

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 22, 2014

EA2014-023

Adeel Babar
Supervisor, Regulatory Compliance
Pacific Gas and Electric Company
3401 Crow Canyon Road, #221E
San Ramon, CA 94583

SUBJECT: Audit of PG&E's North Valley Division

Dear Mr. Babar:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Raymond Cho of my staff conducted an electric audit of PG&E's North Valley Division from September 8-12, 2014. The audit included a review of PG&E's records and field inspections of the North Valley Division's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than January 23, 2015 by electronic or hard copy, of all corrective measures taken by PG&E to remedy and prevent such violations.

If you have any questions concerning this audit please contact Raymond Cho at (415) 703-2236 or raymond.cho@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Fadi Daye".

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

Enclosure: Audit Findings

CC: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC
 Charlotte TerKeurst, Program Manager, Safety and Enforcement Division, CPUC
 Alok Kumar, Senior Utilities Engineer (Supervisor), ESRB, CPUC
 Raymond Cho, Utilities Engineer, ESRB, CPUC

AUDIT FINDINGS

Company: PG&E North Valley Division

Electric Audit

Date: September 8-12, 2014

A.	Location:	PG&E North Valley Division
	Date Visited by CPUC:	9/8/2014 – 9/12/2014
	Explanation of Violation(s):	
	<u>Record Keeping</u>	
	<p>GO 165, Section III-C, – Record Keeping, states:</p> <p style="text-align: center;"><i>For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.</i></p> <p>PG&E does not document all items requiring corrective action during an inspection. Specifically, PG&E staff does not document minor work. PG&E staff only marks a "tally mark" indicating minor work, and does not specify the equipment identified for corrective actions in the tally marks.</p>	

B.	Location:	PG&E North Valley Division
	Date Visited by CPUC:	9/8/2014 – 9/12/2014
	Explanation of Violation(s):	
	<p><u>Late Work Orders</u></p> <p>GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p><i>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.</i></p> <p>GO 165, Section III-C, – Record Keeping, states in part:</p> <p><i>For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.</i></p> <p>From January 2009 to September 2, 2014, there were 3,393 work orders completed past their scheduled date of corrective action. Furthermore, 14 work orders are currently pending past their required completion date.</p>	

C.	Location:	PG&E North Valley Division				
	Date Visited by CPUC:	9/8/2014 – 9/12/2014				
	Explanation of Violation(s):					
	<p><u>Late or Incomplete Inspections</u></p> <p>GO 165, Section III-B, Standards for Inspection, states in part:</p> <p><i>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.</i></p> <p>PG&E reported that 34 detailed inspections and one patrol inspection were not completed in 2009. Additionally, CPUC staff found the following detailed inspections that were not completed (see table below).</p> <table border="1" data-bbox="524 1014 1105 1171" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th data-bbox="524 1014 1105 1052" style="text-align: center;">Record</th> </tr> </thead> <tbody> <tr> <td data-bbox="524 1052 1105 1092" style="text-align: center;">2011 OH Inspection Map Y27</td> </tr> <tr> <td data-bbox="524 1092 1105 1131" style="text-align: center;">2010 UG Inspection Map H22</td> </tr> <tr> <td data-bbox="524 1131 1105 1171" style="text-align: center;">2009 UG Inspection Map X26</td> </tr> </tbody> </table>		Record	2011 OH Inspection Map Y27	2010 UG Inspection Map H22	2009 UG Inspection Map X26
Record						
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The following GO 95 and GO 128 violations were identified during the field inspection and were not documented and/or addressed by PG&E during its last detailed inspection as required by General Order 165:

D.	Location:	19615 Elk St., Montgomery Creek
Equipment No.:		N/A
Previous Visit by PG&E:		6/20/14
Date Visited by CPUC:		9/9/14
Explanation of Violation(s):		
<p><u>Tree and Anchor Guy Contact</u></p> <p>GO 95, Rule 56.7-B, Location of Sectionalizing Insulators - Anchor Guys, states in part:</p> <p><i>In order to prevent trees, buildings, messengers, metal-sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule.</i></p> <p>The section of anchor guy above the insulator contacted a tree.</p>		

E.	Location:	19030 Montgomery Valley Dr., Montgomery Creek
	Equipment No.:	N/A
	Previous Visit by PG&E:	7/22/14
	Date Visited by CPUC:	9/9/14
	Explanation of Violation(s):	
	<p data-bbox="237 659 797 695"><u>Anchor Guy Contact Above Insulator</u></p> <p data-bbox="237 730 1393 804">GO 95, Rule 56.7-B, Location of Sectionalizing Insulators - Anchor Guys, states in part:</p> <p data-bbox="329 842 1305 989"><i>In order to prevent trees, buildings, messengers, metal-sheathed cables or other similar objects from grounding portions of guys above guy insulators, it is suggested that anchor guys be sectionalized, where practicable, near the highest level permitted by this Rule.</i></p> <p data-bbox="237 1026 1122 1062">The section of anchor guy above the insulator contacted a tree.</p>	

F.	Location:	First Intersection on North side of Highway 299 East, Map I4210
Equipment No.:		N/A
Previous Visit by PG&E:		6/16/14
Date Visited by CPUC:		9/9/14
Explanation of Violation(s):		
<p><u>Low Anchor Guy Insulator</u></p> <p>GO 95, Rule 56.7-B, Anchor Guys, states in part:</p> <p><i>An insulator shall be installed in each anchor guy which is required to be sectionalized by Rule 56.6–A or 56.6–B , so that such insulator is located:</i></p> <p><i>(1) 8 Feet or more above the ground;...</i></p> <p>The section of anchor guy insulator was two (2) feet above ground.</p>		

G.	Location:	6570 Highway 273, Anderson
	Equipment No.:	N/A
	Previous Visit by PG&E:	6/24/14
	Date Visited by CPUC:	9/12/14
Explanation of Violation(s):		
<p><u>Inadequate Safety Factor</u></p> <p>GO 95, Rule 44.1, Installation and Reconstruction, states that the safety factor for a new pole shall be no less than four (4).</p> <p>The bending moment safety factor for the 50 foot, Class 1 pole was 3.62 at the time of installation.</p>		

H.	Location:	6156 Popular Ln, Orland
Equipment No.:		T3646
Previous Visit by PG&E		5/30/14
Date Visited by CPUC:		9/11/14
Explanation of Violation(s):		
<p><u>Surface-mounted Transformer Not Secured in Place</u></p> <p>GO 128, Rule 34.3-A, Self-contained Surface-mounted Equipment, states that the equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</p> <p>The pad-mounted transformer was not secured in place (bolted down).</p>		

I.	Location:	457 Humboldt Ave., Willows
	Equipment No.:	T557
	Previous Visit by PG&E:	4/16/14
	Date Visited by CPUC:	9/11/14
	Explanation of Violation(s):	
	<p data-bbox="245 659 1036 695"><u>Surface-mounted Transformer Not Secured in Place</u></p> <p data-bbox="245 730 1300 877">GO 128, Rule 34.3-A, Self-contained Surface-mounted Equipment, states that the equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</p> <p data-bbox="245 915 1240 951">The pad-mounted transformer was not secured in place (bolted down).</p>	

J.	Location:	457 Humboldt Ave., Willows
	Equipment No.:	Splice Vault
	Previous Visit by PG&E:	4/16/14
	Date Visited by CPUC:	9/11/14
	Explanation of Violation(s):	
	<p><u>Trip Hazard</u></p> <p>GO 128, Rule 12.2, Maintenance, states that systems shall be maintained in such condition as to secure safety to workmen and the public in general.</p> <p>PG&E's Electric Distribution Preventative Maintenance Manual states:</p> <p><i>The compliance inspector's primary responsibility when inspecting an overhead or underground electric facility is to examine and record any compelling abnormal conditions that, in the judgment of the inspector will adversely impact safety or service reliability within 12 months.</i></p> <p>The splice box cover was about 1-1/2 inches above grade.</p>	