

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 10, 2015

EA2015-008

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 Peninsula Division

Dear Mr. Babar:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Jamie Lau of my staff conducted an electric audit of PG&E's Peninsula Division from June 8 to June 10, 2015. The audit included a review of PG&E's records and field inspections of PG&E's facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than September 11, 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 Jamie Lau at (415) 703-2233 or jamie.lau@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, CPUC
Charlotte TerKeurst, Program Manager, ESRB, CPUC
Alok Kumar, P.E., Senior Utilities Engineer Supervisor, ESRB, CPUC
Jamie Lau, P.E., Utilities Engineer, ESRB, CPUC

Audit Findings

Company: PG&E – Peninsula
 Electric Distribution Audit
 Date: June 8 to 10, 2015

| A. | Location: | PG&E – Peninsula Division | | | | | | | | | | | | | | |
|-----------|---|--------------------------------------|------------------------|--|-----|-------|-----------------|----------|-------|---|-------------------|-------------|-------|----|-----------------------|------------------------|
| | Date of CPUC Inspection: | 6/8/2015-6/10/2015 | | | | | | | | | | | | | | |
| | Explanation of Violation(s): | | | | | | | | | | | | | | | |
| | <u>Missed and Past-Due Inspections</u> | | | | | | | | | | | | | | | |
| | GO 165, Section III-B, Standards for Inspection, states: | | | | | | | | | | | | | | | |
| | <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> | | | | | | | | | | | | | | | |
| | Facilities in the following map were not inspected on time as required by GO 165: | | | | | | | | | | | | | | | |
| | <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">Map</th> <th style="width: 15%;">Units</th> <th style="width: 30%;">Inspection Type</th> <th style="width: 30%;">Findings</th> </tr> </thead> <tbody> <tr> <td>F0417</td> <td style="text-align: center;">1</td> <td>UG Patrol (Urban)</td> <td>Missed 2014</td> </tr> <tr> <td>F0424</td> <td style="text-align: center;">30</td> <td>OH Inspection (Urban)</td> <td>Inspected late in 2014</td> </tr> </tbody> </table> | | | | Map | Units | Inspection Type | Findings | F0417 | 1 | UG Patrol (Urban) | Missed 2014 | F0424 | 30 | OH Inspection (Urban) | Inspected late in 2014 |
| Map | Units | Inspection Type | Findings | | | | | | | | | | | | | |
| F0417 | 1 | UG Patrol (Urban) | Missed 2014 | | | | | | | | | | | | | |
| F0424 | 30 | OH Inspection (Urban) | Inspected late in 2014 | | | | | | | | | | | | | |

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| B. | Location: | PG&E – Peninsula Division |
| | Date of CPUC Inspection: | 6/8/2015-6/10/2015 |
| | Explanation of Violation(s): | |
| | <p><u>Missed Equipment Test</u></p> <p>GO 165, Section III-B, Standards for Inspection, states:</p> <p style="padding-left: 40px;"><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>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p style="padding-left: 40px;"><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 Utility Standard, TD-2302S, required an overhead capacitor to be tested yearly. Capacitor No. C0558 was not tested in year 2013.</p> | |

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| C. | Location: | PG&E – Peninsula Division |
| | Date of CPUC Inspection: | 6/8/2015-6/10/2015 |
| | Explanation of Violation(s): | |
| | <u>Past-Due Work Orders</u> | |
| | <p>GO 165, Section III-C, – Record Keeping, states in part:</p> <p style="padding-left: 40px;"><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 style="padding-left: 40px;"><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>GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p style="padding-left: 40px;"><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>Our audit found that 604 “Electric Corrective Notifications” work orders, from October 1, 2012 to May 7, 2015, were completed late. Furthermore, 40 work orders were open past their scheduled due dates. The past-due work orders include overhead and underground facilities.</p> | |

| D. | Location: | PG&E – Peninsula Division | | | | | | |
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| | Date of CPUC Inspection: | 6/8/2015-6/10/2015 | | | | | | |
| | Explanation of Violation(s): | | | | | | | |
| | <p data-bbox="256 436 656 470"><u>Past-Due COE Work Order</u></p> <p data-bbox="256 512 1292 546">GO 128, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p data-bbox="370 596 1269 772"><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="370 814 1247 1033"><i>For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.</i></p> <p data-bbox="256 1075 1399 1176">PG&E has a one-year range for completing a Critical Operating Equipment (COE) work order. At the time of the audit, the following COE work order was open past one year:</p> <table border="1" data-bbox="493 1205 1172 1310"> <thead> <tr> <th data-bbox="493 1205 727 1255">Work Order #</th> <th data-bbox="727 1205 909 1255">Type</th> <th data-bbox="909 1205 1172 1255">Date Created</th> </tr> </thead> <tbody> <tr> <td data-bbox="493 1255 727 1310">107777059</td> <td data-bbox="727 1255 909 1310">UG Cable</td> <td data-bbox="909 1255 1172 1310">1/25/2014</td> </tr> </tbody> </table> | | Work Order # | Type | Date Created | 107777059 | UG Cable | 1/25/2014 |
| Work Order # | Type | Date Created | | | | | | |
| 107777059 | UG Cable | 1/25/2014 | | | | | | |

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| E. | Location: | 1250 Alden Ct., Belmont |
| | Pole No.: | N/A |
| | Previous Visit by PG&E: | 4/7/2015 (emergency repair) |
| | Date Visited by CPUC: | 6/8/2015 |
| Explanation of Violation(s): | | |
| <p><u>Emergency Work Order Improperly Cancelled</u></p> <p>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p><i>For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.</i></p> <p>PG&E, Electric Distribution Preventative Maintenance Manual 2015, Closing EC Notifications, states in part:</p> <p><i>The EC Notification cannot be closed until all of the identified maintenance conditions on the notification have been addressed and/or the facilities are in a safe and reliable condition that will not require action. The field employee (Crew, T-Man, Contractor, etc.) completing the EC notification is required to check that all FDA's identified on the notification have been completed, cancelled (action is not required), or found completed upon arrival, and to sign and date the EC notification to confirm that "all maintenance on this notification is addressed (completed, cancelled, or found completed upon arrival)"</i></p> <p>An emergency work order to repair a broken crossarm was cancelled while the repair was incomplete. PG&E repaired the broken crossarm shortly after our field discovery.</p> | | |

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

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| F. | Location: | 2571 Rosewood Drive, San Bruno |
| | Pole No.: | N/A |
| | Previous Visit by PG&E: | 2/5/2015 |
| | Date Visited by CPUC: | 6/9/2015 |
| Explanation of Violation(s): | | |
| <p><u>Third-Party Notification</u></p> <p>GO 95, Rule 18-B, Notification of Safety Hazards, states in part:</p> <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.</i></p> <p>A communication ground wire installed on the surface of the pole was partially exposed. . PG&E did not notify the communications company of this safety hazard when it last inspected the pole.</p> <p><u>Conductor in Contact with Primary Down Guy</u></p> <p>GO 95, Rule 38, Table 2, Case 19-D, requires the radial separation between secondary conductors and down guy wires supported on the same pole to be 3 inches.</p> <p>A PG&E secondary conductor was in contact with a down guy wire attached to the same pole.</p> | | |

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| G. | Location: | 2510 Rosewood Drive, San Bruno |
| | Pole No.: | N/A |
| | Previous Visit by PG&E: | 2/5/2015 |
| | Date Visited by CPUC: | 6/9/2015 |
| Explanation of Violation(s): | | |
| <p data-bbox="250 575 651 611"><u>Missing High-Voltage Sign</u></p> <p data-bbox="250 646 1057 682">GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p data-bbox="363 718 1317 793"><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.</i></p> <p data-bbox="250 829 1243 865">Half of the High Voltage sign was missing on one side of the crossarm.</p> <p data-bbox="250 900 1170 936"><u>Down Guy Wire in contact with Communication Service Drop</u></p> <p data-bbox="250 972 1317 1117">GO 95, Rule 38, Table 2, Case 19-C, requires the radial separation between communication service drops and down guy wires supported on the same pole to be 3 inches. A PG&E down guy wire was in contact with a communication service drop supported on the same pole.</p> | | |

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| H. | Location: | Corner of Third Lane and Chestnut Ave, South San Francisco |
| | Pole No.: | N/A |
| | Previous Visit by PG&E: | 3/16/2015 |
| | Date Visited by CPUC: | 6/9/2015 |
| Explanation of Violation(s): | | |
| <p><u>Third-Party Notification</u></p> <p>GO 95, Rule 18-B, Notification of Safety Hazards, states in part:</p> <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.</i></p> <p>A communication ground wire installed on the surface of the pole was partially exposed. The exposed portion of ground wire was less than 7 feet above the ground. PG&E did not notify the communications company of this safety hazard when it last inspected the pole.</p> <p><u>Metal Visibility Strips Over Ground Molding</u></p> <p>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p><i>For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.</i></p> <p>PG&E's Overhead Inspection Job Aid (TD-2305M-JA99) requires metal visibility strips to be installed under wood moldings. PG&E's metal visibility strips were installed over a wooden ground molding.</p> | | |

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| I. | Location: | 310 Chestnut Ave, South San Francisco |
| | Pole No.: | N/A |
| | Previous Visit by PG&E: | 3/16/2015 |
| | Date Visited by CPUC: | 6/9/2015 |
| Explanation of Violation(s): | | |
| <p data-bbox="251 577 609 609"><u>Third-Party Notification</u></p> <p data-bbox="251 640 1144 682">GO 95, Rule 18-B, Notification of Safety Hazards, states in part:</p> <p data-bbox="365 724 1323 913"><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.</i></p> <p data-bbox="251 945 1380 1081">A communication ground wire installed on the surface of the pole was partially exposed. The exposed portion of ground wire was less than 7 feet above the ground. PG&E did not notify the communications company of this safety hazard when it last inspected the pole.</p> | | |

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| J. | Location: | 322 Chestnut Ave, South San Francisco |
| | Pole No.: | N/A |
| | Previous Visit by PG&E: | 3/16/2015 |
| | Date Visited by CPUC: | 6/9/2015 |
| Explanation of Violation(s): | | |
| <p data-bbox="250 575 604 606"><u>Third-Party Notification</u></p> <p data-bbox="250 644 1146 676">GO 95, Rule 18-B, Notification of Safety Hazards, states in part:</p> <p data-bbox="365 722 1317 903"><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.</i></p> <p data-bbox="250 945 1365 1083">A communication ground wire installed on the surface of the pole was partially exposed. The exposed portion of ground wire was less than 7 feet above the ground. PG&E did not notify the communications company of this safety hazard when it last inspected the pole.</p> | | |

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| K. | Location: | Corner of Miller Ave. and Chestnut Ave., South San Francisco |
| | Pole No.: | N/A |
| | Previous Visit by PG&E: | 3/16/2015 |
| | Date Visited by CPUC: | 6/9/2015 |
| Explanation of Violation(s): | | |
| <p><u>Missing High-Voltage Sign</u></p> <p>GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p style="text-align: center;"><i>Poles which support line conductors of more than 750 volts shall be marked with high voltage signs.</i></p> <p>A High Voltage sign was missing on one side of the crossarm.</p> <p><u>Missing Visibility Strip</u></p> <p>GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:</p> <p style="text-align: center;"><i>For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.</i></p> <p>One of the three visibility strips on the pole was missing.</p> | | |

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| L. | Location: | 127 Morton Drive, Daly City |
| | Equipment No.: | SW 2684 |
| | Previous Visit by PG&E: | 3/5/2015 |
| | Date Visited by CPUC: | 6/10/2015 |
| Explanation of Violation(s): | | |
| <p><u>Loose Bolt on Subsurface Enclosure Cover</u></p> <p>GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p style="text-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>A bolt on the subsurface switch enclosure lid was loose. The bolt could be removed by hand.</p> | | |

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| M. | Location: | 1 Nelson Ct., Daly City |
| | Equipment No.: | T-6149 and T-89 |
| | Previous Visit by PG&E: | 3/12/2015 |
| | Date Visited by CPUC: | 6/10/2015 |
| Explanation of Violation(s): | | |
| <p><u>Missing & Incorrectly Colored Visibility Strips</u></p> <p>GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:</p> <p style="text-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>PG&E's Underground Inspection Job Aid (TD-2305M-JA03) requires all barrier posts to have three visibility strips in orange color.</p> <p>There were ten PG&E barrier posts protecting two padmount transformers. Four posts had only one visibility strip, and the strips were not orange; five posts had three visibility strips but some of the strips were not orange.</p> | | |