transformer box has an unattached grounding wire. PG&E attached the grounding wire in the field.



17.5. Green Valley-Paul Sweet 115kV Circuit Switcher 147 CCVT insulator is dirty. PG&E has existing Notification #133766623 for this issue.



17.6. Green Valley-Paul Sweet 115kV Circuit Switcher 137 CCVT insulator is dirty.
PG&E has existing Notification #133766569 for this issue.



18. Laureles Substation

18.1. Transformer Bank 1 A Phase has an oil weep. PG&E has existing Notification #132825309 for this issue.



18.2. Transformer Bank 1 B Phase has an oil weep. PG&E has existing Notification #132825335 for this issue.



18.3. Transformer Bank 1 C Phase has an oil weep. PG&E has existing Notification #132825331 for this issue.



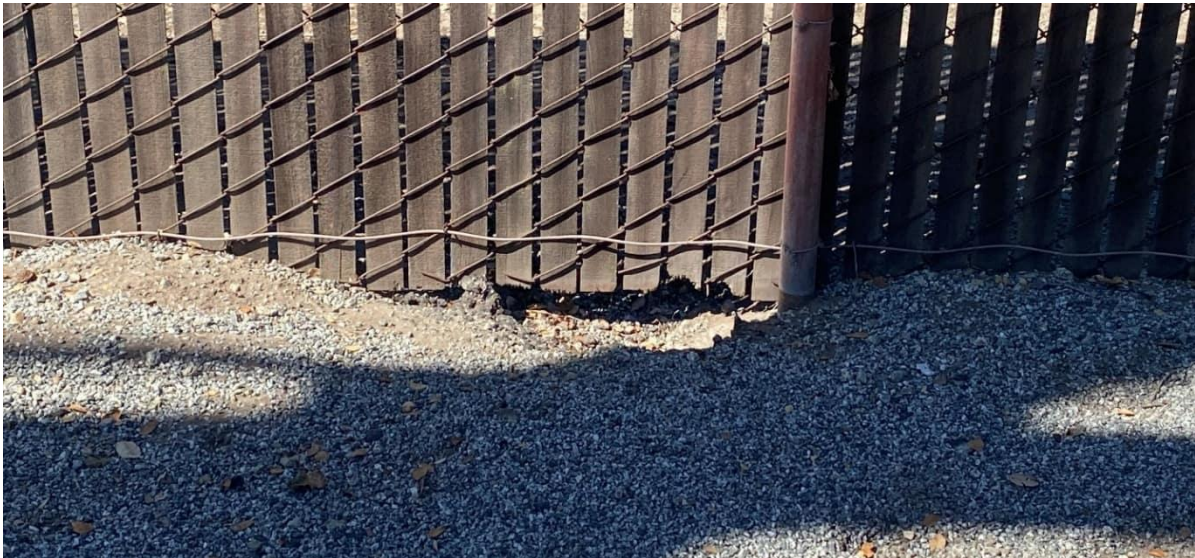
19. Del Monte Substation

19.1. The station single line diagram (SLD) needs to be updated to clearly label the switches. The SLD illegibly labels Switch Bank 1/9 ABC as what looks like Bank 1/5 ABC.¹⁶

19.2. The transmission station has uneven ground and critter holes that present a tripping hazard. PG&E has existing Notification #133732465 for this issue.



19.3. The transmission station perimeter fence has soil erosion and accessibility issues. PG&E has existing Notification #128745177 for this issue.



¹⁶ PG&E Substation Maintenance and Construction Manual for Substation Inspections states “Ensure the station’s single-line diagram is current, posted, and **legible**”

19.4. Transformer Bank 1 shows signs of corrosion and rust. PG&E has existing Notification #128744904 for this issue created on May 10, 2024 and updated for heavy rust on July 23, 2026.¹⁷



19.5. Transformer Bank 5 conservator tank has corrosion and shows signs of an oil weep. PG&E has existing Notification #133781904 for this issue created on July 23, 2026.¹⁸



¹⁷ ESRB identified the same issue under Notification #128882802 during the previous PG&E Moss Landing Substation Audit in June 2024 (SA2024-1172). Notification #128882802 was created on May 23, 2024 and closed on December 30, 2025 for the maintenance team to monitor and re-evaluate the issue.

¹⁸ ESRB identified the same issue under Notification #128301423 during the previous PG&E Moss Landing Substation Audit in June 2024 (SA2024-1172). Notification #128301423 was created on March 18, 2024 and the oil leak was mitigated on January 28, 2025.

19.6. Circuit Breaker 312 shows signs of rust and corrosion. PG&E has existing Notification #128744756 for this issue created on May 10, 2024.¹⁹



19.7. Circuit Breaker 322 shows signs of rust and corrosion. PG&E has existing Notification #128744759 for this issue created on May 10, 2024.²⁰



¹⁹ ESRB identified the same issue under Notification #128882800 during the previous PG&E Moss Landing Substation Audit in June 2024 (SA2024-1172). Notification #128882800 was created on May 23, 2024 and closed on December 30, 2025 because it was a duplicate tag.

²⁰ ESRB identified the same issue under Notification #128882765 during the previous PG&E Moss Landing Substation Audit in June 2024 (SA2024-1172). Notification #128882765 was created on May 23, 2024 and closed on December 30, 2025 because it was a duplicate tag.

V. Observations

During the records review, ESRB observed the following developing safety concerns:

ESRB identified four of the same issues at the Del Monte Substation during the 2024 and 2026 audits, detailed in Section IV, 19.4-19.7 above. However, PG&E provided different notifications tag numbers during the audits for each of the four issues.

During the field inspection, ESRB observed the following developing safety concerns:

1. Dolan Road Substation

1.1. Transformer Bank 1 has a bird's nest. PG&E has existing Notification #133702373 for this issue.

1.2. Circuit Breaker 152 has an active bird's nest.

2. King City Substation

2.1. Station 12kV Bus Work for Circuit Breaker 1105 has multiple bird's nests. PG&E has existing Notification #133579452 for station bird's nests.

3. Tres Pinos Substation

3.1. Distribution Padmount Transformer Bank 1 has cracks in the foundation.

4. Paul Sweet Substation

4.1. Transformer Bank 1 foundation has a non-spalling crack.

4.2. Transformer Bank 1 has an active bird's nest. PG&E has existing Notification #133564696 for this issue.