

PUBLIC UTILITIES COMMISSION

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February 19, 2010

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

CPUC File No. EA2009-21

SUBJECT: Electric Audit of PG&E's Sierra Division . Auburn Service Center.

On behalf of the Utilities Safety and Reliability Branch of the California Public Utilities Commission, Ryan Yamamoto and I conducted an Electric Audit of PG&E's Sierra Division from October 5 - 9, 2009. The audit included a review of your records for the period 2007-2009.

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 were 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: Audit Summary

CC: Ms. Holly Meyer-Zebzda, Quality Assurance
Toddy Ryan, Supervising Engineer
Electronic PDF Version

Audit Summary

1. General Order (GO) 95, Rule 31.1, Design, Construction and Maintenance

Rule 31.1, states in part:

Electrical 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.+

- A. PG&E's 2009 Electric Distribution Preventative Maintenance Manual (EPDM) has a section on Electric Corrective (EC) Notification Due Dates. The section states that a maintenance work (tag) is reported as past due if it is not addressed by the end of the calendar year when work is scheduled to be completed. The following electric tags were completed past the end of the calendar year.
- i. Tag #103311564, due 12/31/2008, completed 3/19/2009
 - ii. Tag #103254467, due 12/31/2008, completed 2/6/2009
 - iii. Tag #102766621, due 12/31/2008, completed 1/26/2009
 - iv. Tag #101993336, due 12/31/2008, completed 1/17/2009
 - v. Tag #101993335, due 12/31/2008, completed 1/17/2009
 - vi. Tag #103099023, due 12/31/2008, completed 1/2/2009
 - vii. Tag #101993332, due 12/31/2008, completed 1/17/2009
 - viii. Tag #103095807, due 12/31/2008, completed 1/12/2009
 - ix. Tag #102542378, due 12/31/2008, completed 1/12/2009
 - x. Tag #103677832, due 12/31/2008, completed 1/9/2009
 - xi. Tag #101993333, due 12/31/2008, completed 1/17/2009
- B. PG&E's 2009 EPDM requires that EC Notification cannot be closed until all the identified maintenance conditions on the notification have been addressed. Furthermore, the EPDM states the crew should also repair minor/incidental maintenance conditions.
- i. Tag #103378146 identified a broken primary insulator, which was corrected on 11/17/2008. However, there were High Voltage signs found missing at the top of the pole and/or cross arm at this pole. Missing and/or damaged High Voltage signs are considered incidental per PG&E's EPDM.
 - ii. Tag #103648685, identified a broken dead end bell and tree branches that needed trimming. On 4/28/2009, PG&E's staff went to the pole and found that the broken dead end bell was corrected. However, the tree branches were not trimmed as of 10/8/2009.

2. GO 128, Rule 17.2, Inspection

Rule 17.2 states:

Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules. (See Rule 12.3).+

An underground inspection of map H4121 was conducted by PG&E on 8/31/2009. The CPUC did a field audit of this map on 10/8/2009, and found two violations not found during PG&E's inspection on 8/31/2009. PG&E did not note the following violations during their inspection on 8/31/2009.

- A. At transformer T-2543, bushes obstructed the opening of the transformer
- B. At transformer T-2902, PG&E was unable to open the transformer door.

3. GO 165, Section IV, - Standards for Inspection, Record-keeping, and Reporting

The Fifth Paragraph of Section IV, states:

For 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.+

Currently, PG&E's patrol and inspection procedures do not require its staff to record all violations of GOs 95 and 128. Specifically, in the course of a GO 165 inspection, if PG&E staff encounters a facility with numerous violations, staff is instructed to create a maintenance order for the facility noting only the most severe violation at the facility. PG&E's practice of having its staff not record all violations of GOs 95 and 128 does not comply with GO 165. It is apparent that all violations identified during an inspection are not recorded at the time of the inspection, nor are violations recorded by follow-up crews who complete the maintenance orders generated during the initial inspections.

Recommendations

The CPUC investigated Tag #102806460 for a field review. The tag identified a leaking transformer and was given a required end date of 4/30/2010. The CPUC found that the transformer was leaking. A customer arrived at the site as well and complained that the oil was leaking on his vehicle parked underneath the transformer. The USBR recommends immediate action done to correct the safety hazard.