

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 7, 2012

Colin Murphey
Electric Supervisor
Ukiah Public Utilities Department
1320 Airport Road
Ukiah, CA 95482

EA2012-008

SUBJECT: Electric Audit of the Ukiah Public Utilities Department

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Ivan Garcia and Paul Penney of my staff conducted an electric audit of the Ukiah Public Utilities Department (Ukiah) from April 30, 2012 to May 3, 2012. The audit included a review of Ukiah's records and a field inspection of Ukiah's facilities.

During the audit, violations of one or more General Orders were identified. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than September 10, 2012, of all the corrective measures taken by Ukiah to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Paul Penney at (415) 703-1817 or paul.penney@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Stepanian".

Raffy Stepanian, P.E.
Program Manager
Electric Safety and Reliability Branch
Consumer Protection and Safety Division
California Public Utilities Commission

Enclosure: Audit Summary

CC: Raymond Fugere, Program and Project Supervisor, ESRB
Alok Kumar, Senior Utilities Engineer, ESRB
Ivan Garcia, Utilities Engineer, ESRB
Paul Penney, Utilities Engineer, ESRB

Audit Summary

General Order (GO) 165, Section III-B, Standards for Inspection, states:

Each utility subject to this General Order shall conduct inspections of its distribution facilities, as necessary, to ensure reliable, high-quality, and safe operation, but in no case may the period between inspections (measured in years) exceed the time specified in Table 1.

Ukiah did not have complete records to demonstrate that it was conducting patrols (overhead, underground and padmounted), and underground detailed inspections and padmount detailed inspections for the audit period (2007-2011) as required by GO165.

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And the definitions section of GO165 states:

"Detailed" inspection shall be defined as one where individual pieces of equipment and structures are carefully examined, visually and through use of routine diagnostic test, as appropriate, and (if practical and if useful information can be so gathered) opened, and the condition of each rated and recorded.

From our discussion with Ukiah personnel, my staff determined that some equipment testing is taking place, but not on the cycles required by GO165. Ukiah must develop procedures and test equipment (i.e., capacitor banks, regulators, etc.) on the cycles defined in the GO165.

GO165, Section III-C, Record Keeping, states in part:

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. 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.

Ukiah's records for overhead detailed inspections and intrusive inspections performed between August 24, 2010 and October 23, 2010 identified 2032 conditions from the detailed inspections and 222 poles that failed to meet minimum strength requirements during the intrusive inspections. These conditions have not been assigned a scheduled date of corrective action as required by GO 165.

GO165, Section III-C, – Record Keeping, states in part:

The utility shall maintain records for (1) at least ten (10) years of the patrol and detailed inspection activities, and (2) the life of the pole for intrusive inspection activities.

Ukiah's maintenance program does not comply with the current record retention requirements of GO165. The time frame listed in the maintenance program is shorter than those required in GO165. Specifically, page 7 of Ukiah's maintenance program states "A copy of the Inspection sheets will be kept for five years after completion of the required maintenance."

GO165, Section III-D, Reporting, states in part:

By July 1st each utility subject to this General Order shall submit an annual report for the previous year under penalty of perjury.

Ukiah has not submitted any annual reports to the Commission. Annual reports must be submitted to the Commission by July 1st.

GO 165, Section IV, Transmission Facilities, states in part:

Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines.

Page 4 of Ukiah's Maintenance plan, states visual inspections shall be conducted twice annually. Ukiah did not have records to demonstrate that inspections of transmission facilities were being conducted per its plan.

Field Violations

| | | |
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| 1. | Location: | Tx-1858 1100 Airport Blvd., in front of Savings Bank |
| | Previous Visit Details: | 1/30/2007 |
| | Date of CPUC Inspection: | 05/02/12 |
| | Explanation of Violation(s): | |
| | GO 128, Rule 34.3-A | |
| | <i>The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</i> | |
| | The transformer case was not bolted down. | |
| 2. | Location: | Tx-538 1116 Airport Blvd. |
| | Previous Visit Details: | 8/13/09 |
| | Date of CPUC Inspection: | 05/02/12 |
| | Explanation of Violation(s): | |
| | GO 128, Rule 34.3-A | |
| | <i>The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</i> | |
| | The transformer case was not bolted down. | |

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| 3. | Location: | Tx-1458 1240 Airport Blvd. |
| | Previous Visit Details: | 8/13/09 |
| | Date of CPUC Inspection: | 05/02/12 |
| Explanation of Violation(s): | | |
| GO 128, Rule 34.3-A | | |
| <p style="text-align: center;"><i>The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</i></p> | | |
| The transformer case was not bolted down. | | |

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| 4. | Location: | Tx-1469 155 Airport Blvd. |
| | Previous Visit Details: | 1/25/07 |
| | Date of CPUC Inspection: | 05/02/12 |
| Explanation of Violation(s): | | |
| GO 128, Rule 34.3-A | | |
| <p style="text-align: center;"><i>The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</i></p> | | |
| The transformer case was not bolted down. | | |

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| 5. | Location: | Tx-1572 115 Airport Blvd., adjacent to the Jack-in-the-Box |
| | Previous Visit Details: | 8/13/09 |
| | Date of CPUC Inspection: | 05/02/12 |
| | Explanation of Violation(s): | |
| GO 128, Rule 34.3-A | | |
| <p style="text-align: center;"><i>The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</i></p> | | |
| The transformer case was not bolted down. | | |

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| 6. | Location: | Tx-1851 795 East Perkins |
| | Previous Visit Details: | Unknown |
| | Date of CPUC Inspection: | 05/02/12 |
| | Explanation of Violation(s): | |
| GO 128, Rule 34.3-A | | |
| <p style="text-align: center;"><i>The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</i></p> | | |
| The transformer case was not bolted down. | | |

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| 7. | Location: | Tx-1541 |
| | Previous Visit Details: | Unknown |
| | Date of CPUC Inspection: | 05/02/12 |
| Explanation of Violation(s): | | |
| GO 128, Rule 34.3-A | | |
| <p style="text-align: center;"><i>The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons.</i></p> | | |
| The transformer case was not bolted down. | | |

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| 8 | Location: | 1601 Airport Blvd. (in back of Mendocino Brewing Co.) |
| | Previous Visit Details: | 8/19/09 |
| | Date of CPUC Inspection: | 05/02/12 |
| Explanation of Violation(s): | | |
| GO 128, Rule 34.3B, Guarding Live Parts, States: | | |
| <p style="text-align: center;">“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.”</p> | | |
| Tx-1569, had holes leading into both the primary and secondary chambers. | | |

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| 9 | Location: | 809 West Perkins |
| | Previous Visit Details: | 2009 USRB Electric Audit |
| | Date of CPUC Inspection: | 05/02/12 |
| Explanation of Violation(s): | | |
| <p>GO95, Rule 56.2, Use, states in part:</p> <p style="padding-left: 40px;">“...Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.”</p> <p>While field verifying the Ukiah's repairs for findings from the 2009 USRB audit, a loose span guy appeared not to have been tightened. Ukiah personnel explained that one of the two poles supporting the span guy was replaced after the 2009 USRB audit and subsequent repair. The span guy was not tightened after the pole was replaced.</p> | | |

Recommendation

GO 95, Rule 18-B requires companies to notify other companies if safety hazards are found during inspections. The rule states:

“If a company, while performing inspections of its facilities, discovers a safety hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery. To the extent the inspecting company cannot determine the facility owner/operator, it shall contact the pole owner(s), who shall be responsible for promptly notifying the company owning/operating the facility with the safety hazard(s), normally not to exceed five business days after being notified of the safety hazard. The notification shall be documented and such documentation must be preserved by all parties for at least ten years. “

Ukiah should incorporate this requirement into its maintenance plan, and maintain records to demonstrate compliance.