

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 27, 2025

TA2025-1269

Shivani Sidhar
Director – Regulatory Affairs
San Diego Gas & Electric (SDG&E)
8315 Century Park Court,
San Diego, CA 92123

SUBJECT: Transmission Audit of SDG&E's Orange County District

Ms. Sidhar:

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 transmission audit of SDG&E's Orange County District from January 6-10, 2025. 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 February 27, 2025, 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.

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
Kyle King, Utilities Engineer, ESRB, SED, CPUC

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Circuit facility inspection records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Tower Structure Analysis Records
- Safety hazard notifications.
- Intrusive test records
- SDG&E's documented inspection program.

II. Records Review – Violations List

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

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

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

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 2022 to 2024, SDG&E did not complete 144 overhead work orders by SDG&E's own scheduled due date for corrective action.

III. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	Z120029	Pole	San Clemente
2	Z120083	Pole	San Clemente
3	Z120081	Pole	San Clemente
4	Z294102	Pole	San Clemente
5	Z294098	Pole	San Clemente
6	Z32231	Lattice Tower	San Clemente
7	Z294095	Pole	San Clemente
8	Z294097	Pole	San Clemente
9	Z294096	Pole	San Clemente
10	Z294101	Pole	San Clemente
11	Z294106	Pole	San Clemente
12	Z119983	Pole	San Clemente
13	Z248756	Pole	San Clemente
14	Z294094	Pole	San Clemente
15	Z120079	Pole	San Clemente
16	Z296180	Pole	San Clemente
17	Z322230	Lattice Tower	San Clemente
18	Z322229	Lattice Tower	San Clemente
19	Z294099	Pole	San Clemente
20	Z120027	Pole	San Clemente
21	Z294103	Pole	San Clemente
22	Z101460	Pole	San Clemente
23	Z101421	Pole	San Clemente
24	Z164835	Pole	San Clemente
25	Z101499	Pole	San Clemente
26	Z101500	Pole	San Clemente
27	Z101502	Pole	San Clemente
28	Z101503	Pole	San Clemente
29	Z101504	Pole	San Clemente
30	Z101505	Pole	San Clemente
31	Z101509	Pole	San Clemente
32	Z101510	Pole	San Clemente
33	Z101511	Pole	San Clemente
34	Z101512	Pole	San Clemente
35	Z223151	Lattice Tower	San Clemente
36	Z223152	Lattice Tower	San Clemente
37	Z120072	Pole	San Clemente
38	Z120073	Pole	San Clemente
39	Z169504	Pole	San Clemente
40	Z120074	Pole	San Clemente
41	Z169505	Pole	San Clemente
42	Z120070	Pole	San Clemente
43	Z223154	Lattice Tower	San Clemente

44	Z223155	Pole	San Clemente
45	Z120069	Pole	San Clemente
46	Z223165	Lattice Tower	San Clemente
47	Z120058	Pole	San Clemente
48	Z223424	Pole	Laguna Niguel
49	Z128036	Pole	Laguna Niguel
50	Z128035	Pole	Laguna Niguel
51	Z223422	Pole	Laguna Niguel
52	Z227164	Pole	Laguna Niguel
53	Z223420	Pole	Laguna Niguel
54	Z128033	Pole	Laguna Niguel
55	Z223418	Pole	Laguna Niguel
56	Z128032	Pole	Laguna Niguel
57	Z223416	Pole	Laguna Niguel
58	Z220823	Pole	Laguna Niguel
59	Z223414	Pole	Laguna Niguel
60	Z128030	Pole	Laguna Niguel
61	Z128029	Pole	Laguna Niguel
62	Z223412	Pole	Laguna Niguel
63	Z223410	Pole	Laguna Niguel
64	Z227163	Pole	Laguna Niguel
65	Z224368	Pole	Laguna Niguel
66	Z223408	Pole	Laguna Niguel
67	Z224370	Pole	Laguna Niguel
68	Z224371	Pole	Laguna Niguel
69	Z121231	Pole	Laguna Niguel
70	Z224372	Pole	Laguna Niguel
71	Z224374	Pole	Laguna Niguel
72	Z223402	Pole	Laguna Niguel
73	Z121229	Pole	Laguna Niguel
74	Z223400	Pole	Laguna Niguel
75	Z224976	Pole	Laguna Niguel
76	Z223398	Pole	Laguna Niguel
77	Z227167	Pole	Laguna Niguel
78	Z223396	Pole	Laguna Niguel
79	Z222161	Pole	Laguna Niguel
80	Z223394	Pole	Laguna Niguel
81	Z223392	Pole	Laguna Niguel
82	Z227160	Pole	Laguna Niguel
83	Z223390	Pole	Laguna Niguel
84	Z227159	Pole	Laguna Niguel
85	Z223384	Pole	Laguna Niguel
86	Z105031	Pole	Laguna Niguel
87	Z223382	Pole	San Juan Capistrano
88	Z121220	Pole	San Juan Capistrano
89	Z223380	Pole	San Juan Capistrano
90	Z221250	Pole	San Juan Capistrano
91	Z223378	Pole	San Juan Capistrano
92	Z227155	Pole	San Juan Capistrano

93	Z223376	Pole	San Juan Capistrano
94	Z38775	Pole	San Juan Capistrano
95	Z227154	Pole	San Juan Capistrano
96	Z223374	Pole	San Juan Capistrano
97	Z29678	Pole	San Juan Capistrano
98	Z223372	Pole	San Juan Capistrano
99	Z221247	Pole	San Juan Capistrano
100	Z223370	Pole	San Juan Capistrano
101	Z221246	Pole	San Juan Capistrano
102	Z223368	Pole	San Juan Capistrano
103	U100022	Underground Vault	Mission Viejo
104	U109843	Underground Vault	San Juan Capistrano
105	U109844	Underground Vault	San Juan Capistrano
106	Z227134	Pole	San Juan Capistrano
107	Z225615	Pole	San Juan Capistrano
108	Z228472	Pole	San Juan Capistrano
109	Z228471	Pole	San Juan Capistrano
110	Z101610	Pole	Rancho Mission Viejo
111	Z247045	Pole	Rancho Mission Viejo
112	Z247048	Pole	Rancho Mission Viejo
113	Z101611	Pole	Rancho Mission Viejo
114	Z101612	Pole	Rancho Mission Viejo

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.

SDG&E had vegetation that needed to be cleared near the ground level of SDG&E towers Z223152 and Z223154.