

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 23, 2014

TA2014-005

Bret Ball
Manager, Transmission Construction and Maintenance
San Diego Gas and Electric
5488 Overland Avenue
San Diego, CA 92123

SUBJECT: Audit of SDG&E's Electric Transmission Facilities in the Mountain, Inland, and Coastal Areas

Dear Mr. Ball:

On behalf of the Safety and Enforcement Branch of the California Public Utilities Commission, Ben Brinkman and Richard Kyo of my staff conducted an audit of SDG&E's electric transmission facilities in the Mountain, Inland, and Coastal areas of San Diego from August 25 to August 29, 2014. The audit included a review of SDG&E's maintenance records and inspections of SDG&E's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than October 23, 2014, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent such violations.

If you have any questions concerning this audit you can contact Ben Brinkman of my staff at (213) 576-7093 or benjamin.brinkman@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Fadi Daye".

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Audit Findings

CC: Ben Brinkman, Senior Utilities Engineer, CPUC
Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC

Audit Findings

Company: SDG&E
Area: Electric Transmission System, Metro San Diego and East San Diego County
Audit Type: Electric Transmission Audit
Date: August 25 - 29, 2014

General Order 165, Section IV, Transmission Facilities, states, in part:

Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines. Each utility shall maintain records of inspection and maintenance activities.

Commission staff shall be permitted to inspect records and procedures consistent with Public Utilities Code Section 314 (a).

SDG&E's Transmission Line Maintenance practices (TCM807, 7/9/09), section 4.2.1, *Transmission System Inspection Frequency*, requires wood pole ground line inspections to be conducted every ten years.

In its pre-audit preparation, SDG&E discovered 19 late pole ground-line inspections, and reported these late inspections to SED. When necessary, SDG&E performed special inspections to correct this deficiency. All of these inspections are currently up to date. As part of its corrective actions, SDG&E also instituted a new annual review and reporting mechanism for such inspections.

Field Violations

1.	Structure ID / Location:	TL13823, Structures 188685, 188684	
Previous SDG&E Visit Details:		October 15, 2012	
Date of CPUC Inspection:		August 27, 2014	
Explanation of Violation(s):			
<p><u>Missing Ground Wires</u></p> <p>General Order 165, Section IV, Transmission Facilities, states, in part:</p> <p align="center"><i>Each utility shall prepare and follow procedures for conducting inspections..</i></p> <p>SDG&E "Transmission Line Maintenance Practices", Section 6.1. states, in part:</p> <p align="center"><i>Maintenance is performed to correct GO95 and GO128 infractions ...</i></p> <p>General Order 95, Rule 31.1, Design, Construction and Maintenance, states, in part:</p> <p align="center"><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>Lattice structures were missing ground wires. SDG&E failed to note this discrepancy during its last inspection.</p>			

2.	Structure ID / Location:	TL6923, Structures Z072823, Z972824, Z972845	
Previous SDG&E Visit Details:		July 12, 2012	
Date of CPUC Inspection:		August 26, 2014	
Explanation of Violation(s):			
<p>Missing Guy Guard General Order 165, Section IV, Transmission Facilities, states, in part:</p> <p style="padding-left: 40px;"><i>Each utility shall prepare and follow procedures for conducting inspections ...</i></p> <p>SDG&E "Transmission Line Maintenance Practices", Section 6.1. states, in part:</p> <p style="padding-left: 40px;"><i>Maintenance is performed to correct GO95 and GO128 infractions ...</i></p> <p>GO 95, Rule 56.9, Guy Marker (Guy Guard) ,states:</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. Where more than one guy is attached to an anchor rod, only the outermost guys required to have a marker.</i></p> <p>Structures are missing guards on the outer anchor guy. SDG&E failed to note this discrepancy during its last inspection.</p>			