

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 12, 2013

EA2013-015

Greg Lohn
Plumas-Sierra Rural Electric Cooperative
Assistant General Manager
Electric Engineering and Operations
73233 State Route 70
Portola, CA 96122

SUBJECT: Audit of Plumas-Sierra Rural Electric Cooperative

Dear Mr. Lohn:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Ivan Garcia, Yusef Collins and Jamie Lau of my staff conducted an electric audit of Plumas-Sierra Rural Electric Cooperative (PSREC) from August 12 to 16, 2013. The audit included a review of PSREC's records and field inspections of PSREC's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations, a list area of concerns and additional question is enclosed. Please advise me no later than December 2, 2013 by electronic or hard copy, of all corrective measures taken by PSREC 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 dark ink, appearing to read "Raymond Fugere".

Raymond Fugere, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Audit Summary

CC: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division
Ivan Garcia, Utilities Engineer, CPUC
Yusef Collins, Utilities Engineer, CPUC
Jamie Lau, Utilities Engineer, CPUC

AUDIT SUMMARY

Company: PSREC
 Electric Audit
 Date: August 12 to August 16, 2013

Violations

A.	Location:	PSREC
	Date Visited by CPUC:	8/12/2013 – 8/16/2013
	Explanation of Violation(s):	
	<p><u>GO 165, Section III-B, – Standards for Inspection, states:</u></p> <p style="text-align: center;"><i>“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.”</i></p> <p>PSREC did not have sufficient records to demonstrate compliance with the patrol and detailed interval requirements of GO 165 for overhead and underground facilities.</p>	

B.	Location:	PSREC
	Date Visited by CPUC:	8/12/2013 – 8/16/2013
	Explanation of Violation(s):	
	<p><u>GO 165, Section III-C, – Record Keeping, states in part:</u></p> <p style="text-align: center;"><i>“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.”</i></p> <p>Several work orders identified by PSREC did not have a date of corrective action.</p>	

C.	Location:	PSREC
	Date Visited by CPUC:	8/12/2013 – 8/16/2013
	Explanation of Violation(s):	
	<p><u>GO 165, Section III-D, –Reporting, states in part:</u></p> <p><i>“By July 1st 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.”</i></p> <p>PSREC has not submitted any annual reports to the Commission. Annual reports must be submitted to the Commission by July 1st.</p>	

D.	Location:	PSREC
	Date Visited by CPUC:	8/12/2013 – 8/16/2013
	Explanation of Violation(s):	
	<p><u>GO 95, Rule 18-A2a – Resolution of Safety Hazards and GO 95 Nonconformances, states in part::</u></p> <p><i>“All companies shall establish an auditable maintenance program for their facilities and lines.”.</i></p> <p>PSREC does not have an auditable maintenance program. SED was unable to determine between patrol and inspection records.</p>	

E.	Location:	PSREC
	Date Visited by CPUC:	8/12/2013 – 8/16/2013
Explanation of Violation(s):		
<u>GO 95, Rule 18-A2a – Resolution of Safety Hazards and GO 95 Nonconformances, states in part::</u>		
<p><i>“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.”</i></p> <p>PSREC currently does not assign the appropriate time periods for correction of its nonconformances.</p>		

F.	Location:	PSREC
	Date Visited by CPUC:	8/12/2013 – 8/16/2013
Explanation of Violation(s):		
<u>GO 95, Rule 18-B –Notification of Safety Hazards, states in part:</u>		
<p><i>“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 th 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.”</i></p> <p>PSREC does not address notification of safety hazards as required by GO 95.</p>		

The following violations were discovered by SED engineers during the field audit and were not documented nor addressed by PSREC during its last visit at the location.

G.	Location:	402 Poplar Valley Road, Graeagle
	Transformer No.:	A34R4C5
	Previous Visit by Utility:	8/2012
	Date Visited by CPUC:	8/14/13
Explanation of Violation(s):		
<p><u>No Ownership Identification</u></p> <p>GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures, states:</p> <p><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> <p>PSREC did not have ownership identification of the padmount transformer at this location.</p>		

H.	Location:	402 Poplar Valley Road, Graeagle
	Equipment No:	CSPMR1
	Previous Visit by Utility:	8/2012
	Date Visited by CPUC:	8/14/2013
Explanation of Violation(s):		
<p><u>Padmount Transformer Not Bolted Down</u></p> <p>GO 128, Rule 34.3A, Self-contained Surface-mounted Equipment, states:</p> <p><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> <p>The padmount transformer at this location was not bolted down.</p>		

I.	Location:	307 Lundy Ln., Graeagle
	Equipment No:	PEC5
	Previous Visit by Utility:	7/2012
	Date Visited by CPUC:	8/14/2013
Explanation of Violation(s):		
<p><u>No Ownership Identification</u></p> <p>GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures, states:</p> <p><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> <p>PSREC did not have ownership identification of the padmount transformer at this location.</p>		

J.	Location:	307 Lundy Ln., Greagle
	Equipment No:	PML11
	Previous Visit by Utility:	7/2012
	Date Visited by CPUC:	8/14/2013
Explanation of Violation(s):		
<p data-bbox="250 590 643 625"><u>No Ownership Identification</u></p> <p data-bbox="250 663 1382 737">GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures, states:</p> <p data-bbox="345 772 1295 919"><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> <p data-bbox="258 955 1305 1024">PSREC did not have ownership identification of the padmount transformer at this location.</p>		

K.	Location:	307 Lundy Ln., Greagle
	Equipment No:	PM11X
	Previous Visit by Utility:	7/2012
	Date Visited by CPUC:	8/14/2013
Explanation of Violation(s):		
<p data-bbox="250 594 643 627"><u>No Ownership Identification</u></p> <p data-bbox="250 667 1382 737">GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures, states:</p> <p data-bbox="344 779 1295 919"><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> <p data-bbox="258 961 1305 1031">PSREC did not have ownership identification of the padmount transformer at this location.</p>		

L.	Location:	2385 Crooked Creek Ln., Quincy
	Pole No:	A138L40R1
	Previous Visit by Utility:	1/9/2013
	Date Visited by CPUC:	8/14/2013
Explanation of Violation(s):		
<p><u>Exposed Ground Wire</u></p> <p>GO 95 Rule 54.6-B, Ground Wires states:</p> <p style="padding-left: 40px;"><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>		
<p><u>Guy Marker Missing</u></p> <p>GO 95 Rule 56.9 Guy Marker (Guy Guard) states in part:</p> <p style="padding-left: 40px;"><i>“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.”</i></p> <p>A guy marker was missing at this pole.</p>		

M.	Location:	2385 Crooked Creek Ln., Quincy
	Pole No:	C161R10
	Previous Visit by Utility:	6/11/2013
	Date Visited by CPUC:	8/14/2013
Explanation of Violation(s):		
<p><u>Exposed Ground Wire</u></p> <p>GO 95 Rule 54.6-B, Ground Wires states:</p> <p><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 at approximately 20 ft. from the base of the pole.</p>		
<p><u>High Voltage Signs Missing</u></p> <p>GO 95 Rule 51.6, High Voltage Marking of Pole states in part:</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 on both sides of the crossarm were missing on this pole.</p>		

N.	Location:	746450 Doyle Grade Rd., Doyle
	Pole No:	D238R6X
	Previous Visit by Utility:	1/8/2013
	Date Visited by CPUC:	8/15/2013
Explanation of Violation(s):		
<p><u>Exposed Ground Wire</u></p> <p>GO 95 Rule 54.6-B, Ground Wires states:</p> <p><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>		
<p><u>Unauthorized Attachment</u></p> <p>GO 95 Rule 34 Foreign Attachments states in part:</p> <p><i>“Unauthorized attachment of equipment foreign to the purposes of overhead electric line construction is not permitted. .”</i></p> <p>A third-party rope attachment was found on this pole.</p>		

O.	Location:	Unknown
	Pole No:	E100R3
	Previous Visit by Utility:	4/5/2013
	Date Visited by CPUC:	8/15/2013
Explanation of Violation(s):		
<p><u>Exposed Ground Wire</u></p> <p>GO 95 Rule 54.6-B, Ground Wires states:</p> <p><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>		
<p><u>High Voltage Signs Missing</u></p> <p>GO 95 Rule 51.6, High Voltage Marking of Pole states in part:</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 on both sides of the crossarm were missing on this pole.</p>		

P.	Location:	1 st pole on 704 Travis Lane, Johnstonville
	Pole No:	E100R3
	Previous Visit by Utility:	E Line 325 Project, WO20081214, 5/2013
	Date Visited by CPUC:	8/15/2013
Explanation of Violation(s):		
<p><u>Third Party Contact On Down Guy</u></p> <p>GO 95 Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 19C, states:</p> <p><i>“Guys and span wires passing conductors supported on the same poles must have a minimum allowable clearance of 3 inches from communication conductors.”</i></p> <p>PRECS’s down guy is in contact with Frontier’s communication cable at this pole.</p>		
<p><u>High Voltage Signs Missing</u></p> <p>GO 95 Rule 51.6, High Voltage Marking of Pole states in part:</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 on the crossarm of this pole.</p>		

Q.	Location:	708 Center Rd., Susanville
	Pole No:	E410R2
	Previous Visit by Utility:	8/8/2013
	Date Visited by CPUC:	8/15/2013
	Explanation of Violation(s):	
	<p data-bbox="250 663 537 699"><u>Guy Marker Missing</u></p> <p data-bbox="250 737 1052 772">GO 95 Rule 56.9 Guy Marker (Guy Guard) states in part:</p> <p data-bbox="344 810 1312 919"><i>“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.”</i></p> <p data-bbox="256 957 805 993">A guy marker was missing at this pole.</p>	