

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 9, 2024

EA2024-1247

Jennifer Kaminsky  
Manager – Electric Assets & Compliance  
San Diego Gas and Electric (SDG&E)  
8315 Century Park Court, Suite CP22B  
San Diego, CA 92123

**Subject:** Audit of SDG&E's Southern Orange County District

Ms. Kaminsky:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Kyle King of my staff conducted an electric distribution audit of SDG&E's Southern Orange County District from August 5-9, 2024. The audit included a review of SDG&E's inspection and maintenance records and a field inspection of SDG&E's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than October 9, 2024, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent 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 also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, you can contact Kyle King at (213) 222-3260 or [Kyle.King@cpuc.ca.gov](mailto:Kyle.King@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjetsli, Program Manager, ESRB, SED, CPUC  
Kyle King, Utilities Engineer, ESRB, SED, CPUC

## Audit Findings

### I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records
- Late Inspections
- Work Orders Created from Inspections
- Repair Work Orders
- Intrusive Testing Records
- Third Party Notifications
- Vegetation Management Records
- Pole Loading Calculation Records

### II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

**GO 95, Rule 18-B1, 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 ...*

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

*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.*

SDG&E's records indicated that from 2020 to 2024, SDG&E had 66 overhead repair notifications that were completed or pending completion past SDG&E's scheduled due date.

**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.*

SDG&E's records indicated that from 2020 to 2024, SDG&E had 157 underground repair notifications that were completed or pending completion past SDG&E's scheduled due date.

### III. Field Inspection

My staff inspected the following facilities during the field inspection portion of the audit:

No.	Structure ID	Structure Type	Location
1	P28106J	Pole	San Clemente
2	P126052	Pole	San Clemente
3	P28107	Pole	San Clemente
4	P28108	Pole	San Clemente
5	P28105	Pole	San Clemente
6	P28110	Pole	San Clemente
7	P28111	Pole	San Clemente
8	P28112	Pole	San Clemente
9	P28113	Pole	San Clemente
10	P28114	Pole	San Clemente
11	P28115	Pole	San Clemente
12	P28116	Pole	San Clemente
13	P25597	Pole	San Clemente
14	P26860	Pole	San Clemente
15	P28117	Pole	San Clemente
16	P28118	Pole	San Clemente
17	P28119	Pole	San Clemente
18	P28120J	Pole	San Clemente
19	P28121	Pole	San Clemente
20	P28122	Pole	San Clemente
21	P28123	Pole	San Clemente
22	P28124	Pole	San Clemente
23	P28125	Pole	San Clemente
24	P128849	Pole	San Clemente
25	P128848	Pole	San Clemente
26	P322438	Pole	San Clemente
27	P128850	Pole	San Clemente
28	P128851	Pole	San Clemente
29	P128852	Pole	San Clemente
30	P128853	Pole	San Clemente
31	P128854	Pole	San Clemente
32	P128855	Pole	San Clemente
33	P128856	Pole	San Clemente
34	P128857	Pole	San Clemente
35	P128859	Pole	San Clemente
36	P127213	Pole	San Clemente
37	P222737	Pole	San Clemente
38	P126999	Pole	San Clemente

39	P23230	Pole	Dana Point
40	P322964	Pole	Dana Point
41	P125379	Pole	Dana Point
42	P23231	Pole	Dana Point
43	P226063	Pole	Dana Point
44	P23232	Pole	Dana Point
45	P124681	Pole	Dana Point
46	P26798	Pole	San Juan Capistrano
47	P26799	Pole	San Juan Capistrano
48	P26932	Pole	San Juan Capistrano
49	P126570	Pole	San Juan Capistrano
50	P126571	Pole	San Juan Capistrano
51	P126572	Pole	San Juan Capistrano
52	P126573	Pole	San Juan Capistrano
53	P126574	Pole	San Juan Capistrano
54	P126575	Pole	San Juan Capistrano
55	P126576	Pole	San Juan Capistrano
56	P126577	Pole	San Juan Capistrano
57	P126578	Pole	San Juan Capistrano
58	P126580	Pole	San Juan Capistrano
59	P126579	Pole	San Juan Capistrano
60	P327181A	Pole	Rancho Mission Viejo
61	P225172	Pole	Rancho Mission Viejo
62	P327180	Pole	Rancho Mission Viejo
63	P327179	Pole	Rancho Mission Viejo
64	P327178	Pole	Rancho Mission Viejo
65	P327177	Pole	Rancho Mission Viejo
66	P226634	Pole	Rancho Mission Viejo
67	P226633	Pole	Rancho Mission Viejo
68	P225632	Pole	Rancho Mission Viejo
69	P226631	Pole	Rancho Mission Viejo
70	P322506	Pole	Rancho Mission Viejo
71	P226630	Pole	Rancho Mission Viejo
72	P226629	Pole	Rancho Mission Viejo
73	P226628	Pole	Rancho Mission Viejo
74	P226627	Pole	Rancho Mission Viejo
75	P226626	Pole	Rancho Mission Viejo
76	P226625	Pole	Rancho Mission Viejo
77	P226624	Pole	Rancho Mission Viejo
78	P226623	Pole	Rancho Mission Viejo

79	P226622	Pole	Rancho Mission Viejo
80	P226621	Pole	Rancho Mission Viejo
81	P226620	Pole	Rancho Mission Viejo
82	P108727	Pole	Rancho Mission Viejo
83	Z101560	Pole	Rancho Mission Viejo
84	P128395	Pole	Rancho Mission Viejo
85	P222485	Pole	Rancho Mission Viejo
86	P128396	Pole	Rancho Mission Viejo
87	P293954S	Pole	Rancho Mission Viejo
88	P251055	Pole	Rancho Mission Viejo
89	P222486	Pole	Rancho Mission Viejo
90	H4973755898	Underground Handhole	Laguna Niguel
91	D110612	Padmounted Transformer	Laguna Niguel
92	H104635	Underground Handhole	Laguna Niguel
93	H4975355949	Underground Handhole	Laguna Niguel
94	H4978055951	Underground Handhole	Laguna Niguel
95	H104610	Underground Handhole	Laguna Niguel
96	D108541	Padmounted Transformer	Laguna Niguel
97	D108542	Padmounted Transformer	Laguna Niguel
98	D108544	Padmounted Transformer	Laguna Niguel
99	D108545	Padmounted Transformer	Laguna Niguel
100	H104612	Underground Handhole	Laguna Niguel
101	D108546	Padmounted Transformer	Laguna Niguel
102	D108547	Padmounted Transformer	Laguna Niguel
103	D108548	Padmounted Transformer	Laguna Niguel
104	H100579	Underground Handhole	Laguna Niguel
105	H106621	Underground Handhole	Laguna Niguel
106	D112351	Padmounted Transformer	Laguna Niguel
107	D112350	Padmounted Transformer	Laguna Niguel
108	D112349	Padmounted Transformer	Laguna Niguel
109	D108425	Padmounted Transformer	Laguna Niguel
110	D108426	Padmounted Transformer	Laguna Niguel
111	D108427	Padmounted	Laguna Niguel

		Transformer	
112	H104538	Underground Handhole	Laguna Niguel
113	D108424	Padmounted Transformer	Laguna Niguel
114	H4979555849	Underground Handhole	Laguna Niguel
115	D108421	Padmounted Transformer	Laguna Niguel
116	D110601	Padmounted Transformer	Laguna Niguel
117	D110597	Padmounted Transformer	Laguna Niguel
118	D110596	Padmounted Transformer	Laguna Niguel
119	P220933	Pole	Laguna Niguel
120	P220934	Pole	Laguna Niguel
121	P220935	Pole	Laguna Niguel
122	P38958	Pole	Laguna Niguel
123	P220936	Pole	Laguna Niguel
124	P220937	Pole	Laguna Niguel
125	P220938	Pole	Laguna Niguel
126	P220698	Pole	Laguna Niguel
127	P220699	Pole	Laguna Niguel
128	P220700	Pole	Laguna Niguel
129	P220701	Pole	Laguna Niguel
130	P220702	Pole	Laguna Niguel

#### **IV. Field Inspection – Violations List**

My staff observed the following violations during the field inspection portion of the audit:

**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.*

The visibility strip attached to pole P128855 was damaged.

**GO 95, Rule 51.6, Marking and Guarding, High Voltage Marking of Poles**, 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. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.*

The High Voltage sign on each of the following poles was damaged:

- P226634
- P327181A
- P28115

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

*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.*

The following pad-mounted facilities required maintenance:

- Pad-mounted fuse cabinet D108425 – a mailbox was obstructing the lid from opening.
- Pad-mounted transformer D108546 – there was damage to the tie-down metal bracket.