

PUBLIC UTILITIES COMMISSION
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October 17, 2008

Ms. Heidi Caswell, Director
Network Performance, Eng & Asset Management
825 NE Multnomah St., Suite 1500
Portland, OR 97232

CPUC File No. E200822

SUBJECT: Electric Audit of PacifiCorp's Crescent City District

On behalf of the Utilities Safety and Reliability Branch (USRB) of the California Public Utilities Commission, Steve Artus and I conducted an Electric Audit of PacifiCorp's Crescent City District from August 25-29, 2008. The audit included a review of your records for 2007 and available records from prior years.

During the inspection, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed.

Within 90 days of your receipt of this letter, please provide a written response (electronic or hard copy) indicating measures taken by PacifiCorp to address the violations and issues/concerns noted.

If you have any questions, please contact me at (415) 703-2055.

Sincerely,

A handwritten signature in cursive script that reads "Aimee Dalusong".

Aimee Dalusong
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Appendix – Audit Summary

Cc: Steve Artus - USRB

APPENDIX

A. Records Review

During the audit, we reviewed records of detailed inspections, detailed test and treat inspections, and safety inspections (patrols) for both overhead and underground facilities in the Crescent City District. We began by looking at 2007 and 2006 inspected areas and/or circuits and checked for earlier inspection cycles.

The list below contains inspection records reviewed that are not in compliance with GO 165 which 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 operation, but in no case may the period between inspections (measured in years) exceed the time specified in the attached table."

The table in General Order 165 requires that a patrol of overhead and underground (including pad mounted) equipment in rural areas must be completed at intervals not to exceed 2 years. Detailed inspections of overhead and pad mounted equipment in rural areas must be completed at intervals not to exceed 5 years.

1. The following areas/circuits/facility points missed their 5-year detailed inspection cycles:
 - a) Overhead Map 07116001.0 Section 08 – No record of detailed inspection between 1998 and 2007.
 - b) Overhead Map 07117001.0 Section 31 – No record of detailed inspection between 1998 and 2007.
 - c) Overhead Map 07217001.0 Section 23 – No record of detailed inspection between 1998 and 2007.
 - d) Overhead Map 07217001.0 Section 10 – No record of detailed inspection between 2000 and 2006 except for the following facility points which met the 5-year detailed inspection cycle:
 - i. Facility point 102500
 - ii. Facility point 102501
 - iii. Facility point 102600
 - iv. Facility point 104401
 - e) Overhead Map 07217001.0 Section 21 – No record of detailed inspection between 2000 and 2006 except for the following facility points which met the 5-year detailed inspection cycle:
 - i. Facility point 215900
 - ii. Facility point 216800
 - iii. Facility point 217600
 - iv. Facility point 218602
 - v. Facility point 219402
 - vi. Facility point 219501
 - f) Underground Map 07217001.0 Section 27 – No record of detailed inspection prior to 2006 for all facility points.
 - g) Underground Map 07116001.0 Section 10 – No record of detailed inspection prior to 2007 for all facility points.

- h) Underground Map 07117001.0 Section 31 – No record of detailed inspection prior to 2007 for all facility points.
- i) Underground Map 07114001.0 Section 33 – No record of detailed inspection between 1998 and 2007 for all facility points.
- j) Underground Map 07117002.0 Section 19 – No record of detailed inspection prior to 2007 for all facility points.
- k) Underground Map 07113001.0 Section 10 – No record of detailed inspection between 1998 and 2007 for all facility points.
- l) Underground Map 07115001.0 Section 17 – No record of detailed inspection prior to 2007 for all facility points.

2. The records for following overhead areas/circuits/facility points do not show compliance with the required 2-year safety inspection (patrol) cycle:

- a) Map 07113001.0 Section 11 – Missed 2-year patrol cycle between 1998-2003 and 2004-2007.
- b) Map 07113001.0 Section 17 – No records of patrols prior to 2007.
- c) Map 07216001.0 Section 34 – Missed 2-year patrol cycle between 2004 and 2007.
- d) Map 07216002 Section 24 – Missed 2-year patrol cycle between 2002 and 2005
- e) Map 07216001.0 Section 18 – No records of patrols between 1998 and 2005.
- f) Map 07216001 Section 30 – No records of patrols between 1998 and 2005

3. PacifiCorp's policies for wood pole test and treatment, detailed inspections and visual assurance inspections for overhead and underground facilities contain the different priority codes used for the conditions found during the respective inspections. Among the various condition codes, it appears that priorities A, B, and C are commonly used for GO 95 or GO 128 infractions.

During the audit, PacifiCorp representatives explained that priority A conditions are addressed within 30 days. When asked about priorities B and C, they stated that there are no specific timeframes to address these conditions and that they are potentially captured when physical work is performed on the facility or at an adjacent location.

Not having scheduled dates or specific timeframes of corrective action to address priorities B and C conditions is a violation of General Order 165 which states:

"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 inspection, and any problems identified during each inspection, as well as the scheduled date of corrective action." (Note: Underline added for emphasis)

Further, the Commission discussed this requirement in the "Opinion" of Decision D.97-03-070 which states:

III. Reporting and Recording Requirements

B. Discussion

"D.96-11-021 required that utilities maintain various kinds of information on inspections. We will also include in the General Order the requirement that the utilities maintain a record of problems observed by the inspector, the scheduled and actual date of corrective action, and the identity of the person performing the work. This type of information will promote follow-up to inspections and serve as a foundation for determining the reasonableness of utility actions if and when specific problems occur of the system."

B. Field Review

The following is a list of General Order 95 and 128 rules referenced in the list of violations found during the field review:

GO 95, Rule 51.6A:

"Poles which support line conductors of more than 750 volts shall be marked with high voltage signs."

GO 95, Rule 54.6B:

"That portion of the ground wire attached...on the surface of wood poles and structures shall be covered by a suitable protective covering."

GO 95, Rule 54.6E(1):

"Risers from underground cables or other conductors shall be encased from the ground level to a level not less than 8 feet above the ground..."

GO 95, Rule 58.1B(3):

"Equipment cases, hangers, and other metal parts in contact therewith shall clear through bolts, arm braces of metal, and other hardware elements, by not less than 1.5 inches; except that such cases and hangers shall clear crossarm braces and crossarm through bolts by not less than 1 inch air-gap distance and 1.5 inch creepage distance. The minimum clearance of 1.5 inches need not apply to through bolts in metallic contact with equipment cases or metal parts thereof nor to through bolts supporting heel arms, provided the portion of such through bolts extending into the climbing space is covered with non-conducting material..."

GO 128, Rule 34.2C:

"Transformers operating at more than 600 volts, other than current and potential transformers and transformers which constitute a component part of other apparatus and which conform to the requirements of such apparatus, shall be readily accessible for operation, inspection, maintenance, and replacement."

GO 128, Rule 34.3A:

"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."

GO 128, Rule 35.3

"Warning signs indicating high voltage shall...be installed on an exterior surface of all such pad mounted transformer compartments and other above ground enclosures."

Field Locations

1. Map 07216001, Pad mount transformer #162382
 - a) Missing "High-Voltage" warning sign on the exterior door of the transformer - GO 128, Rule 35.3. This was field corrected.
2. Map 07217001, Pad mount transformer #351581
 - a) Enclosure was not bolted in place and it slid off of its original location creating a small opening in front of the transformer - GO 128, Rule 34.3A.
 - b) This is an outstanding Priority B condition inspected on 5/26/2005 requiring that the enclosure be bolted down. There is no scheduled date for corrective action to address this condition, which is a violation of GO 165.
3. Map 07217001, Pad mount transformer #351580
 - a) Same as 2a and 2b.
4. Map 07216001, Pole #102507
 - a) Exposed ground about 5 ft. from the ground - GO 95, Rule 54.6 B.
 - b) Missing bolt covers on transformer - GO 95, Rule 58.1 B(3)
5. Map 07216002, Section 24, Pole#249903
 - a) Section of exposed ground about 4 ft. and 5ft. off the ground - GO 95, Rule 54.6B.
 - b) The base of the secondary riser was cracked exposing the secondary conductors - GO 95, Rule 54.6-E(1).
6. Map 07217001, Section 23, Pole #238462
 - a) Section of ground exposed on the sides of the ground molding - GO 95, Rule 54.6B.
7. Map 07217001, Section 23, Pole #237400
 - a) Missing "High Voltage" sign - GO 95, Rule 51.6A.
8. Map 07217001, Section 23, Pole #238440
 - a) Missing "High Voltage" sign - GO 95, Rule 51.6A.
9. Map 07117001, Section 30, Pole #308007
 - a) Exposed ground at ground level - GO 95, Rule 54.6 B.
10. Map 07117002, Pad mount transformer #208680
 - a) Transformer enclosure not bolted on pad - GO 128, Rule 34.3A.
11. Map 07117002, Pad mount transformer #206380
 - a) Pad mount transformer buried and inaccessible. The transformer was last inspected in August 2007 with no outstanding conditions noted - GO 128, Rule 34.2C
12. Map 07117002, Pad mount transformer #202083
 - a) We did not stop to see this pad mount transformer. However while driving by the transformer, it appears that it was partially buried. Please check if the transformer is accessible.