

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 10, 2012

EA2010-28

Mr. Jadwindar Singh  
Manager, Distribution Compliance  
Pacific Gas and Electric Company  
245 Market St, #926  
San Francisco, CA 94105

Subject: PG&E Kern Division Electric Audit

Dear Mr. Singh:

On behalf of the Utilities Safety and Reliability Branch (USRB) of the California Public Utilities Commission (CPUC), George Carter and I conducted an electric audit of PG&E's Kern Division, Taft and Wasco Districts on October 18-22, 2010. The audit included a review of the division's records for the period January 2003 through October 2010. During the audit, we identified violations of one or more General Orders. I have enclosed a copy of our audit summary itemizing those violations. By March 12 2012, PG&E must send me a response to this letter detailing its plans to address those violations and when PG&E expects to complete them. You may email an electronic copy of the response to [iag@cpuc.ca.gov](mailto:iag@cpuc.ca.gov) or send a hard copy to:

Attn: Ivan Garcia  
California Public Utilities Commission  
180 Promenade Circle Suite 115  
Sacramento, CA 95834-2939

Should you have any questions concerning this letter I can be reached by telephone at (916) 928-5875 or by email at [iag@cpuc.ca.gov](mailto:iag@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Ivan Garcia", written over a circular stamp or seal.

Ivan Garcia  
Utilities Safety and Reliability Branch  
Consumer Protection and Safety Division  
California Public Utilities Commission

Enclosures: Audit Summary

CC:

Alok Kumar, Senior Utilities Engineer, CPUC USRB  
Raymond Fugere, Program and Project Supervisor, USRB, CPUC  
Curtis Todd Ryan, Supervisor, PG&E Gas & Electric System Support

## AUDIT SUMMARY

### I. Record Violations

This section summarizes the General Order (GO) violations that we found during our review of PG&E Kern Division maintenance records.

#### A. Late Corrective Actions

GO 95 Rule 31.1 Design, Construction and Maintenance [of overhead lines] and GO 128 Rule 17.1 Design, Construction and Maintenance [of underground systems] state in part:

*For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice*

PG&E's EDPM manual outlines PG&E's methodology for prioritizing (with end dates) corrective actions for issues it finds on its electric system. USRB interprets "accepted good practice" in part to mean following all established internal company procedures and standards. Thus, past due corrective actions that violate the PG&E's EDPM manual are also violations of GOs 95 and/or 128.

PG&E Kern Division had 1725 corrective actions that were completed late or still pending.

## II. Field Violations

This section lists the GO 95 and 128 violations that we identified during our field inspections of PG&E facilities. For the field work, we chose locations that PG&E inspected for GO violations per its maintenance program recent to our audit date.

<b>A.</b>	<b>Location:</b>	In alley behind 117 Kern St., Taft
	<b>Pole No.:</b>	N/A
	<b>Previous Visit by Utility:</b>	9/24/10
	<b>Date Visited by CPUC:</b>	10/21/10
<b>Explanation of Violation(s):</b>		
<p><u>High Voltage Signs Missing</u></p> <p>GO 95 Rule 51.6 A3:</p> <p style="text-align: center;"><i>Crossarms where present may be marked in lieu of marking the pole. Such signs shall be placed on the face and back of each crossarm supporting line conductors</i></p> <p>The pole at this location was missing high voltage signs on both sides of the crossarm.</p>		

<b>B.</b>	<b>Location:</b>	In alley behind 131 Kern St., Taft
	<b>Pole No.:</b>	N/A
	<b>Previous Visit by Utility:</b>	9/24/10
	<b>Date Visited by CPUC:</b>	10/21/10
<b>Explanation of Violation(s):</b>		
<p><u>High Voltage Signs Missing</u></p> <p>GO 95 Rule 51.6 A3:</p> <p style="text-align: center;"><i>Crossarms where present may be marked in lieu of marking the pole. Such signs shall be placed on the face and back of each crossarm supporting line conductors</i></p> <p>The pole at this location was missing a high voltage sign on the east side of the crossarm.</p>		

<b>C.</b>	<b>Location:</b>	In alley behind 145 Kern St., Taft
	<b>Pole No.:</b>	N/A
	<b>Previous Visit by Utility:</b>	9/24/10
	<b>Date Visited by CPUC:</b>	10/21/10
<b>Explanation of Violation(s):</b>		
<p>GO 95, Rule 31.6, Vertical and Lateral Conductors states:</p> <p><i>That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering</i></p> <p>The ground molding was exposed at this pole.</p>		

<b>D.</b>	<b>Location:</b>	4 <sup>th</sup> pole in alley West of 2 <sup>nd</sup> St., Taft
	<b>Pole No.:</b>	5635L
	<b>Previous Visit by Utility:</b>	9/24/10
	<b>Date Visited by CPUC:</b>	10/21/10
<b>Explanation of Violation(s):</b>		
<p>GO 95, Rule 31.6, Abandoned Lines states:</p> <p><i>Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property.</i></p> <p>An exposed ground molding at this pole was abandoned and not in use by PG&amp;E.</p>		

<b>E.</b>	<b>Location:</b>	4 <sup>th</sup> Pole in alley East of 3 <sup>rd</sup> St., Taft
	<b>Pole No.:</b>	3275T

<b>Previous Visit by Utility:</b>	9/24/10
<b>Date Visited by CPUC:</b>	10/21/10
<b>Explanation of Violation(s):</b>	
<p>GO 95, Rule 54.6, Vertical and Lateral Conductors states:</p> <p><i>That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering</i></p> <p>The ground molding was exposed at this pole.</p>	

<b>F.</b>	<b>Location:</b>	4213B McCray Rd., Bakersfield
	<b>Transformer No.:</b>	
	<b>Previous Visit by Utility:</b>	9/7/10
	<b>Date Visited by CPUC:</b>	10/21/10
<b>Explanation of Violation(s):</b>		
<p>GO 128, Rule 17.1, Design, Construction and Maintenance states in part:</p> <p><i>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.</i></p> <p>The enclosure of the vault at this location was broken creating an unsafe condition because of the minor exposure of PG&amp;E's underground equipment.</p>		