

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 13, 2015

EA2015-01

Adeel Babar
Supervisor – Regulatory Compliance
Pacific Gas and Electric Company
3401 Crow Canyon Road, #221E
San Ramon, CA 94583

SUBJECT: Audit of PG&E's Fresno Division

Dear Mr. Babar:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Ivan Garcia, Raymond Cho, and Derek Fong of my staff conducted an electric audit of PG&E's Fresno Division from February 9 to 13, 2015. The audit included a review of PG&E's records and field inspections of PG&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 August 14, 2015, by electronic or hard copy, of all corrective measures taken by PG&E to remedy and prevent such violations.

If you have any questions concerning this audit please contact Ivan Garcia at (916) 928-5875 or iag@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
California Public Utilities Commission

Enclosure: Audit Findings

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division
Charlotte F. TerKeurst, Program Manager, Electric Safety and Reliability Branch
Alok Kumar, Senior Utilities Engineer, Supervisor, CPUC
Ivan Garcia, Utilities Engineer, CPUC

AUDIT FINDINGS

A.	Location:	PG&E – Fresno Division
	Date Visited by CPUC:	2/9/2015- 2/13/2015
	Explanation of Violation(s):	
	<u>Late Inspection</u>	
	<p>GO 165, Section III-B, – Standards for Inspection, states:</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>The following PG&E’s facilities were inspected late:</p> <ul style="list-style-type: none"> • Eight underground enclosures in maps 191629, 1521365, 132096, 1521365, and 1820356 were inspected late in 2007. The enclosures should have been inspected by 12/31/2006 • 125 underground enclosures on 72 maps were inspected late in 2010. The enclosures should have been inspected by 12/31/2009 • One underground enclosure in Map 1320244 was inspected late on 2/11/2011. The enclosure should have been inspected by 12/31/2010. <p>The following PG&E’s facilities were not inspected as required by GO 165:</p> <ul style="list-style-type: none"> • 19 overhead maps with a total of 295 facilities missed a patrol and/or an inspection cycle. • 189 underground maps with a total of 339 facilities missed a patrol and an inspection cycle. 	

B.	Location:	PG&E – Fresno Division
	Date Visited by CPUC:	2/9/2015-2/13/2015
	Explanation of Violation(s):	
	<p><u>Late Work orders</u></p> <p>GO 165, Section III-C, – Record Keeping, states in part:</p> <p><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>GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p><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>PG&E’s records indicated that from January 2010 to February 9, 2015, a total of 15,106 work orders were completed past their scheduled date of corrective action per PG&E’s Electric Notification Prioritization Standards.</p>	

C.	Location:	PG&E – Fresno Division
	Date Visited by CPUC:	2/9/2015-2/13/2015
	Explanation of Violation(s):	
	<p><u>Records Keeping</u></p> <p>GO 165, Section III-C, – Record Keeping, states in part:</p> <p><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>PG&E does not document all items requiring corrective action during an inspection. Specifically, PG&E staff does not document “minor work”. PG&E’s staff only marks a “tally mark” indicating minor work, and does not specify the equipment identified for corrective action in the tally marks.</p>	

ESRB Engineers identified the following violations during the field inspection that were not documented and/or addressed by PG&E during its last detailed inspection as required by General Order 165:

D.	Location:	Intersection of N. Fifth St. and E. Austin Way, Fresno
	Pole No.:	N/A
	Previous Visit by PG&E:	1/12/2015, Detailed Overhead Inspection Map 1320232
	Date Visited by CPUC:	2/10/2015
Explanation of Violation(s):		
<u>Unauthorized Attachment</u>		
GO 95, Rule 34, Foreign Attachments, states in part:		
<p><i>Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction .</i></p>		
A third party sign was attached to the pole.		

E.	Location:	Intersection of E. Austin Way and N. 4 th St., Fresno
	Pole No.:	N/A
	Previous Visit by PG&E:	1/12/2015, Detailed Overhead Inspection Map 1320232
	Date Visited by CPUC:	2/10/2015
Explanation of Violation(s):		
<u>Deteriorated Primary Crossarm</u>		
GO 95, Rule 44.3 Replacement Installation and Reconstruction states in part:		
<p><i>Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1</i></p>		
The crossarm showed signs of deterioration indicating that its safety factor may not be in compliance with GO 95, Rule 44.3.		

F.	Location:	Intersection of E. Austin Way and N. Bond Ave., Fresno
	Pole No.:	N/A
	Previous Visit by PG&E:	1/12/2015, Detailed Overhead Inspection Map 1320232
	Date Visited by CPUC:	2/10/2015
	Explanation of Violation(s):	
<u>Deteriorated Secondary Crossarm</u>		
GO 95, Rule 44.3 Replacement Installation and Reconstruction states in part:		
<p><i>Lines or parts thereof shall be replaced or reinforced before safety factors have been reduced (due to factors such as deterioration and/or installation of additional facilities) in Grades "A" and "B" construction to less than two-thirds of the safety factors specified in Rule 44.1</i></p>		
The crossarm showed signs of deterioration indicating that its safety factor may not be in compliance with GO 95, Rule 44.3.		

G.	Location:	1450 Oakwood Ct., Lemoore
	Equipment No.:	T8342
	Previous Visit by PG&E:	1/31/2015, Detailed Underground Inspection Map 1820354
	Date Visited by CPUC:	2/10/2015
	Explanation of Violation(s):	
<u>Tripping Hazard</u>		
GO 128, Rule 12.2 Maintenance states:		
<p><i>Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules.</i></p>		
The underground vault cover extends above ground causing a tripping hazard to the public.		

H.	Location:	3207 W. Figured Dr., Fresno
	Equipment No.:	Switch 3918
	Previous Visit by PG&E:	1/22/2015, Detailed Underground Inspection Map 1319121
	Date Visited by CPUC:	2/10/2015
Explanation of Violation(s):		
<p><u>Switch Not Inspected In 2015</u></p> <p>GO 165, Table 1 requires underground switching devices to be inspected once every 3 years.</p> <p>GO 128, Rule 17.2 Inspection states:</p> <p style="padding-left: 40px;"><i>Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules.</i></p> <p>During the field inspection portion of the audit, we discovered that the switch in this vault was not included on PG&E's map and was not inspected in the past 3 years.</p>		
<u>Bolt Covers Missing On Underground Vault</u>		
<p>GO 128, Rule 32.7, Covers states in part:</p> <p style="padding-left: 40px;"><i>Manholes, handholes, and subsurface equipment enclosures while not being worked in, shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them and arrangements shall be such that a 1; 001 or appliance shall be required for their opening and cover removal.</i></p> <p>The vault cover was not securely closed (the covers' bolt were missing).</p>		