

PUBLIC UTILITIES COMMISSION

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October 15, 2007

Girish Balachandran
General Manager
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SUBJECT: Electric Audit of Alameda Power and Telecom

On behalf of the Utilities Safety and Reliability Branch (USRB) of the California Public Utilities Commission, Paul Penney and I conducted an Electric Audit of Alameda Power and Telecom electric operations (AP&P EO) from August 25-29, 2008. The audit included a review of your records for the period of 2005-2008.

During the inspection, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed. Within 30 days, please advise me by electronic or hard copy of all the corrective measures taken by AP&P EO regarding the violations and the date on which they were corrected or scheduled to be corrected.

If you have any questions, please contact me at (415) 703-2347.

Sincerely,

Robert Turner
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary

CC: Paul Penney, CPSD

Audit Summary

Violations

- (1) **General Order 165 – Inspection Cycles for Electric Distribution Facilities
IV. Standards for Inspection, Record-keeping, and Reporting
Appendix A, Electric Company System Inspection Cycles (Maximum Interval in Years)**

Patrols and Detailed Inspections

Section IV, states in part:

Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to assure reliable, high quality, and safe operations, but in no case may the period between inspections (measured in years) exceed the time specified in the attached table.

Though AP&T EO has written procedures for General Order 165 compliance I was unable to determine detailed and patrol inspection cycles from records presented to the audit. AP&T EO must conduct detailed and patrol inspections of its facilities per General Order 165, Appendix A, and maintain auditable records of the inspections to determine inspections cycles.

- (2) **General Order 165 – Inspection Cycles for Electric Distribution Facilities
IV. Standards for Inspection, Record-keeping, and Reporting
Appendix A, Electric Company System Inspection Cycles (Maximum Interval in Years)**

Distribution Equipment Inspections

Section IV, states in part:

For all inspections, within a reasonable period, company records shall specify the 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.

Though AP&T EO has written procedures for General Order 165 compliance I did not find a consistent application of the procedures for inspection documentation. From the records presented at the audit I found that inspectors did not or could not accurately state if the inspection was detailed or patrol. Further, I found that inspectors did not accurately, if at all, rate the condition or establish a scheduled date for corrective action. I found that electric crew supervisors typically established corrective action dates after reviewing equipment inspection forms but did not consistently do so in a timely manner. Some equipment inspection records resided in a pile of other inspections records waiting scheduling or assignment with due dates that had already passed.

- (3) **General Order 95, Rule 54.8 Service Drops, 0 - 750 Volts**

B. Clearances above Ground, Buildings, Etc.

The vertical clearances of supply service drops above ground, buildings, etc., shall be not less than the minimum clearances specified in Rule 37, Table 1, Column B, with the following modifications:

(1) Above Public Thoroughfares: Service drop conductors shall have a vertical clearance of not less than 18 feet above public thoroughfares, except that this clearance may grade from 18 feet at a position not more than 12 feet horizontally from the curb line to a clearance of not less than 16 feet at the curb line, provided the clearance at the centerline of any public thoroughfare shall in no case be less than 18 feet. Where there are no curbs the foregoing provisions shall apply using the outer limits of possible vehicular movement in lieu of a curb line.

The service drop for 425 Haight was 13 feet, 6 inches above the street at the curb.

(4) General Order 128, Rule 34.3 Self-contained Surface-mounted Equipment

C. Locking

Compartments and enclosures shall be made secure against entry by unauthorized persons by means of locks or other suitable means.

The padmounted transformer at 389 had no padlock. The maintenance tag for corrective action was not processed or completed in sufficient time to quickly remedy the violation.

Comments

Focused training on AP&T EO's General Order 165 procedures will help prevent future violations. As presented, AP&T EO's circuit cleansing program of fully inspecting and repairing all of its circuits to bring them into General Order compliance over the next couple of years is an appropriate step in rolling out a fully compliant General Order 165 program.

Recommendations

Create an auditable record keeping process for inspections. CPUC inspectors must be able to determine detailed and patrol inspection cycles.

Train staff on AP&P EO's GO 165 procedures to appropriately conduct and document inspections and maintenance. Training needs to include how to correctly document problems found during inspections, per GO 165 and AP&P EO procedures.