

**PG&E MISSION DIVISION  
ELECTRIC DISTRIBUTION AUDIT FINDINGS  
FEBRUARY 26 – MARCH 1, 2024**

**I. Records Review**

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- PG&E’s inspection and maintenance procedures.
- Electric Distribution Preventive Maintenance Manual, December 15, 2023.
- Overhead and underground facilities statistics.
- Completed work orders with notifications, canceled work orders with notifications, and open work orders with notifications from January 2019 to January 2024.
- Patrol and detailed inspection records from January 2019 to December 2023.
- Reliability metrics and sustained outages from January 2018 to December 2023.
- Mission Division map.
- New Construction projects (both overhead and underground) from January 2023 to December 2023.
- Pole loading and safety factor calculations completed from February 2022 to January 2024.
- Third Party Safety Hazard notifications sent and received from January 2019 to December 2023.
- Inspector list from 2019 to 2023 and inspector qualifications.
- Equipment test records from January 2019 to October 2023.
- Intrusive inspection records from January 2023 to December 2023.
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

## II. Records Violations

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

### 1. General Order (GO) 95, Rule 18-B, Maintenance Programs, (1)(a) states in part:

*“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities 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 PG&E’s Mission Division for the past 60 months shown in Table 1. PG&E’s Electric Distribution Preventative Maintenance (EDPM) Manual, published on December 15, 2023, 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 18,061 work orders by their assigned due date. Table 1 below breaks down the late work orders by their given priority, including the total number of late work orders completed, pending and cancelled work orders, which are included in the total.

**Table 1: Late Work Orders in Mission Division<sup>1,2</sup>**

<b>Priority Code</b>	<b>Late Work Orders Pending</b>	<b>Late Work Orders Completed</b>	<b>Late Work Orders Canceled</b>	<b>Total</b>
<b>A</b>	0	273	126	<b>399</b>
<b>B</b>	85	783	209	<b>1077</b>
<b>E</b>	11828	2899	1275	<b>14727</b>
<b>F</b>	498	49	36	<b>583</b>
<b>Total</b>	<b>12411</b>	<b>4004</b>	<b>1646</b>	<b>18061</b>

<sup>1</sup> Completed work orders were considered late if the completion date was after the authorized end date and more than 1 day after the notification date.

<sup>2</sup> Categorization of work orders as complete, open, or cancelled is based on the notification status provided by PG&E.

PG&E needs to provide ESRB with its corrective action plan to complete the 18,061 late pending work orders and its preventive actions to prevent any work orders from being addressed late in the future.

### **PG&E Response:**

#### **Priority A EC Notifications**

The total number of late Priority A EC Notifications in Table 1 does not match what we provided in our response to the Pre-Audit Data Request. Since we cannot replicate the late Priority A EC notification data from the CPUC report, we performed an internal analysis and identified 550 late Priority A EC notifications. All 550 of these notifications are closed as noted in our prior response to the Pre-Audit Data Request.

As our pre-audit data shows, we consider 442 of the 550 late notifications to be potentially late due to record detail availability.

Prior to 2020, we did not have adequate mechanisms to track immediate responses to Priority A Notifications. Accordingly, each of the identified potentially late notifications would require an extensive manual review to validate the accuracy of the completion date. In 2020, we implemented a temporary repair process to accurately track when hazards are immediately mitigated with a temporary repair.

In June 2022, we published TD-2060S providing updated compliance requirements for Priority A Notification management.

Given our continuous process improvement efforts referenced above within the last four years, priority A late notifications have significantly decreased in volume.

#### **Priority B EC Notifications**

We provided 5398 Priority B EC notifications to ESRB staff within the response to DR3, which included a list of all EC notifications created between January 1, 2019, and January 1, 2024. At the time that we submitted the Mission Pre-Audit Data Request response for Q03, we identified 95 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 40 Priority B EC notifications open that remain late.

#### **Priority E and F EC Notifications**

We provided 31,162 Priority E and F EC notifications to ESRB staff within the response to DR3, which included a list of all EC notifications created between January 1, 2019, and January 1, 2024. At the time that we submitted the Mission Distribution Pre-Audit Data Request response for Q03, we identified 12,342 late open Priority E and F notifications. Since then, we recently performed a data refresh of late pending work orders and identified 14,831 Priority E and F EC notifications open that remain late.

#### **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 (Level 1 under GO 95) 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 (Level 2 under GO 95) 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 non-exempt work orders for each priority.

**Table 2: Most Overdue Work Orders**

<b>Priority Code</b>	<b>Most Overdue Work Orders (WO#s)</b>	<b>Number of Days Past Assigned Due Date</b>
<b>A</b>	117146803	138
<b>B</b>	121717327	811
<b>E</b>	116873084	1558
<b>F</b>	116608372	1370

PG&E identified work order # 117146803 on May 2, 2019, to repair a conductor with a required end date of May 23, 2019. PG&E did not complete the work order until October 8, 2019.

**Priority A - EC Notifications**

We created Priority A EC notification 117146803 due to a leaking pad mounted transformer. The replacement required extensive coordination which included an evening outage clearance and crane equipment to replace the 7500lb transformer at the Dublin Bart station, which took place on October 8, 2019.

PG&E identified work order #121717327 on July 12, 2021, to trim vegetation with a required end date of October 12, 2021. PG&E has not completed the work order as of January 1, 2024.

**Priority B - EC Notifications**

We created Priority B EC notification 121717327 because a tree crew was needed to trim tree in rear easement in slack span open wire secondary lines. In the notification long text, the job was confirmed to be completed on December 16, 2022, however, the paperwork was returned for corrections, and the notification was not closed out in SAP. On March 19, 2024, the job was field verified, and we completed the notification in SAP per the field verification.

PG&E identified work order #116873084 on March 30, 2019, to test a pole with a required end date of September 26, 2019. PG&E has not completed the work order as of January 1, 2024.

**Priority E - EC Notifications**

We created Priority E EC notification 116873084 to test pole loading due to a communications line on a PG&E solely-owned pole. The pole condition is monitored annually which includes addressing tree overgrowth conditions.

PG&E identified work order #116608372 on February 26, 2019, to replace an enclosure with a required end date of April 1, 2020. PG&E has not completed the work order as of January 1, 2024.

#### **Priority F - EC Notifications**

We created Priority F EC notification 116608372 because the customer raised the grade around enclosure with concrete for parking. The customer made a wooden lid to compensate, but it does not meet vehicular strength. We need to put a new lid/enclosure for vehicular strength. The lid and box underneath is composite and in good condition.

ESRB identified 304 work orders that were listed as cancelled but had no cancellation date. ESRB also identified a Priority B work order (notification number 126262471) that was listed as completed without a completion date. Additionally, there were ten Priority E work orders and two Priority F work order that were listed as open but have completion dates.

#### **PG&E Response:**

##### **Cancelled with no Cancellation Date**

Of the 304 work orders that were listed as cancelled but had no cancellation date, 238 are Priority A notifications. In order to create major event work orders in our system of record (SAP), the program requires a header notification be created first. We then cancel these header notifications as they do not represent work and are an administrative tool. 235 of the canceled Priority A notifications are canceled header notifications that do not require a cancellation date. The other 3 priority A notifications do not have a cancellation date due to processing errors. However, the Completion Date field does update upon notification closure which can be used to identify the cancellation date.

The remaining 66 canceled notifications without a cancellation date are 48 Priority B notifications and 18 are Priority E / F notifications. 23 of these notifications were cancelled due to the work being found completed upon arrival, and the date was recorded in the "Completed On" field. The final 43 cancellations without a cancellation date were batch processed and did not record a cancellation date. However, the Completion Date field does update upon notification closure which can be used to identify the cancellation date.

##### **Priority B Complete with no Completion Date**

Notification 126262471 was an inspection tag that we escalated because we did not have access to a locked gate at the site. There is no completion date because the inspection was completed in another inspection lot (140003774111). We did confirm that the Completion Date field did update upon the notification closure to December 29, 2023.

##### **Priority E and F Open with a Completion Date**

For the 12 Priority E and F work orders, we finalized the completion of 6 notifications in SAP, canceled one notification, and removed the erroneous completion dates from 5 notifications.

Furthermore, the following 54 work orders were listed as complete or open but had cancellation dates.

**Table 3: Completed or Open Work Orders with Cancellation Dates**

Priority Code	Work Orders (WO#s)	Status	Cancellation Date
A	117295606	COMPLETE	2019-05-31
A	117639187	COMPLETE	2019-07-26
A	117764690	COMPLETE	2019-08-17
A	117826576	COMPLETE	2019-09-11
A	118655544	COMPLETE	2020-03-11
A	119640318	COMPLETE	2020-08-20
A	120445578	COMPLETE	2021-01-21
A	120603803	COMPLETE	2021-03-04
A	122429560	COMPLETE	2021-12-01
A	123666723	COMPLETE	2022-05-25
A	123666740	COMPLETE	2022-05-25
A	123743097	COMPLETE	2022-06-03
A	118523242	COMPLETE	2022-08-31
A	118520013	COMPLETE	2022-08-31
A	124446865	COMPLETE	2022-09-05
A	125082483	COMPLETE	2023-01-27
A	125451141	COMPLETE	2023-02-08
A	125542600	COMPLETE	2023-02-23
A	125542032	COMPLETE	2023-02-23
A	126612881	COMPLETE	2023-07-19
F	117090518	COMPLETE	2022-02-01
E	123748387	COMPLETE	2022-06-03
E	123048049	COMPLETE	2022-03-03
E	119533949	COMPLETE	2020-12-22
E	121478292	COMPLETE	2021-06-08
B	119060617	COMPLETE	2020-07-22
E	117005866	COMPLETE	2019-07-16
B	118962907	COMPLETE	2020-06-08
B	120851638	COMPLETE	2021-05-18
B	117023525	COMPLETE	2019-07-18
B	122478141	COMPLETE	2022-02-09
B	117920174	COMPLETE	2020-02-25
E	116688082	COMPLETE	2019-11-05
B	117882566	COMPLETE	2020-02-19
E	117219525	COMPLETE	2020-10-10
E	121556034	COMPLETE	2022-12-22



Priority Code	Work Orders (WO#s)	Status	Cancellation Date
E	121383038	COMPLETE	2022-12-15
E	121530016	COMPLETE	2022-12-14
E	121398888	COMPLETE	2022-12-15
E	121344710	COMPLETE	2022-12-14
E	121338671	COMPLETE	2022-12-14
E	121352755	COMPLETE	2023-08-18
E	118993612	COMPLETE	2022-12-14
E	117135894	COMPLETE	2022-02-01
E	119002931	COMPLETE	2022-12-14
B	117569324	COMPLETE	2023-02-17
E	117129087	COMPLETE	2022-12-21
E	123568691	OPEN	2023-05-09
E	123527134	OPEN	2023-05-06
E	123435755	OPEN	2023-04-27
E	123425663	OPEN	2023-04-26
F	123395232	OPEN	2023-04-22
E	117768784	OPEN	2021-02-25
E	121790286	OPEN	2023-04-04

**PG&E Response:**

**Priority A EC Notifications**

The 20 Priority A EC Notifications were erroneously marked with both complete and canceled codes in our system of record (SAP). All 20 have been corrected to reflect 12 canceled and 8 completed EC notifications.

**Priority B EC Notifications**

The Completed B notifications were found completed on arrival by field personnel. The closure date was recorded in the Cancellation Date field due to the work being completed on another notification.

**Priority E EC Notifications**

A majority of the Completed E notifications were found completed on arrival, and we recorded the closure dates in the Cancellation Date field due to the work being completed on other notifications. We reviewed the six Open E notifications with cancellation dates. All 6 have been corrected to reflect 4 canceled and 2 open.

**Priority F EC Notifications**

The Completed F notification (117090518) was erroneously marked with both complete and canceled codes in our system of record (SAP). We corrected this error by removing the canceled code. We finished processing the cancellation for the Open F notification (123395232).

**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 identified that PG&E had completed a total of 1,582 overhead patrols and inspections past their assigned due dates in the last five years. Table 4 below breaks down the late overhead patrols and inspections by year.

**Table 4: Late Overhead Patrols and Inspections**

<b>Year</b>	<b>Inspection Type</b>	<b>Number of Late Inspections or Patrols</b>
2020	Inspections	13
2021	Patrols	84
2021	Inspections	1476
2022	Patrols	6
2022	Inspections	2
2023	Patrols	1

### **PG&E's Response:**

In 2020 the 13 late Overhead (OH) Inspections in our service territory of Mission Division were late due to external weather events. On August 15, 2020, unprecedented lightning strikes occurred throughout our 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 identified and included the 13 assets as late inspections in our 2020 GO 165 Annual Report.

In 2021 the 7,863 Overhead (OH) assets patrolled on 84 maps and 1,476 Overhead (OH) inspections in our service territory of Mission 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 became inconsistent with CPUC due dates 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 identified and included the 7,863 assets as late patrols and 1,476 assets as late inspections in our 2021 GO 165 Annual Report.

In 2022 the 160 Overhead (OH) assets patrolled on 6 maps in our service territory of Mission Division were late due to map validations after the patrols were completed. The map validations identified that either the map had an earlier CPUC due date or that the map was missing from the workplan when developed. Monthly validations are currently being performed to remediate these errors. We identified and included the 160 assets as late patrols in our 2022 GO 165 Annual Report.

In 2022 the 2 Overhead (OH) inspections in our service territory of Mission Division were late due to access restrictions from vegetation growth. The OH inspections were completed by year end 2022. We identified and included the 2 assets as late inspections in our 2022 GO 165 Annual Report.

In 2023 the 70 Overhead (OH) assets patrolled on 1 map in our service territory of Mission Division were inadvertently late. We validated map due dates after the patrols were complete. This validation effort identified incorrect due dates for the map, which we updated to reflect the correct dates. This caused the patrols to be completed after their GO 165 due date. We identified and included the 70 assets as late patrols in our 2023 GO 165 Annual Report.

### III. Field Inspection

During the field inspection, ESRB inspected the following facilities in Table 5:

**Table 5: Field Inspection Locations**

Location #	Structure Type	SAP ID	Approximate Longitude & Latitude
1	Pole	100931078	-122.09983252, 37.63184494
2	Pole	100931129	-122.0996038, 37.6321825
3	Pole	100931077	-122.09923557, 37.63228843
4	Pole	100932779	-122.09970532, 37.63148167
5	Pole	100932778	-122.10030062, 37.6315247
6	Pole	100932777	-122.10059568, 37.63152072
7	Pole	100931079	-122.10081568, 37.63155735
8	Pole	100931737	-122.09956264, 37.63156181
9	Pole	100931738	-122.09935109, 37.6315615
10	Underground Vault	107569044	-122.09520255, 37.62086484
11	Underground Vault	107650374	-122.09398355, 37.62053604
12	Underground Vault	107578173	-122.09297246, 37.62009352
13	Underground Vault	107578167	-122.09588507, 37.62097057
14	Pole	100937347	-122.05884036, 37.62776152
15	Pole	100958311	-122.05901924, 37.62772238
16	Pole	100934302	-122.05909662, 37.62743744
17	Pole	100937630	-122.05899859, 37.62732414
18	Pole	100934303	-122.05864176, 37.62696851
19	Pole	100934301	-122.058335, 37.62675921
20	Pole	100937346	-122.05851851, 37.62810766
21	Pole	104054051	-122.05811026, 37.62832351
22	Pole	100930596	-122.06779097, 37.62977104
23	Pole	100930595	-122.0671964, 37.62996329
24	Pole	100930594	-122.0668705, 37.63005054
25	Pole	100930593	-122.06644508, 37.63027205
26	Pole	100930592	-122.06618752, 37.63000451
27	Pole	100930650	-122.06775248, 37.62945977
28	Pole	100933007	-122.07554354, 37.64276364
29	Pole	100933008	-122.07607745, 37.64276872
30	Pole	100931847	-122.05557277, 37.66127708
31	Pole	100931848	-122.05553005, 37.66106105

<b>Location #</b>	<b>Structure Type</b>	<b>SAP ID</b>	<b>Approximate Longitude &amp; Latitude</b>
32	Pole	100931849	-122.05542531, 37.66103983
33	Pole	100931851	-122.05540092, 37.66042949
34	Pole	100931850	-122.05525944, 37.66040733
35	Pole	100919586	-122.06171809, 37.68394599
36	Pole	100919585	-122.06168547, 37.68314715
37	Pole	100919584	-122.06162568, 37.68303918
38	Pole	100919524	-122.06175806, 37.6839466
39	Pole	100919526	-122.0621853, 37.68414984
40	Pole	100919538	-122.062473, 37.68391615
41	Pole	104156674	-122.01721518, 37.68193673
42	Pole	100910486	-122.01746924, 37.68241232
43	Pole	100910485	-122.01801231, 37.68226938
44	Pole	100910481	-122.01826774, 37.68301014
45	Pole	100910480	-122.01796784, 37.68312974
46	Pole	104145203	-122.01833744, 37.68371586
47	Pole	103852970	-122.0458778, 37.70221905
48	Pole	100909743	-122.04575143, 37.70220641
49	Pole	100909742	-122.04548354, 37.70231291
50	Underground Vault	107617694	-122.04612787, 37.70216402
51	Underground Vault	107628968	-122.04637768, 37.70201464
52	Underground Vault	107617882	-122.04707653, 37.70217809
53	Pole	100956988	-122.11156541, 37.69834293
54	Pole	100960248	-122.11143363, 37.69823011
55	Pole	104179610	-122.11201709, 37.69869024
56	Pole	100959427	-122.11209415, 37.6986798
57	Pole	103767467	-122.11204254, 37.69898786
58	Pole	100903709	-122.13397625, 37.73135532
59	Pole	100903708	-122.13370727, 37.73134712
60	Pole	100903669	-122.13398552, 37.73084599
61	Pole	100903726	-122.13415782, 37.73086704
62	Pole	100903679	-122.13455551, 37.73073196
63	Underground Vault	107636755	-122.15409953, 37.72352253
64	Underground Vault	107560980	-122.15373752, 37.72364906
65	Underground Vault	107587752	-122.1533518, 37.72364858
66	Underground Vault	107561109	-122.15435642, 37.72336899

<b>Location #</b>	<b>Structure Type</b>	<b>SAP ID</b>	<b>Approximate Longitude &amp; Latitude</b>
67	Underground Vault	107592406	-121.91094554, 37.46510901
68	Underground Vault	107614690	-121.91080924, 37.46555654
69	Underground Vault	107614671	-121.91129396, 37.46674603
70	Underground Vault	107646779	-121.91102247, 37.46738752
71	Underground Vault	107582201	-121.9105519, 37.46749249
72	Underground Vault	107614705	-121.90955175, 37.46681707
73	Underground Vault	107582196	-121.9097638, 37.46549764
74	Pad mount	107342933	-121.91461979, 37.4991595
75	Underground Vault	107628937	-121.91458678, 37.49912586
76	Underground Vault	107579979	-121.91413877, 37.49888689
77	Underground Vault	108267061	-121.91453542, 37.49955122
78	Underground Vault	107575372	-121.91537476, 37.49878053
79	Underground Vault	107579315	-121.91509295, 37.49828351
80	Pad mount	107342938	-121.91593181, 37.49826059
81	Pole	100947360	-121.95225398, 37.5170413
82	Pole	100944936	-121.95169894, 37.51710825
83	Pole	100944948	-121.95121469, 37.51719937
84	Pole	100944947	-121.95066319, 37.51729639
85	Pole	100944946	-121.95019247, 37.51736976
86	Pole	100942220	-121.94243823, 37.54469721
87	Pole	100938224	-121.94194828, 37.54459003
88	Pole	100938195	-121.94304572, 37.5447317
89	Pole	100942191	-121.94342314, 37.54472344
90	Pole	103531322	-122.04677886, 37.531756
91	Pole	103531348	-122.04652095, 37.53196953
92	Pole	103537866	-122.04607175, 37.53225352
93	Pad mount	108162647	-121.98634871, 37.77907647
94	Pad mount	107583949	-121.98628101, 37.77879693
95	Pad mount	107346419	-121.98687084, 37.77870551
96	Pad mount	107346414	-121.98691958, 37.77792348

<b>Location #</b>	<b>Structure Type</b>	<b>SAP ID</b>	<b>Approximate Longitude &amp; Latitude</b>
97	Underground Vault	107523190	-121.98689365, 37.77846533
98	Underground Vault	107664359	-121.97532058, 37.76502566
99	Underground Vault	107663450	-121.97517625, 37.76613521
100	Underground Vault	107663451	-121.97432191, 37.76638337
101	Underground Vault	107592057	-121.97371057, 37.76633331
102	Pad mount	107357025	-121.91892296, 37.77436304
103	Pad mount	107354641	-121.91978697, 37.77451695
104	Pad mount	107357014	-121.9200589, 37.7750747
105	Pad mount	107357009	-121.91966841, 37.77550004
106	Pad mount	107357030	-121.91862083, 37.77530477
107	Pad mount	107337297	-121.91812156, 37.77472453
108	Pole	100927108	-121.89591045, 37.6303945
109	Pole	104108494	-121.89586507, 37.63092515
110	Pole	100927110	-121.89633743, 37.63191063
111	Pole	100927111	-121.89633069, 37.63200968
112	Pole	100924051	-121.88176926, 37.6634298
113	Pole	100924052	-121.88174531, 37.66332578
114	Pole	100924053	-121.88156948, 37.6631448
115	Pole	104056684	-121.8814331, 37.66305916
116	Pole	100924055	-121.88111645, 37.66275604
117	Pole	100909133	-121.944499, 37.70006674
118	Pole	100909135	-121.94424281, 37.69990704
119	Pole	100909137	-121.94398479, 37.70000771
120	Pole	100909134	-121.94423405, 37.70020266
121	Pole	100909132	-121.94465118, 37.70063126
122	Pole	100906744	-121.69702447, 37.70096193
123	Pole	100906745	-121.69703089, 37.70146488
124	Pole	100906746	-121.69702371, 37.70163422
125	Pole	100906747	-121.6969738, 37.70189268
126	Pole	100924807	-121.69066055, 37.64384539
127	Pole	100924806	-121.69060181, 37.64389604
128	Pole	100924808	-121.69144574, 37.6442493
129	Pole	100924809	-121.69253004, 37.64469193
130	Pole	100957108	-121.76961348, 37.67713267
131	Pole	100908222	-121.76974789, 37.67752517
132	Pole	104149626	-121.76991154, 37.67792189
133	Pole	100926896	-121.76870228, 37.67521463

Location #	Structure Type	SAP ID	Approximate Longitude & Latitude
134	Pad mount	107356955	-121.79887537, 37.68765759
135	Underground Vault	107550107	-121.79784208, 37.68858563
136	Pad mount	107359243	-121.79776525, 37.68730064
137	Pad mount	107349980	-121.79885049, 37.6858193

#### IV. Field Inspection Violations

ESRB identified 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 are listed in Table 6:

**Table 6: GO 95, Rule 31.1 Findings**

Location #	Finding Description
27	A balloon was caught on the secondary line. Remedied on site.
86	Conduit under secondary crossarm is loose.
114	Vegetation growing under riser guard and pushing riser guard loose.
118	Bird cover has rotated so the wire is exposed from the top. Pre-Existing Tag
125	Control box was open.

**PG&E Response:**

**Location 27:** We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the balloon that was hanging on the secondary line in this location. 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 hanging balloon.

**Location 86:** We agree with the finding that we are out of compliance with GO 95, Rule 31.1 for the loose conduit under the secondary cross arm in this location. During the CPUC Audit, our Division Compliance Inspector immediately created EC notification 128224526 to remedy the loose conduit under the secondary cross arm. The remediation work for this EC notification is to be tracked to



completion through our maintenance program.

**Location 114:** We agree with the finding that we are out of compliance with GO 95, Rule 31.1 for the vegetation growing under the riser guard pushing the riser guard loose in this location. During the CPUC Audit, our Division Compliance Inspector immediately created EC notification 128228551 to remedy the vegetation growing under the Riser Guard. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 118:** We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the rotated bird cover exposing the wire from the top in this location. This finding was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 121584457 prior to the CPUC audit and is being tracked to completion through our maintenance program.

**Location 125:** We disagree with the finding that we are out of compliance with GO 95, Rule 31.1 for the control box that was open in this location. 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 closing the open control box.

**2. GO 95, Rule 91.3, Stepping** states in part:

*“A. Unless otherwise specified in this Order, pole steps used to ascend and descend joint use wood poles are not required. However, occupants on joint use wood poles are not prohibited from installing and maintaining temporary or permanent steps.*

*B. Unless non climbable, joint use non-wood poles shall include provisions for ascending and descending. C. Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.”*

ESRB’s findings are listed in Table 7:

**Table 7: GO 95, Rule 91.3 Findings**

<b>Location #</b>	<b>Finding Description</b>
61	Pole step is too low from top of fence. There is an existing notification for this finding.
87	Pole had a low pole step. Step was removed on site.
126	Pole step is too low compared to a nearby fence as a climbable surface. There is an existing notification for this finding.

**PG&E Response:**

**Location 61:** We disagree with the finding that we are out of compliance with GO 95, Rule 91.3 for the pole step being too low from top of fence in this location. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 123721565 prior to the CPUC audit and is being tracked to completion through our maintenance program.

**Location 87:** We disagree with the finding that we are out of compliance with GO 95, Rule 91.3 for the pole that had a low step in this location. 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 low step.

**Location 126:** We disagree with the finding that we are out of compliance with GO 95, Rule 91.3 for the pole that had a low step in this location. This notification was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 126595365 prior to the CPUC audit and is being tracked to completion through our maintenance program.

**3. GO 95, Rule 31.6, Abandoned Lines** states:

*“Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.”*

ESRB’s findings are listed in Table 8:

**Table 8: GO 95, Rule 31.6 Findings**

Location #	Finding Description
32	PG&E had abandoned service lines on this pole.
43	There was an abandoned service line. An EC tag was created on site.
62	Old ground wire hanging from secondary crossarm.

**PG&E Response:**

**Location 32:** We disagree with the finding that we are out of compliance with GO 95, Rule 31.6 for the abandoned service line on the pole in this location. 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 Abandoned Service Line.

**Location 43:** We agree with the finding that we are out of compliance with GO 95, Rule 31.6 for the abandoned service line on the pole in this location. During the CPUC Audit, our Division Compliance Inspector created EC notification 128217509 to remove the abandoned service line. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 62:** We disagree with the finding that we are out of compliance with GO 95, Rule 31.6 for the old ground wire hanging from the secondary crossarm in this location. 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 abandoned service line.

**4. GO 95, Rule 56.2** requires the following:

*“Where mechanical loads imposed on poles, towers, or structures are greater than can be supported with safety factors as specified in Rule 44, additional strength shall be provided by the use of guys or other suitable construction.*

*Where guys are used with poles or similar structures capable of considerable deflection before failure, the guys shall be able to support the entire load, the pole below the point of guy attachment acting merely as a strut. 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 are listed in Table 9:

**Table 9: GO 95, Rule 56.2 Findings**

Location #	Finding Description
3	The down guy anchor is corroded, and the anchor guy is slack. There is an existing notification.
22	There is a slack anchor 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 corroded guy anchor and slack anchor guy in this location. This condition was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 119553816 prior to the CPUC audit and is being tracked to completion through our maintenance program.

**Location 22:** We agree with the finding that we are out of compliance with GO 95, Rule 56.2 for the slack anchor guy in this location. Our Division Compliance Inspector created EC notification 128222184 to tighten the slack anchor guy. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**5. GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires** states:

*"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind. Conductors may be deadended at the crossarm or have reduced clearances at points of transposition and shall not be held in violation of Table 2, Cases 8–15, inclusive. The clearances in Table 2 shall in no case be reduced more than 10 percent, except mid-span in Tier 3 of the High Fire-Threat District where they shall be reduced by no more than 5 percent, because of temperature and loading as specified in Rule 43 or because of a difference in size or design of the supporting pins, hardware or insulators. All clearances of less than 5 inches shall be applied between surfaces, and clearances of 5 inches or more shall be applied to the center lines of such items. The utilities of interest (including electric supply and/or communication companies) shall cooperate and provide relevant information for sag calculations for their facilities, upon request."*

ESRB’s findings are listed in Table 10:

**Table 10: GO 95, Rule 38 Findings**

<b>Location #</b>	<b>Finding Description</b>
24	A telecom service drop is touching a power service drop.
60	Guy wire touching telecom line above the guy wire's insulator.
81	Down guy wire touching service line.
88	Comms service line touching PG&E down guy wire.
89	PG&E service drop touching comms service drop.

**PG&E Response:**

**Location 24:** We agree with the finding that we are out of compliance with GO 95, Rule 38 for the telecom service drop touching a power service drop in this location. Our Division Compliance Inspector created EC notification 129221782 to remove the telecom service drop. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 60:** We agree with the finding that we are out of compliance with GO 95, Rule 38 for the guy wire touching the telecom line above the guy wire insulator in this location. Our Division Compliance Inspector created EC notification 128219785 to remove the Telcom Line. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 81:** We disagree with the finding that we are out of compliance with GO 95, Rule 38 for the guy wire touching the service line in this location. This condition would have been rectified under the pre-existing EC Notification 122101071 for replacing the decayed crossarm in this location. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 88:** We disagree with the finding that we are out of compliance with GO 95, Rule 38 for the comms service line touching the PG&E down guy wire in this location. 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 Field Audit, our Compliance Inspector agreed to add this finding to the pre-existing EC Notification 119155663 for replacing the decayed crossarm in this location. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 89:** We disagree with the finding that we are out of compliance with GO 95, Rule 38 for the PG&E service drop touching the comms service drop in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was to be rectified under the pre-existing EC Notification 121839163 for replacing the damaged crossarm in this location. The remediation work for this EC notification is to be tracked to completion through our maintenance

program.

**6. GO 95, Rule 93, Climbing Space** states:

*“Climbing space shall be provided on all jointly used poles in accordance with the provisions of Rules 54.7, 54.9, 54.10, 54.11, 54.12, and 84.7.*

*Climbing space on jointly used poles shall be maintained so that its position in relation to the pole is not changed by more than 90 degrees in a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.”*

ESRB’s findings are listed in Table 11:

**Table 11: GO 95, Rule 93 Findings**

<b>Location #</b>	<b>Finding Description</b>
34	There is vegetation obstructing the pole’s climbing space.
48	Vegetation is obstructing climbing space.
81	Pole base completely surrounded by vegetation, which obstructs climbing space.

**PG&E Response:**

**Location 34:** We agree with the finding that we are out of compliance with GO 95, Rule 93 for the overgrown vegetation obstructing the pole’s climbing space in this location. Our Division Compliance Inspector created EC notification 129222345 to remove the overgrown vegetation. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 48:** We disagree with the finding that we are out of compliance with GO 95, Rule 93 for the overgrown vegetation obstructing the pole’s climbing space in this location. 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’s evaluation was that the condition was not a hinderance to the pole’s climbing space. In addition, our Vegetation Management Contractor later came and cleared the vegetation from the pole.

**Location 81:** We disagree with the finding that we are out of compliance with GO 95, Rule 93 for the overgrown vegetation obstructing the pole’s climbing space in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and would have been rectified under the pre-existing EC Notification 122101071 for replacing the decayed crossarm in this location. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**7. 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. All work performed on public streets and highways shall be done in such a manner that the operations of other utilities and the convenience of the public will be interfered with as little as possible and no conditions unusually dangerous to workmen, pedestrians or others shall be established at any time.”*

ESRB’s findings are listed in Table 12:

**Table 12: GO 128, Rule 17.1 Findings**

<b>Location #</b>	<b>Finding Description</b>
71	CSP handle is inoperable. There is an existing tag from PG&E.
106	Corroded transformer.
107	Transformer has corrosion. PG&E has an existing notification.

**PG&E Response:**

**Location 71:** We disagree with the finding that we are out of compliance with GO 95, Rule 17.1 for the inoperable CSP handle in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 124153488 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 106:** We disagree with the finding that we are out of compliance with GO 95, Rule 17.1 for the corroded transformer in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 120585420 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 107:** We disagree with the finding that we are out of compliance with GO 95, Rule 17.1 for

the corroded transformer in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 123519962 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**8. GO 95, Rule 56.7.B, Location of Sectionalizing Insulators (Anchor Guys) states:**

*“An insulator shall be installed in each anchor guy which is required to be sectionalized by Rule 56.6–A or 56.6–B, so that such insulator is located:*

*(1) 8 Feet or more above the ground; and (2) 8 Feet or more below the level of the lowest supply conductor, or 6 feet or more from surface of pole and one foot or more below the level of the lowest supply conductor (see Figure 56–8). These sectionalizing requirements for anchor guys can normally be met by insulation at one location; however, short guys or other conditions may require insulation at two locations:*

*(a) One location being 8 feet or more above the ground; and*

*(b) The other location either 8 feet or more below the lowest supply conductor, or 6 feet or more horizontally from surface of pole and one foot or more below the level of the lowest supply conductor. 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. Ungrounded portions of anchor guys which pass through a level of communication conductors at positions other than between the pole and pole pin positions or outside of the outer pin position shall be sectionalized by insulators placed between 6 and 18 inches above the level of the communication conductors (see Figure 56–8B). Any anchor guy which enters the ground less than 8 feet below the lowest level of supply conductors on the pole or structure shall be treated as an overhead guy which is grounded by means of a grounded anchor guy or metal pole. A grounded horizontal brace of a “sidewalk” guy shall in no case be less than 8 feet below the level of the lowest unprotected supply conductor on the same pole (see Figure 56–10B).”*

ESRB’s finding is listed in Table 13:



**Table 13: GO 95, Rule 56.7.B Finding**

<b>Location #</b>	<b>Finding Description</b>
111	Tree touching down guy above guy insulator.

**PG&E Response:**

**Location 111:** We disagree with the finding that we are out of compliance with GO 95, Rule 56.7 for the overgrown vegetation in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 110664873 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**9. GO 95, Rule 12.2, Maintenance of Lines** states:

*“All lines and portions of lines shall be maintained in such condition as to provide safety factors not less than those specified in Rule 44.3. Lines and portions of lines constructed or reconstructed on or after the effective date of this Order shall be kept in conformity with the requirements of this Order. The restoration of clearance originally established prior to the effective date of this Order, where the original clearance has been reduced by additional sagging or other causes, is not considered to be reconstruction and the reestablished clearance shall conform to the requirements of the rules in effect at the time the original clearance was established. The changing of clearance for any other purpose is reconstruction and clearances so changed shall comply with the rules of this Order applicable to reconstruction.”*

ESRB’s findings are listed in Table 14:

**Table 14: GO 95, Rule 12.2 Findings**

<b>Location #</b>	<b>Finding Description</b>
62	Pole has shell rot. PG&E has an existing notification for this finding.
81	Deteriorated primary crossarm.

Location #	Finding Description
84	Damaged cross arm. There is an existing notification from PG&E.
87	Crossarm is damaged.
88	Damaged secondary crossarm. There is an existing notification.
89	Damaged secondary crossarm.
108	Extensive woodpecker damage and cracking at the top.
110	Pole has extensive woodpecker damage.
130	The top primary crossarm has deteriorated.
133	Damaged primary crossarm.

**PG&E Response:**

**Location 62:** We disagree with the finding that we are out of compliance with GO 95, Rule 12.2 for the pole having shell rot in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 117104197 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 81:** We disagree with the finding that we are out of compliance with GO 95, Rule 12.2 for the deteriorated primary crossarm in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 122101071 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 84:** We disagree with the finding that we are out of compliance with GO 95, Rule 12.2 for the deteriorated crossarm in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 122101591 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance

program.

**Location 87:** We agree with the finding that we are out of compliance with GO 95, Rule 12.2 for the damaged crossarm in this location. During the CPUC Audit, our Division Compliance Inspector created EC notification 128224701 to remove the abandoned service line. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 88:** We disagree with the finding that we are out of compliance with GO 95, Rule 12.2 for the damaged secondary crossarm in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 119155663 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 89:** We disagree with the finding that we are out of compliance with GO 95, Rule 12.2 for the damaged secondary crossarm in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 121839163 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 108:** We disagree with the finding that we are out of compliance with GO 95, Rule 12.2 for the extensive woodpecker damage and cracking at the pole top in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 121636541 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 110:** We disagree with the finding that we are out of compliance with GO 95, Rule 12.2 for the extensive woodpecker damage in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 121636689 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 130:** We disagree with the finding that we are out of compliance with GO 95, Rule 12.2 for the deteriorated primary crossarm in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 126314076 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 133:** We disagree with the finding that we are out of compliance with GO 95, Rule 12.2 for the damaged primary crossarm in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 124441710 prior to the CPUC

audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**10. GO 95, Rule 34, Foreign Attachments** states:

*“Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light 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. All permanent attachments must be approved by the Commission (see Rule 15.1) and the owner(s) involved. All temporary attachments shall be restricted to installations where the period is estimated to be one year or less. The utilities, or other governmental entities may require construction standards which are more restrictive than the requirements of this Rule 34. The following rules shall apply to approved temporary foreign attachments installed on climbable poles and structures and shall be maintained as required by Rule 12.2.”*

ESRB’s findings are listed in Table 15:

**Table 15: GO 95, Rule 34 Findings**

<b>Location #</b>	<b>Finding Description</b>
32	This pole had an unauthorized attachment. Removed on site.
41	Unauthorized attachment. Removed on site.
45	Unauthorized attachment on pole.
124	Unauthorized attachment. Removed on site.
130	Unauthorized attachment.

Location #	Finding Description
131	Unauthorized attachment on pole.

**PG&E Response:**

**Location 32:** We disagree with the finding that we are out of compliance with GO 95, Rule 34 for the unauthorized attachment in this location. 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 unauthorized attachment.

**Location 41:** We disagree with the finding that we are out of compliance with GO 95, Rule 34 for the unauthorized attachment in this location. 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 unauthorized attachment.

**Location 45:** We agree with the finding that we are out of compliance with GO 95, Rule 34 for the unauthorized attachment in this location. Our Division Compliance Inspector has created TPN notification 129222859 to remove the unauthorized attachment. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 124:** We disagree with the finding that we are out of compliance with GO 95, Rule 34 for the unauthorized attachment in this location. 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 unauthorized attachment.

**Location 130:** We disagree with the finding that we are out of compliance with GO 95, Rule 34 for the unauthorized attachment in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and would have been rectified under the pre-existing EC Notification 126314076 for replacing the damaged crossarm in this location. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site by removing the unauthorized attachment.

**Location 131:** We disagree with the finding that we are out of compliance with GO 95, Rule 34 for the unauthorized attachment in this location. 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 unauthorized attachment.

**11. 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 are listed in Table 16:

**Table 16: GO 128, Rule 35.3 Findings**

<b>Location #</b>	<b>Finding Description</b>
98	Worn high voltage sign is illegible.
99	No high voltage warning sign.
101	No high voltage warning sign.

**PG&E Response:**

**Location 98:** We agree with the finding that we are out of compliance with GO 128, Rule 35.3 for the illegible high voltage sign in this location. Our Division Compliance Inspector created EC notification 129219241 to install a high voltage sign. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 99:** We agree with the finding that we are out of compliance with GO 128, Rule 35.3 for the illegible high voltage sign in this location. Our Division Compliance Inspector created EC notification 129219215 to install a high voltage sign. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**Location 101:** We disagree with the finding that we are out of compliance with GO 128, Rule 35.3 for the illegible high voltage sign in this location. After further investigation, it was noted that the high voltage sign was covered with dirt. During the CPUC Audit, our Division Compliance Inspector immediately corrected the condition on site by cleaning the illegible high voltage sign.

**12. GO 95, Rule 49.3.C, Pins and Conductor Fastenings (Strength)** states:

*“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.”*

ESRB’s finding is listed in Table 17:

**Table 17: GO 95, Rule 49.3.C Finding**

<b>Location #</b>	<b>Finding Description</b>
89	Squatter insulator on secondary crossarm. There is an existing notification.

**PG&E Response:**

**Location 89:** We disagree with the finding that we are out of compliance with GO 95, Rule 49.3 for the squatter insulator on the secondary crossarm in this location. This condition did not pose an immediate risk of high potential impact to safety or reliability and was previously identified by our Inspection Teams and documented within our system of record (SAP) under EC Notification 121839163 prior to the CPUC audit. The remediation work for this EC notification is to be tracked to completion through our maintenance program.

**V. Observations**

**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 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 violation of GO 95.”*

Table 18 includes all non-PG&E (third-party) findings that ESRB observed during the audit:

**Table 18: Observations**

<b>Location</b>	<b>Observations</b>	<b>SAP ID#</b>	<b>PG&amp;E Notes</b>
14	There is a telecom cable sticking out from its riser guard.	100937347	On July 10, 2024, field check and found issue resolved upon arrival. See attachment, “Loc-14 SAPID 100937347 photos.pdf”
21	There is a telecom line that is not covered by a riser mould.	104054051	2024 created TPU# 129178181
25	There is a telecom line that has a low clearance of less than eight feet.	100930593	2024 created TPU# 129178241
29	Telecom service drops touching each other.	100933008	2024 created TPU# 129178189
33	Abandoned and exposed comms line.	100931851	2024 created TPU# 129178275
34	Telecom ground wire is exposed due to a broken wire guard.	100931850	2024 created TPU# 129178237
38	Telecom box is hanging freely and is not secured.	100919524	2024 created TPU# 129178292
41	Abandoned telecom cable.	104156674	2024 created TPU# 129178284
44	Abandoned telecom service line.	100910481	2024 created TPU# 129178294
47	Riser guard not firmly attached to pole.	103852970	2021 created TPU# 121715032 and TPU# 121783173
54	Abandoned telecom cable. Cable was removed from visibility strips on site	100960248	2024 created TPU# 129178239
56	Exposed ground wire.	100959427	2024 created TPU# 129178300
59	Telecom box on the telecom line is open.	100903708	2024 created TPU# 129178283 2024 created TPU# 123743960
83	Abandoned telecom line.	100944948	2021 created TPU# 122101350
87	Abandoned telecom cable.	100938224	2024 created TPU# 129178276
112	Debris on telecom service drops.	100924051	2024 created TPU# 129178248



<b>Location</b>	<b>Observations</b>	<b>SAP ID#</b>	<b>PG&amp;E Notes</b>
114	Telecom riser loose from pole. PG&E fixed riser to pole on site.	100924053	2024 created TPU# 129178281
121	Ground molding is loose. PG&E has a notification for this finding.	100909132	2024 created TPU# 129178232
125	Exposed telecom ground wire. Corrected on site.	100906747	Minor work completed during field audit.