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

October 28, 2024 EA2024-1238

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 North Valley Division

Mr. Tanguay:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Brandon Vazquez and Stephen Lee of ESRB staff conducted an electric distribution audit of PG&E's North Valley Division from August 19, 2024 through August 23, 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 **November 26, 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 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 Brandon Vazquez at (628) 249-2867 or brandon.vazquez@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 North Valley Division

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC

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PG&E NORTH VALLEY DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
August 19-23, 2024

I. Records Review

During the audit, ESRB staff reviewed the following records:

- PG&E's inspection and maintenance procedures.
    - Electric Distribution Preventive Maintenance Manual: April 1, 2016 version and March 29, 2024 version.
- Completed work orders with notifications, canceled work orders with notifications, and open work orders with notifications from June 2019 to June 2024.
- Patrol and detailed inspection records from June 2019 to June 2024.
- Reliability metrics and sustained outages from June 2019 to June 2024.
- Overhead and underground facilities statistics.
- North Valley Division map.
- New Construction projects (both overhead and underground) from June 2023 to June 2024.
- Pole loading and safety factor calculations completed from June 2023 to June 2024.
- Third Party Safety Hazard notifications (TPN) sent and received from June 2019 to June 2024.
- Inspector list from June 2019 to June 2024 and inspector qualifications.
- Equipment test records from June 2019 to June 2024.
- Intrusive inspection records from June 2023 to June 2024.
- PG&E Pre-Audit Preliminary Analysis for Audit Readiness – Records Review
- PG&E Inspection Quality Management Audits from June 2019 to June 2024.

II. Records Violations

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

"Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.

Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate:

- *Type of facility or equipment;*
- *Location, including whether the Safety Hazard or potential violation is located in the High Fire-Threat District;*
- *Accessibility;*
- *Climate;*
- *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.*

(a) 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.*
  EXCEPTION – Potential violations specified in Appendix J or subsequently approved through Commission processes, including…. The condition's record in the auditable maintenance program must indicate the relevant exception and the date of the corrective action."

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 the late Electric Corrective (EC) notifications within the North Valley Division from June 1, 2019 to June 24, 2024. PG&E's Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines priority codes and associated time frames for EC notifications 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).

PG&E Overhead Inspection Job Aid, TD-2305M-JA02, Rev 12, Effective February 1, 2024, defines priority codes and associated time frames as follows:

	PG&E Priority	Tier 3	Tier 2/HFRA	Non-HFTD
Level 1: immediate risk of high potential impact to safety and reliability	A	Within 24 hours	Within 24 hours	Within 24 hours
Level 2: at least moderate potential impact	X	Up to 5 days	Up to 5 days	Up to 5 days
	B	Up to 6 months	Up to 6 months	Up to 6 months
	E	Up to 6 months	Up to 12 months	Up to 36 months
Level 3: low potential impact	F	60 months	60 months	60 months

ESRB staff reviewed the late EC notifications and determined that PG&E did not address a total of 65,663 EC notifications by their assigned due date (required end date) out of 124,138 total notifications (52.9% late notification percentage). Of these 65,663 EC notifications, 65,579 were classified as "late non-exempt", 84 were classified as "late-exempt", and 5,662 were classified as "late canceled".

Per GO 95, Rule 18B(1)(b), *"Correction times may be extended under reasonable circumstances, such as: third party refusal, customer issue, no access, permits required, system emergencies (e.g. fires, severe weather conditions)."* PG&E classifies EC notifications under these circumstances as "late-exempt" as they are exempted from completion by their assigned due date.

Table 1 below breaks down the 65,663 late EC notifications by the given priority, including the total number of late EC notifications, non-exempt/exempt late EC notifications, and late canceled EC notifications.

Table 1: Late EC Notifications

Priority Code	Total # Late EC Notifications	Total # Late Non-Exempt[1]	Total # Late Exempt[1]	Total # Late Canceled[2]
A	22,819	22,819	-	1,737
B	4,034	3,950	84	341
E	38,522	38,522	-	3,551
F	288	288	-	33
Total	**65,663**	**65,579**	**84**	**5,662**

Of the 65,579 non-exempt late EC notifications, PG&E has one open priority A notification from July 2021. Table 2 below identifies the most overdue non-exempt EC notifications for each priority.

Table 2: Most Overdue EC Notifications

Priority Code	EC Notification #	Number of Days Past Assigned Due Date
A	121706053	1,091
B	117780558	1,587
E	117748995	1,605
F	117682886	1,435

PG&E identified EC notification #121706053 on 07/09/21 to replace a broken pole mounted transformer in a Tier 2 HFTD with a required end date of 07/10/21. PG&E has yet to complete the work.

PG&E identified EC notification #117780558 on 8/19/2019 to replace a rotted/decayed pole in a Tier 3 HFTD with a required end date of 2/19/2020. PG&E replaced the pole on 6/24/2024.

PG&E identified EC notification #117748995 on 8/12/2019 to replace a broken/decayed pole in a Tier 3 HFTD with a required end date of 2/12/2020. EC notification #117748995 was still open as of July 5, 2024.

PG&E identified EC notification #117682886 on 7/31/2019 to test an overloaded pole in a Tier 2 HFTD with a required end date of 7/31/2020. EC notification #117682886 was still open as of July 5, 2024.

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:

[1] Total # Late Non-Exempt and Late Exempt only includes late complete and late open EC notifications.
[2] Total # Late Cancelled is a subset of the late EC notifications and includes items which were exempt, non-exempt, or found already completed.

"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 15,635 overhead patrols and 11,000 inspections past their assigned due dates. Table 3 below breaks down the late overhead patrols and inspections by year and total structures late.

Table 3: Late Overhead Patrols and Inspections

Year	Inspection Type	Total Structures
2020	Inspection	1, 715
2021	Inspection	9,276
2021	Patrol	8,106
2022	Inspection	1
2023	Inspection	8
2023	Patrol	7,529

3. **GO 128, Rule 17.2, Inspection** states in part:

"Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules."

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 in 2023 PG&E completed underground patrols for thirty-one (31) total structures past their assigned due dates:

- Map T3315– Patrol was due on 11/30/2023 per GO 165. PG&E completed the inspection on 12/5/2023.

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities in PG&E's North Valley Division:

Location #	SAP ID	Structure Type	GIS Coordinates
1	101468874	Primary Pole	40.684074, -122.242943
2	101468880	Primary Pole	40.684626, -122.242722
3	101468883	Primary Pole	40.685115, -122.242989
4	108277204	Padmount Transformer	40.639501, -122.241051
5	101459869	Primary Pole	40.639448, -122.240215
6	104150499	Primary Pole	40.639117, -122.240187
7	101496977	Primary Pole	40.457049, -122.318178
8	101496978	Primary Pole	40.457637, -122.317488
9	101521708	Primary Pole	39.895138, -122.379498
10	101521709	Primary Pole	39.895782, -122.379692
11	101521710	Primary Pole	39.896537, -122.379912
12	101521711	Primary Pole	39.897572, -122.380235
13	101521712	Primary Pole	39.898703, -122.38057
14	101529211	Primary Pole	39.847296, -122.620877
15	101529210	Primary Pole	39.846667, -122.621509
16	101529209	Primary Pole	39.845906, -122.621983
17	101529208	Primary Pole	39.845281, -122.622661
18	104189999	Primary Pole	39.747408, -122.20058
19	100427260	Primary Pole	39.747399, -122.201093
20	100361795	Secondary Pole	39.74732, -122.201063
21	100427261	Primary Pole	39.74742, -122.201453
22	104062802	Primary Pole	39.747391, -122.200207
23	100361990	Primary Pole	39.747447, -122.199777
24	108297733	Padmount Transformer	39.747405, -122.200363
25	40167181	Distribution Underbuild Pole	39.6455528, -121.7208284
26	100399552	Distribution Underbuild Pole	39.6449903, -121.7203781
27	100438219	Distribution Underbuild Pole	39.6443738, -121.7197612

28	107732845	Padmount Transformer	39°38'39.73"N, 121°43'10.98"W
29		AT&T Pole	39.385825, -121.391449
30	100409671	Primary Pole	39.386062, -121.389956
31	103984339	Primary Pole	39.386327, -121.389658
32	100414959	Primary Pole	39.386839, -121.396022
33	100380731	Primary Pole	39.386227, -121.395268
34	103326341	Primary Pole	39.431315, -121.533353
35	103326342	Primary Pole	39.431326, -121.533219
36	100420209	Primary Pole	39.431328, -121.533127
37	103654804	Primary Pole	39.431128, -121.533185
38	103645963	Primary Pole	39.430672, -121.533139
39	103646720	Primary Pole	39.430068, -121.533126
40	100392198	Secondary Pole	39.492544, -121.47685
41	100425789	Primary Pole	39.492547, -121.4767
42	100392204	Primary Pole	39.492099, -121.476604
43	100425790	Secondary Pole	39.49206, -121.4767
44	100392203	Secondary Pole	39.491702, -121.476394
45	100425791	Primary Pole	39.491736, -121.476278
46	100425792	Primary Pole	39.491591, -121.476085
47	100392205	Primary Pole	39.491451, -121.476255
48	100375390	Primary Pole	39.535919, -121.458743
49	108219306	Padmount Transformer	39.535552, -121.458524
50	103938761	Primary Pole	39.535531, -121.458724
51	100343291	Primary Pole	39.756731, -121.833894
52	100343287	Primary Pole	39.756961, -121.834207
53	100343288	Primary Pole	39.756963, -121.834516
54	103325870	Primary Pole	39.756903, -121.835232
55	107717336	Padmount Transformer	39.767852, -121.858413
56	107717341	Padmount Transformer	39.767342, -121.859365
57	108076199	UG Splice Box	39.766861, -121.859712
58	107942478	UG Transformer	39.778146, -121.872111
59	107736356	Padmount Transformer	39.76946, -121.875529

60	107700246	Padmount Switch	39.769889, -121.874773
61	107945477	UG Junction Box	39.769883, -121.874706
62	107945473	UG Junction Box	39.769864, -121.874685
63	107700699	Padmount Switch	39.769786, -121.874677
64	100441711	Primary Pole	39.752456, -121.872177
65	100348647	Primary Pole	39.752906, -121.872653
66	100441701	Primary Pole	39.753435, -121.873175
67	100353947	Primary Pole	39.821861, -121.595844
68	100353948	Primary Pole	39.821805, -121.596411
69	100353951	Primary Pole	39.821702, -121.596603
70	100353950	Primary Pole	39.82145, -121.596678
71	103935280	Primary Pole	39.822081, -121.597113
72	100333569	Primary Pole	39.520338, -122.102802
73	100333570	Primary Pole	39.519038, -122.102787
74	100430699	Primary Pole	39.517742, -122.102795
75	100333571	Primary Pole	39.516458, -122.102792
76	100430700	Primary Pole	39.515254, -122.102827
77	100333572	Primary Pole	39.51423, -122.102812
78	100422293	Primary Pole	39.584482, -122.196858
79	100332543	Primary Pole	39.585304, -122.196864
80	100332545	Primary Pole	39.583546, -122.196861
81	100422292	Primary Pole	39.582726, -122.196872

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. **GO 95, Rule 44.3, Replacement** states:

> *"Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1 and in Grade "C" construction to less than one-half of the safety factors specified in Rule 44.1. Poles in Grade "C" construction that only support communication lines shall also conform to the requirements of Rule 81.3–A.. In no case shall the application of this rule be held to permit the use of structures or any member of any structure with a safety factor less than one."*

Location	Violation Description
3	Pole has woodpecker damage. PG&E has an open EC 121350437 (Priority E) to replace the pole.
9	Bowed and leaning pole. PG&E has an open EC 128278455 (Priority B) to replace the pole.
11	Pole and crossarm decayed. PG&E has an open EC 117307333 to replace the pole and crossarm.
13	Pole is deteriorated/decayed with some circumference loss at its base and is leaning about 8%.
14	Pole is deteriorated and has various cracks/splits. PG&E has an open EC 128681768 to replace the pole.
30	Pole has woodpecker damage and decay. PG&E has an open EC 117683132 to replace the pole.
32	Pole is deteriorated and has woodpecker damage. PG&E has an open EC 126701997 to replace the pole.
40	Pole is deteriorated and hollow at ground level. PG&E has an open EC 120890572 to replace the pole.
44	Pole is deteriorated/decayed. PG&E has an open EC 122502872 to replace the pole.
67	Pole is broken/damaged. PG&E has an open EC 124003036 to replace the pole.

2. **GO 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."*

Location	Violation Description
10	Missing high voltage signs. PG&E created a new EC 129411124 to install signage.
21	High voltage signage was loose on one side and missing on the other side. PG&E installed new high voltage signs during the audit.
52	High voltage sign partially missing/damaged. PG&E created a new EC 129422195 to install signage.
72	Partially missing/damaged voltage sign.

3. **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."*

Location	Violation Description
11	Squatting primary insulator. PG&E has an open EC 117307333 to replace the pole.
30	Anchor corroded and buried. PG&E has an open EC 117683132 to replace the pole.
35	Bird protection requires replacement. PG&E has an open EC 124443995 to replace the bird protection.
46	Cracked roadside and center phase insulators. PG&E created a new EC 129419244 to replace the insulators.
52	Chipped roadside primary insulator. PG&E created a new EC 129422195 to replace the insulator.
53	Secondary crossarm has loose hardware. PG&E created a new EC 129422245 to tighten the hardware.
53	Secondary squatter insulator. PG&E created a new EC 129422245 to replace the insulator.
53	Connector incorrectly installed. PG&E created a new EC 129422245 to replace the connector.
64	Insulator broken/cracked. PG&E has an open EC 120527801 to replace the insulator.
68	Incorrect connector on primary jumper (firecracker insulink connector). PG&E has an open EC 118932899 to replace the connector.
75	High-vis strip damaged/loose. PG&E repaired onsite.
78	Transformer bushing cover open. PG&E created a new EC 129429260 to replace the cover.

80	Bump splice tied into insulator. PG&E created a new EC 129429369 to move the splice.

4. **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."

Location	Violation Description
20	Idle communication line. PG&E removed the communication line onsite.
32	Idle transformer. PG&E has an open EC 128166603 to remove the idle transformer.

5. **GO 165, Section III-B, Standards for Inspection, Table 1** states in part:

	Patrol		Detailed	
	Urban	Rural	Urban	Rural
Transformers				
Overhead	1	2[1]	5	5
Underground	1	2	3	3
Padmounted	1	2	5	5

Location	Violation Description
28	ESRB staff observed 2013, 2016, and 2022 inspection stickers in the Padmount Transformer (SAP ID 107732845). PG&E failed to inspect the padmount transformer within 5 years during the period of 2016 to 2022 (6 years between inspections).

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

"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."

Location	Violation Description
53	Loose down guy. PG&E created a new EC 129422245 to adjust the guy.

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."

Location	Violation Description
55	Padmount Transformer has a low oil level. PG&E has an open EC 128806234 to add oil.
59	Padmount Transformer has an oil leak. PG&E has an open EC 128922495 to repair the leak.

8. **GO 128, Rule 32.7, Covers** states:

"Manholes, handholes, and subsurface equipment enclosures while not being worked in, shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them and arrangements shall be such that a tool or appliance shall be required for their opening and cover removal."

Location	Violation Description
58	UG Transformer has a broken lid/frame. PG&E has an open EC 128701378 to repair the lid/frame.

9. **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."

Location	Violation Description
67	Vegetation contact above guy bob. PG&E has an open EC 124003036 to trim the vegetation.

V. Observations

1. ESRB staff observed the following third-party potential safety concerns during the field inspection:

   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."

Location	Violation Description
1	Buddy pole deteriorated and AT&T line touching primary down guy.
29	Low AT&T line along rural road. PG&E created TPN 129418734 to notify AT&T of the low line.
29	Pole rotted, bowing, and splitting apart so bad that the pole can be seen through. PG&E created TPN 129418734 to notify AT&T of the failing pole.
30	AT&T attached with a rope to the pole. PG&E created TPN 129418734 to notify AT&T of the improper attachment.
65	PG&E has an open TPN 129036667 for unattached and/or idle AT&T and Comcast riser cables.
66	Loose communication riser cable and missing cover on communication equipment box.

71	AT&T buddy pole.
71	Comcast buddy pole.