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

October 1, 2024 EA2024-1221

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

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

Mr. Tanguay:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Yi (Rocky) Yang of ESRB staff conducted an electric distribution audit of PG&E's Stockton Division from July 15 to July 19, 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 one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than October 31, 2024, by 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 the audit on the CPUC website. If there is any information in your response that you want 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 Emiliano Solorio at (916) 216-0249 or Emiliano.Solorio@cpuc.ca.gov.

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 Stockton Division

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC
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PG&E STOCKTON DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
July 15 – July 19, 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 Stockton Division:

- Electric Distribution Preventive Maintenance Manual, March 29, 2024
- TD-2305M-B006, Revised Distribution Inspection Guidelines, January 24, 2020
- TD-2302S, Electric Distribution Maintenance Requirements for Overhead and Underground Equipment, August 02, 2022
- Distribution facilities statistics and their wildfire risks, including equipment risks and vegetation risks
- Stockton Distribution Plats with High Fire Threat Districts
- Patrol and Inspection Records list, May 2019 – May 2024
- Electric Corrective Notifications list, June 2019 – May 2024
- Reliability Indexes and Outage list, June 2019 – May 2024
- Stockton New Projects list, June 2023 – May 2024
- Pole Loading Calculations list, June 2023 – May 2024
- Incoming Third-Party Notifications list, June 2019 – May 2024
- Outgoing Third-Party Notifications list, June 2019 – May 2024
- Inspector training records, June 2019 – May 2024
- Equipment test records, June 2019 – May 2024
- Intrusive Inspections, June 2023 – May 2024
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review

II. Records Violations

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

1. Late Work Orders
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 the Stockton Division for the past 60 months (June 2019 – May 2024), shown in Table 1. 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 5 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).*

ESRB staff reviewed late work orders and determined that PG&E did not address a total of 50,676 (48.4%) out of 104,783 work orders by their assigned due date. Table 1 below breaks down the 50,676 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 Stockton Division[1,2]

Priority Code	Late Work Orders Completed	Late Work Orders Pending	Late Work Orders Cancelled	Total
A	1,922	1	558	**2,481**
X	-	-	-	**-**
B	2,786	662	429	**3,877**
E	8,153	32,677	3,178	**44,008**
F	41	246	23	**310**
Total	12,902	33,586	4,188	**50,676**

PG&E shall provide ESRB with its corrective action plan to complete the 33,586 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 non-exempt work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
A	117675098	761
X	-	-
B	125209427	158
E	117291647	1,170
F	117812314	456

PG&E identified work order #117675098 on July 31, 2019, to install a service pole with a required end date of January 31, 2020. PG&E did not complete the work until March 2, 2022.

PG&E identified work order #125209427 on December 22, 2022, for a pole safety inspection with a required end date of March 22, 2023. PG&E did not complete the work until August 27, 2023.

PG&E identified work order #117291647 on May 21, 2019, to replace a broken anchor with a required end date of November 21, 2019. PG&E did not complete the work until February 3, 2023.

PG&E identified work order #117812314 on August 27, 2019, to remove an idle facility with a required end date of February 27, 2020. PG&E did not complete this work until May 28, 2021.

[1] 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.
[2] Categorization of work orders as complete, open, or cancelled is based on the notification status provided by PG&E.

ESRB identified two late cancelled tags with completion dates, one late completed tag with an on-time completion date, five late completed tags that have no completion dates, 54 late open tags that have completion dates. A breakdown of some of the misassigned late category tags are shown below in Table 3.

Table 3: Misassigned Tags

Tag #	Assigned Late Category	Discrepancy
117519721	Late Cancelled	Has a completion date.
119366539	Late Cancelled	Has a completion date.
117689607	Late Complete	Has a completion date that is on-time.
126042443	Late Complete	Has no completion date.
126301935	Late Complete	Has no completion date.
125248770	Late Complete	Has no completion date.
124964807	Late Complete	Has no completion date.
127141236	Late Complete	Has no completion date.
118672152	Late Open	Has a completion date.
119193986	Late Open	Has a completion date.
122249231	Late Open	Has a completion date.
123880234	Late Open	Has a completion date.
125544944	Late Open	Has a completion date.

2. Inspections

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:

"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	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Switching/Protective Devices						
Overhead	1	2	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Regulators/Capacitors						
Overhead	1	2	5	5	---	---
Underground	1	2	3	3	---	---
Padmounted	1	2	5	5	---	---
Overhead Conductor and Cables	1	2	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 identified that PG&E had completed a total of 24,411 (3.7%) out of 665,686 patrols and inspections past their assigned due dates in the last five years. Table 4 below breaks down the late patrols and inspections by year.

Table 4: Late Patrols and Inspections

Year	Inspection Type	Number of Late Inspections or Patrols
2019	Patrols	24
2020	Inspections	144
2021	Patrols	9,503
2021	Inspections	9,675
2022	Inspections	34
2023	Patrols	4,839
2023	Inspections	192

III. Field Inspection

During the field inspection, ESRB inspected locations listed in Table 5:

Table 5: List of Field Inspection Locations

Location #	SAP #	Structure Type	Structure Location/Address
1	102132007	Wood Pole	(38.0667473, -121.1240922)
2	102132006	Wood Pole	(38.0664638, -121.1240309)
3	102130905	Wood Pole	(38.0665092, -121.1230193)
4	102133378	Wood Pole	(38.0587224, -121.1430725)
5	102133380	Wood Pole	(38.0587137, -121.1440277)
6	102133448	Wood Pole	(38.0586786, -121.1446071)
7	103858231	Wood Pole	(38.0545439, -121.1892421)
8	103870318	Wood Pole	(38.0545444, -121.1897323)
9	102137943	Wood Pole	(38.0545463, -121.1903036)
10	102137944	Wood Pole	(38.0546017, -121.1903331)
11	102137655	Wood Pole	11122 Comstock Rd. Waterloo, CA
12	102137657	Wood Pole	11175 Comstock Rd. Waterloo, CA
13	129223887	Wood Pole	3217 Miner Ave. Stockton, CA
14	102056485	Wood Pole	(37.9645201, -121.2486550)
15	101282213	Wood Pole	4121 Cedar Circle Angels Camp, CA
16	103953077	Wood Pole	4128 Cedar Circle Angels Camp, CA
17	104124722	Wood Pole	4149 Cedar Circle Angels Camp, CA
18	104160440	Wood Pole	4146 Cedar Circle Angels Camp, CA

Location #	SAP #	Structure Type	Structure Location/Address
19	101282209	Wood Pole	4087 Ponderosa Way Angels Camp, CA
20	103951344	Wood Pole	(38.0947629, -120.5008102)
21	101279618	Wood Pole	(38.0482981, -120.5240462)
22	101279620	Wood Pole	(38.0479593, -120.5234648)
23	101271419	Wood Pole	(38.0507846, -120.5289781)
24	107016158	Pad Mount Transformer	(38.0507379, -120.5290240)
25	103380638	Wood Pole	1404 Finnegan Ln. Angels Camp, CA
26	101269775	Wood Pole	1434 Finnegan Ln. Angels Camp, CA
27	101268992	Wood Pole	(38.0686921, -120.5403520)
28	101268987	Wood Pole	1298 Bush St. Angels Camp, CA
29	108209019	Junction Box	(38.0694597, -120.5408405)
30	101268219	Wood Pole	308 Clifton Ln. Angels Camp, CA
31	101265930	Wood Pole	195 Clifton Ln. Angels Camp, CA
32	103367821	Wood Pole	158 Clifton Ln. Angels Camp, CA
33	102318284	Wood Pole	(37.7402831, -121.1786390)
34	102318283	Wood Pole	(37.7405477, -121.1786480)
35	102318282	Wood Pole	23861 Austin Rd. Ripon, CA
36	107035508	Underground Switch	1018 Stuart St. Ripon, CA
37	107044698	Underground Junction Box	602 S. Wilma Ave. Ripon, CA
38	107044694	Underground Transformer	508 S. Wilma Ave. Ripon, CA

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
39	107022229	Underground Junction Box	1553 W. Colony Rd. Ripon, CA
40	107022227	Underground Junction Box	1553 W. Colony Rd. Ripon, CA
41	108233917	Pad Mount Transformer	1553 W. Colony Rd. Ripon, CA
42	108263425	Pad Mount Fuse Box	977 Heartland Dr. Manteca, CA
43	107021894	Underground Junction Box	977 Heartland Dr. Manteca, CA
44	107024226	Underground Junction Box	985 Heartland Dr. Manteca, CA
45	102093030	Wood Pole	936 Yolo St. Manteca, CA
46	103822581	Wood Pole	928 Yolo St. Manteca, CA
47	102093032	Wood Pole	916 Yolo St. Manteca, CA
48	103177294	Wood Pole	904 Yolo St. Manteca, CA
49	102093166	Wood Pole	447 Yolo St. Manteca, CA
50	102093165	Wood Pole	431 Edward Ave. Manteca, CA
51	102093174	Wood Pole	331 S. Powers Ave. Manteca, CA
52	104132518	Wood Pole	339 S. Powers Ave. Manteca, CA
53	102093172	Wood Pole	823 Trinity St. Manteca, CA
54	102141965	Wood Pole	807 Trinity St. Manteca, CA
55	102084932	Wood Pole	961 Alameda St. Manteca, CA
56	102084930	Wood Pole	937 Alameda St. Manteca, CA
57	107024724	Pad Mount Transformer	1718 Komenich Dr. Manteca, CA
58	107043195	Pad Mount Fuse Box	(37.8235792, -121.2451490)

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
59	107038497	Pad Mount Transformer	1902 London Ave. Manteca, CA
60	102092777	Wood Pole	1282 N St. Lathrop, CA
61	102092780	Wood Pole	15901 7th St. Lathrop, CA
62	103135263	Wood Pole	15901 7th St. Lathrop, CA
63	102092815	Wood Pole	15896 6th St. Lathrop, CA
64	102092832	Wood Pole	15868 6th St. Lathrop, CA
65	102092830	Wood Pole	15832 6th St. Lathrop, CA
66	102092808	Wood Pole	(37.8175526, -121.2775357)
67	102085450	Wood Pole	12030 Harlan Rd. Lathrop, CA
68	107040401	Pad Mount Transformer	12030 Harlan Rd. Lathrop, CA
69	102090130	Wood Pole	23197 N. Tretheway Rd. Acampo, CA
70	102090133	Wood Pole	(38.1961325, -121.1799784)
71	104029730	Wood Pole	(38.1950658, -121.1799533)
72	102090139	Wood Pole	(38.1950421, -121.1800025)
73	102090707	Wood Pole	22601 N. Tretheway Rd. Acampo, CA
74	103585129	Wood Pole	(38.2036348, -121.2443534)
75	102086238	Wood Pole	23991 N. Kennefick Rd. Acampo, CA
76	102085056	Wood Pole	4847 E. Jahant Rd. Galt, CA
77	102085057	Wood Pole	(38.2039275, -121.2581953)

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
78	102091190	Wood Pole	(38.1747827, -121.2962414)
79	103584983	Wood Pole	(38.1746396, -121.2960255)
80	102091185	Wood Pole	(38.1746427, -121.2969200)
81	107165430	Underground Transformer	18961 Lower Sacramento Rd. Woodbridge, CA
82	107143522	Underground Junction Box	(38.1547320, -121.3008428)
83	107030318	Pad Mount Transformer	(38.1547570, -121.3011898)
84	103199350	Wood Pole	939 E. Augusta St. Woodbridge, CA
85	103193684	Wood Pole	(38.1540594, -121.3025000)
86	107061242	Underground Switch	311 River Meadows Dr. Woodbridge, CA
87	107167094	Underground Transformer	253 River Meadows Dr. Woodbridge, CA
88	107078450	Underground Junction Box	6077 W. Banner St. Lodi, CA
89	107118194	Underground Junction Box	6077 W. Banner St. Lodi, CA
90	107038543	Pad Mount Transformer	10100 Trinity Pkwy. Stockton, CA
91	108292589	Underground Transformer	9742 Angel Ct. Stockton, CA
92	107056255	Underground Junction Box	3714 Hatchers Cir. Stockton, CA
93	107111198	Underground Switch	3711 Hatchers Cir. Stockton, CA
94	102113301	Wood Pole	6528 Herndon Pl. Stockton, CA
95	102066139	Wood Pole	5151 California Ave. Tracy, CA
96	102066137	Wood Pole	(37.7591874, -121.3698610)
97	102066133	Wood Pole	5690 California Ave. Tracy, CA
98	102065269	Wood Pole	(37.7505704, -121.3801463)

Location #	SAP #	Structure Type	Structure Address/GPS Coordinates
99	102075760	Wood Pole	22818-22800 Banta Rd. Tracy, CA
100	107037028	Underground Transformer	600 Pombo Square Dr. Tracy, CA
101	102119629	Wood Pole	2712 Holly Dr. Tracy, CA
102	103899500	Wood Pole	2768 Holly Dr. Tracy, CA
103	103572962	Wood Pole	2796 Holly Dr. Tracy, CA
104	107049865	Underground Transformer	3014 Dovenshire Dr. Tracy, CA
105	107049873	Underground Transformer	335 Marie Ave. Tracy, CA
106	102120072	Wood Pole	340 W. Whittier Ave. Tracy, CA
107	102120075	Wood Pole	354 W. Whittier Ave. Tracy, CA
108	102120071	Wood Pole	1845 Parker Ave. Tracy, CA
109	107041391	Underground Transformer	2040 Valerand Rd. Tracy, CA

IV. Field Inspection – Violations List

ESRB observed the following violations during the field inspection:

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

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

ESRB's findings are listed in Table 6.

Table 6: GO 95, Rule 31.1 Findings

Location	Finding	Notes
1	Pole was decayed/rotten.	PG&E has existing EC notification 124305015 to replace the pole.
2	Pole was decayed/rotten.	PG&E has existing EC notification 124305020 to replace the pole.
3	Pole was damaged/broken. Crossarm was decayed.	PG&E has existing EC notification 123294097 to replace the pole.
4	Pole was decayed/rotten.	PG&E has existing EC notification 124234351 to replace the pole.
6	Pole was damaged from woodpeckers.	PG&E has existing EC notification 124239016 to replace the pole.
8	Bird guard was not sitting correctly on conductor.	PG&E corrected the finding in the field.
11	Pole was decayed/rotten.	PG&E has existing EC notification 126613035 to replace the pole.
13	Pole was damaged.	PG&E created EC notification 129223887 to repair pole.
14	Visibility strips were falling off.	PG&E corrected the finding in the field.
21	Pole was decayed/rotten.	PG&E has existing EC notification 120863831 to replace the pole.
22	Pole was decayed/rotten.	PG&E has existing EC notification 116883114 to replace the pole.

27	Pole was decayed/rotten.	PG&E has existing EC notification 118145300 to replace the pole.
30	Pole top is decayed.	PG&E has existing EC notification 119301148 to replace the pole.
32	Electrical guy wire was within 3 inches of communications cable. Guy anchor was buried. Guy anchor was corroded.	PG&E unburied guy anchor in the field.
48	Pole was decayed/rotten.	PG&E has existing EC notification 126206246 to replace the pole.
50	Crossarm was damaged/broken.	PG&E has existing EC notification 124236484 to repair the crossarm.
51	Pole was burnt at top.	PG&E has existing EC notification 118449932 to replace the pole.
55	Weatherhead had exposed connection.	PG&E has existing EC notification 123969750 to repair the connection.
63	Pole had a low pole step.	PG&E corrected the finding in the field.
73	Pole was damaged/broken.	PG&E created EC notification 121927774 to replace pole.
75	Pole had a low pole step.	PG&E corrected the finding in the field.
76	Pole was decayed/rotten.	PG&E has existing EC notification 126658831 to replace the pole.
84	Crossarm was damaged/broken.	PG&E has existing EC notification 119526490 to repair the crossarm.
94	Crossarm was damaged/broken.	PG&E has existing EC notification 124566331 to repair the crossarm.
101	Pole has an idle facility.	
108	Crossarm is decayed/rotten.	PG&E has existing EC notification 124908060 to replace the crossarm.

2. **GO 95, Rule 54.6, Vertical and Lateral Conductors, Ground Wires** states in part:

"That portion of the ground wire attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8)."

ESRB's findings are listed in Table 7.

Table 7: GO 95, Rule 54.6 Findings

Location	Finding	Notes
9	Ground wire was exposed.	PG&E corrected the finding in the field.
106	Ground molding was broken/damaged.	PG&E has existing EC notification 113631269 to repair the molding. PG&E corrected the finding in the field.

3. **GO 95, Rule 56.6-A, Guys in Proximity to Supply Conductors of Less than 35,500 Volts** states in part:

"All portions of guys within both a vertical distance of 8 feet from the level of supply conductors of less than 35,500 volts and a radial distance of 6 feet from the surface of wood poles or structures shall not be grounded, through anchors or otherwise. Where necessary to avoid the grounding of such portions, guys shall be sectionalized by means of insulators installed at locations as specified in Rule 56.7."

ESRB's finding is listed in Table 8.

Table 8: GO 95, Rule 56.6-A Finding

Location	Finding	Notes
11	Vegetation was found in contact above insulator bob providing a path to ground.	

4. **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 findings are listed in Table 9.

Table 9: GO 95, Rule 56.9 Findings

Location	Finding	Notes
49	Guy guard was damaged.	PG&E corrected the finding in the field.
77	Guy marker was missing.	

5. GO 95, Rule 59.4-A(1)(a), Grounding 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 are listed in Table 10.

Table 10: GO 95, Rule 59.4-A(1)(a) Findings

Location	Finding	Notes
7	Grounding rod was found above ground.	PG&E corrected the finding in the field.
69	Ground rod was found above ground.	PG&E corrected the finding in the field.

6. General Order 95, Rule 34 – Foreign Attachments states:

"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 is listed in Table 11:

Table 11: GO 95, Rule 34 Finding

Location	Finding	Notes
14	Foreign attachment found on pole.	PG&E corrected the finding in the field.

7. **General Order 95, Rule 51.6-A – High Voltage Marking** states in part:

"Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height. Such signs shall be of weather and corrosion–resisting material, solid or with letters cut out therefrom and clearly legible."

ESRB's findings are listed in Table 12:

Table 12: GO 95, Rule 51.6-A Findings

Location	Finding	Notes
2	High Voltage sign was missing.	PG&E has existing EC notification 124305020 to install a new sign.
3	High Voltage sign was missing.	PG&E has existing EC notification 123294097 to install a new sign.
21	High Voltage sign was broken.	PG&E has existing EC notification 120863831 for repair.
26	High Voltage sign was broken.	PG&E has existing EC notification 120911951 for repair.
32	High Voltage sign was missing.	PG&E corrected the finding in the field.
53	High Voltage sign was missing.	PG&E has existing EC notification 112859408 to install a new sign. PG&E corrected the finding in the field.
54	High Voltage sign was broken.	PG&E has existing EC notification 124226422 for repair. PG&E corrected the finding in the field.
55	High Voltage sign was missing.	PG&E has existing EC notification 123969750 to install a new sign. PG&E corrected the finding in the field.
61	High Voltage sign was missing.	PG&E has existing EC notification 112690524 to install a new sign. PG&E corrected the finding in the field.
62	High Voltage sign was missing.	PG&E has existing EC notification 123749669 to install a new sign. PG&E corrected the finding in the

		field.
65	High Voltage sign was broken.	PG&E has existing EC notification 112692828 for repair.
85	High Voltage sign was missing.	PG&E has existing EC notification 110273489 to install a new sign. PG&E corrected the finding in the field.
95	High Voltage sign was missing.	PG&E has existing EC notification 124713675 to install a new sign.
97	High Voltage sign was missing.	PG&E has existing EC notification 124713730 to install a new sign.
108	High Voltage sign was missing.	

8. GO 95, Rule 58.1-B(3), From Hardware states in part:

"…The minimum clearance of 1.5 inches need not apply to through bolts in metallic contact with equipment cases or metal parts thereof nor to through bolts supporting heel arms, provided the portion of such through bolts extending into the climbing space is covered with non-conducting material as specified in Rule 22.8."

ESRB's finding is listed in Table 13.

Table 13: GO 95, Rule 58.1-B(3) Finding

Location	Finding
28	Bolt covers were found loose on transformer support through bolt.

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

"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 14:

Table 14: GO 128, Rule 17.1 Findings

Location	Finding	Notes
48	Lid frame was broken/damaged.	PG&E has existing EC notification 117845397 to repair.

42	Retaining wall missing for ground mounted equipment.	PG&E has existing EC notification 119711206 for the finding. The EC notification was found under the wrong SAP number.
58	Fusebox was missing 2021 inspection sticker in compartment 1.	
87	Enclosure was decayed/rotten.	PG&E has existing EC notification 122560278 to repair enclosure.
89	Enclosure was full of debris.	PG&E has existing EC notification 124241330 to remove debris.
104	Lid frame was broken/damaged.	PG&E has existing EC notification 123298256 to repair. PG&E repaired the lid in the field.

10. GO 128, Rule 35.5, 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 finding is listed in Table 15:

Table 15: GO 128, Rule 35.5 Finding

Location	Finding	Notes
105	High voltage sign was faded.	PG&E corrected the finding in the field.

V. Observations

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."

ESRB's findings are listed in Table 16:

Table 16: GO 95, Rule 18-A Findings

Location	Finding	Notes
5	There was an abandoned communications service drop.	PG&E removed the service drop in field.
14	Communications had an abandoned service drop. Communications ground wire was broken.	
16	Communications needs to transfer conductors to new pole.	
18	Communications needs to transfer conductors to new pole. Communications drop was in contact with guy wire.	
20	Communications needs to transfer conductors to new pole.	
23	Communications conductor was not secured to pole. Communications conductor had no riser.	
27	Communications had an abandoned service drop.	
30	Communications ground wire was exposed.	
45	Communications ground wire was exposed.	
46	Communications had an abandoned service drop.	PG&E removed the service drop in field.
50	Communications conductor was not secured to pole. Communications had damaged	PG&E has existing Third Party Notification 124236493 to correct the unsecured conductor. PG&E

	overhead facilities.	has existing Third Party Notification 124236485 for repairing damaged overhead facilities.
51	Communications ground wire was exposed.	PG&E has existing Third Party Notification 124227316 to repair exposed ground.
52	Communications conductor was not secured to pole.	PG&E created Third Party Notification 129232473 in the field for unsecured communications conductor.
53	Communications ground wire was exposed.	PG&E has existing Third Party Notification 124226722 to repair exposed ground.
60	Communications ground wire was exposed.	PG&E has existing Third Party Notification 124057691 to repair exposed ground. PG&E corrected the finding in the field.
66	Communications guy wire anchor was decayed.	PG&E has existing Third Party Notification 124074703 to repair guy anchor.
69	Communications conductor was broken.	PG&E corrected the finding in the field.
72	Communications guy wire anchor was buried.	
76	Communications lashing wire was broken.	
84	Communications ground wire was exposed. Communications had an abandoned service drop.	
95	Communications pedestal was fallen over.	
97	Communications had an abandoned service drop.	
101	Communications ground rod was exposed.	
103	Communications guy guard was missing.	PG&E corrected the finding in the field.