

**CPUC AUDIT REPORT OF PG&E VICTOR HEADQUARTERS**  
**ELECTRIC TRANSMISSION AUDIT**  
**September 11 – 15, 2023**

**I. Records Review**

During the record review part of the audit, ESRB staff reviewed the following records for the Victor Headquarter (Victor HQ) Electric Transmission facilities provided by PG&E:

- PG&E’s “Electric Transmission Preventive Maintenance Manual (ETPM) TD-1001M” Rev 3, Rev 4, and Rev 5
- PG&E’s utility procedures, standards, guidelines, and job aids for electric transmission facility inspections
- Maps of transmission circuits
- A list of transmission circuits and tower count
- A list of transmission facilities
- Lists of patrol, enhanced inspection, and drone inspections for electric transmission facilities from July 2018 to July 2023
- A list of non-routine patrols for electric transmission facilities from July 2018 to July 2023
- Third-Party Notification and Resolution of Potential Violations and Safety Hazards from July 2018 to July 2023
- Notification to Third-Party Non-Utility of Nonconformance from July 2018 to July 2023
- PG&E’s utility procedures, standards, guidelines, and job aids for electric transmission vegetation management
- A list of vegetation management for transmission circuits from July 2018 to July 2023
- A list of all open, closed, and cancelled notifications from July 2018 to July 2023
- PG&E’s policy and procedures related to transmission right-of-way maintenance, and associated performance records from July 2018 to July 2023
- PG&E’s policy and procedures for insulator washing, and associated performance records from July 2018 to July 2023
- PG&E’s policy and procedures for pole intrusive tests, foundation tests, and all other tests related to transmissions structure safety, and associated performance records from July 2018 to July 2023
- PG&E’s policy and procedures for assigning priority levels to the transmission deficiencies identified from July 2018 to July 2023
- A list of all new construction projects completed from July 2018 to July 2023
- A list of all pole loading calculations from July 2021 to July 2023
- A list of PG&E's training courses from July 2018 to July 2023

- The results of all internal quality management audits from July 2018 to July 2023
- PG&E's utility standard and procedures for transmission work verification, vegetation management quality assurance, and vegetation management audit

## II. Records Violations

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

### 1. General Order (GO) 95, Rule 31.2, Inspection of Lines states in part:

*“Lines shall be inspected frequently and thoroughly for the purpose of insuring 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.”*

PG&E failed to complete the 22 inspections in Table 1 below by their assigned due dates.

**Table 1: PG&E Late Inspections**

Inspection Type	Structure Number	Functional Location	Due Date	Completion Date	Days Late
Enhanced Ground	003/021	ETL.3830	7/31/2022	8/5/2022	5
Enhanced Ground	005/002-GUY	ETL.8220	7/31/2022	9/12/2022	43
Enhanced Ground	005/001-GUY	ETL.8220	7/31/2022	9/12/2022	43
Enhanced Ground	004/006-GUY	ETL.8220	7/31/2022	9/12/2022	43
Enhanced Ground	009/190-GUY	ETL.8210	7/31/2022	11/10/2022	102
Enhanced Ground	009/189-GUY	ETL.8210	7/31/2022	11/10/2022	102
Enhanced Ground	011/151-GUY	ETL.8264	7/31/2022	11/22/2022	114
Enhanced Ground	011/157-GUY	ETL.8264	7/31/2022	11/22/2022	114
Enhanced Ground	011/159-GUY	ETL.8264	7/31/2022	11/22/2022	114
Enhanced Ground	002/057-GUY	ETL.8351	7/31/2022	11/23/2022	115
Enhanced Ground	000/020-GUY	ETL.8351	7/31/2022	11/23/2022	115
Air+	000/008	ETL.1402	7/31/2022	9/28/2022	59
Air+	009/189-GUY	ETL.8210	7/31/2022	10/3/2022	64
Air+	009/190-GUY	ETL.8210	7/31/2022	10/5/2022	66
Air+	004/006-GUY	ETL.8220	7/31/2022	10/3/2022	64
Air+	005/001-GUY	ETL.8220	7/31/2022	10/3/2022	64
Air+	005/002-GUY	ETL.8220	7/31/2022	10/3/2022	64
Air+	011/151-GUY	ETL.8264	7/31/2022	10/3/2022	64
Air+	011/157-GUY	ETL.8264	7/31/2022	10/3/2022	64
Air+	011/159-GUY	ETL.8264	7/31/2022	10/3/2022	64
Air+	000/020-GUY	ETL.8351	7/31/2022	10/3/2022	64
Air+	002/057-GUY	ETL.8351	7/31/2022	10/3/2022	64

**PG&E Response:**

We agree that the enhanced ground inspection on structure 003/021 was completed 5 days late. However, we do not agree that the other 10 enhanced ground inspections were conducted late as they had been recently added to the system in September 2022. Per our TD-8124S “Detailed System Inspections Framework”, if assets are found near or after July 31<sup>st</sup>, then they must be inspected within 90 days of identification. These inspections were all completed before the 90 day timeframe.

Additionally, we do not agree that the 11 aerial inspections are late. All were newly identified assets added to the inspection program after July 31<sup>st</sup> but were inspected within the 90 day timeframe per TD-8124S, as shown below in PGE Image 1.

**PGE Image 1:**

- f. Inspect any newly identified assets added to the base inspection program by **July 31<sup>st</sup>** of the relevant year.
  - (1) IF assets are found near OR after July 31<sup>st</sup>,  
THEN inspect them **within 90 days** of identification.

**PG&E's last two versions of its ETPM, Revision 4, effective 11/20/2018 and Revision 5, effective 08/31/2020, define the priority codes and associated due dates for the corrective actions shown in Tables 2 and 3:**

**Table 2: PG&E ETPM Rev 04, Published on 11/20/2018, Priority Codes**

<b>Priority Code</b>	<b>Priority Code Priority Description</b>
<b>A</b>	The condition is urgent and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date will be 30 days to allow time for post-construction processes and notification close-out.
<b>B</b>	Corrective action is required within 3 months from the date the condition is identified. The condition must be reported to the transmission line supervisor as soon as practical.
<b>E</b>	Corrective action is required within 12 months from the date the condition is identified.
<b>F</b>	Corrective action is recommended within 24 months from the date the condition is identified, (due beyond 12 months, not to exceed 24 months). Requires Director approval.
1. QCRs must report immediately any “Priority Code A” abnormal condition to the transmission line supervisor and GCC.	
2. In addition, QCRs must report any “Priority Code B” condition to the transmission line supervisor as soon as practical, to ensure that correction occurs within the appropriate time.	

**Table 3: PG&E ETPM Rev 05, Published on 08/31/2020, Priority Codes**

Priority Code <sup>1</sup>	Priority Description
A2	The condition is urgent and requires <b>immediate</b> response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date will be 30 days to allow time for post-construction processes and notification close-out.
B3	Corrective action is required within <b>3 months</b> from the date the condition is identified. The condition must be reported to the transmission line supervisor as soon as practical.
E	Corrective action is required within <b>12 months</b> from the date the condition is identified. <i>EXCEPT FOR ITEMS WITHIN HFTD TIER 3 ARE REQUIRED WITHIN 6 MONTHS<sup>4</sup>.</i>
F	Corrective action is recommended within <b>24 months</b> from the date the condition is identified, (due beyond 12 months, not to exceed 24 months). <i>EXCEPT FOR ITEMS WITHIN HFTD TIER 3 ARE REQUIRED WITHIN 6 MONTHS AND WITHIN HFTD TIER 2 ARE REQUIRED WITHIN 12 MONTHS<sup>5</sup>.</i>
1) Refer to 2.3.5.2, “Priority Code Due Dates for High Fire Risk Conditions within HFTDs” and 2.3.5.3, “Priority Code Due Dates for Non-Fire Risk Conditions within HFTDs.”	
2) QCRs must report immediately any “Priority Code A” abnormal condition to the transmission line supervisor, and the transmission supervisor or QCR contacts GCC.	
3) In addition, QCRs must report any “Priority Code B” condition to the transmission line supervisor as soon as practical, to ensure that correction occurs within the appropriate time.	
4) If the condition in the HFTD Tier 3 does NOT create a fire risk (non-threatening) the corrective action is required within 12 months.	
5) If the condition in the HFTD Tier 3 OR Tier 2 does NOT create a fire risk (non-threatening) the corrective action is required within 24 months.	

ESRB found that PG&E did not correct identified deficiencies according to PG&E’s assigned due dates. ESRB staff reviewed notifications from "*DR 16 – Master List of Notifications*" and found a total of 7,991 past due notifications. Table 4 below is a breakdown of the 7,991 past due work orders for each priority.

**Table 4: Number of Notifications Past Their Scheduled Completion Dates by Priority Codes**

Priority Code*	Total Late Notifications	Late Open Notifications	Late Closed Notifications	Late Cancelled Notifications
A	3	0	2	1
B	246	0	217	29
E	5,963	2,494	2,582	887
F	1,779	1,400	153	226
<b>Total</b>	<b>7,991</b>	<b>3,894</b>	<b>2,954</b>	<b>1,143</b>

\*Current Priority Codes

### PGE Response:

We provided TD-8123P-103, “Electric Transmission Line Guidance for Setting Priority Codes” in the Victor Pre-Audit Data Request (PADR) as a response to Question 2. This procedure was issued on 11/3/2022 and went into effect on 1/3/2023. This procedure is meant to supersede the above tables until TD-1001M Revision 5 “Electric Transmission Preventative Maintenance Manual” is fully revised. Please see the excerpt from TD- 8123P-103, labelled PGE Image 2 below, as reference to our current priority code established guidance.

### PGE Image 2:

Table 2. Priority Codes

Priority Code	G.O. 95, Rule 18 Level	Priority Description – Time Frame <sup>1</sup>
A	1	The condition is urgent and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard. SAP due date is 30 days – to allow time for post-construction processes and notification close-out.
B	-	Not used for maintenance corrective action priority.
E	2	Corrective action is required, as follows: <ul style="list-style-type: none"> <li>• Within 6 months for HFTD Tier 3 <sup>2</sup></li> <li>• Within 12 months for HFTD Tier 2/HFRA/Zone 1 <sup>2</sup></li> <li>• Within 12 months for potential violations that compromise worker safety</li> <li>• Within 36 months for all other potential violations</li> </ul>
F	3	Corrective action is required within 60 months.

<sup>1</sup> Time frames listed are “Not to Exceed” and QCR/CIRT may define time frames according to site-specific conditions.

<sup>2</sup> IF the condition in the HFTD Tier 3 OR Tier 2/HFRA/Zone 1 does not create a fire risk (non-threatening), THEN the corrective action is required within 36 months.

PG&E agrees with 2,803 of the 7,991 of the record violations cited in Table 4 “Number of Late Notifications by Priority and Type”. Please see the individual category responses below:

- We agree that 2,075 of the 2,954 “Late Closed Notifications” were completed past their established due dates.
- We agree that 728 of the 3,894 “Late Open Notifications” were completed past their established due dates.

- We do not agree with any of the 1,143 “Late Cancelled Notifications.”

**Late Closed Notifications:**

We agree with 2,075 of the above 2,954 record violations for “Late Closed Notifications”. These notifications were completed past their required end dates or, if previously reassessed, funded repair dates (FRD) per TD-8123P-101 (the procedure in effect at the time the work was completed). The remaining 879 notifications were completed prior to their approved FRD. Please see the breakdown of these notifications in Table 1PGE.

**Table 1PGE**

Priority Code	CPUC “Late Closed Notifications”	PG&E Agrees Completed Late	PG&E Disagree Completed On-time
A	2	1	1
B	217	61	156
E	2,582	1,951	631
F	153	62	91
<b>Total</b>	<b>2,954</b>	<b>2,075</b>	<b>879</b>

**Late Open Notifications:**

We agree 728 of the 3,894 “Late Open Notifications” are records violations in Table 4, “Number of Late Notifications by Priority and Type”.

As of January 3, 2023, our Centralized Inspection Review Team (CIRT) began applying the new Standard TD- 8123P-103 “Electric Transmission Line Guidance for Setting Priority Codes” against all open notifications. This standard was written to help properly allocate resources to the operational and safety risks related to wildfire, public/worker safety, reliability, and to better align with CPUC GO 95, Rule 18. Since the PADR, the CIRT evaluated and converted 3,551 notifications of the 3,894 indicated below in Table 2 PGE. These evaluations resulted in 2,578 notification conversions that no longer show them as past due, 421 notifications still classified as late notifications and 552 cancelled.

Some of the notifications listed in Table 2 PGE were completed before CIRT could review and convert the notifications, therefore, we agree that these 307 notifications were completed past-due. However, we completed 36 notifications before their required end date or their funded repair date (if previously reassessed). Therefore, those 36 are not considered past-due.

Please see the full breakdown of the 3,894 CPUC “Late Open Notifications” in Table 2 PGE below. During the conversion, some notifications were downgraded from level 2 to level 3, resulting in more Priority F and less Priority E notifications.

**Table 2 PGE**

Priority Code*	CPUC “Late Open Notifications”	PG&E Agrees		PG&E Disagree		
		Converted and Late (Open and Closed)	Not Converted and Closed Late	Not Converted and Closed On-Time	Converted and On-time (Open and Closed)	Cancelled
A	0	-	-	-	1	-
B	0	-	-	-	-	-
E	2,494	408	260	24	1107	203
F	1,400	13	47	12	1470	349
<b>TOTAL</b>	<b>3,894</b>	<b>421</b>	<b>307</b>	<b>36</b>	<b>2578</b>	<b>552</b>

**Late Cancelled Notifications:**

We disagree with the above 1,143 records violations for “Late Cancelled Notifications” as we do not have a timeline requirement in our guidance documents for cancelling notifications that are deemed unnecessary, duplicative, or created in error, after review by the CIRT. These notifications are not late as no corrective actions were performed, because no corrective action was needed.

Table 5 below shows the most overdue notification for each priority.

**Table 5: Most Overdue Open or Closed Notifications**

Priority Codes*	Most Overdue Notification	Corrective Action Completion Date	Required End Date	Days Overdue
A	119180837	06/17/2020	05/17/2020	31
B	116948235	12/30/2021	04/02/2020	637
E	116762722	04/28/2023	03/09/2020	1135
F	116744807	10/28/2022	01/29/2020	1003

\*Current Priority Codes

**PGE Response:**

We reviewed each of the notifications in Table 5 “Most Overdue Open or Closed Notifications” and are providing a response in descending order below:

- Priority A notification 119180837 was identified during a drone inspection that occurred on 04/17/2020. However, this notification was inadvertently not created until 06/17/2020. We took corrective action the same day the notification was created. Therefore, this notification was already past due at the time of creation.
- Notification 116948235 was created on 04/03/2019, as an E priority to repair a concrete tower footing. On 11/5/2021, this was upgraded to a B priority after the Centralized Inspection Review Team (CIRT) reviewed drone images from a recent inspection. We took corrective action on December 30, 2021, 55 days from when the priority was upgraded but still past the required end date.
- Notification 116762722 was created on 03/19/2019, to install a new high voltage sign. This non- time dependent notification was completed on 05/01/2023, which was past the required end date.
- We disagree that LC 116744807 is past due. This priority F notification was created on

03/15/2019 to repaint the lattice steel tower. An FSR was performed on 06/04/2022, adding a funded repair date to 06/04/2024. This tower was painted on 10/28/2022, which was before the funded repair date. Per TD-8123P-101, this work was completed before the funded repair date and therefore, not considered past due.

### III. Field Inspection List

During the field inspection, ESRB staff inspected PG&E’s transmission facilities listed in the following Table 6:

**Table 6: Structures Inspected During Field Visit**

Location	Structure Number	Circuits	Voltage (kV)
1	A006/096	Lockeford – Lodi 2	60
2	A006/095	Lockeford – Lodi 2	60
3	A006/094	Lockeford – Lodi 2	60
4	001/025	Lockeford 1	60
5	001/024	Lockeford 1	60
6	001/023	Lockeford 1	60
7	056/250A	Los Banos – Quintos SW Station	230
8	056/250	Los Banos – Quintos SW Station	230
9	057/249	Tesla – Los Banos 1	500
10	063/281	Tracy – Los Banos	500
11	042/183	Quinto – Wesely	230
12	073/320	Miller 1	115
13	048/216	Tracy – Los Banos	500
14	042/184	Tesla – Los Banos 1	500
15	041/182	Quinto – Wesely	230
16	073/319	Miller 1	115
17	000/002	Salado – Crow Creek	60
18	000/001	Salado – Crow Creek	60
19	000/001	Salado – Newman 2	60
20	000/:002	Salado – Newman 2	60
21	000/:003	Salado – Newman 2	60
22	000/:004	Salado – Newman 2	60
23	018/005A	Donnells – Mi-Wuk	115
24	018/005B	Mi-Wuk – Curtis	115
25	018/005	Donnells – Mi-Wuk	115
26	018/005C	Mi-Wuk – Curtis	115
27	018/006	Mi-Wuk – Curtis	115
28	018/007	Mi-Wuk – Curtis	115
29	018/008	Mi-Wuk – Curtis	115
30	018/009	Mi-Wuk – Curtis	115
31	001/005	Racetrack Tap	115
32	001/006	Racetrack Tap	115
33	007/011	Melones – Racetrack	115
34	007/010	Melones – Racetrack	115
35	007/009	Melones – Racetrack	115



36	007/012	Melones – Racetrack	115
37	007/013	Melones – Racetrack	115
38	019/128	Bellota – Cottle	230
39	019/128	Bellota – Cottle	230
40	019/131	Cottle – Melones	230
41	015/119	Salt Springs – Tiger Creek	115
42	015/120	Salt Springs – Tiger Creek	115
43	015/121	Salt Springs – Tiger Creek	115
44	015/117	Salt Springs – Tiger Creek	115
45	015/118	Salt Springs – Tiger Creek	115
46	004/034	Tiger Creek – Valley Springs	230
47	004/035	Tiger Creek – Electra	230
48	001/017	West Point – Valley Spring	60
49	004/036	Tiger Creek – Valley Spring	230
50	004/037	Tiger Creek – Electra	230
51	010/127	West Point – Valley Spring	60
52	010/126	West Point – Valley Spring	60
53	010/125	West Point – Valley Spring	60
54	000/001	Electra – Bellota	230
55	013/109	Tiger Creek – Electra	230
56	013/107	Tiger Creek – Valley Springs	230
57	013/108	Tiger Creek – Electra	230
58	:004/011	Tesla – Stockton Cogen	115
59	:004/012	Tesla – Stockton Cogen	115
60	:004/013	Tesla – Stockton Cogen	115
61	:004/014B	Tesla – Stockton Cogen	115
62	:004/014A	Kasson - Louise	60
63	:004/015B	Tesla – Stockton Cogen	115
64	004/015A	Kasson - Louise	60
65	:004/016B	Tesla – Stockton Cogen	115
66	004/016A	Kasson - Louise	60
67	004/011	Kasson - Louise	60
68	004/012	Kasson - Louise	60
69	004/013	Kasson - Louise	60
70	000/010	Kasson - Louise	60
71	000/009	Kasson - Louise	60
72	022/157	Schulte – Kasson – Manteca	115
73	001/013	Manteca – Vierra	115
74	AA001/017	Manteca 1	60
75	i000/001	Tesla – Salado – Manteca	115

#### IV. Field Inspection – Violations

We disagree with 7 of the 20 field inspection violations listed below. These locations either were deemed unnecessary by CIRT, or had a pre-existing non-conformance identified by our qualified company representative (QCR), documented within our system of record (SAP), and established in our work management annual work plan, prior to the CPUC field audit.

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 communications 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."*

ESRB identified the following structures which either need to be repaired or replaced, shown in Table 7.

**Table 7: Deficient Towers/Poles**

Location	Structure Number	Deficiencies	Comments
3	006/A094	Buried Anchor	PG&E fixed in the field
10	63/281	Guy wire installed incorrectly	PG&E has past due notification LC122383619
16	073/319	Foundation Repair	PG&E created LC127042032 to correct the issue
26	018/005C	Foundation Repair	PG&E created LC127045756 to correct the issue
34	007/010	Replace Pole	PG&E has past due notifications LC123098820 and LC126640240
42	015/120	Corrosion on Steel Structure	PG&E created LC127054149 to correct the issue
46	004/034	Corrosion on Steel Structure	PG&E created LC127055651 to correct the issue
47	004/035	Corrosion on Steel Structure	PG&E created LC127055781 to correct the issue
49	004/036	Replace Insulator	PG&E has past due notification LC123789505
52	010/126	Exposed Ground Rod	PG&E corrected in the field

57	013/108	Foundation Below Grade	PG&E created LC127058669 to correct the issue
62	:004/014	Missing Visibility Strips	PG&E corrected in the field
69	000/013	Missing guy bonding	PG&E has past due notification LC119379220
73	001/013	Bent Structure	PG&E has past due LC119707825
73	001/013	Foundation Below Grade	PG&E created LC127063870 to correct the issue

**PG&E Response:**

We agree with the non-conformance at Location 3 for the buried anchor; however, this was corrected by a QCR during the field audit.

We agree with the pre-existing non-conformance at Location 10 for the guy wire being installed incorrectly; however, we disagree this is a violation of GO 95, Rule 31.1. This notification was identified by our QCR and documented within our system of record (SAP) before the CPUC field audit. Notification 122383619 was recently reviewed by CIRT and updated per the L123 guidance as described in TD-8123P-103. Therefore, the required end date was updated to 10/29/2024.

We agree with the finding at Location 16 for the foundation repair and created notification 127042032, a time dependent priority F notification, in a non-HFTD, and is currently planned to be mitigated by 2028.

We disagree with the finding at Location 26 for the below grade foundation. We created notification 127058669 during the field audit to have this possible non-conformance evaluated by CIRT. The CIRT evaluation resulted in this notification being cancelled, this was determined to not have a safety or reliability concern that will materialize within the next 5 years.

We agree with the finding at Location 34 to replace pole. This notification was identified by our QCR and documented within our system of record (SAP) before the CPUC field audit. However, this work was completed past-due on 11/11/2023.

We disagree with the second notification (LC 126640240) at Location 34 for the pole replacement. This was reviewed by CIRT and cancelled, this work is duplicative to work completed on LC 123098820.

We agree with the finding at Location 42 for corrosion on steel structure and created notification 127054149, a time-dependent priority F notification, in a Tier 3 HFTD, and is currently planned to be mitigated by 2028.

We agree that the tower at Location 46 had some minor corrosion; however, we disagree that this a violation of GO 95, Rule 31.1. We created notification 127055651 during the field to have this possible non-conformance evaluated by CIRT. The CIRT evaluation resulted in this notification being cancelled, it was determined that this superficial rust did not pose a safety or reliability concern that will materialize within the next 5 years.

We agree that the tower at Location 47 had some minor corrosion; however, we disagree that this a violation of GO 95, Rule 31.1. We created notification 127055781 during the field to have this possible non-conformance evaluated by CIRT. The CIRT evaluation resulted in this notification being cancelled, it was determined that this superficial rust did not pose a safety or reliability concern that will materialize within the next 5 years.

We agree with the finding at Location 49 to replace insulators. This notification was previously identified by our QCR and documented within our system of record (SAP) prior to the CPUC field audit. This past-due notification was completed on 01/24/2024.

We agree with the non-conformance at Location 52 for the exposed ground rod; however, this was corrected by a QCR during the field audit.

We disagree with the finding at Location 57 for the below grade foundation. We created notification 127058669 during the field audit to have this possible non-conformance evaluated by CIRT. The CIRT evaluation resulted in cancelling this notification because this was determined to not have a safety or reliability concern that will materialize within the next 5 years.

We agree with the non-conformance at Location 62 for the missing visibility strips; however, this was corrected by a QCR during the field audit.

We agree with the finding at Location 69 for missing guy bonding. This notification was identified by our QCR and documented within our system of record (SAP) before the CPUC field audit. This past-due notification was completed on 09/25/2023.

We agree with the finding at Location 73 for the bent secondary member; however, we disagree this is a violation of GO 95, Rule 31.1. This notification was identified by our QCR and documented within our system of record (SAP) before the CPUC field audit. This notification was reviewed by CIRT for the L123 guidance per TD-8123P-103 in conjunction with the field safety reassessment (FSR) and given a funded repair date of 03/10/2024. The secondary member was replaced on 01/31/2024, therefore it was completed within the funded repair date, but after the required end date.

We agree with the finding at Location 73 for the foundation being below grade and created notification 127063870, a time-dependent priority F notification, in a non-HFTD. This work was completed on 01/31/2024.

**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.*

*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."*

The structures listed in Table 8 have unauthorized third-party attachments.

**Table 8: Third-Party Attachments**

Location	Structure Number	Deficiencies	Comments
64	:004/015A	Unauthorized Sign Attached	PG&E fixed in the field
66	:004/016A	Unauthorized Sign Attached	PG&E fixed in the field

**PGE Response:**

We agree with the finding at Locations 64 and 66 for the unauthorized sign attachments; however, these were corrected by a QCR during the field audit.

**GO 95, Rule 61.7, Stepping states in part:**

*"All towers which are required to be climbed by workmen shall be provided with steps or ladders. Steps or ladders shall start at not less than 7 feet 6 inches from the ground line or from any easily climbed foreign structure, within 6 feet of a tower, from which one could reach or step, including tower footings. The spacing between steps on the same side of the tower legs shall not exceed 36 inches."*

ESRB identified the following low pole step issues shown in Table 9.

**Table 9: Low Tower Step**

Location	Structure Number	Deficiency	Comments
56	013/107	Low Pole Step	PG&E corrected the issue in the field
57	013/108	Low Pole Step	PG&E corrected the issue in the field

**PGE Response:**

We agree with the finding at Locations 56 and 57 for the low pole steps; however, these were corrected by a QCR during the field audit.