

## Mission Investigation

Topic:	Backdating
Task 1.1:	Review all reassessments completed by the Compliance Supervisor and Construction Supervisors during the period 2003-2007. This review includes a comparison of available handwritten reassessments with the corresponding SAP records.
Background	<p>This task was prompted by notification 102370210, which came to the attention of the CPUC during their February 2008 audit. The CPUC alleged that this tag was backdated based on the date the tag was printed compared to the tag's due date and reassessment date. A review of similar tags could reveal whether or not notification 102370210 was an anomaly.</p> <p>The CPUC also noted that the date the alleged backdated reassessment date (6/30/2007) was entered was 31 days after the notification was due for completion. The tag was due on 6/30/2007 and the reassessment was entered into SAP on July 31. How can SAP database allow an entry that is 31 days late? How can this be prevented? Consider database checks and balances (controls).</p> <p>The supervisor also personally entered the information from this reassessment into SAP, which makes the transaction appear more suspicious. Why are supervisors allowed to enter comments into the SAP database? Is this not the responsibility of the clerks? Does the new "RMC process" allow a supervisor to enter comments into the database?</p> <p>The CPUC stated that they believe backdating may occur to keep items from going late.</p>
Methodology	<p>The original plan for QA to review all reassessments completed by the Compliance Supervisor and Construction Supervisors during the period 2003-2007 was not practical after it was determined that a total of 738 reassessments were conducted by these management personnel during the record period. Instead of reviewing all 738 reassessments, a random selection of was reviewed. The 738 reassessments were grouped into the following populations, from which the audit sample was selected:</p> <ul style="list-style-type: none"> <li>• Population 1 – Marking only tags. 131 marking only reassessments were conducted by management personnel during the record period. Marking only reassessments were excluded entirely from the audit.</li> <li>• Population 2 - Main contributors. The following individuals performed the majority of (non-marking) supervisor reassessments. A sample of 44 reassessments was selected from a population of 566. The sample was weighted based on the individual's contribution to the Population 2 sample. <ul style="list-style-type: none"> <li>○ T. Albrigo – Compliance Supervisor – 47 reassessments</li> <li>○ R. Colvin – Electric Distribution Supervisor – 223 reassessments</li> <li>○ G. Galleguillos – Electric Distribution Supervisor – 100 reassessments</li> <li>○ L. Medrano – Electric Distribution Supervisor – 196 reassessments</li> </ul> </li> <li>• Population 3 – Minor contributors. These individuals performed the remaining 41 reassessments. A sample of 24 reassessments was selected from a population of 41. The sample was weighted based on the individual's contribution to the Population 3 sample. <ul style="list-style-type: none"> <li>○ Atkinson - Electric Distribution Supervisor – 6 reassessments</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>○ Bull - Gas Distribution Supervisor – 3 reassessments</li> <li>○ McCoy – Troubleman/Electric Distribution Supervisor – 1 reassessment</li> <li>○ Nguyen – Compliance Analyst – 4 reassessments</li> <li>○ Paxton – Compliance Supervisor – 3 reassessments</li> <li>○ Posey - Construction Supervisor – 1 reassessment</li> <li>○ Robles - Electric Distribution Supervisor – 15 reassessments</li> <li>○ Windschitl - Electric Distribution Supervisor – 8 reassessments</li> </ul> <ul style="list-style-type: none"> <li>● Population 4 - Reassessed by supervisor. Input into SAP by same supervisor. A 100% sample of 26 reassessments was selected from a population of 26.</li> <li>● Population 5 - Reassessed by Supervisor. Input into SAP by other management employee. A sample of 41 reassessments was selected from this population of 275.</li> </ul>
Findings	<p>Criteria: reassessment recorded on tag printed after reassessment date.</p> <ul style="list-style-type: none"> <li>○ 4.4% (6 of 137) of tags reviewed met criteria. Tag Nos. 101261320, 101145720, 101129163, 101620760, 102361050, 101917302</li> <li>○ All six occurrences of potential backdating showed very short durations. An example would tag 101261320, which had an 8/31/04 reassessment recorded and signed on a tag printed on 9/3/04. This shows a potential backdated duration of 3 days.</li> <li>○ Several tags in the same time period were late, which demonstrates that tags were not systematically being backdated to prevent late tags. Specifically, data from Task 2.3 (C) shows that 4% of all tags that were reassessed during the record period were reassessed past the end of the month.</li> </ul> <p>Finding by population, individual, and duration.</p> <ul style="list-style-type: none"> <li>● Population 1 <ul style="list-style-type: none"> <li>○ Excluded from the audit</li> </ul> </li> <li>● Population 2 <ul style="list-style-type: none"> <li>○ 101261320 – Colvin, 3 days</li> <li>○ 101145720 – Colvin, 2 days</li> <li>○ 101129163 – Colvin, 2 days</li> <li>○ 101620760 – Medrano, 4 days</li> <li>○ 102361050 – Medrano, 2 days</li> </ul> </li> <li>● Population 3 <ul style="list-style-type: none"> <li>○ 101917302 – Robles, 9 days</li> </ul> </li> <li>● Population 4 <ul style="list-style-type: none"> <li>○ No findings. This review of supervisors that input their own reassessments into the SAP database found no occurrences of suspected backdating. This population was of particular interest to the CPUC.</li> </ul> </li> <li>● Population 5 <ul style="list-style-type: none"> <li>○ 101620760 – Medrano (note, also found in Population 2), 4 days</li> <li>○ 102361050 – Medrano (note, also found in Population 2), 2 days</li> </ul> </li> </ul>

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Topic:	Reassessment Quality
Task 2.1 :	Develop a listing of all individuals who performed reassessments, and confirm that those individuals were qualified per EDPM Manual requirements.
Background	<p>The CPUC is concerned that individuals other than Compliance Inspectors are reassessing tags.</p> <p>Specific to the Compliance Supervisor, there is a concern that this individual is reassessing tags (exception is “marking only” tags) from the office. PG&amp;E responded to an earlier CPUC audit that this practice is not allowed and has been addressed. Is this occurring again?</p>
Methodology	<p>Step 1 - Task 2.1 first required running multiple searches to find the different names used to identify employees that performed reassessments. This was a time-consuming effort since SAP allows “free form” identification of employees that performed reassessments.</p> <p>Step 2 – Assign titles to each employee that performed reassessments.</p> <p>Step 3 - Associate each reassessment with each individual that performed reassessments during the record period.</p>
Findings	<p>Compliance inspectors performed 2021 of the 5003 reassessments during the record period.</p> <p>The Compliance Supervisor performed a total of 103 reassessments during the record period. Marking only tags comprised 56 of these reassessments. The Compliance Supervisor reassessed 30 marking only tags on 7/1/06. The next highest number of reassessment performed by this individual on a single day was 8 tags. There is no evidence that the Compliance Supervisor is reassessing other than marking only tags from the office.</p> <p>Names of employees performing reassessments and cancellations are not uniquely identified in the SAP database. In one case, SAP contained 30 variations of one individual’s name.</p> <p>Per SAP records, we cannot readily determine which individuals performed reassessments.</p> <p>Could not identify approximately 25% of those who performed reassessments. (e.g. – Bob, and some specific names that Mission Division Compliance Supervisor and Superintendent could not identify).</p> <p>No records exist to specify which individuals performing reassessments had EPCM training.</p> <p>Titles that employees held while performing reassessments are not readily available and are not contained in SAP.</p> <p>There is no requirement to complete EDPM manual training or EC notification training</p>

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prior to performing reassessments.

- 2008 EPCM Manual (Page 123 of 131) – EPCM Notification Training: The course reviews the requirement for creating and completing work as identified on EPCM notifications, and is suggested for employees identified to reassess EPCM notifications.

Gas employees reassessed 125 of the 5003 reassessed tags during the record period. QA reviewed tags with Object Codes classified specifically to electric conditions (8 of the 125). The following four of these eight reassessments by gas employees involved electric conditions found during patrols or inspections.

- 101435545 – Dirt over ½ way up transformer
- 100959495 – Transformer out of level
- 101482213 – Electric service on 2 X 6
- 100749558 – PMT leaning, causing tension and ripping stress cones

Work verification of reassessments will be hampered by the inability to readily track who performs condition assessments.

- 2008 EPCM Manual (Page 32 of 131) – Implementation Responsibilities: Supervisors are responsible for ensuring that employees who perform the facility condition assessments and subsequent maintenance are qualified to perform the assigned tasks. They are also responsible for periodically checking employees' work to verify accuracy, completeness, and accurate and proper recordkeeping.

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Topic:	Reassessment Timing
Task 2.2:	Evaluate the daily rate of reassessments by individual and by type of reassessment (desktop or field).
Background	When multiple tags are reassessed on the same day by the same individual, what is the geographical spread of those tags? Is it reasonable that each tag received a field visit based on proximity?
Methodology	Task 2.1 methodology had to be completed first. It was then possible to group reassessments by individual and date the reassessment was performed. Replicate the top reassessment dates by performing a field visit to each location.
Findings	<p>Up to 35 field (non-marking) reassessments were performed by one individual in a day. Top four high daily reassessment rates were replicated by QA. (See Table 1 for a list of top reassessment days)</p> <p>Ted Albrigo – Compliance Supervisor, reassessed 30 tags on 7/1/06. Each tag was a marking only tag. A desktop reassessment for each one of these tags was appropriate.</p> <p>Only two of the ten personnel represented in Table 1 are compliance inspectors.</p> <p>Unrelated to reassessments:</p> <ul style="list-style-type: none"> <li>○ 100767934. 15 hours charged and no work done. Discovered when replicating field reassessments. Investigate for work not completed.</li> </ul>

Table 1: Top reassessment rates

Name	Title	Date	Marking Tags	Total Tags
Aguilar	Electric Crew Foreman	1/13/05 (Note 1)	0	35
Colvin	Electric Distribution Supervisor	5/29/03 (Note 1)	3	33
Albrigo	Compliance Supervisor	7/1/06	30	30
Aguilar	Electric Crew Foreman	4/6/04 (Note 1)	0	29
Colvin	Electric Distribution Supervisor	6/30/03	0	27
Diebner	Compliance Inspector	9/20/04 (Note 1)	0	27
Maher	Lineman	4/29/04	0	25
Aguilar	Electric Crew Foreman	6/29/06	0	23
Araquistain	Troubleman, Lineman	12/12/04	0	22
Garcia	Lineman	10/25/05	0	22
Aguilar	Electric Crew Foreman	11/22/05	0	21
Aguilar	Electric Crew Foreman	11/18/05	0	21
Aguilar	Electric Crew Foreman	11/17/05	0	21

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Aguilar	Electric Crew Foreman	11/16/05	0	20
Miles	Compliance Inspector, now Troubleman	1/31/07	0	20
Harris	Lineman	10/16/03	0	19
Maher	Lineman	4/27/04	0	19
Martinez	Electric Crew Foreman	8/22/06	0	19

Note 1: The field reassessments performed on this date were replicated by QA personnel.

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Topic:	Reassessment Timing
Task 2.3:	A. Review all tags (capital and expense) reassessed on or near the due date during Q4 2007 for compliance with EDPM Manual requirements.
	B. Provide a frequency of supervisor reassessments over the five-year period (2003-2007).
	C. Randomly select 100 tags that were reassessed during 2003-2007, and compare the due date to the reassessment date.
Background	<p>The CPUC is concerned that the following types of tags that are reassessed on or near the due date:</p> <ul style="list-style-type: none"> <li>○ Tags that were reassessed for a short duration beyond original due date.</li> <li>○ Capital project tags. Mission Division personnel stated to the CPUC that the practice is to perform these reassessments approximately 90 days prior to the due date. This ensures that if the tag does need to be worked, there is sufficient time to order material and schedule clearances.</li> </ul>
Methodology	SAP reports currently only show the new due date resulting from the reassessment. Therefore, each tag selected for the analyses required a manual SAP extract to collect the tag's due date prior to the reassessment. This process was necessary to reveal the date the reassessment was performed in comparison with the tag's due date.
Findings	<p>No SAP report currently exists that readily shows a selection of tags' original due dates compared to the reassessment dates.</p> <p>A. Review all tags (capital and expense) reassessed on or near the due date during Q4 2007 for compliance with EDPM Manual requirements.</p> <p>Timing of reassessments (Q4 2007). Based on 12/31 due date.</p> <ul style="list-style-type: none"> <li>• 3% performed 15 days in advance of due date</li> <li>• 70% performed 60-90 days in advance of due date</li> </ul> <p>A total of 431 tags were due to be completed in the fourth quarter of 2008. 38% (162 of 431) of these tags were reassessed</p> <p>A major change to the EPCM program occurred during Q4 2007, and has been incorporated into the EDPM Manual going forward. See the following comparison between 2007 and 2008 requirements:</p> <ul style="list-style-type: none"> <li>• 2007 EDPM Manual (page 74 of 129) – Every effort must be made to correct identified Grade 2 conditions by the established due date. An EPCM notification will not be past due if it is completed within the calendar month of the scheduled completion date.</li> <li>• 2008 EDPM Manual (Page 80 of 131) – Every effort must be made to correct</li> </ul>

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**address the identified Grade 2 maintenance conditions by the established due date. An EPCM EC notification will not be past due if it is completed within the calendar month of the scheduled completion date addressed (e.g. applicable repair/replacement or reassessed) by December 31 in the year indicated on the tag.**

The Q4 2007 reassessment “due dates” have the following relevant definitions: (1) completed prior to 12/31/2007; (2) completed prior to end of month due; and (3) completed prior to exact date due on tag.

Based on these “due dates”, Q4 2007 Mission Division reassessments showed the following patterns:

Completed prior to 12/31/2007		
Parameters	No. of Reassessments	Percent of reassessments completed
Past EOY	0	0%
< = to 15 days to EOY	5	3.09%
Between 16 and 30 days to EOY	23	14.20%
Between 31 and 60 days to EOY	18	11.11%
Between 61 and 90 days to EOY	113	69.75%
> 91 days to EOY	3	1.85%

Completed prior to end of month due		
Parameters	No. of Reassessments	Percent of reassessments completed
Past EOM	24	14.81%
< = to 15 days to EOM	11	6.79%
Between 16 and 30 days to EOM	8	4.94%
Between 31 and 60 days to EOM	90	55.56%
Between 61 and 90 days to EOM	29	17.90%
> 91 days to EOM	0	0%

Completed prior to due date on tag		
Parameters	No. of Reassessments	Percent of reassessments completed
Past due date on tag	33	20.37%
< = to 15 days to due date	5	3.09%
Between 16 and 30 days to due date	40	24.69%
Between 31 and 60 days to due date	58	35.80%



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Between 61 and 90 days to due date	26	16.05%
> 91 days to due date	0	0%

Mission Division's statement that the practice is to perform these reassessments approximately 90 days prior to the due date does not hold up in Q4 2007. However, it can be concluded that the majority of reassessments occur at least 30 days before the due date. Very few reassessments are performed  $\leq$  to 15 days to due date.

B. Provide a frequency of supervisor reassessments over the five-year period (2003-2007).

Supervisors performed 12.7% (607 of 4787) of all non-marking reassessments during the record period.

C. Randomly select 100 tags that were reassessed during 2003-2007, and compare the due date to the reassessment date.

Timing of reassessments (2003 – 2007). Based on end of month due date

- 62% performed 15 days in advance of due date
- 0% performed 60-90 days in advance of due date

The 2003-2007 reassessment "due dates" have the following relevant definitions: (1) completed prior to end of month due; and (2) completed prior to exact date due on tag.

Based on these "due dates", 2003-2007 Mission Division reassessments showed the following patterns:

Completed prior to end of month due		
Parameters	No. of Reassessments	Percent of reassessments completed
Past EOM	4	4.0%
$\leq$ to 15 days to EOM	62	62.0%
Between 16 and 30 days to EOM	18	18.0%
Between 31 and 60 days to EOM	16	16.0%
Between 61 and 90 days to EOM	0	0%
> 91 days to EOM	0	0%

Completed prior to due date on tag		
Parameters	No. of Reassessments	Percent of reassessments completed
Past due date on tag	49	49.0%
$\leq$ to 15 days to due date	28	28.0%

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	Between 16 and 30 days to due date	14	14.0%
	Between 31 and 60 days to due date	9	9.0%
	Between 61 and 90 days to due date	0	0%
	> 91 days to due date	0	0%

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Topic:	Handwritten vs. electronic records
Task 3.1:	Randomly select a sample of 100 notifications from each of the following two populations: reassessed tags (5,003) and cancelled tags (2,603) in Mission Division over the 5-year audit period. The sample shall satisfy the following restrictions: <ul style="list-style-type: none"><li>○ Selected notifications shall have handwritten records on file.</li><li>○ “Marking” notifications will not be selected.</li></ul>
Methodology	<p>Each tag from the population of reassessed and cancelled tags was assigned a randomly generated number. The tags were sorted in ascending order based on the randomly assigned number.</p> <p>The top 100 tags from each population were chosen for the samples utilized to complete Task 2.3.</p>

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Topic:	Handwritten vs. electronic records
Task 3.2:	Compare hand-written tags vs. SAP records to identify significant deviations.
Background	<p>The CPUC is concerned that handwritten comments on a tag do not match SAP record. The CPUC stated that the apparent mismatch between the original handwritten tag and the SAP record could make it impossible for them to conduct audits.</p> <p>Two specific concerns:</p> <ul style="list-style-type: none"> <li>○ When supervisor makes a comment, there is no indication that the inspector knows about or agrees with the supervisor’s comments.</li> <li>○ Supervisor’s comments get attributed to the inspector. Example, there is no note stating, “per supervisor...”</li> </ul>
Methodology	Original, hand-written tags from Task 3.1 were compared to SAP versions of the tag.
Findings	<p>Only one tag (100428961) from the two samples had hand-written comments from the inspector, which were crossed out and rewritten by the Compliance Supervisor, and input into SAP</p> <ul style="list-style-type: none"> <li>○ This tag had a reassessment on 3/5/03 to push the tag out to 9/30/03.</li> <li>○ A further field assessment was performed by Aars on 3/20/03 and stated: “do the job now; and buckarm on transformer pole.”</li> <li>○ This wording was changed to: “Field checked by Aars on 3/20/03. No change in condition. Also need to replace the buckarm.</li> <li>○ During this period, only one reassessment was allowed.</li> </ul> <p>Five tags were found to have the following one issue: Tag was reassessed after either being reassessed or cancelled by another employee. The subsequent reassessment could not be entered into the system. Tags 101371301, 101242268, 100847405, 100847299, and 100847144.</p> <ul style="list-style-type: none"> <li>○ This finding points to a “version control” issue. The employee performing the reassessment did not know that an action had recently been taken on the tag.</li> <li>○ Opinions can vary, even among QCRs, as to the condition of a facility.</li> </ul> <p>Reassessed tags –</p> <ul style="list-style-type: none"> <li>○ 100428961 – Hand-written comments do not match SAP</li> <li>○ 101371301 – 4/26/05, Colvin reassessed tag for 12 months. 4/28/05, Crandall reassessed tag for six months. Crandall’s reassessment not entered into SAP</li> </ul> <p>The following four tags were cancelled by one individual since the work was complete. At a later date, the tags were reassessed by another individual. Since the tags were already cancelled, the reassessments could not be entered into SAP.</p> <ul style="list-style-type: none"> <li>○ 101242268 - Work completed by Dalke on 8/12/04. Condition was reassessed by Diebner on 9/23/04. Diebner stated okay to move out 12 months.</li> <li>○ 100847405 – Field checked by Fox on 10/11/04. Fox reported that work</li> </ul>

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	<p>was complete upon arrival. Reassessed by Medrano on 10/17/04. Okay for 24 months. Medrano's hand-written reassessment could not be entered into SAP since the tag was cancelled as complete upon arrival. Tag cancelled in SAP on 10/21/04.</p> <ul style="list-style-type: none"><li>○ 100847299 – Field checked by Fox on 10/12/04. Fox reported that work was complete upon arrival. Reassessed by Medrano on 10/17/04. Okay for 24 months. Medrano's hand-written reassessment could not be entered into SAP since the tag was cancelled as complete upon arrival. Tag cancelled in SAP on 10/21/04.</li><li>○ 100847144 – Field checked by Fox on 10/11/04. Fox reported that work was complete upon arrival. Reassessed by Medrano on 10/17/04. Okay for 24 months. Medrano's hand-written reassessment could not be entered into SAP since the tag was cancelled as complete upon arrival. Tag cancelled in SAP on 10/21/04.</li></ul>
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Topic:	Cancelled tags
Task 4.1:	Develop a listing of all individuals who performed cancellations, and confirm that those individuals were qualified per EDPM Manual requirements.
Background	CPUC observation during 2/08 audit (Luer Cancellation)
Findings	<p>Essentially the same issues as described in Task 2.1 for reassessments. Except that tags can be cancelled due to clerical errors, and duplicate tags, and complete upon arrival. These types of cancellations do not require judgment similar to reassessments.</p> <ul style="list-style-type: none"> <li>○ No unique identifier in SAP of who performed cancellation.</li> <li>○ Titles of those performing cancellations are not readily available. <ul style="list-style-type: none"> <li>▪ Mission Division personnel could not identify 22 individuals that performed cancellations during the record period.</li> </ul> </li> <li>○ Sixteen individuals performed patrols and inspections during the record period; 161 individuals performed cancellations. While patrols and inspections are performed by compliance inspectors, the classification of those performing reassessments is not limited.</li> <li>○ Page 80 of the 2008 EDPM Manual indicates that QCRs should perform cancellations <ul style="list-style-type: none"> <li>▪ Reassessments: If the identified condition will not require action before the next inspection, the notification can be <u>cancelled</u>. The condition will automatically be marked as “no action taken” with the justification for the action documented in the “Comments” section. An explanation of why the reassessment or <u>cancellation</u> of the notification is appropriate, and a new time frame (duration), if necessary, shall be recorded on the appropriate EC notification and must be signed and dated by the <u>QCR</u> performing the reassessment.</li> </ul> </li> </ul>

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Topic:	Cancelled tags
Task 4.2:	Randomly select a sample of 50 notifications cancelled during 2H 2007.
Methodology	<p>Each tag from the population of cancelled tags during 2H 2007 was assigned a randomly generated number. The tags were sorted in ascending order based on the randomly assigned number.</p> <p>The top 50 tags were chosen for the sample utilized to complete Task 4.3.</p>

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Topic:	Cancelled tags
Task 4.3:	Perform a field visit to validate the cancellation
Methodology	QA utilized Rich Jones and George Stokes to review and report on the field conditions. Rich and George each reviewed approximately 25 locations.
Findings	<p>Of the cancelled tags reviewed in the field, 6% (3 of 50) showed conditions that did not match the cancellation notes.</p> <ul style="list-style-type: none"> <li>○ 102386874 <ul style="list-style-type: none"> <li>▪ QA observation - Only one of the three potheads had bird protection installed.</li> <li>▪ Cancellation notes state: “Field checked on 8/20/07 and found new bird guards installed. No work required. Ok to cancel”.</li> <li>▪ It is the opinion of the QCR that cancelled the tag that the repair was adequate.</li> </ul> </li> <li>○ 102264246 <ul style="list-style-type: none"> <li>▪ QA Observation - It appeared that the work at this location was not done per the comments section of the tag. The rusty guy was not replaced but looks like the guy is not needed at this location. The 4 services were gray but there are no visible cracks in the services.</li> <li>▪ Cancellation notes state: “Work completed on WRO job 30548157. See the attached sketch. This notification canceled with no work performed”.</li> <li>▪ tag was closed from the desk based on paperwork to support completion of PM 30548157</li> </ul> </li> <li>○ 102422186 <ul style="list-style-type: none"> <li>▪ QA Observation - The pole was not moved in line as stated on the tag, which would do away with the need for the angle guy. The pole is about 8' out of line. The anchor behind where the guy stub was located was not removed. Should check this location and re-evaluate the need for an angle guy.</li> <li>▪ Cancellation notes state: Somebody set new pole in line, no longer need guy. Field checked Fox 9/14/07---cancel tag. This notification cancelled with no work performed.</li> </ul> </li> </ul>



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Topic:	Patrols and Inspections
Task 6.1:	Determine the rate of abnormalities found (tags/hours and tags/facility inspected) during patrols and inspections.
Background	An allegation was made by a PG&E employee that his fellow inspectors are not adequately noting abnormalities. He questions if they actually go into the field.
Methodology	Gather hours spent and tags found from each patrol and inspection folder (folder contains map and log) during 2006 and 2007. Units and inspector already appear on Albrigo's tracking spreadsheet.
Findings	<p>Gathering tags generated and hours to complete patrols and inspections was a manual process.</p> <p>All inspectors found some issues Some inspectors found many issues (wide variation in rates)</p> <p>Primary patrol/inspection records do not validate work completion</p> <ul style="list-style-type: none"> <li>○ Colored line on map to document work</li> <li>○ No GPS records, minimal photos, etc.</li> <li>○ Supervisor does very little field checking of inspection work</li> </ul> <p>Wide variations exist between hours inspected per tag created. Summary tables have been generated. Examples:  2006 OH patrols – 110.5 hours/tag (Kinard), 4.8 hours/tag (Thompson)  2006 UG patrols – 198.3 hours/tag (Kinard), 23.8 hours/tag (House)  2007 OH patrols – 132.0 hours/tag (Miles), 4.3 hours/tag (Harris)  2007 UG patrols – 117.4 hours/tag (Kinard), 23.8 hours/tag (House)</p> <p>2006 OH inspect – 43.1 hours/tag (Coltharp), 4.3 hours/tag (Miles)  2006 UG inspect – 32.6 hours/tag (Miles), 8.0 hours/tag (Aars)  2007 OH inspect – 3.6 hours/tag (Aguilar performed the majority of inspections)  2007 UG inspect – 16.6 hours/tag (Fox), 2.9 hours/tag (Thompson)</p> <p>It is not possible to get an accurate count of tags found during patrols and inspections from SAP.</p> <p>The following three inspectors used in 2006 and 2007 did not hold the Compliance Inspector title. Each individual did receive EDPM Manual training and passed the test.</p> <ul style="list-style-type: none"> <li>○ Art Aguilar - Foreman</li> <li>○ D. Harris – Lineman</li> <li>○ Robert Shuss - Foreman</li> </ul>

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Topic:	Substandard Assets
Task 7.1:	Provide the full history behind each of 38 examples of substandard assets provided by PG&E employee. Topics include reassessments, cancellations, minor work, prioritization, and inspection quality. Tasks include: <ul style="list-style-type: none"><li>○ Field review with the CPUC</li><li>○ Record review to locate original and/or SAP notifications</li></ul>
Background	A selection of photographs and hand-written notifications was presented by a PG&E employee showing conditions that exist in the field. The allegation was made that maintenance work was not being performed, scheduled, or prioritized correctly.
Methodology	The entire story behind each condition was created by researching the paper trail and field checking where appropriate. The CPUC attended portions of the field review.
Findings	29 locations showed proper prioritization and follow-up 8 locations forwarded to compliance for repair work. 1 location forwarded to compliance for follow-up research

### Task 7.1 Results

Item Number	Issue	Assessment	Forward to Compliance for follow-up
1	<p>Thompson wrote tag in log to change out Padmount J-73346 because bolt broke and he could not get in to inspect it. Someone came by and painted it and installed new stickers, but did not inspect it. Still cannot get in.</p>	<p>6/18/07 - Thompson log states: "I broke the bolt to turn handle can't open need to replace pad-mount "J" before end of year, also inspect in by Dec."</p> <p>8/28/07 – Thompson's log reviewed by Albrigo</p> <p>12/06/07 - Pursuant to 6/18/07 log, tag 102658581 was created to replace equipment. A 12 month tag was created with a required end date of 6/18/2008.</p> <p>12/07/07 – tag 102659128 was created. Tag indicates Cirino reported corroded PM Junction (#73346), broken lock mechanism. Required end date is 9/27/2008. Tag is priority G, which means that it should not be reassessed.</p> <p>Rich Jones discussed this condition with CPUC. Rich produced the tags and explained that the item is in estimating with a 9/27/2008 due date. CPUC is satisfied that a tag exists to repair facility by September 2008.</p> <p>Per ILIS, this abnormality is on the inoperable equipment list.</p>	No
2	<p>Tags 101286469 and 101286465</p> <p>Tags were pre-stamped as eligible to reassess. Tag was cancelled during the field visit.</p> <p>When is tag stamped?</p>	<p>101286469: 261 Farrelly. QA field assessment showed surface cracks only on one side of the arm. The arm is good. QA agrees that this tag was correctly cancelled.</p> <p>101286465: 280 Farrelly. QA field assessment showed arm is good. QA agrees that this tag was correctly cancelled.</p> <p>Stamp was in use by Mission Division in approximately 2004-2005. The stamp was the idea of the compliance analyst at the time. Tags were pre-stamped prior to the reassessment. Pre-stamping was not a code. Stamp on the sample tags for this issue show that the inspectors did not have to fill out reassessment duration. In this case, the tags were cancelled.</p>	No

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Item Number	Issue	Assessment	Forward to Compliance for follow-up
3	<p>Tags 101129163, 101129202, and 101129220</p> <p>Can an originally 0-3 month tag be made into a 12 mos. tag? Was original tag truly for 0-3 months? How can a non-operational controller not be a reliability issue?</p>	<p>Each one of these three tags was for a controller on a capacitor. This is an equipment inspection issue. Operational inspections for capacitors are completed per Utility S2302.</p> <p>No field visit by QA. However, a discussion was conducted with the CPUC. Rich explained the following:</p> <p>An explanation for moving the tag from 3 months to 12 months... material (the controller) may not be available at the time.</p> <p>Capacitors are inspected twice/year by T-men. T-men run tests and are guided by a specific form to determine repair needs. T-men determine repair schedule. These tags are from 2003. Each piece of equipment has had approximately 8 inspections from t-men, since the 2003 tags were written.</p> <p>Items to consider in determining if this is a reliability issue:</p> <ul style="list-style-type: none"> <li>○ Are there reports of low voltage in the area?</li> <li>○ Can the potential reliability issue be resolved by putting the unit on manual and closed?</li> </ul>	No
3	Tag 101262798. A late tag.	Third party tag. Due date was 8/20/2004. Tag completed by Moss on 8/04/2004. Per paperwork, tag does not appear to be late.	No
3	<p>Tag 101336636</p> <p>Can an originally 0-3 month tag be made into a 12 mos. tag? Was original tag truly for 0-3 months?</p>	<p>Yes, this was a 0-3 month tag. Initiated on 2/16/2004. Tag was reassessed on 05/28/2004 with a new due date of 05/27/2005.</p> <p>Tag was cancelled on 03/18/2005 because it was found repaired. Per ILIS tag was repaired on 7/1/04.</p>	No
3	<p>Tag 101260351</p> <p>Tag for visibility strips and a HV sign. Lazy. Should have fixed in field.</p>	Tag originally created on 1/12/2004 for HV and visibility strips. Reassessed on 11/22/04 – no change in condition. Tag completed on 12/01/06.	No

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Item Number	Issue	Assessment	Forward to Compliance for follow-up
		QA field check confirms work is complete.	
4	Service drop issue. 22 tags written by Thompson in January 2004.	No QA assessment	No
4a	A selection of 26 tags written by Thompson	No QA assessment	No
5	<p>Tag 102518710</p> <p>Watch this one. May get reassessed. Leaking transformer that has not been replaced.</p> <p>At this location the bushing has flashed over, it's leaking! Replace it. Back in the day when we had leaking transformers we replaced them right away. How long has this "pot" been leaking? Was it pushed out also? This job is due 7/31/08, let's see.</p>	<p>Tag created on 7/6/07 by Aguilar. Due 7/3/08. This job was forwarded to the estimating department on 7/24/07. This is a priority P tag, which means it can be reassessed.</p> <p>Site visited on 5/30/08 by Rich and CPUC. CPUC asking about flash over, how does that happen? Rich - This could have occurred in many ways: dirty insulators, bird, Mylar balloon, etc.</p> <p>Rich would not take exception if this item were, in fact, reassessed.</p> <p>Observation, paint is chipping away from the pole</p>	No
6	<p>Tag 102626551 - 35972 Plumeria, Fremont.</p> <p>Running out of cocktail shakers. T-1100 cable are still on stand offs and covered with Cocktail Shakers. The job is not done.</p>	No field visit. The CPUC did not want to visit the site after Rich explained that this was an expense tag to locate the fault. Fault was located, so tag was closed.	No
7	<p>Tag 102603008</p> <p>Vines. Condition should be a higher priority.</p>	<p>Tag was originally created on 3/6/2007. Rechecked by Aguilar on a routine inspection on 7/6/2007 (no change in condition). Per the tag, on 5/3/2008 a PO was to be generated for Newcomb Tree service to remove the Ivy from the pole. (PO work order #40841674)</p> <p>Field visit with CPUC. The condition in the field is the same. Vines are not in the secondary. CPUC was satisfied with this field condition. Not a</p>	No

### Task 7.1 Results

Item Number	Issue	Assessment	Forward to Compliance for follow-up
		safety issue. Bucket truck assessable. Some vines were cut at about 15 feet above ground. The crews are encouraged to remove the Ivy when work is performed on the pole.	
8	537 Ruby Rd  Leaking transformer. T-1387.	<p>There were two tags generated on this condition.</p> <ul style="list-style-type: none"> <li>○ 101475938 – tag generated on 9/29/2004 by Hurtz. Tag due 10/29/04. On 10/05/04, Diebner, wiped oil away, stated the transformer was no longer leaking, and closed the tag.</li> <li>○ 102097020 (Tag was converted to a new EC Notification 102585252). 102097020 was generated on 7/31/06 by Thompson. Tag was originally due on 9/30/06. (SAP drill down by George). Reassessed by Ochoa on 9/25/2006 for a 12-month duration. Tag due on 9/20/2007.</li> </ul> <p>On 8/24/2007, Rhonda Watkins noted a hairline crack. No safety issue at this time. QA notes this is not a reassessment.</p> <p>On 12/20/2007, Aars reassessed for a new due date of 1/16/2008. No change in transformer condition. Pad crack on three sides.</p> <p>End date is 3/31/08.</p> <p>On 5/30/08 ride-along, the CPUC indicated they have been to this site and there was no need to go again at this time. During their previous site visit, the CPUC saw where the transformer did show signs of leaking QA visited the site on 6/6/2008.</p> <ul style="list-style-type: none"> <li>○ The transformer is still leaking; they have begun doing some work to replace the unit.</li> <li>○ Rock and vegetation have been removed.</li> <li>○ The area have been USA'ed</li> <li>○ One issue at this time is that there are no Live Front transformers available.</li> </ul>	No

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Item Number	Issue	Assessment	Forward to Compliance for follow-up
		<ul style="list-style-type: none"> <li>○ If they use a dead front transformer a new pad has to be set and this will consist of a larger shut down and more work.</li> </ul>	
9	<p>5838 Mayhews Landing Road, Fremont.</p> <p>Found during drive by on 5/18/08. Did tag make it into system?</p>	<p>Tag 103058524 generated on 5/18/2008 with a required end date of 5/22/2008. This tag was completed on date found.</p> <p>QA note on condition: Secondary arm. Per EDPM Manual (page 96 of 131) this condition could be given a Priority P and 0-12 month duration.</p>	No
10	<p>102518787 - 967 Cashew, Fremont</p> <p>The arm is already broken and the pin is floating. Is the replacement date really 7/31/09?</p> <p>Created a short duration (one week) tag.</p>	<p>7/05/2007 - Tag 102518787 generated by Aguilar with a 7/03/2009 end date. Tag is to replace secondary x-arm.</p> <p>5/15/08 - During an OH patrol, Thompson wrote tag with a required end date of 5/22/2008. Thompson correctly notes that tag 102518787 already exists at this location. Thompson's tag notes x-arm has already broken and pin has pulled out of arm.</p> <p>CPUC had no interest in field review because tag is not due until July 2009.</p> <p>QA field assessment: This is moderate deterioration.</p> <p>In 2007, Aguilar rated this for a 12-month duration. Aguilar could have rated for up to 36 month per EDPM Manual (moderate deterioration – split, inspect ,or decay damage within two inches of pin/brace holes)</p> <p>Thompson, during his patrol, created a one-week non-reassessable tag. Per QA, condition still within EDPM manual requirements for a 36-month tag.</p> <p>Thompson's patrol folder does not indicate a "hot tag". Thompson sent tag directly to Fremont. No way to track if tag made it to Fremont. Condition has not been repaired.</p>	Yes

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Item Number	Issue	Assessment	Forward to Compliance for follow-up
		<p><b>967 Cashew = the condition is the same; we suggest that some temporary work be done in the next two weeks until permanent repairs can be made.</b></p>	
10	<p>Tag 102518911 - 36045 Carnation, Fremont</p> <p>Rotten cross arm. Pushed out to 7/31/09.</p>	<p>7/05/07 – Tag 102518911 created by Aguilar with a required end date of 7/03/09.</p> <p>The notification was never reassessed. 7/31/09 is the original end date.</p> <p>CPUC had no interest in field review because tag is not due until July 2009.</p> <p>QA field assessment:</p> <ul style="list-style-type: none"> <li>• The original 24 month duration was fine and correct. The conditions can change due to weather and decay</li> <li>• The x-arm looks bad from one side and pretty good on the other. This condition is appropriate for the current 6-12 month duration. It does fit the moderate duration and decay within two inches of pin/brace hole.</li> </ul>	No
10	<p>Tag 102507447 - End of Fox Avenue, Fremont</p> <p>Idle Facilities in field, but not on map. They say it will be removed by end of June 2008, let's see.</p>	<p>1/16/2003 - Grade 3 monitor tag created with a 90-duration to de-energize. Facilities de-energized on 4/14/2003.</p> <p>7/07/2007 - Aguilar recommends facilities be removed.</p> <p>3/31/2008 - tag was upgraded to a grade 2 tag, with a 6/30/2008 end date.</p>	No
10	<p>Tag 102518912 - 35801 Plumeria, Fremont</p> <p>The arm is about to give way. It says this arm is going to be replaced on 7/31/08. But, why are we waiting or</p>	<p>7/05/2007 - Tag created by Aguilar replace x-arm</p> <p>Field visit with CPUC on 5/30/2008. End of arm is bad. Distance from eye bolt to rot is about two inches. QA/CPUC discussed the condition and question if this really needed to be written up. Tag is due on 7/03/08. Good example of how opinions can vary depending on experience and</p>	No



### Task 7.1 Results

Item Number	Issue	Assessment	Forward to Compliance for follow-up
	taking the chance?	background of QCRs.	
11	Newark and Thornton  No center rail on subsurface enclosure. Condition identified in 2003. The 2003 tag was completed and signed off. Condition written up again. Condition still exists.	CPUC had been to this site previously. They did not have to see it again. This facility was a part of another investigation, where it was found that this tag (101265907) was incorrectly cancelled.  QA field assessment:  The condition is the same. QA felt that the enclosure condition is worse than the center rail issue. Ted Albrigo was very familiar with the issue; there is a tag for the replacement of the entire enclosure. EC 102226135 due 4/23/2009.	No
11	No protection around T-1689	The CPUC did not feel the need to perform a field check. They felt that this is a 3 <sup>rd</sup> party issue.  QA assessment: <b>a tag should be written for barrier posts.</b> Third-party created condition.  (QA is unable to determine the location of the other enclosure (with no rail) in the other picture in this packet)	Yes
12	16649 E. 14 <sup>th</sup> Street, Hayward  Split pole top found on 8/21/03. Repaired with “non-approved” patch kit. 4 kV is touching arm (wrote tag a long time ago)	8/21/2003 - Thompson created tag 101077424 with a due date of 8/20/2004. Tag closed 8/25/2004. Map I0911.  QA (Rich) visited the site on 6/2/2008. The patch noted in the field is an acceptable fix. The condition has not changed. <b>The 4kV pin is still broken and needs to be repaired.</b> QA did not locate a tag in the system for this condition.	Yes
13	SW-6821  7/28/03 - Bad cross arm identified by Thompson; he alleges no action taken. T-Men complained; then something was done. The original tag was pulled	Switch 6821 is no longer in the system.  Ted does not have a junk file drawer.  <b>QA follow-up – find Thompson’s OH patrol map from 7/28/03. Use P&amp;I spreadsheet to ID map number.</b>	No

### Task 7.1 Results

Item Number	Issue	Assessment	Forward to Compliance for follow-up
	out of a "Junk File" folder drawer. Replaced arm.		
14a	Hayward Roller Rink - abandoned building. Mission south of Mission and Tennyson  Three transformers were removed and the pole was left there.	Field review with CPUC 5/30/2008. The pole and building have been removed. The CPUC took pictures and made GO 95 comments about the take off pole and a pole, 1 span south on Mission.  They wondered why the down guy was not removed when the wire was taken out.	No
14b	Las Positas golf course in the middle of the field. Located off of 580-HWY near Kitty Hawk exit.  No good pole in middle of field. Called Ted, no response, tag never written. Pole has an "N" on it found in mid 2007.	No site visit.  Ted says that if there is it will be with the Pole Test and Treat people at this time. If it was a 2005 tag it is Ok and will be replaced. If it is earlier not sure where that program is today.  <b>Follow-up: Pole #110114588. Is there a tag for this?</b>	Yes
14c	40535 La Purissiam Way Fremont  T-1459 replaced and put on a pad that was to small	George and Rich visited this site 6/2/2008. <b>This pad should be replaced and sized correctly. Needs a tag.</b>	Yes
15a	3001 Bernal X street Stanely Blvd Pleasanton near McDonald's  Need to lower secondary box. It is 9" too high	Thompson's hand-written tag. Date tag created is blank. Required end date is 11/28/08.  Found EC tag 102672893, which is due 11/28/2008.  <b>Print out copy of tag 102672893</b>	No
15b	3001 Bernal X street Stanely Blvd Pleasanton near McDonald's  Overhead 25KVA transformer is leaking / also broken 2" ground	Thompson's hand-written tag. Date tag created is blank. Required end date is 11/28/08.  Found EC tag 102808151, which is due 11/28/2008.	No

### Task 7.1 Results

Item Number	Issue	Assessment	Forward to Compliance for follow-up
	molding. Ted Albrigo said that this is not a number one call. No oil on the ground.	<b>Print out copy of tag 102808151</b>	
16	101585275, 101585517, and 101585532  Need to weld PG&E on manhole cover	Marking only tag. Tag created on 11/03/04 by Hummel. Reassessed on 9/27/2006 for 24 months.  QA field evaluation: <ul style="list-style-type: none"> <li>• Correct, this facility does not have the PG&amp;E identifier welded onto the cover.</li> <li>• Manhole number welded onto the manhole cover. Electrical is cast into the manhole cover.</li> <li>• Tag due 9/26/2009.</li> </ul>	No
17	15680 E.14 <sup>th</sup> Street, Hayward  Rope sling has held up a triplex service for over five years. Who patrolled during last five years?	No tag in SAP. This location is on Map I0809.  This map was last inspected in 2004 (Coltharp) and patrolled in 2005 (Miles), 2006 (Cirino), and 2007 (House).  QA field assessment: <b>Triplex still tied up with a rope. This location needs to be cleaned up, possibly new pole and down guy required.</b>  Cannot determine how long condition has existed.	Yes
18	5331 Milani, Newark  Broken Secondary wood pin tag written long ago	Could not find a tag in the system. 5/30/2008 site visit with the CPUC showed condition still the same.  <b>Need to have M&amp;C make repairs because service is lying on the phone cable.</b>	Yes
19	Thornton Ave, Fremont  Bad X-arm near Thornton /880 freeway over crossing. Tag turned in	5/30/2008 site visit with the CPUC showed that the X-arm has been replaced.	No

### Task 7.1 Results

Item Number	Issue	Assessment	Forward to Compliance for follow-up
	by Thompson and nothing has been done.		
20	<p>In field near the 580 / 680 interchange</p> <p>Cover flipped up due to being hit by a disc.</p>	<p>7/12/2004 - Tag 101436489 created by Thompson with a due date of 1/25/2007.</p> <p>01/25/05 - Tag reassessed by Diebner. Reassessment notes state that box is in an empty field surrounded by a fence. Not subject to pedestrian or vehicular traffic.</p> <p>1/11/2007 - Tag # 101436489 was completed. Completion notes state: "re-bend lid, bolt down both lids"</p> <p><b>QA field visit showed the frame of this 3X5 box was bent so that the lids could not be bolted down to the frame. This box does not have any cables in the enclosure. Enclosure may have been hit by construction equipment after the 1/11/07 repair date.</b></p>	Yes
21	<p>In the rear of 657 Garvin, Hayward</p> <p>Street light duplex was attached to a secondary hot leg with a clevis.</p>	<p>1/22/03 – tag 100906205 created by Thompson. Tag states: Wrong way to attach a street light. May need to install span guy".</p> <p>7/09/03 – tag reassessed by Thompson</p> <p>11/17/03 – tag closed by Morales. .Per Ken Dalke no action was required to correct the problem and the tag was cancelled by Morales and considered to be safe and reliable.</p> <p>QA conducted field visit to this location to evaluate the conditions. Found that the street light conductor was attached to the secondary pin: not on the secondary conductor as portrayed in the picture provided by Thompson. Apparently, a corrective action was completed after the Thompson photo was taken. This corrective action could have occurred prior to Morales closing the tag on 11/17/2003.</p>	No
22	Tag 101260465. 27726 Cliffwood,	Tag was created by Albrigo on 1/8/2004 with a due date of 1/6/2006.	No

### Task 7.1 Results

Item Number	Issue	Assessment	Forward to Compliance for follow-up
	<p>Hayward</p> <p>Low Service (only 10'6" in driveway). Need Periscope Extension. Ted Albrigo cancelled tag.</p>	<p>Miles cancelled this tag on 12/22/2004 as COA.</p> <p>QA field visit: Confirmed that periscope extension bracket was installed.</p>	
23	<p>Tag 101260466. Five Poles west of Toll Plaza on Marshlands Rd.</p> <p>Another low wire tag written by Ted Albrigo</p>	<p>This is actually a third-party tag, not a low wire tag.</p> <p>Tag was created on 1/8/04 with a due date of 5/30/2005. Luer noted the tag was COA on 2/14/2005.</p> <p>QA field review on 5/30/08 showed the signs have been removed from the PG&amp;E poles.</p>	No
23	<p>Tag 101260600. 27555 La Porte Ave., Hayward</p> <p>Another low wire tag written by Ted Albrigo.</p>	<p>Tag was created by Albrigo on 1/7/2004 with a due date of 1/6/2006. Ted's comments were: Service only 12'0" to 27555 and only has 6" separation from the phone.</p> <p>Miles cancelled this tag on 12/22/2004.</p> <p>QA field visit: Location is OK. Insulated service, which can be 10' over driveway. (Drawing number 022169)</p>	No
23	<p>Tag 101260374. Via Represa &amp; Corte Breve, San Lorenzo</p> <p>Another low wire tag written by Ted Albrigo</p>	<p>This is actually a tag for a broken ground molding 7' above the ground. Tree at 15758 Via Represa is in the secondary.</p> <p>Tag was written on 1/9/2004 by Albrigo. Reassessment performed on 7/26/2004 pushed the due date out to 7/26/2005. Completed by Fox on 11/22/2004.</p> <p>QA field assessment: The molding was most likely repaired in 2004 and the tree was most likely trimmed. <b>Now, four years later, the molding has slipped again. Should repair or install a new plastic ground covering. Tree condition has grown back. Some work needs to be</b></p>	Yes

### Task 7.1 Results

Item Number	Issue	Assessment	Forward to Compliance for follow-up
		<b>done.</b>	
23	<p>Tag 101260604. 15753 Via Sonata, San Lorenzo</p> <p>Another low wire tag written by Ted Albrigo.</p>	<p>Tag was created by Albrigo on 1/9/2004 with a due date of 1/9/2006. Ted's comments were: Low service at driveway...</p> <p><u>Fox</u> cancelled this tag on 11/22/2004.</p> <p>QA field visit: Location is OK. Insulted service, which can be 10' over driveway. (Drawing number 022169). Service is OK height is fine.</p>	No
24	Reassessments form yard. Previous investigation	There is no QA assessment required	No