

CPUC SUBSTATION AUDIT
FINDINGS PG&E Eureka
Headquarters October 16 –
October 20, 2023

I. Records Review

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

- List of all PG&E substations in the Eureka HQ
- Map showing all PG&E substation locations in the Eureka HQ
- PG&E Substation Maintenance and Construction (SM&C) Manual, Utility Standard: TD-3322M, Revision 11, with forms 1, 2, 5, 6, and 7.
- PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S, Revision 9, with attachments 2 through 12
- PG&E Substation Supplemental Inspection Program, Utility Standard: TD-3328S, Revision 2
- PG&E Substation Asset Performance Management (APM) Process, Utility Procedure: TD-3320P-36, Revision 0
- PG&E Substation SAP Work Management System (WMS) Process, Utility Procedure: TD-3320P-12, Revision 7
- PG&E SM&C Manual – Infrared Inspections, Utility Standard: TD-3322M, Revision 11
- PG&E SM&C Manual – Insulating Oil, Utility Standard: TD-3322M, Revision 8
- PG&E Accumulated Critical Current (ACC) Process, Utility Standard: TD-3320P-12, Revision 0
- PG&E SM&C Manual – Substation Batteries, Utility Standard: TD-3322M, Revision 13
- PG&E Substation Fire Protection Systems and Equipment – Inspection, Test and Maintenance: TD-3320P-07, Revision 3
- Explanation of PG&E inspector training policies
- List of the previous five years' substation inspections
- List of all open/pending, completed, cancelled, and late work orders or what PG&E refers to as, Line Corrective (LC) Notifications, in the previous five years
- Equipment lists for ESRB selected substations
- Single-line diagrams of ESRB selected substations
- Last two visual inspection checklists for ESRB selected substations
- List of transformer banks that operated beyond nameplate capacity for the last five years for ESRB selected substations.
- Infrared Testing records for ESRB selected substations in the last 24 months
- Most recent oil sample test results for ESRB selected substations
- Most recent electric test results for ESRB selected substations
- Training records for all substation and maintenance personnel in the past five years
- Other relevant substation inspections for the past five years for ESRB selected substations
- PG&E internal audit findings for Eureka HQ for the past five years

II. Records Violations

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

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

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

1. PG&E Substation Equipment Maintenance Requirements, Utility Standard: TD-3322S¹, establishes PG&E’s Basic Finish Date and Past Due dates as follows:

Table 1. Due Dates Per Priority Code

Priority Code	Basic Finish Date	Past Due Date
A	Within 30 days	1 st day of the month following the month in which the basic finish date occurs
B	Within 90 days	1 st day of the 2 nd month following the month in which the basic finish date occurs
E	Within 365 days	1 st day of the year following the year in which the basic finish date occurs
F	Greater than 365 days	None*

*Schedule Priority F when it is operationally efficient to perform the work

Based on Table 1 above, ESRB noted 32 notifications that were closed after their past due dates. Therefore, PG&E did not perform maintenance in accordance with accepted good practices described in Utility Standard TD-3322S. See Table 2 below for the past-due LC notifications.

Table 2. Overdue LC Notifications

Notification No.	Priority	Completion Date	Out of Compliance Date	Days Late
122206816	E	9/13/2023	1/1/2023	255
122207166	E	9/13/2023	1/1/2023	255
119791190	E	3/29/2021	1/1/2021	87
123762549	B	10/26/2022	10/1/2022	25
119575046	E	1/24/2021	1/1/2021	23
119574335	E	1/22/2021	1/1/2021	21

¹ PG&E Utility Standard TD-3322S, April 7, 2022, Revision 8.

119575848	E	1/22/2021	1/1/2021	21
119574201	E	1/21/2021	1/1/2021	20
119596822	E	1/21/2021	1/1/2021	20
119576474	E	1/21/2021	1/1/2021	20
119576673	E	1/21/2021	1/1/2021	20
119575264	E	1/20/2021	1/1/2021	19
119573745	E	1/20/2021	1/1/2021	19
119573749	E	1/20/2021	1/1/2021	19
119575175	E	1/20/2021	1/1/2021	19
119575267	E	1/20/2021	1/1/2021	19
119575472	E	1/20/2021	1/1/2021	19
119575477	E	1/20/2021	1/1/2021	19
119575754	E	1/20/2021	1/1/2021	19
119576562	E	1/20/2021	1/1/2021	19
119575179	E	1/19/2021	1/1/2021	18
119573659	E	1/19/2021	1/1/2021	18
119573720	E	1/19/2021	1/1/2021	18
119575041	E	1/19/2021	1/1/2021	18
119575843	E	1/19/2021	1/1/2021	18
119574294	E	1/19/2021	1/1/2021	18
119574015	E	1/18/2021	1/1/2021	17
119574180	E	1/18/2021	1/1/2021	17
119574245	E	1/18/2021	1/1/2021	17
119573840	E	1/18/2021	1/1/2021	17
119573843	E	1/18/2021	1/1/2021	17
119574088	E	1/18/2021	1/1/2021	17

PG&E Response:

We agree with one of the above record violations:

- Notification 123762549 was identified on 05/25/2022 to apply Glyptol to a glass bushing to coat a chipped area. The work was not completed until 10/26/2022, which was 25 days past the out of compliance (OOC) date.

We disagree with 31 of the above record violations:

- Notifications 122206816 and 122207166 were cancelled, and therefore, are not considered past-due.
- Notification 119791190 was identified on 09/21/2020 to replace a meter on Bank 1. This priority E notification should have received a required end date of 09/21/2021, which has been updated in our system of record, SAP. Therefore, since the work was completed on 03/29/2021, this notification is not considered past-due.
- The additional 28 priority E notifications were all completed within the allotted past due date of one year per TD-3322S but had incorrect due dates in SAP. We corrected this, and we apologize for this oversight.

- Please see below Table1PGE to see the new OOC dates for the 31 notifications.

Table1PGE

Notification No	Priority	Notification date	Completion Date	OOO Date	Status
122206816	E	7/13/2021	9/13/2023	1/1/2023	Canceled
122207166	E	10/14/2021	9/13/2023	1/1/2023	Canceled
119791190	E	9/14/2020	3/29/2021	1/1/2022	Closed
119575046	E	5/18/2020	1/24/2021	1/1/2022	Closed
119574335	E	5/20/2020	1/22/2021	1/1/2022	Closed
119575848	E	5/18/2020	1/22/2021	1/1/2022	Closed
119574201	E	5/12/2020	1/21/2021	1/1/2022	Closed
119596822	E	5/15/2020	1/21/2021	1/1/2022	Closed
119576474	E	5/18/2020	1/21/2021	1/1/2022	Closed
119576673	E	5/20/2020	1/21/2021	1/1/2022	Closed
119575264	E	5/8/2020	1/20/2021	1/1/2022	Closed
119573745	E	5/20/2020	1/20/2021	1/1/2022	Closed
119573749	E	5/20/2020	1/20/2021	1/1/2022	Closed
119575175	E	5/18/2020	1/20/2021	1/1/2022	Closed
119575267	E	5/19/2020	1/20/2021	1/1/2022	Closed
119575472	E	5/19/2020	1/20/2021	1/1/2022	Closed
119575477	E	5/19/2020	1/20/2021	1/1/2022	Closed
119575754	E	5/19/2020	1/20/2021	1/1/2022	Closed
119576562	E	5/19/2020	1/20/2021	1/1/2022	Closed
119575179	E	5/7/2020	1/19/2021	1/1/2022	Closed
119573659	E	5/20/2020	1/19/2021	1/1/2022	Closed
119573720	E	5/20/2020	1/19/2021	1/1/2022	Closed
119575041	E	5/18/2020	1/19/2021	1/1/2022	Closed
119575843	E	5/19/2020	1/19/2021	1/1/2022	Closed
119574294	E	5/26/2020	1/19/2021	1/1/2022	Closed
119574015	E	5/13/2020	1/18/2021	1/1/2022	Closed
119574180	E	5/13/2020	1/18/2021	1/1/2022	Closed
119574245	E	5/14/2020	1/18/2021	1/1/2022	Closed
119573840	E	5/21/2020	1/18/2021	1/1/2022	Closed
119573843	E	5/21/2020	1/18/2021	1/1/2022	Closed
119574088	E	5/31/2020	1/18/2021	1/1/2022	Closed

2. According to PG&E’s Substation Maintenance and Construction Manual, “Infrared Inspections”, anomalies have to be assigned a repair priority code of either A or B, which indicates either immediate repair, repair in 30 days, repair in 90 days, or re-inspect in 90 days.

Temperature Rise (ΔT)						
SAP Repair Priority Codes	Action	Direct View Targets Percent of Rated Load			Indirect View Targets	Main Tank compared to LTC
		0-40%	41-80%	81-100%		
A	Immediate repair	> 100°C		> 125°C	> 10°C	> -5°C
A	Repair 30 days	80°-100°C		100°-125°C	NA	
B	Repair 90 days	60°-79°C	NA	80°-99°C	5°-9°C	-4° to -5°C
B	Re-inspect 90 days	15°-59°C	15°-79°C		2°-4°C	-2° to -3°C
NA	No action	< 15°C			< 2°C	≤ -1°C

Figure 1: Temperature Rise Chart per Priority Code

However, ESRB noted that in the list of notifications that PG&E provided, twelve hot spot-related notifications were given an “E” priority code, allowing 365 days to complete the necessary repair. ESRB listed these twelve discrepancies in Table 3 below.

Functional Location	Notification No	Priority	Completion Date	OOC Date	Status
ETS.06.12398	117445202	E	7/30/2019	1/1/2021	Closed
ETS.06.12398	117559101	E	7/30/2019	1/1/2021	Closed
ETS.06.12116	120008839	E	12/16/2020	1/1/2022	Closed
ETS.06.12903	120224410	E	3/24/2021	1/1/2022	Closed
ETS.06.12903	120224460	E	3/24/2021	1/1/2022	Closed
ETS.06.12493	120224352	E	3/2/2021	1/1/2022	Closed
ETS.06.12493	120224266	E	12/28/2020	1/1/2022	Canceled
ETS.06.12351	120204476	E	2/5/2021	1/1/2022	Closed
ETS.06.12493	120541527	E	2/22/2021	1/1/2023	Closed
ETS.06.12034	122368307	E	12/15/2021	1/1/2023	Closed
ETS.06.12350	122367884	E	12/11/2021	1/1/2023	Closed
ETS.06.12455	122368309	E	2/15/2022	1/1/2023	Closed

Table 3: Hot Spot-Related Notifications assigned Priority Code E

ESRB noted that PG&E TD-3322S permits staff to deviate from procedures if the line supervisor obtains approval from the local transmission field specialist. It also requires that the variance must be documented in the long-text field of the SAP order for the maintenance work and refer to the approved form TD-3322M-F90 “SM&C Manual Procedure Variance Review”. However, the notifications above do not refer to a form TD-3322M-F90.

PG&E Response:

We agree that all 12 notifications listed above were created with the incorrect priority code. These have all been corrected within our system of record, SAP. However, all 12 notifications were completed within the allowed time frame for a B-priority per TD-3322S, and therefore, are not in violation of G.O. 174, Rule 12.

Please see below for the updated dates provided in Table2PGE.

- Notification 120224266 was cancelled and therefore is not past-due.
- The remaining 11 notifications were updated in our system of record, and we provided the updated dates in Table2PGE below.

Table2PGE

Functional Location	Notification No	Priority	Completion Date	OOB Date	Status
ETS.06.12398	117445202	B	7/30/2019	11/1/2019	Closed
ETS.06.12398	117559101	B	7/30/2019	12/1/2019	Closed
ETS.06.12116	120008839	B	12/16/2020	4/1/2021	Closed
ETS.06.12903	120224410	B	3/24/2021	4/1/2021	Closed
ETS.06.12903	120224460	B	3/24/2021	4/1/2021	Closed
ETS.06.12493	120224352	B	3/2/2021	4/1/2021	Closed
ETS.06.12493	120224266	B	12/28/2020	4/1/2021	Canceled
ETS.06.12351	120204476	B	2/5/2021	5/1/2021	Closed
ETS.06.12493	120541527	B	2/22/2021	7/1/2021	Closed
ETS.06.12034	122368307	B	12/15/2021	4/1/2022	Closed
ETS.06.12350	122367884	B	12/11/2021	4/1/2022	Closed
ETS.06.12455	122368309	B	2/15/2022	4/1/2022	Closed

We recognized a persistent issue with incorrect priority codes or end dates with pre-2023 IR data. We created CAP 120564870 to perform an apparent cause evaluation (ACE). From this, we established the preventative measure of having all reinspection or repair LC notifications automatically created through the Asset Performance Management (APM) software when an IR anomaly is identified. This enhancement was released in late 2022 and helps to ensure all LC notifications for reinspection/repairs are created timely and with the correct priority codes.

III. Field Inspection

During the field inspection, ESRB inspected the following 13 substations:

Location	Substation
1	Humboldt Substation
2	Arcata Substation
3	Orick Substation
4	Trinidad Substation
5	Fairhaven Substation
6	Eureka A Substation
7	Blue Lake Substation
8	Willow Creek Substation
9	Maple Creek Substation
10	Fort Seward Substation
11	Garberville Substation
12	Fruitland Substation
13	Harris Substation

IV. Field Inspection – Violations List

ESRB observed the following violations during the field inspection:

GO 174, Rule 12, General states in part:

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

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

PG&E Response:


We appreciate the insight and feedback from the ESRB, as well as the support in helping us achieve our stand that everyone and everything is always safe. We agree with 33 of the ESRB’s findings of violation and are committed to remedying these issues and striving to reduce and eliminate such findings in the future.

We do not believe some of the field observations qualify as violations of GO 174, Rule 12. Our Substation


Inspection Program focuses on monthly and bi-monthly station inspections, along with our Enhanced Inspections (EI), Quality Verification (QV) audits, and Annual Infrared (IR) Inspections. These different levels of visual and technical assessments are conducted to indicate abnormal conditions before the equipment fails and to prevent unsafe events. Twenty of the ESRB's observations made during the field portion of the audit were previously identified and properly recorded in our system of record (SAP) as abnormal conditions during planned inspections. Each of these notifications were identified timely by our QEWs and scheduled for the appropriate corrective action in accordance with our maintenance standard/procedures and GO 174 requirements. Therefore, we do not believe that these 20 notifications qualify as GO 174, Rule 12 violations.

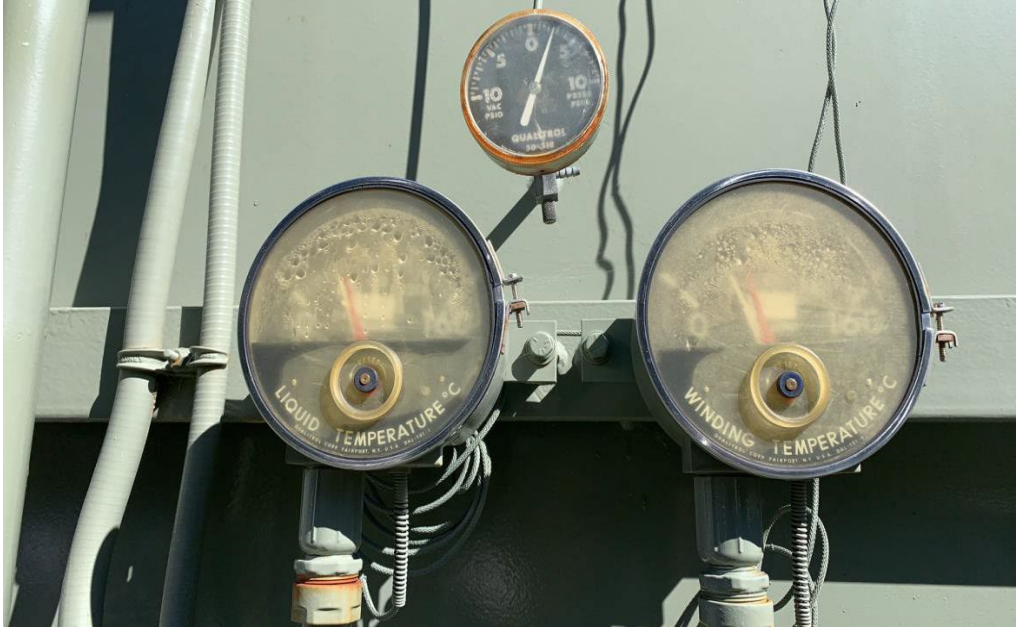
The field violations are listed below:

Humboldt Substation

Violation #	Violation Description	Image
1	<p>The temperature gauge at one of the transformer banks has deteriorated paint, moss growth, and low readability. PG&E stated that there is already a corrective tag for this issue.</p> <p>PG&E Response: We agree with the finding of deteriorated paint, moss growth and low readability on Transformer 2 at Humboldt Substation. We created priority B notification 127285519 and we completed the work on 11/17/2023.</p>	

Orick Substation

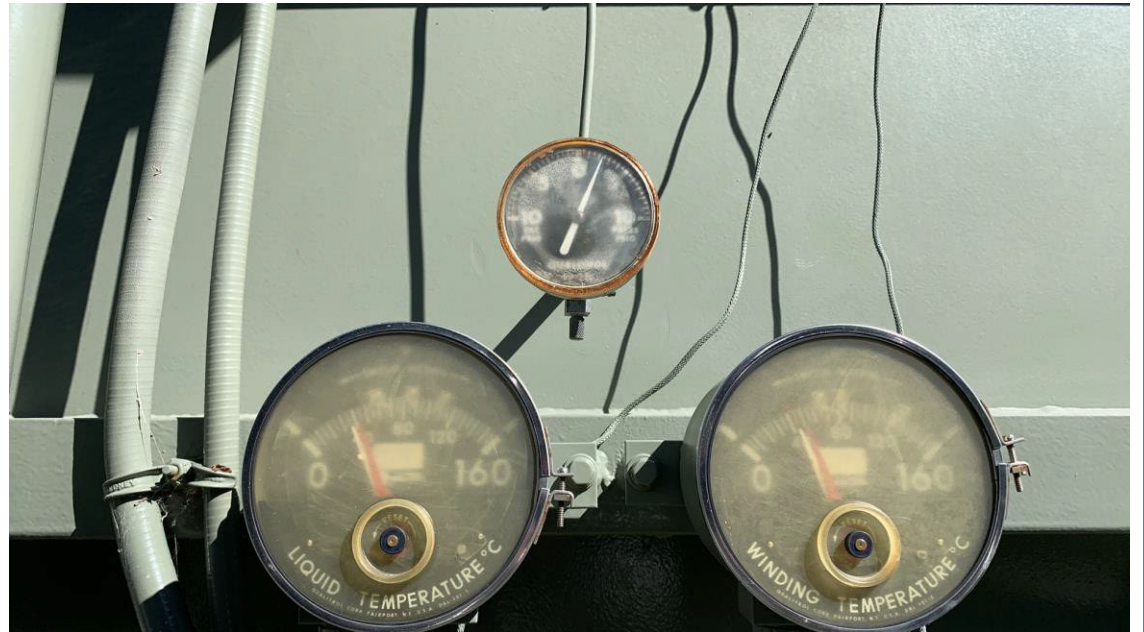
Violation #	Violation Description	Image
2	<p data-bbox="275 196 1318 266">There is a chipped insulator at Transformer 1A. PG&E stated that there is already an existing corrective tag #127139780.</p> <p data-bbox="275 318 1325 542">PG&E Response: We agree with the finding that Transformer 1A had a chipped insulator at Orick Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification 127139780. We completed the work on 12/12/2023.</p>	 A close-up photograph of a white ceramic insulator on a power line. The insulator consists of several stacked, rounded, disc-like segments. The top segment shows a small, dark chip or mark on its surface. The insulator is mounted on a metal structure, and power lines are visible in the background against a clear blue sky.

Violation #	Violation Description	Image
3	<p>There are temperature gauges that are not legible. PG&E stated that there is already a corrective tag #127143756.</p> <p>PG&E Response: We agree with the finding that the A-phase gauge is not legible at Trinidad Substation. We created priority E bundled notification 127292416 and added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	

4 The C-Phase temperature gauges are not legible. PG&E stated that there is already a corrective tag #127143757.

PG&E Response:

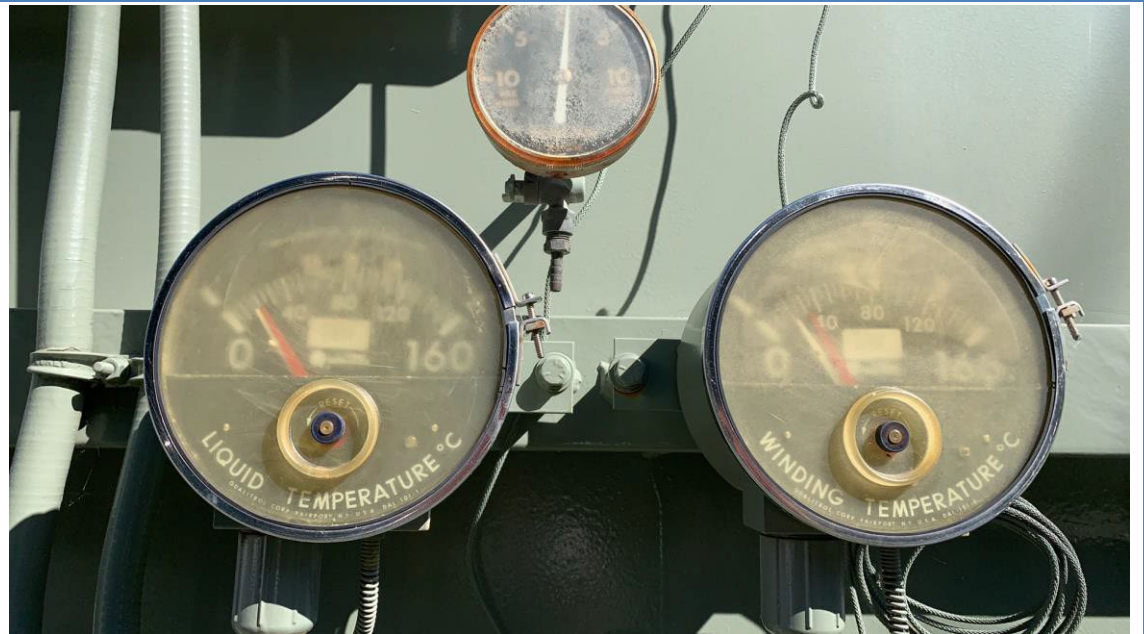
We agree with the finding that the C-phase gauge is not legible at Trinidad Substation. However, we inadvertently provided ESRB the incorrect notification. This work will be performed on a priority B notification 127828973 and has been added to the workplan. We will complete the work based on current work prioritization and material availability.



5 Temperature gauges are not legible. PG&E stated that there is already an existing tag #127143759.

PG&E Response:

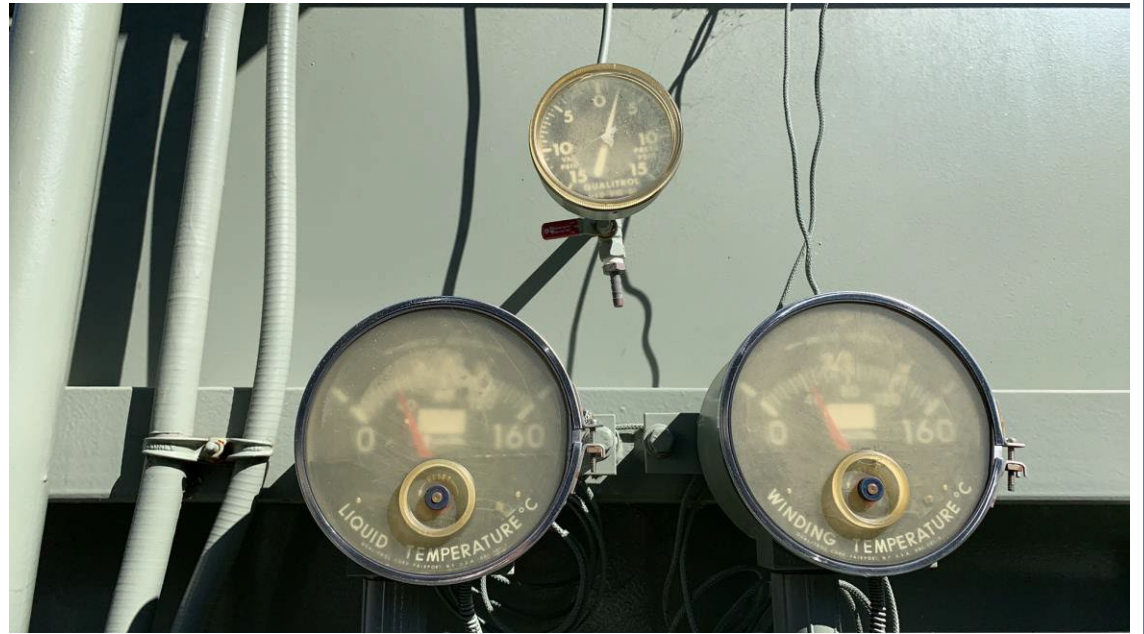
We agree with the finding that the spare temperature gauge is not legible at Trinidad Substation. However, we inadvertently provided ESRB the incorrect notification. This work will be performed on a priority B notification 127828974 and has been added to the workplan. We will complete the work based on current work prioritization and material availability.



6 The A-Phase transformer gauge is not legible. PG&E stated that there is no existing tag.

PG&E Response:

We agree with the finding that the A-phase gauge is not legible at Trinidad Substation. We created priority E bundled notification 127292416 and added it to the workplan. We will complete the work based on current work prioritization and material availability.



- 7 There is corrosion at the back of a meter panel. PG&E stated that there was an existing tag #127143598 for the corrosion.

PG&E Response:

We agree with the finding that the meter cabinet has corrosion at Trinidad Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification, 127143598. We will complete the work based on current work prioritization and material availability.




- 8 There is spare aluminum conductor by a transformer. There is an existing tag #126500663 to store the conductor elsewhere.

PG&E Response:

We agree with the finding of spare aluminum conductor at Trinidad Substation. However, we inadvertently provided ESRB the incorrect notification. This work will be performed on a priority E notification 128070406 and has been added to the workplan. We will complete the work based on current work prioritization and material availability.



Violation #	Violation Description	Image
9	<p>There is a rusted potential transformer on A-Phase on Fairhaven #1 line. There is an existing tag #127135346.</p> <p>PG&E Response: We agree with the finding that there is rust on the potential transformer on A phase at Fairhaven Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification, 127135346. We completed the work on 10/19/2023.</p>	

- 10 There is a rusted potential transformer on the C-Phase on Fairhaven #1 line. There is an existing tag #127135560.

PG&E Response:

We agree with the finding that there is rust on the potential transformer C-phase at Fairhaven Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification, 127135560. We completed the work on 10/20/2023.



- 11 There is a rusted potential transformer on the B-Phase on Fairhaven #1 line. There is an existing tag #127135349.

PG&E Response:

We agree with the finding that there is rust on the potential transformer B-phase at Fairhaven Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification, 127135349. We completed the work on 11/02/2023.



- 12 There is faded signage at the A-Phase potential transformer.

PG&E Response:

We agree with the finding that the signage is faded on the A phase potential transformer at Fairhaven Substation. We created priority E bundled notification 127294346 and added it to the workplan. We will complete the work based on current work prioritization and material availability.



13 C-Phase potential transformer signage is worn out.

PG&E Response:

We agree with the finding that the signage is faded on the C phase potential transformer at Fairhaven Substation. We created priority E bundled notification 127294346 and added it to the workplan. We will complete the work based on current work prioritization and material availability.



14 B-Phase potential transformer signage is worn out.

PG&E Response:

We agree with the finding that the signage is faded on the B phase potential transformer at Fairhaven Substation. We created priority E bundled notification 127294346 and added it to the workplan. We will complete the work based on current work prioritization and material availability.





15 The signage for Essex junction Arcata-Fairhaven line is worn out. Each phase already has a tag.

PG&E Response:

We agree with the finding that the Essex

	<p>junction Arcata-Fairhaven sign is faded at Fairhaven Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as priority E notifications: 127135163, 127135165, and 127135168. We will complete the work based on current work prioritization and material availability.</p>	
<p>16</p>	<p>Fairhaven-Humboldt line potential transformer signage missing on all phases.</p> <p>PG&E Response: We agree with the finding that the signage is faded on the Fairhaven-Humboldt line potential transformer at Fairhaven Substation. We created priority E bundled notification 127294346 and added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	

<p>17 The signage at switch 6031 is worn out.</p> <p>PG&E Response: We agree with the finding that the signage is faded on switch 6031 at Fairhaven Substation. We created priority E bundled notification 127294346 and added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	 A photograph of an electrical switch assembly at a substation. The switch is mounted on a metal structure and features several insulators and conductors. The signage on the switch is faded and difficult to read. The background shows a clear sky and some industrial structures.
<p>18 Switch 6023 signs are worn out.</p> <p>PG&E Response: We agree with the finding that the signage is faded on switch 6023 at Fairhaven Substation. We created priority E bundled notification 127294346 and added it to the workplan. We will complete the work on current work prioritization and material availability.</p>	 A photograph of an electrical switch assembly at a substation, similar to the one in the first image. The switch is mounted on a metal structure and features several insulators and conductors. The signage on the switch is faded and difficult to read. The background shows a clear sky and some industrial structures.

19 Switch 6011 signs are worn out.

PG&E Response:
We agree with the finding that the signage is faded on switch 6011 at Fairhaven Substation. We created priority E bundled notification 127294346 and added it to the workplan. We will complete the work based on current work prioritization and material availability.



20 6043 switch signs are faded.

PG&E Response:
We agree with the finding that the signage is faded on switch 6043 at Fairhaven Substation. We created priority E bundled notification 127294346 and added it to the workplan. We will complete the work based on current work prioritization and material availability.



21 Transformer #1 phase-C potential transformer is rusting.

PG&E Response:

We agree with the finding of rusting at Potential Transformer #1 Phase C at Fairhaven Substation. We created priority E notification 127293886. We completed this work on 10/25/2023.





22 There is rust on Transformer 1. There is an existing tag #127135562.

PG&E Response:

We agree with the finding of rust on Transformer 1 at Fairhaven Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification, 127135562. We will complete the work based on current work prioritization and material availability.



<p>23 CB1103 signs are rusted over. PG&E has an existing tag for all the rusted signs.</p> <p>PG&E Response: We agree with the finding that the signage is rusted on CB1103 at Fairhaven Substation. We created priority E bundled notification 127294346 and added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	 A close-up photograph of electrical equipment at Fairhaven Substation. The image shows several horizontal metal cross-arms supported by vertical insulators. Two signs are visible, one labeled '1103' and another labeled '1105'. The signs appear to be made of metal and show signs of rust. The background is a clear, light sky.
<p>24 Reg 1 has rusted signs. PG&E has an existing tag for those signs.</p> <p>PG&E Response: We agree with the finding that the signage is rusted on Reg 1 at Fairhaven Substation. We created priority E bundled notification 127294346 and added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	 A wide-angle photograph of electrical equipment at Fairhaven Substation. The image shows a complex arrangement of metal cross-arms, insulators, and electrical components. Several signs are visible, some of which appear to be rusted. The background is a clear, light sky.

25 Station bank 1 and outdoor AC panel #1 are rusted. There is an existing tag #127135561.

PG&E Response:

We agree with the finding of rust on Station Bank 1 and outdoor AC Panel #1 at Fairhaven Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification, 127135561. We will complete the work based on current work prioritization and material availability.



26 Potential transformer at 1103 PT 1C has damage. PG&E stated that there is already a capital work order.

PG&E Response:

We agree with the finding of PT replacement at Fairhaven Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority F bundled notification, 122507600. We will complete the work based on current work prioritization and material availability.

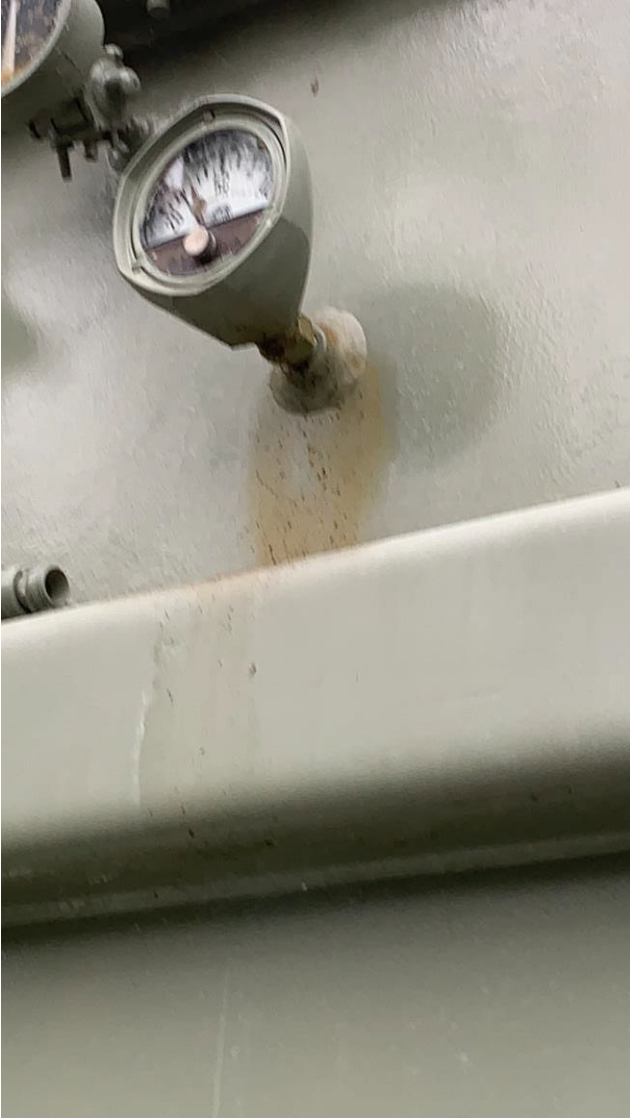


27 Potential transformer at 1104PT 1C is damaged. There is an existing capital project #122507600.

PG&E Response:

We agree with the finding of damage on 1104 PT 1C at Fairhaven Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority F bundled notification, 122507600. We will complete the work based on current work prioritization and material availability.

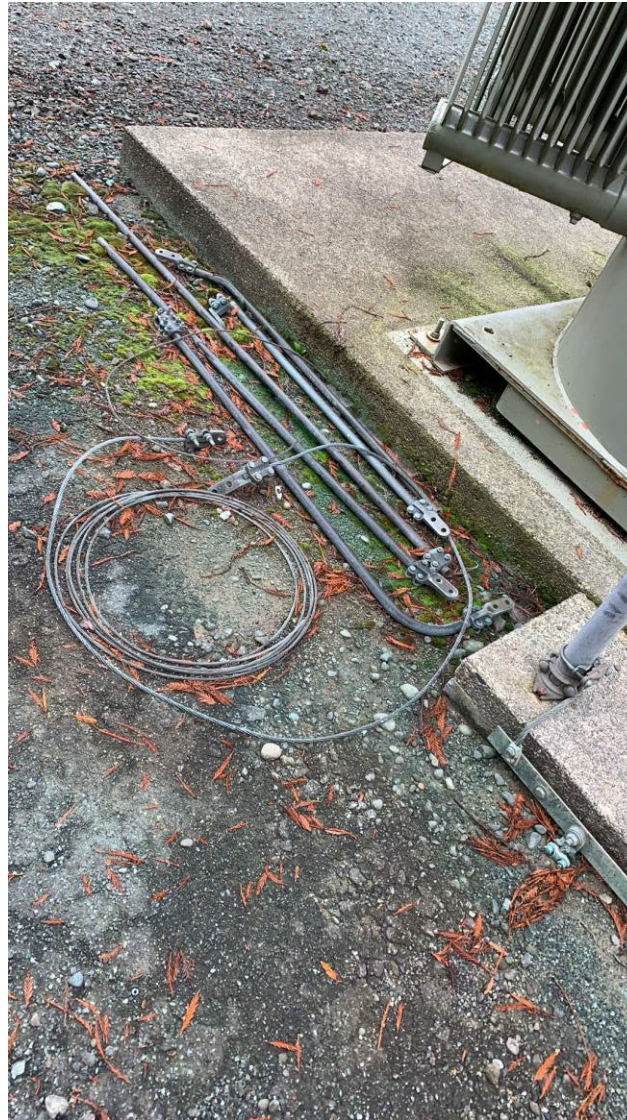


Violation #	Violation Description	Image
28	<p>There is an oil leak at Reg 1 by the top oil gauge. There is an existing tag #127140063.</p> <p>PG&E Response: We agree with the finding that the oil leak on Reg 1 at Blue Lake Substation. However, we inadvertently provided ESRB the incorrect notification. This work will be performed on priority a B notification 128045416 and has been added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	 A close-up photograph of a white oil gauge mounted on a grey metal surface. The gauge has a circular window with a needle and a red oil level indicator. Below the gauge, there is a significant yellowish-brown stain on the metal surface, indicating an oil leak. The background shows other parts of the equipment.

29 There are spare parts on the ground for Bank 1 spare transformer. There is an existing tag #127140064.

PG&E Response:

We agree with the finding of spare parts at Bank 2 Spare at Blue Lake Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification, 127140064. We completed the work on 12/20/2023.



30 There is corrosion on the frame by MET POT phases A, B, and C.

PG&E Response:
We agree with the finding that there is corrosion on the frame by MET POT phase A, B and C at Blue Lake Substation. We created priority E notification 127301901 and added it to the workplan. We will complete the work based on current work prioritization and material availability.



31 The insulators by MET POT 1A,1B, and 1C are contaminated. There is an existing tag #127140060.

PG&E Response:
We agree with the finding of contamination insulators by MET POT 1A, 1B, 1C at Blue Lake Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification, 127140060. We will complete the work based on current work prioritization and material availability.




32 There is paint flaking off spare bank 1.

PG&E Response:

We agree with the finding of paint flaking at spare bank 1 at Blue Lake Substation. We created priority B notification, 127301902. We completed the work on 12/07/2023.



Violation #	Violation Description	Image
33	<p>The top nitrogen gauge for spare bank 1 transformer is illegible.</p> <p>PG&E Response: We agree that the top nitrogen gauge for the spare bank 1 transformer is illegible at Willow Creek Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. The nitrogen is read by the gauge in the lower nitrogen cabinet, or the electrician would use a calibrated portable gauge. This top nitrogen gauge is installed by the manufacturer and is an unsafe location that could potentially cause harm should an electrician need to read it, so it is not utilized.</p>	

34 The nitrogen gauge at top of C phase bank 1 transformer is illegible.

PG&E Response:

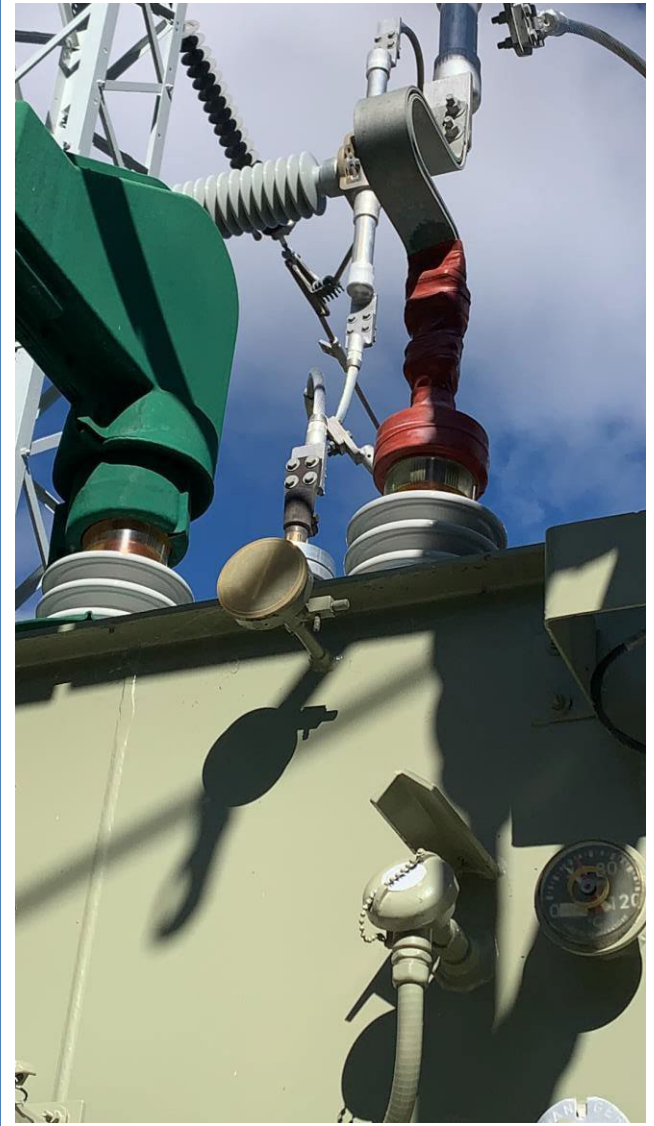
We agree that the top nitrogen gauge for the bank 1 C phase transformer is illegible at Willow Creek Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. The nitrogen is read by the gauge in the lower nitrogen cabinet, or the electrician would use a calibrated portable gauge. This top nitrogen gauge is installed by the manufacturer and is an unsafe location that could potentially cause harm should an electrician need to read it, so it is not utilized.



35 Top pressure gauge at B phase bank 1 transformer is illegible.

PG&E Response:

We agree that the top nitrogen gauge for the bank 1 B phase transformer is illegible at Willow Creek Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. The nitrogen is read by the gauge in the lower nitrogen cabinet, or the electrician would use a calibrated portable gauge. This top nitrogen gauge is installed by the manufacturer and is an unsafe location that could potentially cause harm should an electrician need to read it, so it is not utilized.




36 Nitrogen gauge at top of phase a bank1 transformer is illegible.

PG&E Response:

We agree that the top nitrogen gauge for the bank 1 A phase transformer is illegible at Willow Creek Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. The nitrogen is read by the gauge in the lower nitrogen cabinet, or the electrician would use a calibrated portable gauge. This top nitrogen gauge is installed by the manufacturer and is an unsafe location that could potentially cause harm should an electrician need to read it, so it is not utilized.



Violation #	Violation Description	Image
37	<p>The footing at switch 43 is rusting.</p> <p>PG&E Response: We agree with the finding that there is rust on the footing on switch 43 at Maple Creek Substation. We created priority B notification 127473741. We completed the work on 12/12/23.</p>	 A photograph showing a close-up of a metal structure's footing. The metal beam is painted a light blue or grey color. It is mounted on a square concrete footing. The area where the metal meets the concrete is heavily corroded, with a thick, brown, flaky layer of rust. The ground around the footing is dark, damp soil with some small rocks and debris. In the background, another similar metal structure is visible, and a person's leg in blue jeans is partially seen.

38 There is flaked paint at the support structure of A phase PT at JB12

PG&E Response:

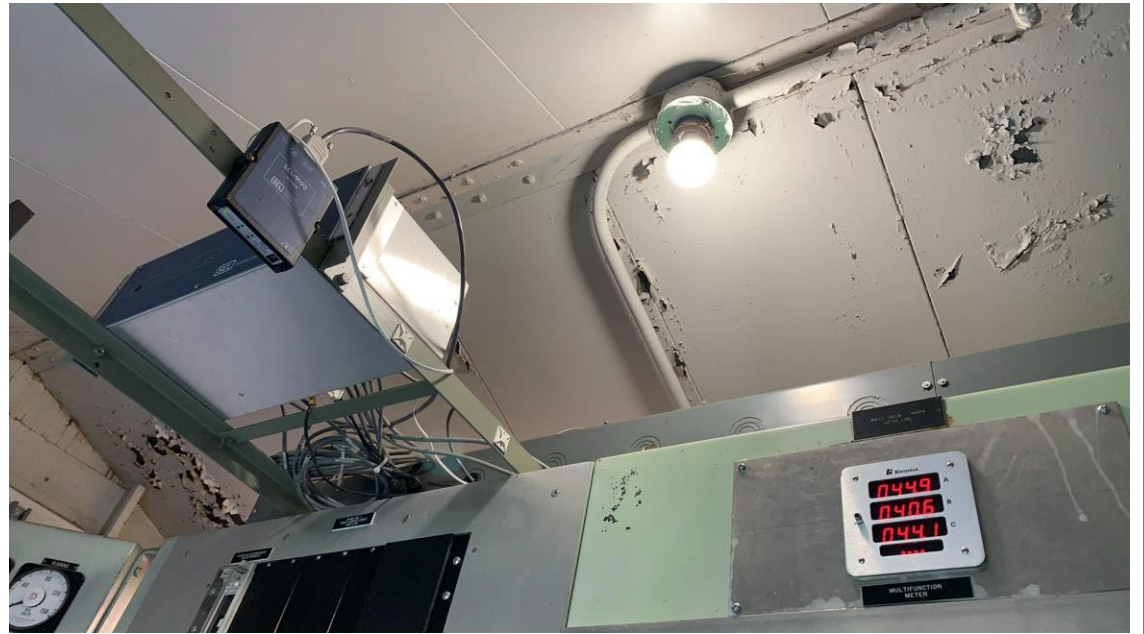
We agree with the finding that there flaked paint on A phase PT at Maple Creek Substation. We created priority E notification 127301729 and added it to the workplan. We will complete the work based on current work prioritization and material availability.




39 There is paint chipping throughout the control room interior. There is a capital project for this issue.

PG&E Response:

We agree with the finding that the control room roof has paint chipping at Maple Creek Substation. We created priority E notification 127545246. We completed the work on 12/14/2023.



Fort Seward Substation

Violation #	Violation Description	Image
40	<p>There are signs on the inside side of the perimeter fence.</p> <p>PG&E Response: We agree with the finding the signs are on the inside of the perimeter fence at Fort Seward Substation. We created priority B notification 128045444 and added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	


41 There is spare conductor kept inside the frame of a support structure.

PG&E Response:

We agree with the finding the spare conductor is kept inside the frame of a support structure at Fort Seward Substation. We created priority E notification 128045445 and added it to the workplan. We will complete the work based on current work prioritization and material availability.



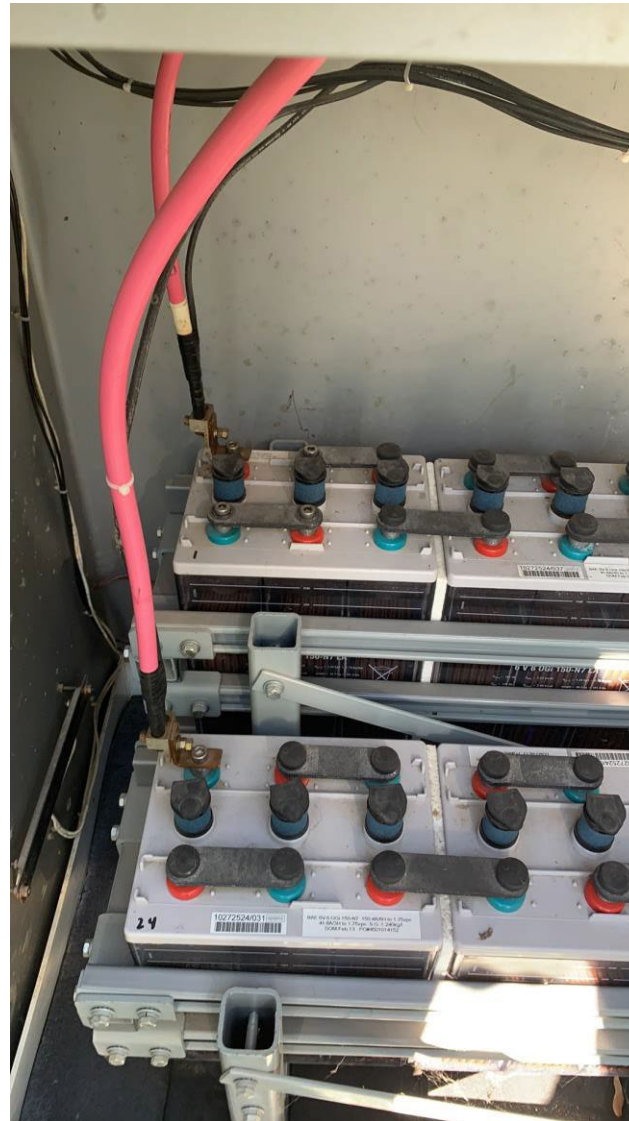
Garberville Substation


Violation #	Violation Description	Image
42	<p>There are signs on the inside of the perimeter fence.</p> <p>PG&E Response: We agree with the finding the signs are on the inside of the perimeter fence at Garberville Substation. We created priority B notification 128045442 and added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	

44 There is a second instance of batteries missing caps.

PG&E Response:

We agree that the batteries are missing some terminal caps at Garberville Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. While we agree that these are a good business process, these caps are provided by the manufacturer and are not required per any PG&E standard.

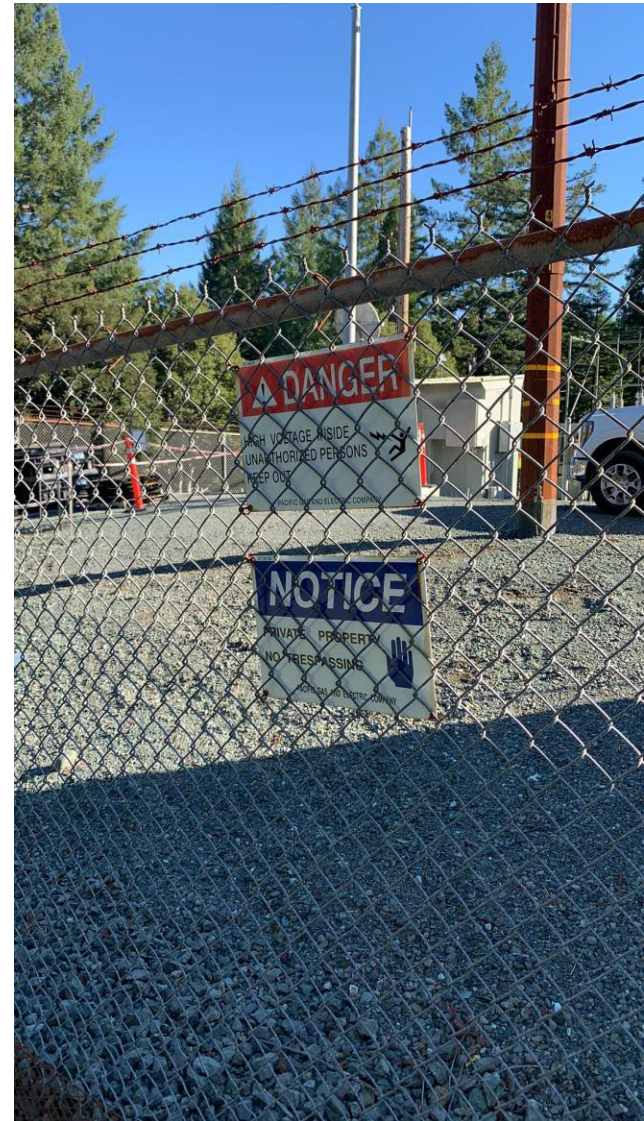


Violation #	Violation Description	Image
45	<p data-bbox="310 219 1083 251">There is a bolt broken off of the back panel of the regulator.</p> <p data-bbox="310 305 1234 568">PG&E Response: We agree with the finding of a broken bolt at the Regulator at Fruitland Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification, 127132810. We will complete the work based on current work prioritization and material availability.</p>	 A close-up photograph of a metal regulator assembly. The image shows a grey metal panel with several bolts along its edge. A diagonal metal rod is attached to the top of the panel. One of the bolts on the right side of the panel is broken, with the head and part of the shaft missing. The background shows other parts of the substation structure under a clear sky.


46 There is a sign on the inside side of the perimeter fence.

PG&E Response:

We agree with the finding the signs are on the inside of the perimeter fence at Fruitland Substation. We created priority B notification 128045441 and added it to the workplan. We will complete the work based on current work prioritization and material availability.



Harris Substation

Violation #	Violation Description	Image
47	<p>Rust on CB 1108/2</p> <p>PG&E Response: We agree with the finding of rust on CB 1108/2 at Harris Substation. We created priority E notification 127313009 and added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	

48 There is a light out at CB 1108/2. There is an existing tag #126606872

PG&E Response:

We agree with the finding of light out on CB 1108/2 at Harris Substation. However, we inadvertently provided ESRB the incorrect notification. This work will be performed on a priority E notification 128045440 and has been added to the workplan. We will complete the work based on current work prioritization and material availability.



49 There is flaking paint on 25SS transformer.

PG&E Response:

We agree with the finding of Station Service 2 transformer having flaking paint at Harris Substation. We created priority E notification 127313013 and added it to the workplan. We will complete the work based on current work prioritization and material availability.



50 C phase PT has rust. There is an existing tag #126607211.

PG&E Response:

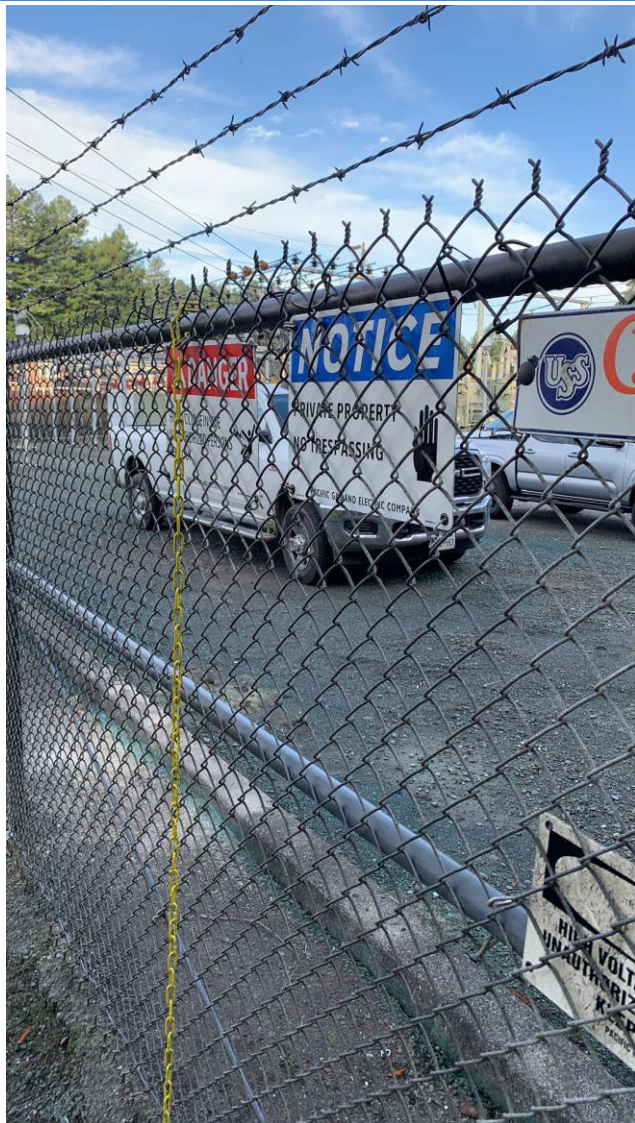
We agree with the finding of a rust at C Phase PT at Harris Substation, but do not agree that the finding qualifies as a violation of GO 174, Rule 12. Our QEW identified this issue prior to the CPUC field audit and documented it in our system of record as a priority E notification, 126607211. We will complete the work based on current work prioritization and material availability.




51 There is a sign on inside side of fence.

PG&E Response:

We agree with the finding the signs are on the inside of the perimeter fence at Harris Substation. We created priority B notification 128045419 and added it to the workplan. We will complete the work based on current work prioritization and material availability.



<p>52</p>	<p>There are dirty insulators at 1109 and at station bank 1 C.</p> <p>PG&E Response: We agree with the finding of dirty 12kV insulators (1109 and station Bank 1C) at Harris Substation. We created priority E bundled notification 127312999 and added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	
<p>53</p>	<p>There are dirty insulators at E PT.</p> <p>PG&E Response: We agree with the finding of dirty 12kV insulators (E PT) at Harris Substation. We created priority E bundled notification 127312999 and added it to the workplan. We will complete the work based on current work prioritization and material availability.</p>	