PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



February 5, 2010

EA-2009-25

Mr. Barry Fisher Construction/Maintenance Supervisor City of Lodi Electric Utility 1331 South Ham Lane Lodi, California 95242

CPUC File No. EA2009-25

SUBJECT: General Order 95, 128, and 165 Audit of City of Lodi Electric Utility

Dear Mr. Fisher,

On behalf of the Utility Safety and Reliability Branch of the California Public Utilities Commission, Ryan Yamamoto and I conducted General Order 95, 128, and 165 Inspections of Lodi Electric Utility (LEU) from November 2. 4, 2009.

During the audit, we identified violations of one or more of the General Orders. A copy of the inspection summary itemizing the violations is enclosed. Please advise me by electric or hard copy of all corrective measures taken by LEU regarding the violations. Please provide the electronic or hard copy records showing the correction date for each violation.

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: Inspection Summary

I. General Order (GO) 165, Inspection Cycles for Electric Distribution Facilities

A. Paragraph IV (1st sub-paragraph).states:

"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. Appendix A."

LEU does not have a formal inspection program that complies with the GO165 inspection requirements. No records were furnished during the audit that demonstrated compliance with inspection cycles required by GO 165.

B. Paragraph IV (5th sub-paragraph) 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 the inspection, and any problems identified during each inspection, as well as the scheduled date of corrective action. ..."

The LEU inspection program does not identify all GO 95 and 128 violations of its electric facilities.

II. GO 128, Rules For Construction of Underground Electric Supply and Communication Systems

GO 128, Rule 34.3-B, Guarding Live Parts states:

Compartments and enclosures which will, during normal operation, contain exposed live parts shall be designed and installed to prevent a person from passing a wire or other conducting material into such compartment from the outside when it is closed. This requirement is not intended to prevent normal work operations such as fishing ducts and installing cable.

"EXCEPTION:

Read-mounted equipment that contains exposed live parts shall be installed to resist the passing of a wire the equivalent of a bare number 18 AWG from the outside between the pad and the housing of the equipment, into the compartment which contains live parts when it is closed.+

On November 3, 2009, the following two transformer enclosures, with exposed live parts, were shown to have openings at the base which could enable a person to insert a wire or other conducting material into the enclosures from the outside when the enclosures are closed Both transformers were lasted inspected on July 14, 2009.

- 1) Transformer 39-26, located at 1614 West Royal Crest Dr
- 2) Transformer 39-24, at located 1119 South Dover Dr.