



May 31, 2024

Chron: DP&O 24-003

Attn: Mr. Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Subject: Audit of Sacramento Municipal Utility District (SMUD)

Dear Mr. Tse:

Attached is SMUD's response to your letter dated May 3, 2024, regarding the electric distribution audit of SMUD from March 4 through March 8, 2024.

Please contact me if you have any questions regarding SMUD's response.

Sincerely,

A handwritten signature in black ink, appearing to read "Wenjie Chen", is written over a light blue horizontal line.

Wenjie Chen, P.E.
Supervising Principal Engineer, T&D Maintenance Planning
Distribution Planning and Operations
Sacramento Municipal Utility District (SMUD)
4401 Bradshaw Road, Sacramento, CA 95827
(916) 732-5031
Wenjie.Chen@smud.org

Cc: Paul Lau
Frankie McDermott
Laura Lewis
Joy A. Mastache
Katarina Miletijev
Lucas Raley
Raul Pantoja

SMUD'S RESPONSE TO 2024 CPUC ELECTRIC DISTRIBUTION AUDIT SUMMARY

The California Public Utilities Commission's Electric Safety and Reliability Branch (ESRB) conducted an audit of the Sacramento Municipal Utility District (SMUD) electric distribution assets during the period from March 4 through March 8, 2024. SMUD and the PUC disagree about whether the PUC has jurisdiction over SMUD pursuant to GO 95, GO 128, and GO 165. Nevertheless, SMUD has cooperated with the PUC regarding general orders in the past, and in the spirit of continued voluntary cooperation offers the following response to ESRB's audit findings.

Mr. Rickey Tse of the ESRB provided a summary of the audit findings to SMUD by letter dated May 3, 2024. SMUD responds to the items identified in the audit findings as follows:

Section II - Records Violations Identified During Records Review

SMUD issues annual work plans during the last quarter of the current year for the following year; these workplans are maintained in our Enterprise Asset Management (EAM) system (or SAP). Inspection notifications are monitored via regular internal reports using SAP data. The regular internal reports provide a platform for stakeholders to review and discuss updates on planned work. These processes and systems were implemented to track the work required to make informed decisions and to achieve compliance with our inspection and maintenance programs. SMUD continues to improve our existing processes and systems as needed.

- 1. ESRB Finding: SMUD had a total of 182 late-completed notifications. Late-completed notifications are notifications that were completed past their assigned due date based on their priority level.*

SMUD Response: Based on the data provided to the CPUC, there were 182 late-completed **corrective maintenance or CM** notifications from January 1, 2019 to December 31, 2023. SMUD completed a total of 39,650 CM notifications in this time interval. The late-completed notifications are approximately 0.46% of the total quantity of completed CM notifications.

Of these less than 0.5% late completions, many were due to permit delays, access issues, system emergencies over which SMUD has no control, and were promptly completed upon resolution of the delay.

In addition, in January of 2024, SMUD transitioned its pole replacement time interval to align with revised GO 95 rule 18 level 2 priority timeframe, from five years to three years. Approximately 99.5% or 4,293 pole replacements were completed within the shortened timeframe. Twenty-four poles were completed within the original five-year timeframe although outside of the three-year timeframe reset at the time of transition, and automatically showed as late completions after the transition. A majority of these 24 notifications were completed in less than 6 months after the transition.

CONFIDENTIAL

- 2. ESRB's review of SMUD's overhead patrol and inspection records found a total of 24 late completed inspections and 259 late outstanding inspections per the GO 165 due date.*

SMUD Response: Based on the overhead (OH) inspection data provided to the CPUC, there were 24 late-completed inspections and 259 late-outstanding inspection notifications from January 1, 2019 to December 31, 2023. SMUD completed a total of 130,085 OH inspections in this time interval making the late-completed and late-outstanding notifications less than 0.3% of the overall OH inspection quantity.

Of these less than 0.3% late completions, many were due to permit delays, access issues, system emergencies over which SMUD has no control and were promptly completed upon resolutions of the delay.

SMUD plans to complete all 259 late-outstanding inspections by the end of third quarter in 2024. A total of 106 of these late-outstanding inspections have been completed as of May 31, 2024.

- 3. ESRB Finding: SMUD's underground patrol and inspection records found that SMUD completed a total of two detailed inspections past their GO 165 due dates*

SMUD Response: Based on the data provided to the CPUC, there were two late-completed underground (UG) detailed line inspections from January 1, 2019 to December 31, 2023. SMUD completed a total of 48,437 UG detailed line inspections in this time interval.

Both late-inspections were completed within approximately two weeks after the required compliance due date.

Section IV - Field Inspection Violations

The CPUC's audit report identified 30 field inspection violations. Twenty-three out of the 30 deficiencies identified in this section have been addressed as of May 28, 2024. Six of the remaining 7 deficiencies are pole replacements which have either been planned for completion or will be planned for completion upon receipt of permits. The final deficiency is a high voltage sign that will be addressed through opportunity work during replacement of the pole planned for 2027. SMUD's response is detailed below for each location. Some photos of the field audit condition and the condition after correction are attached (See Attachments).

1.1 ESRB Finding: Wood Pole #044595 at 13639 Jackson Rd in Sloughouse (Location 8) needs to be replaced due to a failed intrusive test. SMUD has a preexisting notification (#32056510) to replace the pole.

SMUD Response: SMUD has completed the design and is awaiting permit approval from Cal Trans for construction.

1.2 ESRB Finding: Wood Pole #077083 at 8911 Mooney Rd in Wilton (Location 12) needs to be replaced due to a failed intrusive test. SMUD has a preexisting notification (#31971177) to replace the pole.

SMUD Response: Wood pole UD077083 was replaced March 19, 2024.

1.3 ESRB Finding: Wood Pole #044307 at 8666 W Stockton Blvd in Elk Grove (Location 21) needs to be replaced due to a failed intrusive test. SMUD has a preexisting notification (#31969882) to replace the pole.

SMUD Response: SMUD has completed the design and is awaiting California Highway Patrol (CHP) permit for construction.

1.4 ESRB Finding: Wood Pole #045032 near Big Horn Blvd and Portofino Dr in Elk Grove (Location 23) needs to be replaced due to a failed intrusive test. SMUD has a preexisting notification (#31877912) to replace the pole.

SMUD Response: SMUD has scheduled to replace wood pole UD045032 by the end of June 2024.

1.5 ESRB Finding: Wood Pole #020812 at 2212 Opera Aly in Sacramento (Location 30) has a cracked pole top and a large crack starting at the ground to approximately 15 feet up the pole.

SMUD Response: SMUD installed a split bolt to the top of the pole and added new high voltage signs May 8, 2024. SMUD completed the evaluation of the crack as described in the ESRB finding and determined no further corrective action is required.

CONFIDENTIAL

1.6 ESRB Finding: Wood Pole #062246 located at GPS coordinates 38.6935908, -121.215892 in Orangevale (Location 39) has a significantly degraded and shrunk/reduced pole top.

SMUD Response: SMUD installed a split bolt at the top of the pole and conducted a drill test at pole top May 7, 2024. The drill test was satisfactory and no further corrective action is required.

1.7 ESRB Finding: Wood Pole #087567 at 9475 Golden Gate Ave in Orangevale (Location 40) has a degraded primary crossarm that is missing a section of wood near the insulator hardware.

SMUD Response: SMUD replaced the primary crossarm March 26, 2024.

1.8 ESRB Finding: Wood Pole at 4701 Chicago Ave in Fair Oaks (Location 49) has a primary crossarm with a crack approximately 2.5 feet long at the through bolt.

SMUD Response: This wood pole is identified as UD049351. SMUD replaced the crossarm May 23, 2024.

1.9 ESRB Finding: Wood Pole #124941 located at GPS coordinates 38.6031338,-121.3922421 in Sacramento (Location 54) needs to be replaced due to a failed intrusive test. SMUD has a preexisting notification (#32135071) to replace the pole.

SMUD Response: SMUD will replace this wood pole by the required end date of December 14, 2024.

1.10 ESRB Finding: Wood Pole #124652 located at GPS coordinates 38.6027186,-121.3922284 in Sacramento (Location 59) has a degraded pole top with a 2 foot long crack

SMUD Response: SMUD repaired the degraded pole top May 7, 2024.

1.11 ESRB Finding: Wood Pole #161530 at 6131 Quincewood Cir in Citrus Heights (Location 66) needs to be replaced due to a failed intrusive test. SMUD has a preexisting notification (#31997472) to replace the pole.

SMUD Response: SMUD has completed the design and is awaiting Traffic Control Plan (TCP) approval from the City for construction.

CONFIDENTIAL

1.12 ESRB Finding: Secondary Wood Pole #106814 at 445 Adair St in Elverta (Location 77) needs to be replaced due to a failed intrusive test. SMUD has a preexisting notification (#32304966) to replace the pole.

SMUD Response: SMUD will replace this wood pole by the required end date of November 8, 2026.

2.1 ESRB Finding: Wood Pole #044629 at 13639 Jackson Rd in Sloughouse (Location 9) has a broken high-visibility strip.

SMUD Response: SMUD replaced the visibility strips May 7, 2024.

2.2 ESRB Finding: Wood Pole #024085 located at GPS coordinates 38.3256352,-121.3198484 in Galt (Location 10) is leaning more than 10% and has soil erosion at its base.

SMUD Response: SMUD replaced the wood pole May 10, 2024.

2.3 ESRB Finding: Wood Pole #135085 at Pleasant Grove Elementary in Elk Grove (Location 16) has a damaged/loose high-visibility strip.

SMUD Response: SMUD replaced visibility strip May 17, 2024.

2.4 ESRB Finding: Secondary Wood Pole at 1520 23rd St in Sacramento (Location 26) is leaning more than 10%. SMUD has a preexisting notification (#32073607) to adjust the pole.

SMUD Response: SMUD straightened the leaning wood pole May 8, 2024. The pole was tested good.

3.1 ESRB Finding: Wood Pole #024086 located at GPS coordinates 38.3256289,-121.3210133 in Galt (Location 11) is missing high voltage signs on both sides.

SMUD Response: SMUD conducted an evaluation on this wood pole April 6, 2024 and concluded that the pole will need to be replaced. New high voltage signs will be installed when the pole is replaced. Work is planned to be completed by the required end date of April 6, 2027.

3.2 ESRB Finding: Wood Pole #077082 at 8911 Mooney Rd in Wilton (Location 13) has a loose high voltage sign.

SMUD Response: SMUD re-attached the loose high voltage sign May 16, 2024.

CONFIDENTIAL

3.3 *ESRB Finding: Wood Pole #072797 at 1516 Florin Rd in Sacramento (Location 25) is missing high voltage signs on both sides.*

SMUD Response: SMUD installed new high voltage signs May 7, 2024.

3.4 *ESRB Finding: Wood Pole #020812 at 2212 Opera Aly in Sacramento (Location 30) has a damaged/partially missing high voltage sign.*

SMUD Response: SMUD installed new high voltage sign May 8, 2024.

3.5 *ESRB Finding: Wood Pole #060080 at 7300 Bonita Way in Citrus Heights (Location 46) has deteriorated/partially missing high voltage signs on both sides.*

SMUD Response: SMUD installed new high voltage signs May 8, 2024.

3.6 *ESRB Finding: Wood Pole #192024 located at GPS coordinates 38.602351,-121.3922023 in Sacramento (Location 55) is missing a high voltage sign.*

SMUD Response: SMUD installed new high voltage signs May 7, 2024.

3.7 *ESRB Finding: Wood Pole #068862 at 5601 Rich Ln in Antelope (Location 75) is missing a high voltage sign.*

SMUD Response: SMUD installed new high voltage signs May 7, 2024.

4. *ESRB Finding: Wood Pole #077082 at 8911 Mooney Rd in Wilton (Location 13) has a barbed wire fence attached to it.*

SMUD Response: SMUD inspected the site May 16, 2024 but did not find barbed wire on the pole. Crews removed some staples from where the wire may have been attached to the pole.

5.1 *ESRB Finding: Padmount Transformer TX-01018959 at 8458 Casablanca Way in Sacramento (Location 19) has an oil leak. SMUD has a preexisting notification (#32140777) to repair the leak.*

SMUD Response: SMUD completed addressing the oil leak March 18, 2024.

CONFIDENTIAL

5.2 ESRB Finding: Padmount Transformer TX-01073785 at 2201 Howe Ave in Sacramento (Location 62) has sunk several inches into the ground causing it to slant sideways. SMUD has a preexisting notification (#32068191) to reset the padmount.

SMUD Response: SMUD completed the work associated with notification #32068191 April 29, 2024. The corrective action on the padmount transformer at 2201 Howe Ave (TX-01073835) was completed May 28, 2024.

5.3 ESRB Finding: Padmount Transformer TX-01053993 at 8427 Lichen Dr in Citrus Heights (Location 70) has dried oil residue on the exterior enclosure that needs to be cleaned.

SMUD Response: SMUD replaced the old padmount transformer with a new unit March 5, 2024.

6. ESRB Finding: Vegetation is causing strain/abrasion to a secondary line at Secondary Wood Pole #117552 at 3531 Becerra Way in Sacramento (Location 32). SMUD has a preexisting notification (#35705412) to trim the vegetation.

SMUD Response: SMUD completed all vegetation work May 22, 2024.

7. ESRB Finding: Wood Pole #087567 at 9475 Golden Gate Ave in Orangevale (Location 40) has vegetation contact at/above the anchor guy bob which is providing a path to ground.

SMUD Response: SMUD completed all vegetation work May 8, 2024.

8. ESRB Finding: Wood Pole #184802 located at GPS coordinates 38.707344,-121.3201984 in Citrus Heights (Location 68) is missing a 7 foot section of ground wire and ground molding at the base of the pole.

SMUD Response: SMUD repaired / installed ground wire and ground molding at the base of wood pole UD184802 May 7, 2024.

V. Observations

1. *ESRB Finding: Wood Pole #068864 at 5549 Rich Ln in Antelope (Location 74) has a primary insulator with a minor chip and possible arc damage.*

SMUD Response: SMUD conducted a detailed field inspection May 15, 2024. Crews stated that all insulators are checked good.

- 2.1 *ESRB Finding: There is an abandoned communications line hanging 6-7 feet from the ground at Wood Pole #058755 at Pleasant Grove Elementary in Elk Grove (Location 15).*

SMUD Response: SMUD sent an official email notice of the observation to the telecommunication company May 16, 2024.

- 2.2 *ESRB Finding: There is an abandoned cable coax line on the ground at Secondary Wood Pole #135055 at Pleasant Grove Elementary in Elk Grove (Location 18).*

SMUD Response: SMUD sent an official notice of the observation to the telecommunication company May 16, 2024.

- 2.3 *ESRB Finding: Vegetation is causing strain/abrasion to a communications line at Secondary Wood Pole #117552 at 3531 Becerra Way in Sacramento (Location 32).*

SMUD Response: SMUD sent an official notice of the observation to the telecommunication company May 16, 2024.

- 2.4 *ESRB Finding: Cable buddy pole next to Wood Pole #190063 at 7749 Fair Oaks Blvd in Sacramento (Location 33) has a down guy that is missing a guy guard.*

SMUD Response: SMUD sent an official notice of the observation to the telecommunication company May 16, 2024.

- 2.5 *ESRB Finding: There is a downed communications line on the ground from Secondary Pole #196049 to #199721 at 7732 Winding Way in Fair Oaks (Location 52).*

SMUD Response: SMUD sent an official notice of the observation to the telecommunication company May 16, 2024.

- 2.6 *ESRB Finding: A tree branch is growing into a communications anchor guy at Wood Pole #068865 at 5549 Rich Ln in Antelope (Location 73).*

SMUD Response: SMUD sent an official notice of the observation to the telecommunication company May 16, 2024.

Field Inspection Photographs

1.2 Pole Failed Intrusive Test, UD077083 (Replaced with UD199989)

Before SMUD Correction:

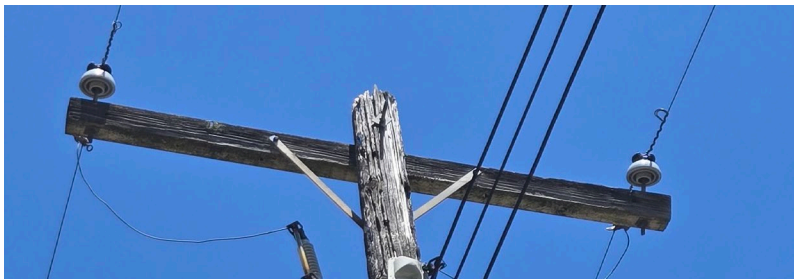


After SMUD Correction:

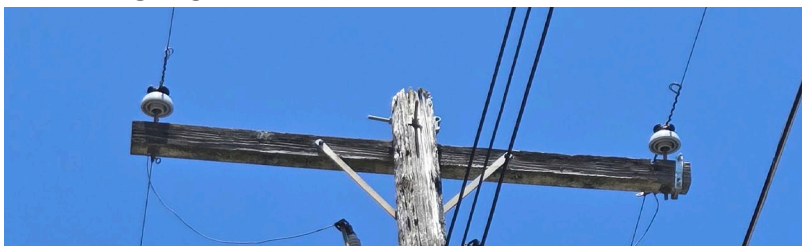


1.6 Degraded Pole Top, UD062246

Before SMUD Correction:



After SMUD Correction:

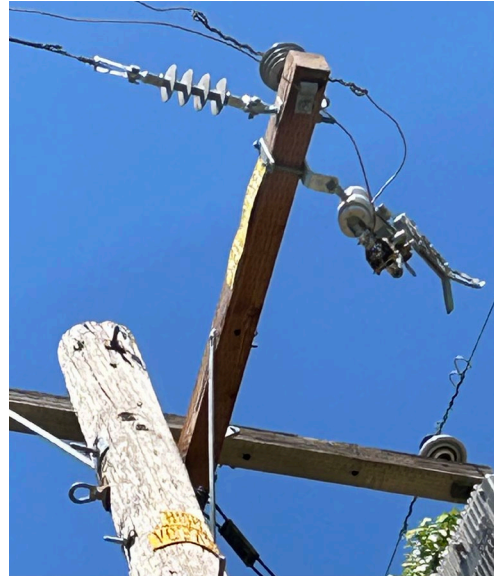


1.7 Degraded Primary Crossarm, UD087567

Before SMUD Correction:



After SMUD Correction:



1.8. Crack on Primary Crossarm, UD049351

Before SMUD Correction:



After SMUD Correction:

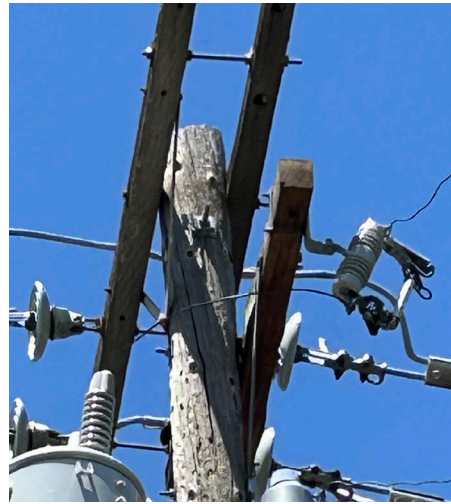


1.10. Degraded Pole Top with Crack, UD124652

Before SMUD Correction:



After SMUD Correction:



2.1 Broken Visibility Strips, UD044629

Before SMUD Correction:



After SMUD Correction:



2.2 Leaning Pole, UD024085

Before SMUD Correction:



After SMUD Correction:



2.3 Damaged / loose visibility strip, UD135085

Before SMUD Correction:



After SMUD Correction:

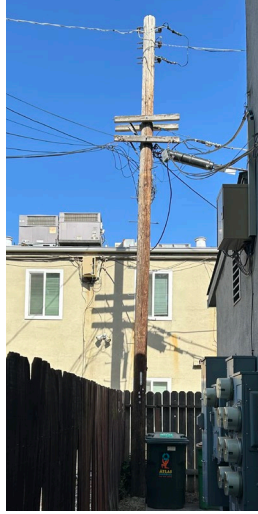


2.4 Leaning Pole, UD020814

Before SMUD Correction:



After SMUD Correction:



3.2 Loose High Voltage Sign, UD077082

Before SMUD Correction:

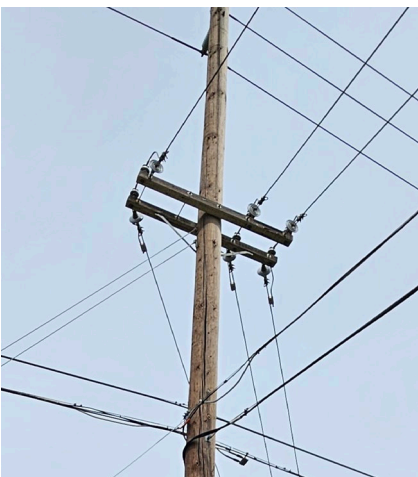


After SMUD Correction:

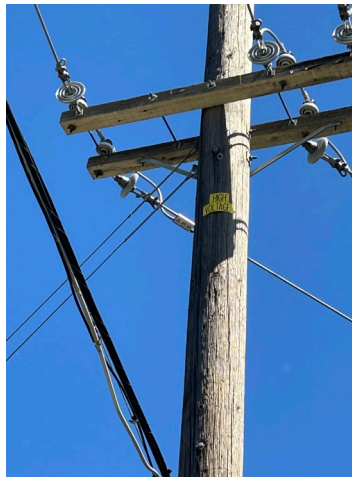


3.3 Missing High Voltage Signs, UD072797

Before SMUD Correction:



After SMUD Correction



3.4 Damaged High Voltage Signs, UD020812

Before SMUD Correction:



After SMUD Correction

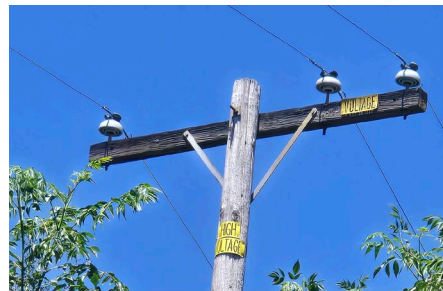


3.5 Deteriorated/Partially Missing High Voltage Signs, UD060080

Before SMUD Correction:

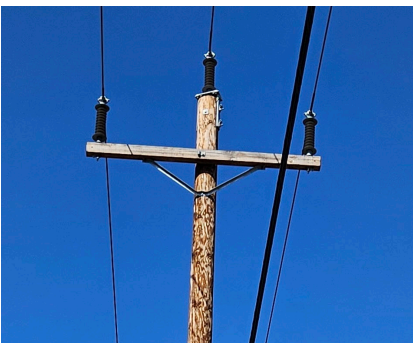


After SMUD Correction:



3.6 Missing High Voltage Sign, UD192024

Before SMUD Correction:



After SMUD Correction:

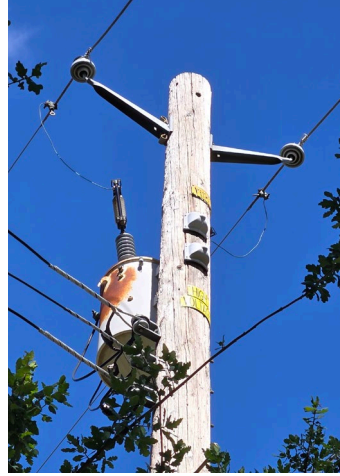


3.7 Missing high voltage sign, UD068862

Before SMUD Correction:

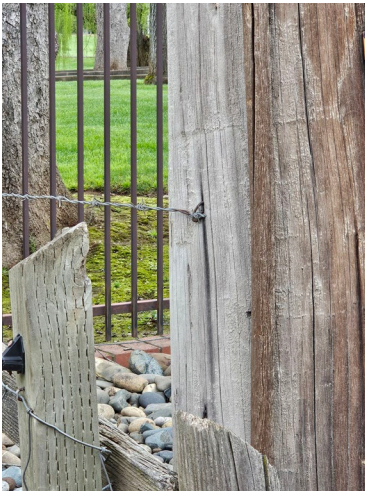


After SMUD Correction:



4. Barbed Wire Attached to Pole, UD077082

Field Audit Condition:



SMUD Inspected May 16, 2024



5.1 Transformer Oil Leak, TX-0108959

Before SMUD Correction: Picture Not Available

After SMUD Correction:



5.2 Slant Transformer Pad, TX-01073835 (TX-01073785)

Before SMUD Correction:

After SMUD Correction:



5.3 Dried oil residue on the exterior of PM transformer, TX-01053993

Before SMUD Correction:



After SMUD Correction:



6. Vegetation causes strain / abrasion on secondary line, UD117552

Before SMUD Correction:



After SMUD Correction:



7. Vegetation contact at/above the anchor guy bob, UD087567

Before SMUD Correction:



After SMUD Correction:



CONFIDENTIAL

8. Missing a 7-foot section of ground wire and ground molding at the base of UD184802.

Before SMUD Correction:



After SMUD Correction:

