

PUBLIC UTILITIES COMMISSION

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December 11, 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. EA2009-23

SUBJECT: Electric Audit of PG&E's Diablo Division, Concord Service Center

On behalf of the Utilities Safety and Reliability Branch (USRB) of the California Public Utilities Commission, Dennis Lee, Terence Eng, and I conducted an Electric Audit of PG&E's Diablo Division-Concord Service Center from 10/26-10/30/2009. The audit included a review of your records for the period of 2006 to 2008.

During the inspection, 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 the corrective measures taken by the Utility regarding the violations and the date on which they were corrected.

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

Sincerely,

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

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

Enclosure: Audit Summary

CC: Ms. Holly Myer-Zebzda, PG&E
Mr. Dennis Lee, CPUC
Mr. Terence Eng, CPUC

AUDIT SUMMARY

A. Records Review

1. General Order (GO) 165, 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 operation..."

PG&E's 2008 EDPM Manual states:

"Inspected facilities include all associated electric distribution and applicable service facilities outside the substation fence to the end of the line, including primary enclosures and idle facilities..."

Document the completion of inspections by performing the following:

- *On a daily basis, highlight the inspected facilities..."*

During our review of the underground (UG) inspection records, we found the following facilities not highlighted as an indication of it being inspected:

- a) Map B0804 – One UG primary box was not highlighted in the 2008 detailed inspection record.
- b) Map B1623 – Four UG primary boxes and one transformer were not highlighted in the 2008 detailed inspection record.

Both maps were last detailed inspected in 2005.

2. General Order 165, 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 operation..."

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."

PG&E's 2007-2008 EDPM Manual, Equipment Testing and Inspection Intervals table shows in part:

Facilities	(Intervals)			
	Quarterly	Twice Yearly	Yearly	As Needed
Capacitor Bank, OH & UG, Fixed or Switched, Padmounted or OH		T		
Recloser, OH-Hydraulic Electronic & Microprocessor		T/I		
Regulators, OH			T	
SCADA/PDAC			T	

During records review, we requested 2007 and 2008 inspection records for the following equipment:

Capacitors

- a) K102 – 2/2/2007 test record shows the "tested by" and "test date and time" fields blank
- b) K1052 – 10/7/2008 test record shows the amperage readings (52 Amps) for all 3 phases to be outside the range stated on the table with no follow-up
- c) K100 – Missing 2008 test record
- d) K724 – Missing 2007 test record
- e) K504 – 2/1/2008 test record has some required missing fields blank (Counter reading, cap control manufacturer and model number)

- f) C508C – 2/2/2007 test record shows the “tested by” and “test date and time” fields blank
- g) C525C – Missing 2007 test record
- h) D504C – Missing 2007 test record
- i) K704 – Missing 2007 test record
- j) K587 – Missing 2007 test record
- k) K871 – Missing 2007 test record
- l) K809 – Missing 2007 test record
- m) K209 – Missing 2007 test record

Recloser

- a) B504R – 2007 first test record “Tested by” and “Test date and time” fields are blanks
- b) B534R – 2007 second test record did not have the “Test date and time” information
- c) 2442 – 2007 second test record did not have the “Test date and time” information
- d) 6142 – 2007 second test record did not have the “test date and time” information
- e) 6512 – 2007 second test record did not have the “Test date and time” information
- f) 19062 – 2007 second test record did not have the “Test date and time” information
- g) B513R – 2007 second test record did not have the “Test date and time” information
- h) B511R – 2007 second test record did not have the “Test date and time” information
- i) B542R – 2007 second test record did not have the “Test date and time” information; Missing 2008 test record
- j) 21471 – Missing first and second 2007 test records and 2008 first test records
- k) 2212 – 2007 second test record did not have the “Test date and time” information
- l) A106R – 2007 second test record did not have the “Test date and time” information

Regulators

- a) Balfour regulator – No 2007 test record
- b) Foster regulator – There were no 2007 and 2008 test records

SCADA

The following did not have records of inspection for both 2007 and 2008:

- a) B5325
- b) A5415
- c) K1205
- d) A5465
- e) C5855
- f) Q37
- g) C4075
- h) W5385
- i) D400S
- j) N530S
- k) D302S
- l) D539S
- m) T16

3. General Order 165, 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 operation, but in no case may the period between inspections exceed the time specified in the attached table.

	<i>Patrol</i>		<i>Detailed</i>	
	<i>Urban</i>	<i>Rural</i>	<i>Urban</i>	<i>Rural</i>
<i>Streetlighting</i>	<i>1</i>	<i>2</i>	<i>X</i>	<i>X</i>

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.”

Review of patrol maps showed the locations of streetlights, but they are not highlighted during the patrols. It was explained to us that most, if not all, of the streetlights in the division are PG&E-owned facilities. The division representative explained that PG&E inspectors are instructed to look at the

condition of the streetlights, whether or not they are owned by PG&E, as they do their patrols; however they are not instructed to highlight or tally these facilities.

It is our understanding that highlighting facilities on the map indicates completion of a patrol or inspection. If this remains true, not highlighting the streetlights during the patrol inspections or the absence of additional streetlight patrol records is a violation of General Order 165.

B. Field Review

OH Map F12-22

- a) Location 1: Primary down guy was found cut upon arrival; This was field repaired.
- b) Location 4: Bob on the primary down guy was touching the tree; This was field repaired.
- c) Location 10: High Voltage sign missing; This was field repaired.
- d) Location 17: Exposed ground and missing High Voltage sign; Both were field repaired.
- e) Location 18: Exposed ground; This was field repaired.

OH Map F12-18

- f) Location 27: This is pending EC# 102567702 to install down guy;
 - During field verification, we also found service drop to 316 Ramona Rd at 8'; The low service drop was field repaired.
- g) Location 31: Bob on primary down guy was touching the tree; This was field repaired.
- h) Location 33: Strap holding the underarm bus was falling off; This was field repaired.
- i) Location 35: Service drop to 187 Ramona Rd was measured to be 9' 7" – This is pending repair. [Note: GO 95, Rule 54.8B(2)(b) requires 12 feet clearance except for insulated services that conform with Rule 20.9-G which can be reduced to 10 feet]