

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 14, 2024

TA2024-1256

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

SUBJECT: Transmission Audit of SDG&E's Metro District

Ms. Kaminsky:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Calvin Choi of my staff conducted an electric transmission audit of SDG&E's Metro Transmission District from September 16 – 20, 2024. The audit included a review of SDG&E's records and field inspections 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 December 16, 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 Calvin Choi at (213) 219-3034 or Calvin.Choi@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

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Calvin Choi, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Patrol & Detailed Inspection Records
- Repair Notifications
- Vegetation Management Records
- Third Party Notifications
- Infrared Testing Records
- Intrusive Test Records
- Structural Load Calculations
- Foundation Resistance Test 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 General Order 95, a supply or communications company is in compliance with this rule if it designs, constructs and maintains a facility in accordance with accepted good practice for the intended use and known local conditions.

SDG&E's records indicated that from 2020 to 2024, SDG&E had 8 overhead repair notifications that were completed or pending completion past SDG&E's scheduled due date for corrective action.

III. Field Inspection

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

No.	Structure ID.	Type of Structure
1	U109130	Vault
2	Z253128	Steel Pole
3	Z119331	Steel pole
4	Z187482	Wood pole
5	U109167	Vault
6	U109131	Vault
7	Z34132	Pole
8	Z187476	Pole
9	U108792	Vault
10	Z100303	Pole
11	Z100309	Pole
12	U108793	Vault
13	U108794	Vault
14	Z187423	Pole
15	U108795	Vault
16	U108797	Vault
17	U108798	Vault
18	U108790	Vault
19	U108753	Vault
20	U116454	Vault
21	U108493	Vault
22	U108494	Vault
23	U108495	Vault
24	U108545	Vault
25	Z190331	Steel pole
26	Z190334	Steel pole
27	Z284003	Tower
28	Z284004	Tower
29	Z283986	Tower
30	Z100672	Steel pole
31	Z283985	Tower
32	Z100667	Wood pole
33	Z100666	Wood pole
34	Z283984	Tower
35	Z194624	Wood pole
36	Z188665	Tower
37	Z118993	Steel pole
38	Z118994	Steel pole
39	Z188666	Tower
40	Z105035	Steel pole

41	S119000	Steel pole
42	Z105036	Steel pole
43	Z284065	Wood pole
44	Z284064	Wood pole
45	Z284063	Wood pole
46	Z284062	Wood pole
47	Z284061	Wood pole
48	Z284060	Wood pole
49	Z284059	Wood pole
50	Z284058	Wood pole
51	Z284057	Wood pole
52	Z284056	Wood pole
53	Z284055	Wood pole
54	Z284054	Wood pole
55	Z1829973695	Wood pole
56	Z730772	Wood pole
57	Z730730	Wood pole
58	Z730713	Wood pole
59	Z132824	Wood pole
60	Z731414	Wood pole
61	Z731402	Wood pole
62	Z132787	Wood pole
63	Z730771	Wood pole
64	Z731419	Wood pole
65	Z1876673894	Steel pole
66	Z1875073900	Wood pole
67	Z1873673904	Wood pole
68	Z1877273908	Wood pole
69	Z675193	Wood pole
70	Z675194	Wood pole
71	Z370493	Wood pole
72	Z370494	Wood pole
73	Z370495	Wood pole
74	Z2149873119	Steel pole
75	Z731089	Wood pole
76	Z2146073119	Steel pole
77	Z731090	Wood pole
78	Z731077	Steel pole
79	Z131721	Wood pole
80	Z2001473035	Wood pole
81	Z231501	Wood pole
82	Z1997473029	Wood pole
83	Z193558	Wood pole
84	Z731357	Wood pole
85	Z731367	Steel pole

86	Z1941472556	Wood pole
87	Z104972	Steel pole
88	Z731372	Steel pole

IV. Field Inspection – Violations List

We observed the following violations during the field inspections portion of the audit:

GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wire, 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.

The down guy wire supporting Pole Z2001473035 was loose.