

**PG&E NORTH BAY DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
SEPTEMBER 11 – 15, 2023**

I. Records Review

During the distribution audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for PG&E's North Bay Division:

- Electric Distribution Preventive Maintenance Manual, April 1, 2016
- TD-2305M-B006, Revised Distribution Inspection Guidelines, January 24, 2020
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, August 02, 2022
- TD-2301S, Patrols and Detailed/Intrusive Inspections of Electric Overhead and Underground Distribution Facilities, May 15, 2020
- Electric Corrective Notifications list, July 2018 – July 2023
- Distribution facilities statistics and their wildfire risks, including equipment risks and vegetation risks.
- North Bay Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, July 2018 – July 2023
- Reliability Indexes and Outage list, July 2018 – July 2023
- North Bay Division New Projects list, August 2022 – July 2023
- Pole Loading Calculations list, January 2022 – May 2023
- Incoming Third-Party Notifications list, July 2018 – July 2023
- Outgoing Third-Party Notifications list, July 2018 – July 2023
- Inspector training records, January 2018 – May 2023
- Equipment test records, June 2018 – May 2023
- Intrusive Inspections, July 2022 – July 2023
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review
- North Bay Division Quality Management Audit Results, 2018 – 2023

II. Records Violations

ESRB staff observed the following violations during the record review portion of the audit:

1. General Order (GO) 95, Rule 18-B(1), Maintenance Programs states in part:
shall establish and implement an auditable maintenance program for its facilities

“Each company (including electric utilities and communications companies) and lines for the purpose of ensuring that they are in good condition so as to conform to these rules.

Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.

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 staff reviewed late work orders completed within the North Bay Division for the past 60 months (July 2018 – July 2023), shown in Table 1. PG&E’s Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines the priority codes and associated time frames for the response/repair action 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).”*

ESRB staff reviewed late work orders and determined that PG&E did not address a total of 35,164 work orders by their assigned due date. Table 1 below breaks down the 35,164 late work orders by their given priority, including the total number of late work orders completed, pending, and canceled work orders, which are included in the total.

Table 1: Late Work Orders in North Bay Division

Priority Code	Late Work Orders Completed	Late Work Orders Pending	Late Work Orders Cancelled	Total by Priority
A	7 (2,946)*	-	-	2,946
B	1,339	131	291	1,761
E	7,969	18,480	3,436	29,885
F	46	475	51	572
Total	9,361 (12,300)	19,086	3,778	35,164

* Priority A notifications of 2,939 includes work that is categorized as Priority A (e.g., the data includes Fire Rebuilds and Vegetation Management) but is not an “emergency” as that term is defined for Priority A.

PG&E shall provide ESRB with its corrective action plan to complete the 19,086 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

PG&E Response:

Priority B EC Notifications

We provided 7,837 Priority B EC notifications to ESRB staff within the response to DR3, which included a list of all EC notifications created between July 17, 2018, and July 17, 2023. At the time that we submitted the North Bay Pre-Audit Data Request response for Q03, we identified 131 late open Priority B EC notifications. Since then, we recently performed a data refresh of late pending work orders and identified that we presently have 166 Priority B EC notifications remaining late open.

Priority E and F EC Notifications

We provided 49,386 Priority E and F EC notifications to ESRB staff within the response to DR3, which included a list of all EC notifications created between July 17, 2018, and July 17, 2023. At the time that we submitted the North Bay Distribution Pre-Audit Data Request response for Q03, we identified 18,955 late open Priority E and F notifications. Since then, we recently performed a data refresh of late pending work orders and identified 16,383 Priority E and F EC notifications remaining late open.

Corrective Action Plan for Tag Completion and Going Forward Compliance

In 2019, we began the Wildfire Safety Inspection Program (WSIP) to proactively expand inspections of poles and associated equipment in High Fire Threat Districts (HFTD)/High Fire Risk Areas (HFRA) on an accelerated and enhanced basis to mitigate ignition risk. The WSIP inspections led to a significant increase in the volume of notifications.

Along with the WSIP inspections, other programs added notifications to the backlog such as Pole Test and Treat (PT&T), Post-Event Patrols, Patrol Inspections, and Infrared Inspections.

We have developed a plan to reduce the wildfire risk associated with the backlog of ignition-risk tags in HFTD/HFRA by 77 percent at the end of the 2023-2025 Wildfire Mitigation Plan (WMP) cycle. We submitted details of the work plan in PG&E's 2023-2025 WMP R3 (revision 3).

Our highest priority is to complete all A and B tags based on required compliance dates:

- Priority A tags require response by taking corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority; and
- Effective April 29, 2024, priority B tags are addressed within 6 months for

potential violations that create risk of at least moderate potential impact to safety or reliability per bulletin *TD-8123S-B001 Level 2 Priority B Tag Management Requirements*.

We divide remaining notifications into two groups: (1) ignition risk notifications in the HFTD/HFRA; and (2) non-ignition risk notifications in the HFTD/HFRA. Ignition risk notifications in HFTD/HFRA areas are the highest priority in this group of notifications. Our focus is on HFTD ignition risk tags as our risk analysis indicates that these types of tags contain 20 times more risk than non-ignition or non-HFTD tags.

Tags identified prior to 2023 will be prioritized by considering risk. We began bundling work by isolation zones starting in 2023 to reduce customer impact and improve operational efficiency and safer coworker conditions. Our 2023 work plan and WMP commitment was to reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA by 48 percent; in 2023 We exceeded this target and reduced the backlog ignition-risk in HFTD/HFRA by over 52 percent. Our 2024 work plan and WMP commitment is to reduce the wildfire risk associated with backlog ignition-risk tags in HFTD/HFRA by 68 percent (2023 and 2024 combined).

In 2024, we are expanding prioritization of E and F tags through a bundled risk spend efficiency approach. A and B tags are not planned to be included in the bundling approach. While we anticipate that most of the E and F tags will be prioritized this way, there will be instances where a different approach may be warranted.

The bundled risk spend efficiency approach will enable us to execute EC notifications more efficiently by reducing the number of times we perform corrective work on the same circuit, executing more tags with the same resources, and reducing the number of clearances required to close tags. We are proposing to use the bundled risk spend efficiency approach through 2029 to reduce our backlog of tags.

We are looking into developing a plan to reduce the non-HFTD/HFRA tag backlog.

Table 2 below identifies the most overdue and late non-exempt work orders for each priority. The late work orders have been closed and the past-due work orders are still open, as of July 16, 2023.

Table 2: Most Overdue Work Orders*

Priority Code	Most Past Due Work Orders (WO#s)	Number of Days Past Due**
A	117280338	508
B	116743802	1,585
E	114838902	1,443
F	116735756	1,405

*Days past due determined using the Required End Date noted in DR 3

**As of July 16, 2023

PG&E identified work order #117280338 (A-Complete) on May 20, 2019, to perform vegetation management with a required end date of November 16, 2019. The work order was completed on April 7, 2021.

PG&E Response:

We created Priority E EC notification 117280338 for a guy anchor attached to an adjacent tree, or commonly called a “Tree Connect” on May 20, 2019.

In May of 2020, we decided to seek recovery for Tree Connect tags under Catastrophic Emergency Memorandum Account (CEMA) - Major Work Category (MWC) 95 which resulted in the conversion of notification 117280338 from Priority E to Priority A. However, in December 2020, it was deemed that Tree Connects, in general, do not follow the classification of an emergency work and would be reclassified to the correct prioritization, in this case back to Priority E. Since Estimating was already completed on this tag and due to system limitations, this tag remained under the MWC 95 through completion even though the tree attachment did not present an emergency condition.

PG&E identified work order #116743802 (B-Open) on March 15, 2019, to replace a decaying pole with a required end date of September 11, 2019. As of July 16, 2023, PG&E’s records indicate that the order is still open.

PG&E Response:

We created EC notification 116743802 on March 15, 2019, as Priority E. Our inspectors performed safety reassessments on July 17, 2020, June 14, 2021, and April 19, 2022, to inspect the pole condition. On May 23, 2023, the existing notification was upgraded to a Priority B. The B-tag did not get completed by its due date due to resource constraints and the work was completed on October 26, 2023.

PG&E identified work order #114838902 (E-Open) on August 3, 2018, to replace a damaged conductor with a required end date of August 3, 2019. As of July 16, 2023, PG&E’s records indicate that the order is still open.

PG&E Response:

We created EC notification 114838902 on August 3, 2018, as a Priority E to replace a damaged conductor. We were unable to complete this work between 2018-2022 due to risk prioritization. However, in 2023, this job was redesigned and is in the 2024 work plan.

PG&E identified work order #116735756 (F-Open) on March 14, 2019, to test an overloaded pole with a required end date of September 10, 2019. As of July 16, 2023, PG&E’s records indicate that

the order is still open.

PG&E Response:

We created EC Notification 116735756 on March 14, 2019, as a Priority E to investigate loading due to a communications attachment. In April 2019, we completed the pole loading calculation and determined that the pole was not overloaded. On May 15, 2021, we reprioritized this to Priority F to document joint pole ownership. At this time, MAT Code: GAC tags were still a new notification which did not have a well-defined process to ensure GAC tags were advanced to a completed status within SAP. On June 4, 2024, we reviewed the PLC and completed this tag.

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 ”

ESRB staff identified that PG&E completed a total of 9,736 patrol and detailed inspections of overhead and underground (UG)/padmount electric facilities past their GO 165 required completion date, as shown in Table 3.

Table 3: Late Overhead Patrols and Inspections

Year	OH Patrol	OH Detailed	UG Patrol	UG Detail	Total Structures
2018	3	-	-	4	7
2019	-	-	-	-	-
2020	-	48	30	2*	80
2021	6,831	1,296		1	8,128
2022	-	-	-	-	-
2023**	1,521	-	-	-	1,521
Total	8,355	1,344	30	7	9,736

*Reported as “Can’t Get In”

**Preliminary information, final report due July 1, 2024

PG&E’s Response:

In 2018, the three (3) Overhead (OH) patrol units in our North Bay Division were late due to human error. We identified two maps with the same map name, but these maps are in two different districts with different units associated with each map. Our clerical staff printed map OO40 in the same district twice which led to missing the patrol for the (3) OH units in the different district with the same map name OO40. As a result, the three padmount units (included as OH units) were not patrolled by the due date due to the facilities not being reflected in the map provided. We discovered this error after the CPUC due date of the map. After discovering the error, we completed the patrols for the 3 assets on map OO40 on August 10, 2018. We included the 2 assets as late inspections in our 2018 GO 165 Annual Report.

Additionally, in 2018, the four (4) Underground (UG) detailed inspection units in our North Bay Division were not inspected on time due to human error. We erroneously reported map QQ4312 as completed due to a clerical entry error. This error was discovered during a work verification review. We completed a detailed inspection of the four (4) units on December 4, 2018, after the CPUC due date of November 20, 2018. Our North Bay Division patrol and inspection data is now validated through our Compliance Supervisor and a Specialist as an additional control to address the clerical error. We included the 2 assets as late inspections in our 2018 GO 165 Annual Report.

In 2020, the 48 late OH inspections in our territory of North Bay Division were late due to external weather events. On August 15, 2020, unprecedented lightning strikes occurred throughout our service territory resulting in multiple fires across California. As these fires grew, they were blended into the August Complex, the North Complex, the LNU Lightning Complex, the SCU Lightning Complex, the SQF Complex, and the Creek Fire. Because it took several months for these fires to be contained, many of our assets were not accessible due to the unsafe field

conditions. During the time of the fires, our priority was to restore service to our customers safely, which also impacted these units from being completed on time. Furthermore, we had multiple PSPS events take place in September, October, and November compounding the planned patrol and detailed inspections. Consequently, by the end of 2020, OH inspections were completed after their GO 165 due dates. We included the 48 assets as late inspections in our 2020 GO 165 Annual Report.

In 2020 the 30 late Underground (UG) Patrols in PG&E's territory of North Bay Division were late due to map printing error for maps UU3223B (3 units) and UU3210 (27 units). Initial map packages sent by the PG&E's Resource Management Center's (RMC) clerical staff did not contain the printed maps. The Compliance Specialist notified the RMC clerical team of this error and had the paper maps printed and mailed to the local office. When the paper maps arrived at the local office, they were inserted into the corresponding map package folders. The assigned inspectors completed the UG patrols on April 26, 2020 and May 12, 2020 respectively. During a map review process after the units' patrol dates had passed, PG&E discovered the area depicted on both maps was incorrect, even though the paper maps themselves had the correct printed label and heading. Corrected copies of these maps were printed, and both UG map patrols were completed on June 8, 2020, seventeen days after the CPUC due date of May 22, 2020. We identified and included the 30 assets as late inspections in our 2020 GO 165 Annual Report.

Additionally, in 2020, the 2 UG Inspections in our service territory North Bay Division were late due to a human error and a map error in which the inspector created an Electric Corrective (EC) notification. The UG inspections were completed by year end of 2020. We included the 2 assets as late inspections in our 2020 GO 165 Annual Report.

- UG Map QQ3914, 1 asset late due to human error
 - Regarding a Manhole that showed a due date of December 31, 2020, and was completed on November 27, 2020; however, the UG Inspection due date for that same plat map was July 23, 2020, which takes precedence. This point has been communicated to the team to prevent passing Manhole due dates in the future.
- UG Map TT3209, 1 asset late due to map error
 - A portion of the map was incorrect on the initially printed copy. Once it was determined there were errors with mapping (after CPUC due date), the map was readdressed, and the additional unit was captured. The UG inspection was completed on November 29, 2020.

In 2021, the 6,831 OH patrols and 1,296 OH inspections in our North Bay Division were late due to our WMP commitment in 2020 to prioritize our detailed inspections in HFTD areas prior to peak fire season. This change in inspection priorities caused a misalignment to CPUC due dates as defined in GO 165. Consequently, by the end of 2021, OH patrols and OH inspections were completed after their GO 165 due dates. We mitigated this error by ensuring our workplan reflects both the WMP commitment dates and the GO 165 due dates. We included the 6,831 assets as late patrols and 1,296 assets as late inspections in our 2021 GO 165 Annual Report.

Additionally, in 2021, the one UG inspection in our North Bay Division was late due to a human error. The UG inspection was completed by year end 2021. We included the asset as a late inspection in our 2021 GO 165 Annual Report.

- UG Map TT314, 1 asset late due to human error
 - Our Contractor misunderstood our process to create a “Could Not Locate” inspection notification which resulted in the inspection to be completed late. During our map review, our Compliance Supervisor discovered the discrepancy and on October 23, 2021, sent another inspector to complete the inspection. Since then, our Compliance Supervisor has provided coaching and daily check-ins with the contractor to mitigate another occurrence. Ultimately the contractor was released on November 4, 2021.

We originally reported in 2023 there were 1,714 preliminary late OH patrols in our North Bay Division. We can confirm that we have 2,951 OH patrols in our North Bay Division that are late due to a human error. We completed a map due date validation when we were done later in the year. After our field execution completed the patrols and inspections, the map due dates were updated with an earlier due date. Subsequently, we reported these maps as completed late.

Additionally in 2023, the 3 UG patrols in our North Bay Division were late due to a human error. Our map folder included a roster with an incorrect due date identified as the map due date. The local office did not compare it against the patrol and inspection workplan due date. We discovered this discrepancy when the map folder was logged as completed; therefore, UG patrols were completed late on November 1, 2023.

Lastly in 2023, the 2 OH inspections in our North Bay Division were late due to access constraints and a customer refusal in which the inspector created an EC notification. The OH inspections were completed by year end of 2023.

- SAP ID# 102293801, Access Constraints
 - Asset was late due to a homeless encampment blocking access. We were able to obtain access and complete patrol on May 31, 2023.
- SAP ID# 103310257, Customer Refusal
 - Asset was late due to a customer restricting access on property. We obtained access and completed patrol on September 30, 2023.

The 2023 GO 165 Annual Report will not be published until July 1, 2024.

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

“Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which

they are to be operated, to enable the furnishing of safe, proper, and adequate service.”

ESRB also reviewed selected EC Notifications and FSRs identified during the field audit of PG&E’s facilities. The selected review shows a pattern of various issues, including FSRs conducted after the initial required due date, FSRs conducted after the revised due date, revised due dates not in keeping with the reassessments, and work orders overdue beyond the most recent revised date. While a review of all EC and FSRs is not feasible, examples of the issues noted above are shown in Table 4.

Table 4: Late FSRs and Overdue Work Orders

EC Notification	Priority	Initial Notification	1 st FSR Date	2 nd FSR Date	Comments
		Required Due Date	Due Date	Due Date	
116973362	E	4/7/2019	3/27/2021	4/22/2022	Pole split and rotting.
		10/5/2019	8/28/2021	4/23/2023	
118260838	E	12/11/2019	5/10/2021	5/11/2022	Top of pole really split, add damaged conductor
		6/11/2020	5/11/2022	5/12/2023	
119493135	E	7/23/2020	4/24/2020	7/10/2022	2 nd FSR notes condition needs attention <12 months. Rescheduled 24.
		7/23/2021	5/11/2022	5/11/2022	
114005089	F	11/25/2017	5/16/2022	-	Late FSR
		3/13/2022	5/17/2027	-	
119466024	E	4/27/2020	4/1/2021	5/10/2022	Required and FSR dates exceeded.
		10/27/2020	4/2/2022	5/11/2023	

PG&E’s Response:

Field Safety Reassessments (FSR) are an internal containment activity we perform to mitigate potential safety impacts on tags that are past due the required end date until work execution of the tag is complete. Our FSR program is intended to mitigate potential safety impacts because it enables us to prioritize the conditions most likely to fail for repair amidst a backlog of thousands of notifications that are overdue. The FSR process enables us to prioritize notifications on past due tags based on observed risk of failure rather than other subject methods.

4. GO 95, Rule 44.1, Installation and Reconstruction states in part:

“Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term “planned” applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.

“The entity responsible for performing the loading calculation(s) for an installation or reconstruction shall maintain records of these calculations for the service life of the pole or other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.”

ESRB reviewed selected pole loading calculations (PLCs) identified during the field audit of PG&E’s facilities. The review showed PLC parameters used for safety factor calculations not accurately reflecting the facility condition as constructed, including missing components. While a review of all PLCs is not feasible, the erroneous PLC is shown in Table 5.

Table 5: PLC Parameters Differing from Location Construction

SAP ID	PLC Parameter	Observed in Field
102229822	Two primary down guys: at 128 and 253 degrees	One primary down guy: at 253 degrees (no primary down guy at 128 degrees)

PG&E’s Response:

We agree that the PLC calculation was incorrect. The primary down guy was at 253 degrees and not 128 degrees. Upon further review, the 128 degree anchor only has PT (Pacific Telephone) down guys; therefore, we believe this value was added in error. The PLC calculation has since been updated.

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities in PG&E's North Bay Division:

Location	Structure Type	SAP ID Number
1	Pole	102242937
2	Pole	102242936
3	Pole	102242934
4	Pole	104125713
5	Pole	102232521
6	Pole	102232160
7	Pole	102132516
8	Pole	102232075
9	Pole	104025970
10	Pole	103329323
11	Pole	102233262
12	Pole	102233257
13	Subsurface Transformer	107787283
14	Splice Box	107789617
15	Pad Mount Transformer	107688030
16	Pole	102249968
17	Pole	102249966
18	Pole	102249963
19	Pole	102249961
20	Pole	104147330
21	Pole	104129622
22	Pole	102229620
23	Pole	102230415
24	Pole	102230413
25	Pole	104174406
26	Pole	102229826
27	Pole	102229822
28	Pad Mount Transformer	107675198
29	Pole	104057048
30	Pole	102230646
31	Pole	102230647
32	Pole	103911193
33	Pole	102264093
34	Pole	102264094
35	Pole	102264095
36	Pole	102288053
37	Subsurface Transformer	107729897
38	Splice Box	107735432
39	Splice Box	107768196

40	Secondary Splice Box	107783591
41	Subsurface Transformer	107808254
42	Pole	102279950
43	Pole	102264751
44	Pole	102264752
45	Pad Mount Transformer	107682135
46	Pad Mount Transformer with Switches	107678988
47	Secondary Splice Box	107767811
48	Pad Mount Transformer	107678298
49	Pole	104025880
50	Pole	102220728
51	Pole	102220752
52	Pole	103135261
53	Pole	104045875
54	Pole	104045322
55	Pole	102225679
56	Pole	102225678
57	Pole	104026254
58	Pole	102263595
59	Pole	104026253
60	Pole	104026255
61	Pole	102260486
62	Pad Mount Transformer	107688246
63	Pole	102260483
64	Pole	102260482
65	Pole	102260480
66	Pole	102281969
67	Pole	102281967
68	Pole	102281966
69	Pole	102281978
70	Pole	102273404
71	Pole	102292677
72	Pole	102285407
73	Pole	102285409
74	Pole	102285410
75	Pad Mount Transformer	107682478
76	Pole	102285411
77	Pad Mount Transformer	107685490
78	Pad Mount Transformer	107686544
79	Underground Switch	107830724
80	Pad mount Transformer	107685488
81	Pad mount Transformer	107680429
82	Pad mount Transformer	107677858

IV. Field Inspection Violations

ESRB staff 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.,,

ESRB’s findings related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 31.1 Findings

Location	Finding	Notes
3	The pole is rotten and decayed and needs replacement, and the pole has a tilted insulator.	PG&E has a preexisting tag for the pole replacement, all additional issues at the pole will be resolved when the pole is replaced (EC 116973362).
6	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 118260838).
16	The pole has splices with improper connections from tie wires connected directly to the insulators.	PG&E has a preexisting tag for the issue (EC 123608568).
17	The pole has a down guy with a buried anchor.	PG&E has a preexisting tag for the issue (EC 117272612).
19	The pole has a down guy with a buried anchor.	PG&E has a preexisting tag for the issue (EC 114005089).
22	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 119466024).
23	The pole has an incorrectly installed connector.	PG&E has a preexisting tag for the issue (EC 119042051).
30	The pole has conductors with improper connections.	PG&E has a preexisting tag for the issue (EC 123960396).
31	The pole has a strained anchor down guy in contact with the crossarm.	PG&E has a preexisting tag for the issue (EC 123965426).

42	The pole has a down guy with a corroded anchor.	PG&E has a preexisting tag for the issue (EC 124803155).
43	The pole has a tie wire tied into and wrapped around the splice on the primary phase.	PG&E created a tag for this issue during the field portion of the audit (EC 127050336).
50	The pole has a down guy with a corroded anchor.	PG&E has a preexisting tag for the issue (EC 119025673).
51	The pole is rotten and decayed with a large crack along the side and needs replacement.	PG&E has a preexisting tag for the issue (EC 117160015).
55	The pole is rotten and decayed with woodpecker holes and needs replacement. The pole is in a Local Responsibility Area and does not have a firebreak. ¹	PG&E has a preexisting tag for the pole replacement (EC 123863171).
56	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 123863853).
61	The pole has a down guy with a buried anchor.	PG&E has a preexisting tag for the pole replacement, and the buried anchor will be resolved when the pole is replaced (EC 119689350).
63	The pole is rotten and decayed and needs replacement.	PG&E has a preexisting tag for the issue (EC 119689324).
64	The pole is rotten and decayed and needs replacement.	PG&E created a tag for this issue during the field portion of the audit (EC 127058090).
73	The pole has a down guy with a buried anchor and soil eroding around the anchor.	PG&E has a preexisting tag for the issue (EC 124285472).

PG&E Response:

Location 3: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Rotten/Decayed Pole and Titled Insulator in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 116973362 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 6: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Rotten/Decayed Pole in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 118260838 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 16: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Improper Splice Connections identified in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123608568 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 17: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Buried Anchor identified in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 117272612 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 19: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Buried Anchor identified in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 114005089 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 22: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Rotten/Decayed Pole in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 119466024 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 23: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Incorrectly Installed Connector identified in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 119042051 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 30: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Improper Connections identified in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123960396 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 31: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Strained Anchor Down Guy in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123965426 prior to the CPUC

audit and is being tracked to completion through our maintenance program.

Location 42: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Corroded Anchor in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 124803155 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 43: We agree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Tie Wire Tied Into and Wrapped Around Splice identified in this location. Our Division Compliance Inspector created EC notification 127050336 to replace the pole. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 50: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Corroded Anchor in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 119025673 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 51: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Rotten/Decayed Pole in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 117160015 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 55: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Rotten/Decayed Pole in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123863171 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 56: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Rotten/Decayed Pole in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123863853 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 61: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Buried Anchor in this location as this finding will be resolved with the pre-existing EC notification for pole replacement. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 119689350 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 63: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Rotten/Decayed Pole in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and

documented within our system of record (SAP) under EC 119689324 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 64: We agree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Pole Rotten and Needs Replacement identified in this location. Our Division Compliance Inspector created EC notification 127058090 to replace the pole. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 73: We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the Buried Anchor and Eroding Soil in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 124285472 prior to the CPUC audit and is being tracked to completion through our maintenance program.

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

“Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight 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.

¹ California Public Resource Code, Section 4292

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.).”

ESRB's finding related to the above rule is listed in Table 7:

Table 7: GO 95, Rule 34 Finding

Location	Finding	Notes
36	The pole has an unauthorized third-party attachment.	PG&E removed the attachment in the field.

PG&E Response:

Location 36: We disagree with the finding that we are out of compliance with GO 95, Rule 34 for a foreign object (Lost Dog Sign) being found on the pole. This condition did not pose an immediate risk of high potential impact to safety or reliability and would have been identified during its monitored Asset Inspection Cycle. During the CPUC Audit, our Division Compliance

Inspector immediately corrected the condition on site by removing the sign.

3. GO 95, Rule 35, Vegetation Management states in part:

“Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained. (Also see Appendix E for tree trimming guidelines.) These requirements apply to all overhead electrical supply and communication facilities that are covered by this General Order, including facilities on lands owned and maintained by California state and local agencies.

Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).”

ESRB’s findings related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 35 Findings

Location	Finding	Notes
10	Excessive vegetation and a branch are causing strain on the service drop.	PG&E has a preexisting tag for the issue (EC 119493135).
12	The pole has excessive vegetation in the climbing space.	PG&E has a preexisting tag for the issue (EC 119497989).
44	Excessive vegetation is causing strain and abrasion on the secondary lines.	PG&E created a tag for this issue during the field portion of the audit (EC 127050338).
57	Excessive vegetation between the pole and the service pole is causing strain and abrasion on the service drop.	PG&E has a preexisting tag for the issue on the adjacent service pole (EC 116990306).
67	Excessive vegetation is causing strain and abrasion on the service drop.	PG&E has a preexisting tag that includes the issue (EC 122055073).

72	The pole has excessive vegetation that is causing strain and abrasion in the secondary lines and deflecting the down guy wire.	PG&E has a preexisting tag for the issue (EC 124285504).
----	--	--

PG&E Response:

Location 10: We disagree with the finding that we are out of compliance with GO 95, Rule 35 for the Excessive Vegetation Causing Strain On Service Drop in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 119493135 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 12: We disagree with the finding that we are out of compliance with GO 95, Rule 35 for the Excessive Vegetation in Climbing Space in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 119497989 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 44: We agree with the finding that we are out of compliance with GO 95, Rule 35 for the Excessive Vegetation Causing Strain and abrasion on secondary lines identified in this location. Our Division Compliance Inspector created EC notification 127050338 to clear vegetation. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

Location 57: We disagree with the finding that we are out of compliance with GO 95, Rule 35 for the Excessive Vegetation between pole and service pole in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 116990306 (for pole replacement and vegetation clearance) prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 67: We disagree with the finding that we are out of compliance with GO 95, Rule 35 for the Excessive Vegetation causing strain on service drop in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 122055073 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 72: We disagree with the finding that we are out of compliance with GO 95, Rule 35 for the Excessive Vegetation causing strain on secondary lines and down guy in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 124285504 prior to the CPUC audit and is being tracked to completion through our maintenance program.

4. GO 95, Rule 44.1, Installation and Reconstruction states in part:

“Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term “planned” applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.

The entity responsible for performing the loading calculation(s) for an installation or reconstruction shall maintain records of these calculations for the service life of the pole or other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.”

ESRB’s findings related to the above rule are listed in Table 9:

Table 9: GO 95, Rule 44.1 Findings

Location	Finding	Notes
54	The pole is overloaded and leaning, and it is contacting nearby communication lines.	PG&E has a preexisting tag for the issue (EC 123863591).
69	The pole is overloaded and needs replacement.	PG&E has a preexisting tag for the issue (EC 123445235).

PG&E Response:

Location 54: We disagree with the finding that we are out of compliance with GO 95, Rule 44.1 for the overloaded/leaning guy pole contacting communication lines in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123863591 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 69: We disagree with the finding that we are out of compliance with GO 95, Rule 44.1 for the overloaded pole in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123445235 prior to the CPUC audit and is being tracked to completion through our maintenance program.

5. GO 95, Rule 49.2-C, Crossarms, Strength states in part:

“Crossarms shall be securely supported by bracing, where necessary, to withstand unbalanced vertical loads and to prevent tipping of any arm sufficiently to decrease clearances below the values specified in Section III. Such bracing shall be securely attached to poles and crossarms. Supports in

lieu of crossarms shall have means of resisting rotation in a vertical plane about their attachment to poles or shall be supported by braces as required for crossarms. Metal braces or attachments shall meet the requirements of Rules 48.2 and 49.8.,

ESRB’s findings related to the above rule are listed in Table 10:

Table 10: GO 95, Rule 49.2-C Findings

Location	Finding	Notes
3	The pole has decayed crossarms.	PG&E has a preexisting tag for the pole replacement, all additional issues at the pole will be resolved when the pole is replaced (EC 116973362).
16	The pole has decaying crossarms.	PG&E has a preexisting tag for the issue (EC 123608568).
30	The pole has a crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 123960396).
34	The pole has a secondary crossarm that is split and needs replacement.	PG&E has a preexisting tag for the issue (EC 125998468).
42	The pole has a decaying crossarm that needs replacement.	PG&E has a preexisting tag for the issue (EC 124803155).
44	The pole has a decaying secondary crossarm.	PG&E created a tag for this issue during the field portion of the audit (EC 127050343).

PG&E Response:

Location 3: We disagree with the finding that we are out of compliance with GO 95, Rule 49.2-C for the decayed crossarm in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 116973362 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 16: We disagree with the finding that we are out of compliance with GO 95, Rule 49.2-C for the decayed crossarm in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123608568 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 30: We disagree with the finding that we are out of compliance with GO 95, Rule 49.2-C for the crossarm replacement needed in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123960396 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 34: We disagree with the finding that we are out of compliance with GO 95, Rule 49.2-C for the crossarm replacement needed in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 125998468 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 42: We disagree with the finding that we are out of compliance with GO 95, Rule 49.2-C for the crossarm replacement needed in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 124803155 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 44: We agree with the finding that we are out of compliance with GO 95, Rule 49.2-C for the decaying crossarm needs replacement identified in this location. Our Division Compliance Inspector created EC notification 127050343 to clear vegetation. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

6. GO 95, Rule 49.3-C(1)(b), Pins and Conductor Fastenings, Strength states in part:

“Insulator pins and conductor fastenings shall be able to withstand the loads to which they may be subjected with safety factors at least equal to those specified in Rule 44.

(1) Longitudinal Loads Normally Balanced:

b. Conductor Fastenings: Where longitudinal loads are normally balanced, tie wires or other conductor fastenings shall be installed in such a manner that they will securely hold the line conductor to the supporting insulators and will withstand without slipping of the conductor unbalanced pulls as follows:

Supply conductor fastening – 40% of the maximum working tensions but not more than 500 pounds.

Class C conductor fastenings – 15% of the maximum working tensions but not more than 300 pounds.

Tie wires are not required on Class C conductors at point– type transpositions in Grade F construction.”

ESRB’s findings related to the above rule are listed in Table 11:

Table 11: GO 95, Rule 49.3-C(1)(b) Findings

Location	Finding	Notes
57	The pole has a loose tie wire on the primary phase.	PG&E has a preexisting tag for the issue (EC 123636857).
59	The pole has a secondary tie wire that needs adjustment or replacement.	PG&E has a preexisting tag for the issue (EC 123637371).
69	The pole has an incorrectly installed connector.	PG&E has a preexisting tag for the issue (EC 122055052).

PG&E Response:

Location 57: We disagree with the finding that we are out of compliance with GO 95, Rule 49.3-C(i)(b) for the loose primary tie wire in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123636857 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 59: We disagree with the finding that we are out of compliance with GO 95, Rule 49.3-C(i)(b) for the secondary tie wire replacement/adjustment needed in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123637371c prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 69: We disagree with the finding that we are out of compliance with GO 95, Rule 49.3-C(i)(b) for the incorrectly installed connector in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 122055052 prior to the CPUC audit and is being tracked to completion through our maintenance program.

7. 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).

Poles that support risers of more than 750 volts, which are not supporting line conductors of more than 750 volts, shall be marked with a high voltage sign(s). The top of such sign(s) shall be located between the level of the lowest exposed energized portion of the riser to no more than 40" below that portion of the riser."

ESRB's findings related to the above rule are listed in Table 12:

Table 12: GO 95, Rule 51.6-A Findings

Location	Finding	Notes
16	The pole has a damaged high voltage sign on the cross arm.	PG&E has a preexisting tag for a cross arm replacement, which would resolve the high voltage sign finding (EC 123608568).
65	The pole has a faded high voltage sign on the primary cross arm.	

PG&E Response:

Location 16: We disagree with the finding that we are out of compliance with GO 95, Rule 51.6-A for the damaged high sign in this location as this finding will be resolved with the pre-existing EC notification for crossarm replacement. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123608568 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 65: We agree with the finding of the faded high voltage sign. A notification was created by our Inspection Teams and documented within our system of record (SAP) under EC 128922403 after the CPUC audit and is being tracked to completion through our maintenance program.

8. GO 95, Rule 54.6-B, Vertical and Lateral Conductor, Ground Wires states in part:

"That portion of the ground wire attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8)."

ESRB's finding related to the above rule is listed in Table 13:

Table 13: GO 95, Rule 54.6-B Finding

Location	Finding	Notes
24	The pole has an exposed vertical ground wire.	PG&E has a preexisting tag for the issue (EC 123908379).

PG&E Response:

Location 24: We disagree with the finding that we are out of compliance with GO 95, Rule 54.6-B for the exposed vertical ground in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123908379 prior to the CPUC audit and is being tracked to completion through our maintenance program.

9. GO 95, Rule 54.6-I, Attachment of Protective Covering states in part:

“Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion-resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position.

Where such covering consists of wood moulding, rigid plastic moulding, or other suitable protective moulding, the distance between the attachment materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) shall not exceed 36 inches on either side of the moulding.”

ESRB’s finding related to the above rule is listed in Table 14:

Table 14: GO 95, Rule 54.6-I Finding

Location	Finding	Notes
35	The pole has a broken ground molding that is exposing the transformer ground wire.	PG&E has a preexisting tag for the issue (EC 125998113).

PG&E Response:

Location 35: We disagree with the finding that we are out of compliance with GO 95, Rule 54.6-I for the broken ground molding in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 125998113 prior to the CPUC audit and is being tracked to completion through our maintenance program.

10. 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.”

ESRB’s findings related to the above rule are listed in Table 15:

Table 15: GO 95, Rule 56.2 Findings

Location	Finding	Notes
3	The pole has a slack span guy.	PG&E has a preexisting tag for the pole replacement, all additional issues at the pole will be resolved when the pole is replaced (EC 116973362).
29	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (EC 123962530).
49	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (EC 124012105).
50	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (EC 116973362).
52	The pole has a slack secondary span guy to the pole at Location 51.	PG&E has a preexisting tag for the overloaded pole, and the slack guy will be resolved when the pole is replaced (EC 123999062).
53	The pole has a slack down guy.	PG&E has a preexisting tag for the issue (EC 126892254).
65	The pole has a slack primary down guy.	

PG&E Response:

Location 3: We disagree with the finding that we are out of compliance with GO 95, Rule 56.2 for the slack span guy in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 116973362 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 29: We disagree with the finding that we are out of compliance with GO 95, Rule 56.2 for the slack down guy in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123962530 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 49: We disagree with the finding that we are out of compliance with GO 95, Rule 56.2 for the slack down guy in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 124012105 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 50: We disagree with the finding that we are out of compliance with GO 95, Rule 56.2 for the slack down guy in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 116973362 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 52: We disagree with the finding that we are out of compliance with GO 95, Rule 56.2 for the slack span guy in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 123999062 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 53: We disagree with the finding that we are out of compliance with GO 95, Rule 56.2 for the slack down guy in this location as this finding was previously identified in a pre-existing EC notification. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 126892254 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 65: We agree with the finding of the slack primary down guy. A notification was created by our Inspection Teams and documented within our system of record (SAP) under EC 128922403 after the CPUC audit and is being tracked to completion through our maintenance program.

11. GO 95, Rule 56.7-B, Location of Sectionalizing Insulators, Anchor Guys
states in part:

“In order to prevent trees, buildings, messengers, metal–sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule.”

ESRB's findings related to the above rule are listed in Table 16:

Table 16: GO 95, 56.7-B Findings

Location	Finding	Notes
3	The pole has vegetation above the guy insulator that is contacting and ground the anchor guy.	PG&E has a preexisting tag for the pole replacement, all additional issues at the pole will be resolved when the pole is replaced (EC 116973362).
9	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.	PG&E resolved the finding in the field.
17	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.	PG&E has a preexisting tag for the issue (EC 117272612).
32	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.	PG&E has a preexisting tag for the issue (EC 125998891).
65	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.	
69	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.	PG&E has a preexisting tag for the issue (EC 122055052).
74	The pole has vegetation above the guy insulator that is contacting and grounding the anchor guy.	PG&E has a preexisting tag for the issue (EC 113092001).

PG&E Response:

Location 3: We disagree with the finding that we are out of compliance with GO 95, Rule 56.7-B for the vegetation above guy insulator touching ground in this location as this finding is being addressed in a pre-existing EC notification for pole replacement. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 116973362 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 9: We disagree with the finding that we are out of compliance with GO 95, Rule 56.7 for the vegetation above guy insulator in this location as our Division Compliance Inspector corrected this issue on site.

Location 17: We disagree with the finding that we are out of compliance with GO 95, Rule 56.7-B for the vegetation above guy insulator touching ground in this location as this finding is being addressed in a pre-existing EC notification for pole replacement. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 117272612 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 32: We disagree with the finding that we are out of compliance with GO 95, Rule 56.7-B for the vegetation above guy insulator touching ground in this location as this finding is being addressed in a pre-existing EC notification for pole replacement. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 125998891 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 65: We agree with the finding of the vegetation above guy bob. A notification was created by our Inspection Teams and documented within our system of record (SAP) under EC 128922403 after the CPUC audit and is being tracked to completion through our maintenance program.

Location 69: We disagree with the finding that we are out of compliance with GO 95, Rule 56.7-B for the vegetation above guy insulator touching ground in this location as this finding is being addressed in a pre-existing EC notification for pole replacement. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 122055052 prior to the CPUC audit and is being tracked to completion through our maintenance program.

Location 74: We disagree with the finding that we are out of compliance with GO 95, Rule 56.7-B for the vegetation above guy insulator touching ground in this location as this finding is being addressed in a pre-existing EC notification for pole replacement. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 113092001 prior to the CPUC audit and is being tracked to completion through our maintenance program.

12. GO 95, Rule 56.9, Guy Marker (Guy Guard) states:

“A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.”

ESRB’s finding related to the above rule is listed in Table 17:

Table 17: GO 95, Rule 56.9 Finding

Location	Finding	Notes
18	The pole has a loose guy marker that is unsecured.	PG&E fixed the finding in the field.

PG&E Response:

Location 18: We disagree with the finding that we are out of compliance with GO 95, Rule 56.9 for the loose guy marker in this location as our Division Compliance Inspector corrected this issue on site.

13. 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’s finding related to the above rule is listed in Table 18:

Table 18: GO 128, Rule 17.1 Finding

Location	Finding	Notes
81	The pad mount transformer has different interior and exterior equipment number labels.	PG&E fixed the finding in the field.

PG&E Response:

Location 81: We disagree with the finding that we are out of compliance with GO 128, Rule 17.1 for the missing utility marker in this location as our Division Compliance Inspector corrected this issue on site.

14. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

“Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.”

ESRB’s finding related to the above rule is listed in Table 19:

Table 19: GO 128, Rule 17.8 Finding

Location	Finding	Notes
79	The underground switch is missing a utility ownership marker.	PG&E fixed the finding in the field.

PG&E Response:

Location 79: We disagree with the finding that we are out of compliance with GO 128, Rule 17.8 for the missing utility marker in this location as our Division Compliance Inspector corrected this issue on site.

15. GO 128, Rule 32.3, Manholes, Handholes and Subsurface Equipment Enclosures, 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.”

ESRB’s finding related to the above rule is listed in Table 20:

Table 20: GO 128, Rule 32.3 Finding

Location	Finding	Notes
37	The subsurface transformer has a damaged enclosure that requires replacement.	PG&E has a preexisting tag for the issue (EC 122444933).

PG&E Response:

Location 37: We disagree with the finding that we are out of compliance with GO 128, Rule 32.3 for the damaged enclosure in this location as this finding is being addressed in a pre-existing EC notification for pole replacement. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 122444933 prior to the CPUC audit and is being tracked to completion through our maintenance program.

16. GO 128, Rule 32.7, Manholes, Handholes and Subsurface Equipment Enclosures, Covers states in part:

*“Manholes, handholes, and subsurface equipment enclosures while not being removal.”
worked in, shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them and arrangements shall be such that a tool or appliance shall be required for their opening and cover*

ESRB’s findings related to the above rule are listed in Table 21:

Table 21: GO 128, Rule 32.7 Findings

Location	Finding	Notes
39	The splice box has an unsecured and raised bolt on the cover.	PG&E fixed the finding in the field.
47	The secondary splice box cover has a hole that is accessible by the public.	PG&E fixed the finding in the field.

PG&E Response:

Location 39: We disagree with the finding that we are out of compliance with GO 128, Rule 32.7 for the unsecured box cover/raised bolt in this location as our Division Compliance Inspector corrected this issue on site.

Location 47: We disagree with the finding that we are out of compliance with GO 128, Rule 32.7 for the splice box hole in cover in this location as our Division Compliance Inspector corrected this issue on site.

17. GO 128, Rule 34.3-A, Self-contained Surface-mounted Equipment, Strength states:

“The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.”

ESRB’s findings related to the above rule are listed in Table 22:

Table 22: GO 128, Rule 34.3-A Findings

Location	Finding	Notes
78	The pad mount transformer has a corroded enclosure that is accessibly by the public.	PG&E did a temporary repair in the field to make the transformer safe.
80	The pad mount transformer enclosure is corroded.	PG&E has a preexisting tag for the issue (EC 126529892).

PG&E Response:

Location 78: We agree with the finding of the corroded enclosure. Our Division Compliance Inspector corrected this issue on site by making a temporary repair to make safe. (126803546 – Transformer Replacement – Tag created 8/10/23).

Location 80: We disagree with the finding that we are out of compliance with GO 128, Rule 34.3-A for the corroded enclosure in this location as this finding is being addressed in a pre-existing EC notification for pole replacement. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 126529892 prior to the CPUC audit and is being tracked to completion through our maintenance program.

18. GO 128, Rule 35.1, Identification of Cables states:

“Cables operating at a voltage in excess of 750 volts shall be permanently and clearly identified by tags or other suitable means to indicate their operating voltage and the circuit with which they are normally associated at each manhole or other commonly accessible location of the underground system ”

ESRB’s finding related to the above rule is listed in Table 23:

Table 23: GO 128, Rule 35.1 Finding

Location	Finding	Notes
48	The pad mount transformer is missing a label on the primary phase 2 cable.	PG&E fixed the finding in the field.

PG&E Response:

Location 48: We disagree with the finding that we are out of compliance with GO 128, Rule 35.1 for the primary phase 2 cable label missing in this location as our Division Compliance Inspector corrected this issue on site.

19. GO 128, Rule 35.3, Warning Signs states:

“Warning signs indicating high voltage shall be installed on an interior surface, or barrier if present, inside the entrance of vaults, manholes, handholes, pad mounted transformer compartments, and other above ground enclosures containing exposed live parts above 750 volts. Such warning signs shall also be installed on an exterior surface of all such pad mounted transformer compartments and other above ground enclosures. Such signs shall be clearly visible to a person in position to open any such access door, other opening, or barrier.”

ESRB’s findings related to the above rule are listed in Table 24:

Table 24: GO 128, Rule 35.3 Findings

Location	Finding	Notes
48	The pad mount transformer has a faded exterior high voltage sign.	PG&E fixed the finding in the field.
79	The underground switch has a missing high voltage sign.	PG&E fixed the finding in the field

PG&E Response:

Location 48: We disagree with the finding that we are out of compliance with GO 128, Rule 35.3 for the faded high voltage sign in this location as our Division Compliance Inspector corrected this issue on site.

Location 79: We disagree with the finding that we are out of compliance with GO 128, Rule 35.3 for the missing high voltage sign in this location as our Division Compliance Inspector corrected this issue on site.

20. GO 128, Rule 36.5-C, Grounding and Bonding of Conductors and Equipment, Grounding Methods states in part:

*“Conductors and equipment required by Rule 36.5–A to be grounded shall be effectively grounded by one or more of the following methods:
(1) Burial in Earth: Bare neutral conductors, metallic cable sheaths and shields, metal pipes and metal conduits may be grounded by burying them directly in the earth.*

- (2) *Grounding Electrodes: Conductors and equipment may be grounded by connections at one or more locations to driven ground rods or other suitable grounding electrodes.*
- (3) *Bonding: Conductors and equipment may be grounded by bonding at one or more locations to conductors or equipment grounded in accordance with Rule 36.5–C1 or Rule 36.5–C2.*”

ESRB’s finding related to the above rule is listed in Table 25:

Table 25: GO 128, Rule 36.5-C Finding

Location	Finding	Notes
48	The pad mount transformer is missing a ground for the case on the secondary side.	PG&E has a preexisting tag for the issue (EC 126528944).

PG&E Response:

Location 48: We disagree with the finding that we are out of compliance with GO 128, Rule 36.5 for the missing ground in this location as this finding is being addressed in a pre-existing EC notification for pole replacement. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC 126528944 prior to the CPUC audit and is being tracked to completion through our maintenance program.

V. Observations

1. GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities 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 violation of GO 95.”

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

During the field inspection, ESRB observed the following third-party safety concerns listed in Table 26:

Table 26: Third-Party Audit Observations

Location	Observations
3	The pole has a broken communications lashing wire.
7	The pole has a loose vertical communications drop and has a loose bracket.
10	The communications service drop to 106 Crescent Road is wrapped around the power service drop and the communications lines have strain and abrasion from excessive vegetation. PG&E sent a third-party notification for these issue.
18	The pole has a loose communications line. PG&E fixed the finding in the field.
19	The pole has a low hanging communications service drop.
26	The pole has a slack communications down guy.
29	The pole has a loose communications lashing wire.
30	The communications vertical riser guard is gaping away from the pole. PG&E fixed the finding in the field.
31	Two communications down guys are in contact.
36	The communications down guy cover is missing visibility strips. PG&E fixed the finding in the field.
39	The cable TV box has a loose lid and the enclosure is accessible by the public. PG&E sent a third-party notification for this issue.
43	The pole has loose communications lines and an unsecured riser guard.

50	The pole has abandoned communications lines.
51	The pole has abandoned communications lines. PG&E fixed this issue in the field.
55	The pole has a cut and abandoned communications down guy. PG&E sent a third-party notification for this issue.
64	The pole has loose communications lines and an unsecured riser guard. PG&E fixed this issue in the field.
66	The pole has loose communications lines and an unsecured riser guard. PG&E fixed this issue in the field.

PG&E Response:

We appreciate the insight and feedback from the ESRB, as well as the support in helping us achieve and maintain a safe electric system. We acknowledge the third-party utility findings listed above. These observations were either pre-identified by our Inspection Teams, rectified on site during the CPUC Audit, or notifications were sent to the third parties to address their facilities. As per GO 95, Rule 18-A, the conditions did not pose a significant threat to human life or property and would have been identified during its monitored Asset Inspection Cycle as per GO 95, Rule 31.2. Please see the table below for the listed observations and their associated referenced status:

Location	Observation	SAP ID#	Reference
3	The pole has a broken communications lashing wire.	102242934	TPU Notification 128820148 sent to Other Utility on 5/21/2024
7	The pole has a loose vertical communications drop and has a loose bracket.	102232516	TPU Notification 128822763 sent to Other Utility on 5/21/2024
10	The communications service drop to 106 Crescent Road is wrapped around the power service drop and the communications lines have strain and abrasion from excessive vegetation. PG&E sent a third-party notification for these issue.	103329323	TPU Notification 127035114 sent to Other Utility on 09/18/2023
18	The pole has a loose communications line. PG&E fixed the finding in the field.	102249963	Addressed in field as minor work
19	The pole has a low hanging communications service drop.	102249961	TPU Notification 123609252 sent to Other Utility on 05/27/2022
26	The pole has a slack communications down guy.	102229826	TPU Notifications 120767378, 120880632 sent to Other Utilities. We received response from

			Comcast it was not their service that area.
29	The pole has a loose communications lashing wire.	104057048	TPU Notification 128838703 sent to Other Utility on 5/21/2024
30	The communications vertical riser guard is gaping away from the pole. PG&E fixed the finding in the field.	102230646	Addressed in field as minor work
31	Two communications down guys are in contact.	102230647	TPU Notifications 123965443 and 123981723 sent to Other Utilities on 07/02/2022
36	The communications down guy cover is missing visibility strips. PG&E fixed the finding in the field.	102288053	Addressed in field as minor work
39	The cable TV box has a loose lid and the enclosure is accessible by the public. PG&E sent a third-party notification for this issue.	107768196	TPU Notification 127047148 sent to Other Utility 09/19/2023
43	The pole has loose communications lines and an unsecured riser guard.	102264751	TPU Notification 128826764 sent to Other Utility on 5/21/2024
50	The pole has abandoned communications lines.	102220728	Confirmed with PG&E Compliance lead there are no abandoned comm lines at this location. Photos taken at site of audit show a loose down guy in contact with comms line. Field checked on 5/22/2024 and found down guy was already adjusted. Inspector did notice a comm riser molding was not secured. Created TPU 128826764 to address issue.
51	The pole has abandoned communications lines. PG&E fixed this issue in the field.	102220752	Addressed in field as minor work
55	The pole has a cut and abandoned communications down guy. PG&E sent a third-party notification for this issue.	102225679	TPU Notifications 123863162 and 123869976
64	The pole has loose communications lines and an unsecured riser guard. PG&E fixed this issue in the field.	102260482	Addressed in field as minor work
66	The pole has loose communications lines and an unsecured riser guard. PG&E fixed this issue in the field.	102281969	Addressed in field as minor work