PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

June 27, 2008

Mr. Bob Daniels AM&ET Performance Analysis QA, Manager Pacific Gas and Electric Company 77 Beale Street, Mail Code H15H P.O. Box 770000 San Francisco, CA 94177

CPUC File No. EA2008-03

SUBJECT: Electric Audit of PG&Ecs Kern Division. Bakersfield Service Center.

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission, Dennis Lee and I conducted an Electric Audit of PG&E Kern Division from April 14 - 18, 2008. The audit included a review of your records for the period 2006-2008.

During the audit, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed. Please advise me by electronic or hard copy of all corrective measures taken by PG&E regarding the violations and the date on which they where corrected.

If you have any questions, please contact me at (916) 324-7144.

Sincerely,

Ivan Garcia
Utilities Engineer
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Appendix . Audit Violations

CC: Ms. Holly Meyer-Zebzda, Quality Assurance

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APPENDIX– Audit Violations

1. General Order 165, Section IV, - Standards for Inspection, Record-keeping, and Reporting

The Fifth Paragraph of Section IV, states:

‰or all inspections, within a reasonable period, company records shall specify circuit, area, or equipment inspected, the name of the inspector, the date of the inspection, and any problems identified during each inspection, as well as the scheduled date of corrective action. For detailed and intrusive inspections, companies shall also rate the condition of inspected equipment. Upon completion of corrective action, company records will show the nature of the work, the date, and the identity of persons performing the work.+

During the review of the records, eight open maintenance tags (tags) were found to have been missing the original assessment date. The tags were reassessed, but we were unable to determine an initial scheduled date of corrective action before reassessment.

- a. Tag # 102359156, created 04/20/2007, reassessed 10/01/2007
- b. Tag # 102379303, created 04/20/2007, reassessed 10/01/2007
- c. Tag # 101914350, created 10/03/2005, reassessed 10/01/2007
- d. Tag # 102384231, created 05/15/2007, reassessed 10/01/2007
- e. Tag # 102330590, created 04/04/2007, reassessed 10/01/2007
- f. Tag # 102386269, created 06/25/2007, reassessed 10/25/2007
- g. Tag # 102342387, created 03/21/2007, reassessed 10/25/2007
- h. Tag # 102386265, created 06/25/2007, reassessed 10/25/2007

2. General Order 165, Appendix A, Electric Company Inspection Cycles

- a. Map #2724126 . No documentation showing that T-4328 was patrolled in 2007.
- b. Map #2724115 . No documentation showing that SW5885/SW5884 was patrolled in 2007.
- c. Map #2724114 . No documentation showing that T-11550 was patrolled in 2007.
- d. Recloser Test Report (Operating # 3065) . Not completely tested since the second page of the Recloser Test Report was not filled out on 12/17/07.
- e. Recloser Test Report (Operating #3621). Not completely tested since the first page of the Recloser Test Report was not filled out on 12/10/07.
- Approximately 80 Capacitor Bank Test Reports records were missing for the Fall 2007 capacitor bank testing.

3. General Order 95, Rule 31.2, Inspection of Lines

Rule 31.2 states:

Weines shall be inspected frequently and thoroughly for the purpose of insuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.+

At the 2nd pole East of Buttonwillow Avenue in the alley between Second and Third Streets (Map #2923145), a down guy preform could not be inspected due to the fact that it was buried in dirt. Furthermore, PG&Ecs Electric Distribution Preventive Maintenance Manual specifies % Buried-Down Guy Preform+as an % bnormal condition the maintenance inspector must evaluate for possible grading.+ This type of % bnormal condition+is specified as % ainor work+and should have been completed on the day of the February 2008 Inspection.

4. General Order 95, Rule 31.1, Design, Construction and Maintenance

GO 95, Rule 31.1, states in part:

% lectrical 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.

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.+

General Order 95, Rule 31.2, Inspection of Lines

GO 95, Rule 31.2, states:

% ines shall be inspected frequently and thoroughly for the purpose of insuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.+

At the 3rd pole (service pole) west of Lux Avenue in the alley between First and Second Streets (Map #2923145), was not mapped. Additionally, PG&E representatives were unsure who owned the pole. Regardless, of who owns the pole, PG&E should have noted the pole in the February 2008 inspection and previous patrols. Since no documentation was made, there are no records showing it was inspected. Additionally, on this service pole, a dead-end attachment for the service was not attached to the insulator.