

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 12, 2012

Paul Hauser
General Manager
Trinity Public Utilities District
P.O. Box 1216
Weaverville, CA 96093-1216

EA2012-025

SUBJECT: Audit of Trinity Public Utilities District

Dear Mr. Hauser:

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 Trinity Public Utilities District's (TPUD's) electric distribution system from August 13, 2012 to August 15, 2012. The audit included a review of TPUD's records and field inspections of TPUD's facilities.

During the audit, my staff 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 November 16, 2012 by electronic or hard copy, of all corrective measures taken by TPUD to remedy and prevent such violations.

If you have any questions concerning this audit please contact, Ivan Garcia at (916) 928-5875 or ivan.garcia@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

Enclosures: Audit Summary

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

TPUD is not conducting and documenting detailed inspection cycle for overhead facilities as required in GO 165. TPUD has never documented detailed inspections for their overhead facilities.

TPUD is not conducting and documenting detailed inspection cycle for underground facilities as required in GO 165. TPUD has never documented detailed inspections for their underground facilities.

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.

TPUD does not document all violations during an inspection.

GO 165, 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.

TPUD's Preventative Maintenance Program does not comply with the current GO 165 requirements. TPUD's Preventative Maintenance Program states that copies of completed maintenance tags will be kept for a minimum of five years after completion of the required maintenance. TPUD was unable to provide completed maintenance tags before 2011. Furthermore, TPUD was unable to provide any patrol and/or detailed inspections records.

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

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

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

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.”

TPUD’s Preventative Maintenance Program outlines the company’s prioritization of corrective actions consistent with GO 95, Rule 18-A2a. However, TPUD did not take appropriate corrective action to remedy Safety Hazards and GO 95 nonconformances posed by its facilities.”

GO 95, Rule 18-B, - 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.”

TPUD does not notify other companies of safety hazards as required by GO 95.

GO 95, Rule 44.2, - Additional Construction, states:

“Any entity planning the addition of facilities that materially increase vertical, transverse or longitudinal loading on a structure shall perform a loading calculation to ensure that the addition of the facilities will not reduce the safety factors below the values specified by Rule 44.3. Such entity shall maintain these pole loading calculations for ten years and shall provide such information to authorized joint use pole occupants and the Commission upon request.”

TPUD did not conduct pole load calculations.

A.	Location:	Old Lewiston Rd., Lewiston
	Equipment ID:	TPUD 14435
	Previous Visit by Utility:	5/15/12
	Date Visited by CPUC:	8/14/12
Explanation of Violation(s):		
<u>Guy Guard Missing</u>		
<p>GO 95 Rule 56.9, Guy Marker (Guy Guard), states in part::</p> <p style="padding-left: 40px;">A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.</p> <p>The guy guard at this location was missing from the down guy. This violation was not identified by TPUD during its last visit to this location.</p>		

B.	Location:	Ponderosa Pines, Lewiston
	Equipment ID:	TPUD 14952
	Previous Visit by Utility:	5/15/12
	Date Visited by CPUC:	8/14/12
Explanation of Violation(s):		
<u>Guy Guard Missing</u>		
<p>GO 95 Rule 56.9, Guy Marker (Guy Guard), states in part::</p> <p style="padding-left: 40px;">A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.</p> <p>The guy guards at this location were missing from the down guys. This violation was not identified by TPUD during its last visit to this location.</p>		

C.	Location:	Ponderosa Pines, Lewiston
	Equipment ID:	TPUD 14588
	Previous Visit by Utility:	5/15/12
	Date Visited by CPUC:	8/14/12
Explanation of Violation(s):		
<u>Guy Guard Missing</u>		
<p>GO 95 Rule 56.9,Guy Marker (Guy Guard), states in part::</p> <p style="padding-left: 40px;">A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.</p> <p>The guy guard at this location was missing from the down guy. This violation was not identified by TPUD during its last visit to this location.</p>		

D.	Location:	
	Equipment ID:	TPUD 4218
	Previous Visit by Utility:	7/6/12
	Date Visited by CPUC:	8/14/12
Explanation of Violation(s):		
<u>Guy Guard Missing</u>		
<p>GO 95 Rule 56.9,Guy Marker (Guy Guard), states in part::</p> <p style="padding-left: 40px;">A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.</p> <p>The guy guard at this location was missing from the down guy. This violation was not identified by TPUD during its last visit to this location.</p>		

E.	Location:	
	Pole No.:	TPUD 4021
	Previous Visit by Utility:	7/6/12
	Date Visited by CPUC:	8/14/12
Explanation of Violation(s):		
<p data-bbox="342 579 748 615"><u>High Voltage Signs Missing</u></p> <p data-bbox="342 653 1386 688">GO 95 Rule 51.6, Marking and Guarding, High Voltage Marking of Poles:</p> <p data-bbox="483 726 1419 1016">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.</p> <p data-bbox="342 1054 1503 1125">High Voltage Signs were missing on both sides of the crossarm at this pole. This violation was not identified by TPUD during its last visit to this location.</p>		

F.	Location:	Red Hill Road at Corner Creek Bridge
	Pole No.:	Unknown
	Previous Visit by Utility:	8/8/12
	Date Visited by CPUC:	8/14/12
Explanation of Violation(s):		
<p data-bbox="342 579 675 617"><u>Ground Wire Exposed</u></p> <p data-bbox="342 653 857 690">GO 95, Rule 54.6, B, states in part:</p> <p data-bbox="483 726 1422 835">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 (see Rule 22.8).</p> <p data-bbox="342 871 1536 945">At this location, TPUD's ground wire was exposed. This violation was not identified by TPUD during its last visit to this location.</p>		