

PUBLIC UTILITIES COMMISSION

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July 2, 2009

Eleanor Pefferman, Manager
Sustainable Electric Reliability
Pacifica Gas and Electric Company
245 Market Street, Mail Code N14L
San Francisco, CA 94105

CPUC File No. E200903

SUBJECT: Electric Audit of PG&E's Los Padres Division

On behalf of the Utilities Safety and Reliability Branch (USRB) of the California Public Utilities Commission, Ryan Yamamoto and I conducted an Electric Audit of PG&E's Los Padres Division from March 9-13, 2009. The audit included a review of your records for the period of 2008-2009.

During the inspection, we identified several concerns and recommendations. A copy of the audit summary itemizing those issues is enclosed. Please advise me by electronic or hard copy of all the corrective measures taken by the Utility regarding the issues and the date on which they were, or are to be corrected.

If you have any questions, please contact me at (415) 703-2192.

Sincerely,

Jadwindar Singh, P.E.
Utilities Safety and Reliability Branch
Consumer Protection and Safety Division

Enclosure: Audit Summary

CC: Ms. Holly Meyer-Zebzda, PG&E
Mr. Ryan Yamamoto, CPUC

Audit Summary

Concerns and Recommendations

(1) Pole Number Forms

Los Padres Division has been completing the "Pole Number Form" when a new pole is installed, but do not know where to send the form after its completion. Los Padres Staff have sent the forms to the RMC, but they were subsequently sent back. It appears that no one knows who is responsible for entering the data from the form. While we found this to be true in Los Padres, it may also be true for the rest of the system. Please provide system wide guidance as to where the "Pole Number Form" should go so that the data can be entered.

A discussion related to the completion of pole numbering in PG&E's system will be provided in another letter.

(2) Monthly ORT Meetings

- a) Attachment 1 of the 2008PGM-03 standard has a long list of items that are to be reviewed during the meeting. However, there are no specific expectations for the participants of the meeting. It is clear that the Divisions are expected to review each item in the list, but it is not clear as to what level of detail is required, or whether they are expected to also document the analysis of each item in the list and create an action item for each.

The "Los Padres ORT Action Item Tracking" spreadsheet is very limited and only contains an analysis of the "Worst 15 Performing Circuits in the Past 5 Years", with the addition of some other circuits (it is not clear why these are included). There is no analysis of the remaining items on the list and we believe discussion of those those items must be included in the action items. For example, it is not evident that there has been any discussion of such items as ERR Prioritization, review of outage cause information, and review of the "Worst Performing Circuits of the Past 12 Months." Other divisions may also be unclear as to what is expected of them as well.

- b) There are ERR items on the worst performing circuits that do not have an EPCMSAP number and also items that have been on the list for years. Without an EPCMSAP number, the Division has no time table that must be followed to correct the issue and, as can be seen, the items reside on the list indefinitely. Furthermore, the USRB doesn't understand the rationale behind highlighting "ERR on the worst performing circuits" in the Monthly Report if the Division does not aggressively pursue correcting those issues. The fact that these ERR items have remained on the list for so long emphasizes this point. Whose responsibility is it to create the EPCMSAP number for each ERR item and why hasn't it be done? Whose responsibility is it to ensure that each ERR does in fact have an ECPCMSAP number?
- c) We found that noting ERR equipment that delayed restoration on the outage log by the DO's is not necessarily mandatory. We find that it should be added to the procedures and become mandatory so that ERR equipment that delayed restoration may be discussed by the Monthly ORT meeting participants.
- d) There are notations regarding a "Reliability Blitz" in the "Los Padres ORT Action Item Tracking" spreadsheets as a means to address certain issues on some of the "worst performing circuits". These notations date back to October 2008. However, according to the Division, no circuits have been funded for the blitz. Does PG&E plan to fund Los Padres's "Reliability Blitz"? If so, when? If not, why not?

(3) Substation Insulator Washing Program (Los Padres, and System Wide)

The 6/11/08 ORT Meeting minutes raise issues regarding pole fires and insulator washing that “used to take place” and that “most washing would be in the coastal areas but due to budget this maintenance was not being done.” Please address the following:

Please explain what “used to take place” means relative to the requirements of the Substation Insulator Washing Program and what has taken place (or not taken place) in Los Padres Division.