PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 9, 2024 EA2024-1190

Vincent Tanguay, Senior Director
Electric Compliance, Electric Engineering
Pacific Gas & Electric Company (PG&E)
300 Lakeside Dr., Oakland, CA 94612

SUBJECT: Electric Distribution Audit of PG&E's San Francisco Division

Mr. Tanguay:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Joe Murphy, Tom Roberts, and Sajjad Mansuri of ESRB staff conducted an electric distribution audit of PG&E's San Francisco Division from June 10th through 14th, 2024. During the audit, ESRB staff conducted field inspections of PG&E's distribution facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95, GO 128, and GO 165. A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than October 10, 2024, via electronic copy of all corrective actions and preventive measures taken by PG&E to correct the identified violations and prevent the recurrence of such violations. Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Joe Murphy at muj@cpuc.ca.gov or (415) 652-1847.

Sincerely,

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC Electric Distribution Audit Report for PG&E San Francisco Division

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PG&E SAN FRANCISCO DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
JUNE 10-14, 2024

I. Records Review

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

- TD-2305M, Electric Distribution Preventive Maintenance Manual, March 29, 2024
- TD-2305M-JA02, Job Aid: Overhead Assessment, March 25, 2024
- TD-2305M-JA03, Job Aid: Underground Inspection, August 4, 2022
- TD-8123P-200 Open Electric Corrective (EC) Tag Validation Procedure, December 29, 2023
- TD-8125S Level 2 Priority X Electric Corrective (EC) Standard, March 25, 2024
- TD-2305M-JA13 EC Job Aid: Create, Complete, Cancel EC Notifications-Field Employees, April 2016
- TD-2302P-01 Distribution Network Transformers and Protectors – Maintenance and Inspection, June 4, 2023
- TD-2302P-02 Distribution Network Protectors – Maintenance and Inspection, August 7, 2022
- Electric Corrective Notifications list, April 2019 – April 2024
- Patrol and Inspection Records list, April 2019 – April 2024
- San Francisco Division Reliability Indexes and Outage list, April 2019 – April 2024
- San Francisco Division New Projects list, April 2023 – April 2024
- Pole Loading Calculations list, April 2023 – April 2024
- Incoming Third-Party Notifications list, April 2019 – April 2024
- Outgoing Third-Party Notifications list, April 2019 – April 2024
- Inspector training records, April 2019 – April 2024
- Equipment test records, April 2019 – April 2024
- Intrusive Inspections, April 2023 – April 2024
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review
- San Francisco Division Quality Management Audit Results, 2019– 2024

II. Records Violations

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

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

> *"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."

PG&E's TD-2305M, Electric Distribution Preventive Maintenance Manual, March 29, 2024 does not define priority codes nor specify time frames for repairs. Previous revisions of TD-2305M listed both priority codes and specified time frames for corrective action.

PG&E's TD-2305M-JA02, Job Aid: Overhead Assessment, page 5, published on March 23, 2024, defines the priority codes and associated time frames for the response/repair action as follows for overhead facilities:

- *Priority A – Immediate risk of high potential impact to safety and reliability (due within 24 hours).*
- *Priority X – At least moderate potential impact (due up to 7 days).*
- *Priority B – At least moderate potential impact (due up to 6 months).*
- *Priority E – At least moderate potential impact (due up to 6 months in HFTD Tier 3 areas, up to 12 months in Tier 2/HFTA area, up to 36 months in Non-HFTD areas).*
- *Priority F – Low potential impact (due in 60 months).*

a) PG&E's TD-2305M-JA03, Underground Job Aid, Effective Date August 4, 2022 instructs inspectors to assign a priority or to prioritize based on condition when a non-conformance is found. TD-2305M-JA03 does not provided guidance nor contain definition of priority levels nor correction completion intervals. TD-2305M-JA03 previously used the parent document, PG&E's TD-2305M, to define priorities. The current revision of PG&E's TD-2305M no longer contains priority definitions nor completion intervals.

b) ESRB staff reviewed work orders created withing the San Francisco Division from February 2019 through February 2024 and determined that PG&E did not

address a total of 14,088 work orders by their assigned due date.[1] [2] Table 1 below breaks down the 14,088 late work orders by their given priority, including the total number of late work orders completed, pending, and canceled work orders, which are included in the total.

Table 1: Late Work Orders in San Francisco Division[3] [4]

Priority Code	Late Work Orders Completed	Late Work Orders Pending*	Late Work Orders Cancelled	Total by Priority
A	919	3	-	922
X	-	-	-	0
B	1,267	442	98	1,807
E	1,345	9,507	366	11,218
F	11	127	3	141
Total	3,276	10,079	467	**14,088**

* As of April 22, 2024

PG&E shall provide ESRB with its corrective action plan to complete the 10,079 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Table 2 below identifies the most overdue work orders as of April 22, 2024.

Table 2: Most Overdue Work Orders**

Priority Code	Most Past Due Work Orders (WO#s)	Number of Days Past Due***
A	128238349	49
B	117874155	1,318
E	117378276	1,574
F	117221797	1,003

**Days past due determined using the Required End Date noted in Data Request Response 3
***As of April 22, 2024

PG&E identified work order #128238349 (A-Open) on March 4, 2024, to replace a burned conductor with a required end date of March 4, 2024. As of April 22, 2024, PG&E's records indicate that the order is still open.

[1] DRU13243_Q03_Atch01_Division_WorkOrderHistory_CONF
[2] PG&E provided data on priority X work orders separately under DRU13847_Q02(a-b)_Atch01_CONF.xlsx Tab DR 2 (a)i
[3] ESRB used the initial Required Due Date to assess the timeliness of work orders. The values in Table 1 do not match the Summary values provided in DRU13243_Q03_Atch01_Division_WorkOrderHistory_CONF for the reasons in the footnote below. Most differences are less than 5 % except for "Late Work Orders Completed" for Priority Code A, also addressed in the footnote below.
[4] In DRU13847_Q02(a-b)_Atch01_CONF Tab DR 2 (b)i, PG&E indicates that Authorized Repair Date, which is derived from either the Required Due Date or the Funded Repair Date to used internally to assess Work Order performance for B, E, and F priorities. PG&E further notes that A priority WOs have categories and conditions that it considers "On Time" even if completed beyond the required due date.

PG&E identified work order #117874155 (B-Open) on September 12, 2019, to replace a decayed pole with a required end date of January 1, 2020. As of April 22, 2024, PG&E's records indicate that the order is still open.

PG&E identified work order #117378276 (E-Open) on June 3, 2019, to repair a switch with a required end date of December 31, 2019. As of April 22, 2024, PG&E's records indicate that the order is still open.

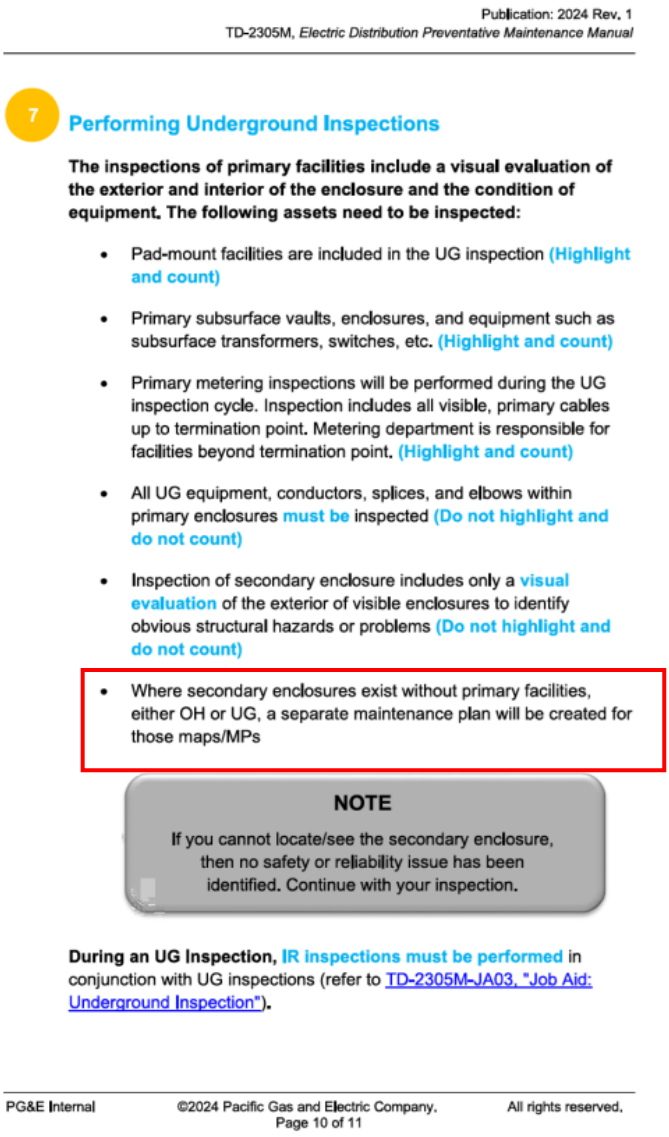
PG&E identified work order #117221797 (F-Open) on May 9, 2019, to install missing primary marker tags on a padmounted transformer with a required end date of July 24, 2021. As of April 22, 2024, PG&E's records indicate that the order is still open.

2. **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."*

PG&E's Electronic Distribution Preventative Maintenance (EDPM) manual TD-2305M, Rev. 1 dated March 29, 2024, discusses underground inspections including enclosures with only secondary voltage equipment on page 26 at the sixth bullet point, "Where secondary enclosures exist without primary facilities, either OH or UG, a separate maintenance plan will be created for those maps/MPs." [5] See Figure 1.

[5] TD-2305M EDPM page 26 of the PDF, also noted as page 10 of the chapter describing the activities required by the compliance inspector to complete overhead (OH) and underground (UG) inspections.



Publication: 2024 Rev. 1
TD-2305M, *Electric Distribution Preventative Maintenance Manual*

7 **Performing Underground Inspections**

The inspections of primary facilities include a visual evaluation of the exterior and interior of the enclosure and the condition of equipment. The following assets need to be inspected:

- Pad-mount facilities are included in the UG inspection **(Highlight and count)**
- Primary subsurface vaults, enclosures, and equipment such as subsurface transformers, switches, etc. **(Highlight and count)**
- Primary metering inspections will be performed during the UG inspection cycle. Inspection includes all visible, primary cables up to termination point. Metering department is responsible for facilities beyond termination point. **(Highlight and count)**
- All UG equipment, conductors, splices, and elbows within primary enclosures **must be** inspected **(Do not highlight and do not count)**
- Inspection of secondary enclosure includes only a **visual evaluation** of the exterior of visible enclosures to identify obvious structural hazards or problems **(Do not highlight and do not count)**
- Where secondary enclosures exist without primary facilities, either OH or UG, a separate maintenance plan will be created for those maps/MPs

NOTE

If you cannot locate/see the secondary enclosure, then no safety or reliability issue has been identified. Continue with your inspection.

During an UG Inspection, IR inspections must be performed in conjunction with UG inspections (refer to TD-2305M-JA03, "Job Aid: Underground Inspection").

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Figure 1: Performing Underground Inspection, TD-2305M

ESRB asked for this plan and PG&E replied that the San Francisco Division does not have any secondary-only maintenance plans. [6] PG&E's failure in this instance to follow its own procedures is a violation of GO 128 Rule 17.1.

[6] ESRB DR #1 question 9, updated PG&E response provided to ESRB August 28, 2024

3. **GO 165, Section III-C, Record Keeping** states in part:

> *"The utility shall maintain records for (1) at least ten (10) years of patrol* ***and*** *detailed inspection activities, and (2) the life of the pole for intrusive inspection activities."*

PG&E's TD-2305M, Electric Distribution Preventive Maintenance Manual, March 29, 2024, Record Retention, Record Retention Requirement, GO 165 Record Retention Guidelines Table lists requirements of 2 inspection cycles or 5 years with minimum record retention of 5 to 10 (years, note: no time unit is specified, in context, years is implied). See Figure 2.

2 G.O. 165 Record Retention Guidelines

RECORD TYPE	REQUIREMENT	MINIMUM RECORD RETENTION
OH Inspection Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Inspection cycles or 5 years, whichever is longer	10
UG Inspection Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Inspection cycles or 5 years, whichever is longer	6
OH Patrol Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Patrol cycles or 5 years, whichever is longer	5
UG Patrol Maps/MPs, Electric Maintenance Patrol/Inspection Daily Logs, and Paper or Electronic Notification Forms	2 Patrol cycles or 5 years, whichever is longer	5

Figure 2: GO 165 Record Retention Guidelines, TD-2305M

Per GO 165, Section III-C, records shall be maintained for at least 10 years for patrol and inspection activities. PG&E's TD-2305M, Electric Distribution Preventive Maintenance Manual and practices need revision requiring a minimum record retention as prescribed.

4. **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."

Table 1: Distribution Inspection Cycles (Maximum Intervals in Years)

	Patrol		Detailed		Intrusive	
	Urban	Rural	Urban	Rural	Urban	Rural
Transformers						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Switching/Protective Devices						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Regulators/Capacitors						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Overhead Conductor and Cables	1	2[1]	5	5	---	---
Streetlighting	1	2	x	x	---	---
Wood Poles under 15 years	1	2	x	x	---	---
Wood Poles over 15 years which have not been subject to intrusive inspection	1	2	x	x	10	10
Wood Poles which passed intrusive inspection	---	---	---	---	20	20

ESRB staff identified that PG&E completed a total of 8,091 patrol and detailed inspections of overhead (OH) electric facilities past their GO 165 required completion dates, as shown in Table 3. There are no recorded incidents of padmounted or underground (UG) electric facility inspections beyond the GO 165 required completion dates.

Table 3: Late Patrols and Detailed Inspections in San Francisco Division [7]

Year	OH Patrol	OH Detailed Inspection	Total Structures
2019	-	-	-
2020	-	-	-
2021	4,730 (13.5%)[8]	3,361 (51.4%) [9]	8,091
2022	-	-	-
2023	-	-	-
2024*	-	-	-
Total	4,730	3,361	**8,091**

*2024 Preliminary information, final report due July 1, 2025

[7] DRU13243_Q04(c)_Atch01_SF Late Units (2019-2024)
[8] 34,945 Facilities patrolled during 2021 per DRU13243_Q04(a)_Atch01_SF PI Data 2019-2024
[9] 6,538 Facilities inspected (detailed) conducted during 2021 per DRU13243_Q04(a)_Atch01_SF PI Data 2019-2024

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities in PG&E's San Francisco Division, listed in Table 4:

Table 4: San Francisco Division Field Inspection Locations

Location	Structure Type	SAP ID Number	Latitude	Longitude
1	Wood pole	110026341	37.74874568	-122.4160323
2	Wood pole	101825442	37.74902531	-122.4159765
3	Wood pole	101839261	37.74913034	-122.4160749
4	Underground	108112641	37.74837955	-122.415775
5	Wood pole	101839259	37.74919796	-122.4153131
6	Wood pole	103854308	37.74921338	-122.4147772
7	Wood pole	101825443	37.74916182	-122.4155378
8	Wood pole	101825444	37.74923876	-122.4154716
9	Wood pole	103967968	37.744031	-122.42253
10	Wood pole	101828055	37.744031	-122.42233
11	Padmount	107782424	37.742989	-122.42281
12	Underground	108253988	37.742869	-122.42294
13	Underground vault	107687749	37.79222254	-122.4006401
14	Underground vault	107690459	37.79260644	-122.4007977
15	Underground vault	107694451	37.79298495	-122.4015113
16	Underground vault	107700481	37.79294898	-122.4015564
17	Underground vault	107684108	37.7929883	-122.4023241
18	Underground	108140404	37.7939565	-122.4112528
19	Underground	108276291	37.7937402	-122.411234
20	Underground	108139912	37.79374286	-122.411296
21	Wood pole	103993484	37.79446897	-122.4113814
22	Wood pole	101813123	37.79456036	-122.4111348
23	Wood pole	103852285	37.79340725	-122.4201974
24	Wood pole	103837362	37.79347452	-122.4196937
25	Wood pole	103768515	37.79349855	-122.4196098
26	Wood pole	103768516	37.79331322	-122.4195819
27	Wood pole	101842540	37.79438185	-122.4181155
28	Wood pole	101812927	37.79406248	-122.418116
29	Wood pole	101812928	37.79367678	-122.4179224
30	Wood pole	101812931	37.79366463	-122.4180211
31	Underground	108146200	37.80268539	-122.4226386
32	Underground	108145956	37.79379691	-122.4179001
33	Underground	108040093	37.80232784	-122.4229555
34	Underground	108087574	37.8062009	-122.4754098
35	Wood pole	103165856	37.80625594	-122.4751319
36	Padmount	108244063	37.8074925	-122.4765
37	Wood pole	103165857	37.80599768	-122.4746799
38	Wood pole	101812449	37.80246821	-122.4410581
39	Underground	None (new) J52212, 230 Capra	37.80254104	-122.4411934
40	Underground	108062466	37.8025522	-122.4411457
41	Underground	None	37.80253158	-122.4410877
42	Wood pole	101812448	37.80326709	-122.4412564
43	Underground	108059081	37.79971541	-122.4374022
44	Underground	108133382	37.79971395	-122.4370757

Location	Structure Type	SAP ID Number	Latitude	Longitude
45	Underground vault	107682843	37.79974309	-122.4371284
46	Underground	108039297	37.7947139	-122.4324096
47	Underground	108300149	37.79462104	-122.4327289
48	Underground	108276454	37.79457351	-122.4327739
49	Wood pole	101840002	37.79492336	-122.4333675
50	Underground	108140000	37.79456838	-122.433213
51	Wood pole	101812686	37.79456673	-122.4332646
52	Wood pole	101812688	37.79520715	-122.433421
53	Underground vault	107698622	37.78837978	-122.423796
54	Padmount	108236579	37.72863822	-122.4776519
55	Padmount	108237891	37.7286828	-122.4776383
56	Underground	108246685	37.72949687	-122.4773957
57	Underground	108073109	37.7292809	-122.4773612
58	Underground	108073143	37.72933705	-122.4773271
59	Wood pole	101811107	37.74178002	-122.4745691
60	Wood pole	101811106	37.74131384	-122.4745493
61	Wood pole	103767709	37.74116106	-122.4743753
62	Wood pole	101811104	37.7411679	-122.4746082
63	Wood pole	101807467	37.75720255	-122.4922144
64	Wood pole	101807466	37.7573554	-122.4926856
65	Wood pole	101841705	37.75737802	-122.4916475
66	Wood pole	101841921	37.75734669	-122.4910951
67	Wood pole	101841699	37.75748689	-122.4907765
68	Wood pole	101830867	37.75492735	-122.505989
69	Wood pole	101830868	37.7548549	-122.5065114
70	Wood pole	101838296	37.7548989	-122.5065644
71	Wood pole	103812904	37.75494459	-122.5055969
72	Wood pole	101830946	37.75490783	-122.505448
73	Underground	108011709	37.77477574	-122.4841999
74	Wood pole	101815131	37.77448674	-122.4842958
75	Wood Pole	101815130	37.77448315	-122.4842017
76	Underground vault	107684456	37.78479002	-122.413424
77	Underground vault	108143391	37.78462109	-122.4141839
78	Underground vault	107701295	37.78366812	-122.4139661
79	Underground	108098109	37.78217543	-122.4156932
80	Underground	108095150	37.74723605	-122.4137877
81	Wood pole	101826417	37.74725666	-122.4140726
82	Wood pole	101826418	37.74727148	-122.4145061
83	Underground	108133975	37.74714951	-122.413475

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

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

> *"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service."*

ESRB's findings related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 31.1 Findings

Location	Finding	Notes
7	Unlocked switch	
69	Broken cross arm	
70	Primary cross arm requires replacement	EC # 122036474 to replace primary and secondary cross arms past both original and FSR due dates

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.)."*

ESRB's finding related to the above rule is listed in Table 6:

Table 6: GO 95, Rule 34 Finding

Location	Finding	Notes
1	The pole has an unauthorized third-party attachment on pole and service drop.	

3. GO 95, Rule 38, Minimum Clearance of Wires from Other Wires states in part:

> *"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.*
>
> *Table 2, Case 3C: The clearance between wires, cables and conductors not supported on the same poles, vertically at crossings in spans and radially where colinear or approaching crossings for communication conductors (including open wire, cables and service drops) must be at least 24 inches."*

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

Table 7: GO 95, Rule 38 Finding

Location	Finding	Notes
7	Supply service drop contacting communications drop over street.	

4. GO 95, Rule 49.1-A(1) Poles, Towers and Other Structures, Strength states:

> *"Wood poles shall be of sound timber"*

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

Table 8: GO 95, Rule 49.1-A(1) Findings

Location	Finding	Notes
8	Deteriorated pole.	

25	Deteriorated pole.	Work order EC # 126160354 to replace pole past due date (5/2024)
49	Deteriorated pole.	Work order EC # 124173064 to replace pole past due date (7/2023)
52	Deteriorated pole.	Work order EC # 125209429 to replace pole past due date (7/2023)
64	Deteriorated pole.	Work order EC # 124303277 to replace pole past due date (8/2023)
65	Deteriorated pole.	Work order EC # 121600081 to replace pole past due date (6/2022)
66	Deteriorated pole.	Work order EC # 121600184 to replace pole past due date (6/2022)
74	Deteriorated pole.	Work order EC # 121826876 to replace pole past both original (8/2022) and FSR (12/2023) due dates

5. **GO 95, Rule 54.6 E(1) Risers Encased from Ground Level to 8 Feet Above the Ground** states:

> *"Risers from underground cables or other conductors shall be encased from the ground level to a level not less than 8 feet above the ground."*

ESRB's finding related to the above rule is listed in Table 9:

Table 9: GO 95, Rule 54.6 E(1) Finding

Location	Finding	Notes
51	Riser is lifted from pole surface.	Work order EC # 124180140 to replace pole past due date (7/2023)

6. **GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires** states:

> *"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 finding related to the above rule is listed in Table 10:

Table 10: GO 95, Rule 56.2 Finding

Location	Finding	Notes
28	Span guy deflected.	

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

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

ESRB's finding related to the above rule is listed in Table 11:

Table 11: GO 95, Rule 56.9 Finding

Location	Finding	Notes
24	Outmost down guy missing marker.	Repaired in field.

8. GO 95, Rule 59.4-A(1)(a), Grounding Conductors states:

"The grounding conductor from each ground rod to the base of the pole shall not be less than 1 foot below the surface of the ground."

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

Table 12: GO 95, 59.4-A(1)(a) Findings

Location	Finding	Notes
37	Exposed ground rod.	Work order EC # 120842328 to repair various nonconformances past due date (4/2022)
75	Exposed ground rod.	Repaired in field.

9. GO 128, Rule 17.1, Design, Construction and Maintenance states in part:

"Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment."

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

Table 13: GO 128, Rule 17.1 Finding

Location	Finding	Notes
79	Subsurface enclosure lid is corroded/damaged, creating a sidewalk tripping hazard.	Work order EC # 1226267801 to repair enclosure lid past due date (10/2022).

10. GO 128, Rule 35.2 A, Guarding Live Parts states:

"Live parts shall be enclosed, isolated, guarded, or insulated to prevent accidental contact."

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

Table 14: GO 128, Rule 35.2 A Finding

Location	Finding	Notes
46	Hook guard missing from access lid.	Repaired in field.

V. Observations

1. **GO 95, Rule 18, Reporting and Resolution of Safety Hazards Discovered by Utilities** states in part:

> *"For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property..."*

GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

> *"(3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.*
>
> *(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount 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."*

During the field inspection, ESRB observed the following third-party safety concerns listed in Table 15:

Table 15: Third-Party Audit Observations

Location	Finding	Notes
7	Insufficient clearance, communications line to supply service drop	PG&E created a third-party notification for this issue during the audit (TPN 129053636).
8	Insufficient clearance, communications line to supply service drop	PG&E created a third-party notification for this issue during the audit (TPN 129053814).
10	Low comm drop over street, 13.5 ft.	PG&E created a third-party notification for this issue during the audit (TPN 129054136).
23	Unsecured communication amplifier and ground rod.	PG&E created a third-party notification for this issue during the audit (TPN 129059287).

Location	Finding	Notes
24	Communication lines need transfer to new pole, abandoned pole removed.	PG&E created a third-party notification for this issue during the audit (TPN 129059426).
30	Communications splice box needs to be secured. Loose lashing.	PG&E created a third-party notification for this issue during the audit (TPN 129060196).
60	Communications down guy not taut.	PG&E created a third-party notification for this issue during the audit (TPN 129071117).
62	Broken communications lashing.	PG&E created a third-party notification for this issue during the audit (TPN 129071247).
63	Abandoned communications lines.	PG&E created a third-party notification for this issue during the audit (TPN 129072390).
67	Broken communications ground moulding, exposed ground conductor.	PG&E created a third-party notification for this issue during the audit (TPN 129072348).
69	Abandoned communications lines.	PG&E created a third-party notification for this issue during the audit (TPN 129072642).
69 (2)	Broken communications cross arm.	PG&E created a third-party notification for this issue during the audit (TPN 129072723).
70	Abandoned communications lines and equipment.	PG&E created a third-party notification for this issue during the audit (TPN 129072780).
71	Low communications service drop (12 ft, 11 inches), insufficient service drop clearance, unsecured equipment.	PG&E created a third-party notification for this issue during the audit (TPN 129072886).
74	Unsecured vertical communications lines on pole, broken communications conduit, span guy not taut.	PG&E created a third-party notification for this issue during the audit (TPN 129073292).
81	Broken communications cross arm.	PG&E created a third-party notification for this issue during the audit (TPN 129076935).