



**ALAMEDA
MUNICIPAL POWER**

A Department of the City of Alameda

September 15, 2023

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

Re: Electric Distribution Audit of Alameda Municipal Power

Dear Mr. Tse:

Thank you for your team's time spent in May 2023 performing the distribution system audit. We appreciate the professionalism the team has shown while on our premises. In response to your letter dated August 15, 2023, this letter is to address findings from the audit, and to inform you of corrective and preventative measures taken or scheduled.

As mentioned in your report, AMP is in the process of deploying an asset and workflow management system to track patrols, inspections, and work orders which will correct any discrepancies found in tracking and maintaining records of such activities.

AMP is currently using a simple cloud-based spreadsheet application and a geospatial information system (GIS) based system map to track assets, work orders, and inspections, as interim tools until the new asset and workflow management system is fully operational. Due to the inherent simplicity of these current tools, the use of additional priority codes (Priority 5 and Priority 6) in the spreadsheet was done a data entry and reporting workaround, avoiding added complexity by creating separate check boxes for "no issue" and "issue resolved". Since these are not actual priority codes and the use of these two codes is readily understood, they do not need to be added in AMP's *Preventative Inspection Manual*.

The General Orders (GOs) do not contain prescribed guidelines regarding notifications to third parties and as such are not included in AMP's *Preventative Inspection Manual*. By default, third parties are responsible for their own installations per their respective GOs. If AMP notices an issue, we notify the respective utility or entity, but AMP is under no general obligation to actively inspect their facilities.

There is a record of past work orders and inspections in the current spreadsheet as new data is added as a new entry for the asset instead of overwriting the old entry.

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AMP uses the respective GOs as our standard inspection guidelines and we do not believe it makes sense to duplicate this information into AMP's manual. AMP's *Preventative Inspection Manual* and the digital form used to add inspection findings to AMP's spreadsheet database include checklists to ensure consistency and completeness.

The attached table provides a summary of the corrective measures taken in response to violations that were identified during the May 2023 audit.

AMP appreciates the feedback received from the Electric Safety and Reliability Branch during this audit. It has assisted us in improving our processes and procedures.

Sincerely,

A handwritten signature in black ink, appearing to read "Andre Basler". The signature is written in a cursive, flowing style.

Andre Basler, PE
Assistant General Manager – Engineering and Operations

Enclosure: CPUC Audit May 2023 Corrective Actions Summary

Corrective Actions Summary

Location	Equipment Number/	Structure Type	GO	Rule	Findings	AMP Response	work scheduled
2	Corner of 5th Street and Central Avenue	Pole	95	18-A (Observations)	The Pole at the corner of 5th Street and Central Avenue has an exposed communications grounding wire.	Notify 3rd parties	sched: 9/21/23
27	L-920	Pad Mount Transformer	128	17.1	The Pad Mount Transformer L-920 has a faded number tag	repair/ maintenance	Priority 2: < 6 months)
27	L-920	Pad Mount Transformer	128	17.1	The Pad Mount Transformer L-920 has a gauge showing low oil levels.	Monitor on AMP's inspection schedule	annually
5	Pole with switch A303 at 503 Central Avenue	Pole	95	35	Excessive vegetation is surrounding the service drop to 507 Central Avenue from the Pole at 503 Central Avenue and causing possible strain and abrasion.	tree trimming	Priority 2: < 6 months)
6	511 Central Avenue	Pole	95	37	The vegetation is less than 18 inches from the primary lines on the Pole at 523 Central Avenue.	tree trimming	Priority 2: < 6 months)
33	CA38210	Pole	95	31.1	Pole CA38210 is located along a paved road and is missing visibility strips.	repair/ maintenance	Complete
33	CA38210	Pole	95	31.1	The down guy anchor head for Pole CA38210 is buried in the ground.	repair/ maintenance	Priority 2: < 6 months)
6	511 Central Avenue	Pole	95	18-A (Observations)	The conductor span between the Poles at 511 Central Avenue and 523 Central Avenue has a broken communications lashing wire.	Notify 3rd parties	sched: 9/21/23
6	511 Central Avenue	Pole	95	18-A (Observations)	The Pole at 511 Central Avenue has strain and abrasion from vegetation on the communications	Notify 3rd parties	sched: 9/21/23
7	523 Central Avenue	Pole	95	18-A (Observations)	The Pole at 523 Central Avenue has an abandoned communications line.	Notify 3rd parties	sched: 9/21/23
76	CA46230	Pole	95	31.1	Pole CA46230 is located along a paved road and is missing visibility strips.	repair/ maintenance	Complete
76	CA46230	Pole	95	31.1	Pole CA46230 has bolts along the pole that are extending more than 1.5 inches from the pole and require trimming.	repair/ maintenance	Complete
7	523 Central Avenue	Pole	95	51.6-A	The Pole at 511 Central Avenue has loose high voltage signs.	repair/ maintenance	Complete
10	1440 Benton Street	Pole	95	35	Excessive vegetation is surrounding the service wires on the Pole at 1440 Benton Street and causing possible strain and abrasion.	tree trimming	Priority 2: < 6 months)
11	1424 Benton Street	Pole	95	35	Excessive vegetation is surrounding the service wires on the Pole at 1424 Benton Street and causing possible strain and abrasion.	tree trimming	Priority 2: < 6 months)
13	CA24040 at 2001 Alameda Avenue	Pole	95	51.6-A	Pole CA24040 at 2001 Alameda Avenue has damaged high voltage signs.	repair/ maintenance	Priority 2: < 6 months)
13	CA24040 at 2001 Alameda Avenue	Pole	95	56.4-C(4)	Pole CA24040 has an anchor guy that is less than the required 3 inches away from the communication line and is contacting the secondary conductor above the guy insulator.	repair/ maintenance	Complete
14	CA24050 at 1228 Chestnut Street	Pole	95	18-A (Observations)	Pole CA24050 has a loose communications cable that is not secured to the pole.	Notify 3rd parties	sched: 9/21/23
15	Corner of Armitage Street and Pattinson Way	Underground Vault	128	32.7	The underground vault at the corner of Armitage Street and Pattinson Way has a damaged lid. AMP has placed a temporary cover over the underground vault until it can be replaced.	replace	Priority 2: < 6 months)
18	L-725	Pad Mount Transformer	128	17.1	Pad Mount Transformer L-725 has rust and corrosion on the enclosure.	Monitor on AMP's inspection schedule	annually

Corrective Actions Summary

Location	Equipment Number/	Structure Type	GO	Rule	Findings	AMP Response	work scheduled
21	2901 Bay View Parkway	Underground Vault – Primary Pull Box	128	32.7	The underground vault at 2901 Bay View Parkway was lifted off the ground with tree roots growing into the interior, making it accessible by the public, creating a tripping hazard, and keeping the enclosure lid from being secured.	temp repair to mitigate unauthorized access Re-built under review in engineering	Priority 2: < 6 months)
23	LT632	Pad Mount Transformer	128	34.2-C	Vegetation obstructed access to Pad Mount Transformer LT-632	Clear vegetation, Notify 3rd parties	Complete
31	CA26000	Pole		Observation only	The automatic splices on the conductor span on Pole CA26000 are tied in too close to the supporting insulator and may be preventing free movement of the splice with the conductor.	investigate	Priority 4: < 3 years
32	CA15070	Pole	95	56.9	The outermost guy guard on Pole CA15070 has shifted up and is no longer securely attached to the lowest portion of the anchor guy.	new guy guard	Complete
32	CA15070	Pole	95	18-A (Observations)	Pole CA15070 has an exposed communications grounding wire.	Notify 3rd parties	sched: 9/21/23
32	CA15070	Pole	95	56.4-C(4)	Pole CA15070 has an anchor guy that is less than the required 3 inches away from the communication	repair/maintenance	Complete
33	CA38210	Pole	95	56.9	The outermost guy guard on Pole CA38210 is missing high visibility markers.	repair/maintenance	Complete
33	CA38210	Pole	95	18-A (Observations)	Pole CA38210 has an unattached communications guy wire that needs to be anchored.	Notify 3rd parties	sched: 9/21/23
34	CA14290	Pole	95	31.1	Pole CA14290 has a tree that is pressing against and deflecting the anchor guy.	tree removal	Priority 3: < 12
34	CA14290	Pole	95	56.9	The outermost guy guard on Pole CA14290 is missing high visibility markers.	repair/maintenance	Complete
34	CA14290	Pole	95	56.4-C(4)	Pole CA14290 has an anchor guy that is less than the required 3 inches away from the communication	repair/maintenance	Priority 2: < 6 months)
34	CA14290	Pole	95	56.7-B	Pole CA14290 has vegetation above the guy insulator that is contacting and grounding the	tree trimming	Complete
35	CA23750	Pole	95	31.1	Pole CA23750 has a rusted overhead transformer.	Monitor on AMP's inspection schedule	annually
36	CA10380	Pole	95	51.6-A	Pole CA10380 has a damaged high voltage sign.	repair/maintenance	Priority 3: < 12
37	CA23740	Pole	95	18-A (Observations)	Pole CA23740 has an abandoned communications line.	Notify 3rd parties	sched: 9/21/23
39	CA23720	Pole	95	18-A (Observations)	Pole CA23720 has a slack communications down guy that is hanging low over a residential driveway.	Notify 3rd parties	sched: 9/21/23
39	CA23720	Pole	95	56.4-A(1)(a)(2)	The anchor guy attached to Pole CA23720 is less than 14 feet above a residential driveway.	repair/maintenance	Priority 3: < 12
40	CA60980	Pole	95	18-A (Observations)	Pole CA60980 has an abandoned communications line.	Notify 3rd parties	sched: 9/21/23
41	West Corner of Grand Avenue and Clement Street	Pole	95	34	The Pole at the west corner of Grand Avenue and Clement Street has an unauthorized third-party attachment.	Notify 3rd parties	Priority 3: < 12 months)
41	West Corner of Grand Avenue and Clement Street	Pole	95	51.6-A	The Pole at the west corner of Grand Avenue and Clement Street is missing a high voltage sign.	repair/maintenance	Priority 3: < 12 months)
43	CA60960	Pole	95	34	Pole CA60960 has an unauthorized third-party attachment.	Notify 3rd parties	Priority 3: < 12

Corrective Actions Summary

Location	Equipment Number/	Structure Type	GO	Rule	Findings	AMP Response	work scheduled
43	CA60960	Pole	95	51.6-A	Pole 60960 has a broken high voltage sign.	repair/maintenance	Priority 3: < 12
45	CA60950	Pole	95	31.1	The down guy anchor head for Pole CA60950 is partially buried in the ground.	repair/maintenance	Priority 3: < 12
45	CA60950	Pole	95	18-A (Observations)	Pole CA60950 has an exposed and damaged communications grounding wire.	Notify 3rd parties	sched: 9/21/23
46	CA61370	Pole	95	56.4-D(2)	Pole CA61370 has anchor guy that is less than the required 3 inches away from another anchor guy. AMP has Pole CA61370 scheduled for replacement after Osmose testing revealed rotting in the pole, and all issues with the pole will be resolved when it is replaced.	replace pole	Priority 2: < 6 months)
48	CA61350	Pole	95	18-A (Observations)	Pole CA61350 has an exposed communications grounding wire.	Notify 3rd parties	sched: 9/21/23
48	CA61350	Pole	95	54.6-B	Pole CA61350 has an exposed ground wire leading to the transformer.	Comm ground, not AMP Notify 3rd parties	sched: 9/21/23
48	CA61350	Pole	95	56.7-B	Pole CA61350 has vegetation above the guy insulator that is contacting and grounding the	tree trimming	Priority 2: < 6 months)
48	CA61350	Pole		Observation only	The automatic splices on the conductor span on Pole CA61350 are tied in too close to the supporting insulator and may be preventing free movement of the splice with the conductor.	investigate	Priority 4: < 3 years
49	CA61340	Pole	95	34	Pole CA61340 has an unauthorized third-party attachment.	Notify 3rd parties	Priority 3: < 12
49	CA61340	Pole	95	56.7-B	Pole CA61340 has vegetation above the guy insulator that is contacting and grounding the	tree trimming	Priority 2: < 6 months)
50	1311 Fernside Boulevard	Pole	95	37	The vegetation is less than 18 inches from the primary lines on the Pole at 1311 Fernside	tree trimming	Complete
51	1305 Fernside Boulevard	Pole	95	56.7-B	The Pole at 1305 Fernside Boulevard has vegetation above the guy insulator that is contacting and grounding the anchor guy.	tree trimming	Priority 2: < 6 months)
53	Corner of Encinal Avenue and Fernside Boulevard	Pole		Observation only	The automatic splices on the conductor span on the Pole at the corner of Encinal Avenue and Fernside Boulevard are tied in too close to the supporting insulator and may be preventing free movement of the splice with the conductor.	investigate	Priority 4: < 3 years
55	3312 Encinal Avenue	Pole	95	18-A (Observations)	The Pole at 3312 Encinal Avenue has a loose communications lashing wire. The Pole at 3312 Encinal Avenue has a communications line contacting the secondary conductor, which could potentially lead to an	Notify 3rd parties	sched: 9/21/23
55	3312 Encinal Avenue	Pole	95	56.4-C(4)	The Pole at 3312 Encinal Avenue has an anchor guy that is less than the required 3 inches away from the secondary lines and there is contact between the secondary and communication lines. AMP has the Pole at 3312 Encinal Avenue scheduled for replacement after Osmose testing revealed rotting in the pole, and all issues with the pole will be resolved when it is replaced.	replace pole	Priority 2: < 6 months)
56	LX-193	Pad Mount Transformer	128	17.1	Pad Mount Transformer LX-193 has a gauge showing low oil levels.	Monitor on AMP's inspection schedule	annually

Corrective Actions Summary

Location	Equipment Number/	Structure Type	GO	Rule	Findings	AMP Response	work scheduled
58	In front of LX-225	Underground Vault – Primary Pull Box	128	32.7	The underground primary vault in front of Pad Mount Transformer LX- 193 has no bolts securing the lid and is accessible by the public.	repair/ maintenance	Complete
59	L-161	Pad Mount Transformer	128	36.5-C	Pad Mount Transformer L-161 has no grounding rod or other grounding method.	repair/ maintenance	Priority 2: < 6 months)
62	2620 Washington Street	Pole	95	18-A (Observations)	The Pole at 2620 Washington Street has an abandoned communications line.	Notify 3rd parties	sched: 9/21/23
62	2620 Washington Street	Pole	95	54.8-C(4)	The service drop and communication cable on the Pole at 2620 Washinton Street are making contact and do not have the required 12 inches of clearance.	repair/ maintenance	Complete
64	CA27640 at 1109 Pearl Street	Pole	95	...	Pole CA27640 has an incorrect connection between the service drop and weatherhead.	(No rule specified by ESRB) repair/ maintenance	Priority 2: < 6 months)
70	CA11100	Pole		Observation only	The automatic splices on the conductor span on Pole CA11100 are tied in too close to the supporting insulator and may be preventing free movement of the splice with the conductor.	investigate	Priority 4: < 3 years
92	919 Lincoln Avenue	Pole	95	18-A (Observations)	The Pole at 919 Lincoln Avenue has an exposed communications grounding wire.	Notify 3rd parties	sched: 9/21/23
72	2820 Barbers Point Road (backyard)	Pole	95	18-A (Observations)	The Pole at 2820 Barbers Point Road has an abandoned	Notify 3rd parties	sched: 9/21/23
72	2820 Barbers Point Road (backyard)	Pole	95	51.6-A	Pole 60960 has a broken high voltage sign.	repair/ maintenance	Priority 3: < 12
96	Corner of Hawthorne Street and San Antonio Avenue near 1050 San Antonio Avenue	Pole	95	18-A (Observations)	The Pole at Corner of Hawthorne Street and San Antonio Avenue (1050 San Antonio Avenue) has an abandoned communications line and a loose communications line.	Notify 3rd parties	sched: 9/21/23
99	1035 San Antonio Avenue	Pole	95	18-A (Observations)	The Pole at 1035 San Antonio Avenue has a loose communications messenger not secured to the pole.	Notify 3rd parties	sched: 9/21/23
72	2820 Barbers Point Road (backyard)	Pole	95	54.6-B	The Pole in the backyard at 2820 Barbers Point Road has an exposed secondary ground wire.	repair/ maintenance	Priority 2: < 6 months)
75	CA45430 at Corner of Main Street and Ferry Street	Pole	95	18-A (Observations)	Pole CA45430 has a slack communications down guy.	Notify 3rd parties	sched: 9/21/23
76	CA46230	Pole	95	34	Pole CA46230 has an unauthorized third-party attachment.	Notify 3rd parties	Priority 3: < 12
77	CA46220	Pole	95	18-A (Observations)	Pole CA46220 has missing visibility strips on the communications down guy.	Notify 3rd parties	sched: 9/21/23
78	CA46210	Pole	95	56.4-C(4)	Pole CA46210 has an anchor guy that is less than the required 3 inches away from the communication line and is contacting the communication line.	repair/ maintenance	Priority 2: < 6 months)
79	CA46170	Pole	95	35	Excessive vegetation is surrounding the secondary lines on Pole CA46170 and causing possible strain and abrasion.	tree trimming	Priority 2: < 6 months)
79	CA46170	Pole	95	37	Pole CA46170 has bare secondary lines on the primary level traveling through dense vegetation with less than 18 inches of radial clearance.	tree trimming	Priority 2: < 6 months)
79	CA46170	Pole	95	18-A (Observations)	Pole CA46170 has a loose communications line that is pulling away from the building.	Notify 3rd parties	sched: 9/21/23
80	CA46090	Pole	95	18-A (Observations)	Pole CA46090 has a slack communications down guy.	Notify 3rd parties	sched: 9/21/23

Corrective Actions Summary

Location	Equipment Number/	Structure Type	GO	Rule	Findings	AMP Response	work scheduled
81	CA46100	Pole	95	31.1	The secondary down guy anchor head for Pole CA46100 is buried in the ground.	repair/maintenance	Priority 3: < 12
81	CA46100	Pole	95	18-A (Observations)	Pole CA46100 has an exposed communications grounding wire.	Notify 3rd parties	sched: 9/21/23
82	CA46110	Pole	95	18-A (Observations)	Pole CA46110 has an exposed communications grounding wire.	Notify 3rd parties	sched: 9/21/23
84	LX-374	Pad Mount Transformer	128	34.2-C	Vegetation obstructed access to Pad Mount Transformer LT-374	Clear vegetation, Notify 3rd parties	Complete
84	LX-374	Pad Mount Transformer	128	34.3-A	The Pad Mount Transformer LX-374 was not bolted down or secured to the pad.	repair/maintenance	Complete
87	LM-350	Pad Mount Motorized Switch	128	35.3	Pad Mount Motorized Switch LM-350 has a faded high voltage sign.	repair/maintenance	Complete
88	LX-353	Pad Mount Transformer	128	17.1	Pad Mount Transformer LX-353 has a gauge showing low oil levels and was leaking oil from the C Phase primary elbow inside the transformer and onto the pad outside of the transformer.	repair/maintenance	Complete
88	LX-353	Pad Mount Transformer	128	34.3-A	The Pad Mount Transformer LX-353 was not bolted down or secured to the pad.	repair/maintenance	Complete
89	LM-616	Pad Mount Motorized Switch	128	35.3	Pad Mount Motorized Switch LM-616 has a faded high voltage sign.	repair/maintenance	Complete
91	Corner of Wood Street and Pacific Avenue near 1629 Wood Street	Pole	95	31.1	The Pole at the corner of Wood Street and Pacific Avenue (1629 Wood Street) has an unsecured bolt with a loose nut.	repair/maintenance	Complete
92	919 Lincoln Avenue	Pole	95	31.1	The Pole at 919 Lincoln Avenue has a tree that is pressing against and deflecting the anchor guy.	tree trimming	Priority 2: < 6 months)
92	919 Lincoln Avenue	Pole	95	56.7-B	The Pole at 919 Lincoln Avenue has vegetation above the guy insulator that is contacting and grounding the anchor guy.	tree trimming	Priority 2: < 6 months)
93	915 Lincoln Avenue	Pole	95	18-A (Observations)	The Pole at 915 Lincoln Avenue has loose communications hardware.	Notify 3rd parties	sched: 9/21/23
95	Corner of Lincoln Avenue and Wood Street near 917 Lincoln Avenue	Pole	95	31.1	The Pole at the corner of Lincoln Avenue and Wood Street (917 Lincoln Avenue) is located along a paved road and is missing visibility strips.	repair/maintenance	Complete
95	Corner of Lincoln Avenue and Wood Street near 917 Lincoln Avenue	Pole	95	56.9	The outermost guy guard on the Pole at the corner of Lincoln Avenue and Wood Street (917 Lincoln Avenue) is missing high visibility markers.	new guy guard high v-strips	Complete
95	Corner of Lincoln Avenue and Wood Street near 917 Lincoln Avenue	Pole	95	18-A (Observations)	The Pole at corner of Lincoln Avenue and Wood Street near 917 Lincoln Avenue has a communications ground wire attached to distribution down guy above the guy insulator.	Notify 3rd parties	sched: 9/21/23
95	Corner of Lincoln Avenue and Wood Street near 917 Lincoln Avenue	Pole	95	56.4-C(4)	The Pole at corner of Lincoln Avenue and Wood Street near 917 Lincoln Avenue has a communications ground wire attached to distribution down guy above the guy insulator.	duplicate entry (also under GO95 18-A, notification), Notify 3rd parties	Complete

Corrective Actions Summary

Location	Equipment Number/	Structure Type	GO	Rule	Findings	AMP Response	work scheduled
97	Corner of Hawthorne Street and San Antonio Avenue, along Hawthorne Street	Pole	95	51.6-A	The Pole along Hawthorne Street at the corner of San Antonio Avenue and Hawthorne Street has a damaged high voltage sign.	repair/maintenance	Priority 3: < 12 months)
97	Corner of Hawthorne Street and San Antonio Avenue, along Hawthorne Street	Pole	95	56.4-C(4)	The Pole along Hawthorne Street at the corner of Hawthorne Street and San Antonio Avenue has an anchor guy that is less than the required 3 inches away from the communication line and is contacting the communication line.	Notify 3rd parties	sched: 9/21/23
98	1036 San Antonio Avenue	Pole	95	31.6	The Pole at 1036 San Antonio Avenue has an abandoned wire in the underarm bus.	repair/maintenance	Complete
98	1036 San Antonio Avenue	Pole	95	56.7-A	The guy insulator is located less than 6 feet along the overhead guy attached to the Pole at 1036 San Antonio Avenue.	repair/maintenance	Priority 2: < 6 months)
99	1035 San Antonio Avenue	Pole	95	31.1	The Pole at 1035 San Antonio Avenue is located along a paved road and is missing visibility strips.	repair/maintenance	Complete
100	1026 San Antonio Avenue	Pole	95	31.1	The Pole at 1026 San Antonio Avenue is located along a paved road and is missing visibility strips.	repair/maintenance	Complete
101	Corner of Caroline Street and San Antonio Avenue	Pole	95	31.1	The Pole at the corner of Caroline Street and San Antonio Avenue is located along a paved road and is missing visibility strips.	repair/maintenance	Complete
	1701 Wood Street	Pole	95	35	Excessive vegetation is surrounding the service drop on the Pole at 1701 Wood Street and causing possible strain and abrasion.	tree trimming	Complete