

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 8, 2012

David Folce  
Electric Operations Manager  
Lassen Municipal Utility District  
65 S. Roop Street  
Susanville, Ca 96130

EA2012-014

**SUBJECT:** Audit of Lassen Municipal Utility District

Dear Mr. Folce:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Ryan Yamamoto and Ivan Garcia of my staff conducted an audit of Lassen Municipal Utility District (LMUD) from June 20, 2012 to June 22, 2012. The audit included a review LMUD's records and field inspections of LMUD's facilities.

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 no later than September 12, 2012 by electronic or hard copy, of all corrective measures taken by LMUD to remedy and prevent such violations.

If you have any questions concerning this audit please contact, Ivan Garcia of my staff at (916) 928-5875 or [ivan.garcia@cpuc.ca.gov](mailto:ivan.garcia@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "R. Stepanian", with a long horizontal line extending to the right.

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

Enclosures: Audit Summary

CC: Ryan Yamamoto, Utilities Engineer, ESRB, CPUC  
Alok Kumar, Senior Utilities Engineer, ESRB, CPUC  
Raymond Fugere, Program and Project Supervisor, ESRB, CPUC  
Ivan Garcia, Utilities Engineer, ESRB, CPUC

## AUDIT SUMMARY

### **GO 165, Section III-B, - Standards for Inspection, states in part:**

*“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.”*

LMUD did not have sufficient records to demonstrate compliance with the patrol, detailed, and intrusive intervals requirements of GO 165.

### **GO 165, Section III-C, – Record Keeping, states in part:**

*“For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.”*

All violations that were discovered by the LMUD were not scheduled for corrective action.

### **GO 165, Section III-D, - Reporting, states in part:**

*“By July 1<sup>st</sup> each utility subject to this General Order shall submit an annual report for the previous year under penalty of perjury. The report shall list four categorical types of inspections: Patrols, Overhead Detailed, Underground Detailed and Wood Pole Intrusive. The report shall denote the total units of work by inspection type for the reporting period and the number of outstanding (not completed) inspections within the same reporting period for each of the four categories.”*

LMUD has not submitted any annual reports to the Commission. Annual reports must be submitted to the Commission by July 1<sup>st</sup>.

**GO 95 , Rule 18-A1a, - Resolution of Safety Hazards and GO 95 Nonconformances, states in part:**

*“Each company (including utilities and CIPs) is responsible for taking appropriate corrective action to remedy Safety Hazards and GO 95 nonconformances posed by its facilities.”*

LMUD did not document, schedule for correction and correct all Safety Hazards received from other companies.

**GO 95, Rule 18-A2a - Resolution of Safety Hazards and GO 95 Nonconformances, states in part:**

*“All companies shall establish an auditable maintenance program for their facilities and lines.”*

LMUD does not have an auditable maintenance program.

**GO 95, Rule 18-A2a, - Resolution of Safety Hazards and GO 95 Nonconformances, states in part:**

*“All companies must include a timeline for corrective actions to be taken following the identification of a Safety Hazard or nonconformances with General Orders 95 on the company’s facilities. The auditable maintenance program shall prioritize corrective actions consistent with the priority levels set forth below and based on the following factors, as appropriate:”*

LMUD currently does not assign the appropriate time periods for correction of its nonconformances.

**GO 95, Rule 18B, - Notification of Safety Hazards, states in part:**

*“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.”*

LMUD does not address notification of safety hazards as required by GO 95.

<b>A.</b>	<b>Location:</b>	216 Fir St., Westwood
	<b>Pole No.:</b>	Unknown
	<b>Previous Visit by Utility:</b>	Unknown
	<b>Date Visited by CPUC:</b>	6/21/12
<b>Explanation of Violation(s):</b>		
<p data-bbox="358 621 846 653"><u>Low Primary Conductor Clearance</u></p> <p data-bbox="358 695 1495 768">GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc.; Table 1, Case 3E:</p> <p data-bbox="407 804 1511 982"><i>Clearance between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also clearances between conductors, guys, structures, or other objects, shall not be less than those set forth at 25 feet and at a Temperature of 60°F and no wind.</i></p> <p data-bbox="358 1024 1390 1056">The primary conductor at this pole was less than 25 feet from the ground.</p>		

<b>B.</b>	<b>Location:</b>	305 2 <sup>nd</sup> St., Westwood
	<b>Pole No.:</b>	Unknown
	<b>Previous Visit by Utility:</b>	Unknown
	<b>Date Visited by CPUC:</b>	6/21/12
<b>Explanation of Violation(s):</b>		
<u>High Voltage Signs Missing</u>		
GO 95 Rule 51.6, Marking and Guarding, High Voltage Marking of Poles:		
<p><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.</i></p>		
High Voltage Signs were missing at this pole.		

<b>C.</b>	<b>Location:</b>	3 <sup>rd</sup> pole in alley, between 2 <sup>nd</sup> and 3 <sup>rd</sup> St., Westwood
	<b>Pole No.:</b>	0614 (Transformer number)
	<b>Previous Visit by Utility:</b>	Unknown
	<b>Date Visited by CPUC:</b>	6/21/12
<b>Explanation of Violation(s):</b>		
<u>Exposed Ground Wire</u>		
GO 95 Rule 54.6B, Vertical and Lateral Conductors: Ground Wires:		
<p><i>Ground Wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.</i></p>		
The ground wire at this pole was exposed up to the communication level.		

<b>D</b> .	<b>Location:</b>	5 <sup>th</sup> pole in alley, behind 218 Delwood St., Westwood
	<b>Pole No.:</b>	Unknown
	<b>Previous Visit by Utility:</b>	Unknown
	<b>Date Visited by CPUC:</b>	6/21/12
	<b>Explanation of Violation(s):</b>	
<p><u>Exposed Ground Wire</u></p> <p>GO 95 Rule 54.6B, Vertical and Lateral Conductors: Ground Wires:</p> <p style="text-align: center;"><i>Ground Wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.</i></p> <p>The ground wire at this pole was exposed up to the transformer.</p>		

<b>E.</b>	<b>Location:</b>	400 Fir St., 1 <sup>st</sup> pole in alley, Westwood
	<b>Pole No.:</b>	Unknown
	<b>Previous Visit by Utility:</b>	Unknown
	<b>Date Visited by CPUC:</b>	6/21/12
<b>Explanation of Violation(s):</b>		
<p><u>High Voltage Signs Missing</u></p> <p>GO 95 Rule 51.6, Marking and Guarding, High Voltage Marking of Poles:</p> <p><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.</i></p> <p>High Voltage Signs were missing at this pole.</p>		
<p><u>Tree branch Clearance From Primary Conductors</u></p> <p>GO 95 Rule 35, Vegetation Management, Table 1, Case 13E states:</p> <p><i>The radial clearance of bare line conductors from tree branches or foliage for supply conductors and supply cables, 750 – 22,500 Volts is 18 inches.</i></p> <p>The tree branch clearance from the primary conductor span to the next pole on this alley was less than 18 inches.</p>		

<b>F.</b>	<b>Location:</b>	400 Fir St., 2 <sup>nd</sup> pole in alley, Westwood
	<b>Pole No.:</b>	Unknown
	<b>Previous Visit by Utility:</b>	Unknown
	<b>Date Visited by CPUC:</b>	6/21/12
<b>Explanation of Violation(s):</b>		
<p><u>Service Lines Touching Roofs Of Two Homes</u></p> <p>GO 95 Rule 84.8C4, Clearance above Ground and Buildings, From Buildings and Structures states in part:</p> <p style="text-align: center;"><i>Service drops are not required to clear the roofs of buildings on the premises served any specified vertical distance. The vertical clearance above buildings on premises other than the one being served shall not be less than 8 feet, except that a reduction to not less than 2 feet”</i></p> <p>The service lines from this pole were touching the roofs of the two homes on 404 Fir St. and 406 Fir St.</p>		
<p><u>Exposed Ground Wire</u></p> <p>GO 95 Rule 54.6B, Vertical and Lateral Conductors: Ground Wires:</p> <p style="text-align: center;"><i>Ground Wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.</i></p> <p>The ground wire at this pole was exposed throughout the length of the pole.</p>		



<b>G</b>	<b>Location:</b>	400 Fir St., 4 <sup>th</sup> pole in alley, Westwood
	<b>Pole No.:</b>	Unknown
	<b>Previous Visit by Utility:</b>	Unknown
	<b>Date Visited by CPUC:</b>	6/21/12
<b>Explanation of Violation(s):</b>		
<u>Exposed Ground Wire</u>		
GO 95 Rule 54.6B, Vertical and Lateral Conductors: Ground Wires		
<i>Ground Wires of supply circuits must be protected by suitable covering and be in good repair throughout their length.</i>		
The ground wire at this pole was exposed throughout the length of the pole.		
<u>High Voltage Signs Not Legible</u>		
GO 95 Rule 51.6, Marking and Guarding, High Voltage Marking of Poles:		
<i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.</i>		
High Voltage Signs were not legible to show the words "HIGH" and "VOLTAGE".		

<b>H</b>	<b>Location:</b>	Intersection of Skyline Dr. and Numa Rd., Susanville
	<b>Equipment ID:</b>	Switch S112
	<b>Previous Visit by Utility:</b>	Unknown
	<b>Date Visited by CPUC:</b>	6/21/12
<b>Explanation of Violation(s):</b>		
<u>No Ownership Identification</u>		
GO 128, Rule 17.8 Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures		
<p style="text-align: center;"><i>Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.</i></p>		
LMUD did not have ownership identification of the padmount switch at this location.		

<b>I</b>	<b>Location:</b>	745 Ruth St., Susanville
	<b>Equipment ID:</b>	Pad 232
	<b>Previous Visit by Utility:</b>	6/10/09
	<b>Date Visited by CPUC:</b>	6/21/12
<b>Explanation of Violation(s):</b>		
<u>Padmount Transformer Not Bolted Down</u>		
GO 128, Rule 34.3A, Self-contained Surface-mounted Equipment, Strength:		
<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 padmount transformer at this location was not bolted down.		

<b>J</b>	<b>Location:</b>	690 Ruth St., Susanville
	<b>Equipment ID:</b>	Pad 233
	<b>Previous Visit by Utility:</b>	6/10/09
	<b>Date Visited by CPUC:</b>	6/21/12
	<b>Explanation of Violation(s):</b>	
	<p data-bbox="358 583 971 615"><u>Unable To Inspect Pad mount Transformer.</u></p> <p data-bbox="358 657 1182 688">GO 95 Rule 17.1, Design, Construction, and Maintenance:</p> <p data-bbox="475 730 1507 867"><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 data-bbox="358 909 1463 976">LMUD was unable to inspect this Padmount Transformer due to excessive dirt interfering with opening the lid.</p>	