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July 1, 2010

***VIA OVERNIGHT DELIVERY***

Paul Clanon, Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

**RE: PacifiCorp's (U 901-E) 2009 Annual report of Inspection Activities Filed Pursuant to General Order No. 165**

Pursuant to General Order No. 165, PacifiCorp provides an original and one (1) copy of the attached 2009 annual report of inspection activities for electric distribution facilities.

It is respectfully requested that all formal correspondence and Staff requests regarding this matter be addressed to:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Cathie Allen, Regulatory Manager, at (503) 813-5934.

Sincerely,

Andrea L. Kelly  
Vice President, Regulation

cc: Brian D. Schumacher

**CALIFORNIA**  
**CONDITION CORRECTION POLICY**  
Power Delivery Policy 192

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## California Condition Correction Policy

### 1 Scope

The policies and work practices that follow apply to PacifiCorp's employees and contractors who address nonconforming facilities within the State of California.

Condition corrections included within this policy are those for which PacifiCorp is responsible. Condition correction timeframes for conditions attributable to other parties (such as communication infrastructure providers) do not have explicit deadlines.

These measures are intended to and shall be adequate to ensure conformance with California General Orders (GO) 95, 128 and 165, PacifiCorp Policies, Distribution Construction Standards, infringement by other utilities or individuals, defects, damage, potential hazards, and deterioration of the facilities which need to be corrected in order to maintain safe and reliable service. Items that are found to be nonconforming are considered out of compliance and shall be noted and entered into PacifiCorp's Facility Point Inspection (FPI) system.

### 2 References

California General Orders including GO's 95, 128 and 165

PacifiCorp Policy No. 009, Detailed Inspections for Transmission and Distribution Lines

PacifiCorp Policy No. 013, Wood Pole Test and Treat

PacifiCorp Procedure 069, Condition Dropdown Codes

PacifiCorp Safety Rules and Procedures

### 3 Condition Priority Assignments

Refer to PacifiCorp Policy No. 009, Detailed Inspections for Transmission and Distribution Lines, and Procedure 069, Dropdown codes for priority assignments and descriptions.

### 4 Condition Correction Timeframes

#### 4.1 Conditions reported after December 31, 2008

Conditions reported after December 31, 2008 within the California service territory shall be corrected per the following timeframes:

Priority A: All A-conditions are to be made safe immediately. Those conditions deemed to have been made safe must be brought into any necessary further compliance within 30 days of discovery.

*Exception 1:* Poles determined by the pole test and treat program to be A-conditions shall be addressed in accordance with PacifiCorp policies and procedures within 90 days of discovery.

*Exception 2:* These timeframes do not apply where the record indicates a good faith effort to obtain access or other permissions to correct the condition has been made. A good faith effort includes current documentation of both written and personal contacts in order to effect the corrections.

Priority B: B-conditions are to be brought into compliance by the end of the fourth calendar year after discovery. For example a condition discovered on 6/30/2009 must be corrected by 12/31/2013.

*Exception 1:* This timeframe does not apply where the record indicates a good faith effort to obtain access or other permissions to correct the condition has been made. A good faith effort includes current documentation of both written and personal contacts in order to effect the corrections.

Priority C: C-conditions have no set timeframe for correction and will be addressed when scheduled work is performed at that facility point.

Priority D: D-conditions are considered to be conforming to code and do not have a regulatory timeline for being addressed. These conditions typically involve reliability issues that are recorded for engineering and planning purposes.

Priority G: G-conditions are considered to be conforming to code as required at the date of installation (grandfathered) and do not need to be addressed.

If an existing C, D or G condition has not been corrected by the next scheduled inspection, the status of the condition must be updated if it has worsened or changed sufficiently to merit re-prioritization. If a condition has remained unchanged from one inspection cycle to the next, then the original date of discovery should be maintained in the FPI database until made conforming. After a condition has been corrected, the FPI database must be updated to reflect the change.

## 4.2 Conditions reported prior to December 31, 2008

Conditions discovered prior to December 31, 2008 within the California service territory shall be corrected per the following timeframes:

Priority A: All A-conditions are to be made safe immediately. Those conditions deemed to have been made safe must be brought into any necessary further compliance within 30 days of discovery.

*Exception 1:* Poles determined by the pole test and treat program to be A-conditions shall be addressed in accordance with PacifiCorp policies and procedures within 90 days of discovery.

*Exception 2:* These timeframes do not apply where the record indicates a good faith effort to obtain access or other permissions to correct the condition has been made. A good faith effort includes current documentation of both written and personal contacts in order to effect the corrections.

Priority B: Many B conditions discovered prior to 2009 were prioritized prior to the implementation of the current "C", "D" and "G" condition codes. As such there are B conditions which may be incorrectly prioritized based upon these new criteria. To address these issues all B conditions that remain outstanding shall be reviewed during their next scheduled detail inspection. These conditions shall be evaluated based upon the revised prioritization criteria and priorities changed to A, C, D, G or left as a B as required. Conditions that are reprioritized to an A, C, D or G shall have a new inspection date entered which will then be used to trigger correction timeframes per section 4.1 above. The inspection date of conditions which remain as a B priority shall remain unchanged. All B conditions discovered prior to December 31, 2008 that are not reprioritized shall be corrected by the end of the eighth calendar year after their discovery. For example a "B" condition discovered on 6/30/2006 and reconfirmed as a "B" during a detail inspection performed in 2011 must be corrected by 12/31/2014.

*Exception 1:* This timeframe does not apply where the record indicates a good faith effort to obtain access or other permissions to correct the condition has been made. A good faith effort includes current documentation of both written and personal contacts in order to effect the corrections.

Priority C: C-conditions have no set timeframe for correction and will be addressed when scheduled work is performed at that facility point.

Priority D: D-conditions are considered to be conforming to code and do not have a regulatory timeline for being addressed. These conditions typically involve reliability issues that are recorded for engineering and planning purposes.

Priority G: G-conditions are considered to be conforming to code as required at the date of installation (grandfathered) and do not need to be addressed.

If an existing C, D or G condition have not been corrected by the next scheduled inspection, the status of the condition must be updated if it has worsened or changed sufficiently to merit re-prioritization. If a condition has remained unchanged from one inspection cycle to the next, then the original date of discovery should be maintained in the FPI database until made conforming. After a condition has been corrected, the FPI database must be updated to reflect the change.

**TABLE A-1**  
**2009 GENERAL ORDER 165 ANNUAL REPORT**

Reporting Period: 01/01/09 - 12/31/09

**PacifiCorp Wood Pole Inspections**

**Visual Assurance & Detail Inspections**

DISTRICT	NO. OF FACILITIES		INSPECTION TYPE									
	Distribution Poles	Transmission Poles	O/H Safety (Patrol)	% Compliance Distribution [2]	% Compliance Transmission [2]	% Compliance (Dist. & Trans) [2]	% of Total Poles Inspected [3]	O/H Detail	% Compliance Distribution [2]	% Compliance Transmission [2]	% Compliance (Dist. & Trans) [2]	% of Total Poles Inspected [3]
Inspection Cycle			2 Yrs				50%	5 Yrs				20%
<b>Tulelake</b>	13,419	1,744	9,889	100%	97%	99%	65%	3,522	100%	89%	99%	23%
<b>Alturas</b>	4,513	1,103	3,512	100%	99%	100%	63%	1,268	99%	99%	99%	23%
<b>Crescent City</b>	9,431	1,514	5,772	100%	97%	100%	53%	2,608	100%	64%	95%	24%
<b>Yreka/Mt. Shasta</b>	35,117	5,774	23,198	100%	99%	100%	57%	7,773	100%	90%	98%	19%
<b>Main Grid</b>	0	1,688	4,956	NA	100%	100%	100%	1,688	NA	100%	100%	100%
<b>California Totals</b>	<b>62,480</b>	<b>11,823</b>	<b>47,327</b>			<b>100%</b>	<b>64%</b>	<b>16,859</b>			<b>92%</b>	<b>23%</b>

Notes:

- [1] Reporting unit basis for PacifiCorp is facility point.
- [2] Percentage of compliance for the 2009 General Order 165 Annual Report for Visual Assurance & Detail inspections is based on a point by point analysis of the inspection records for each facility due comparing the last inspection date for each inspection type (visual assurance or detail inspection) through Dec. 31st, 2009.
- [3] Percentage of Total pole population inspected for the 2009 General Order 165 Annual Report in each District.
  - a. As of January 1st, 2007, PacifiCorp initiated a project to identify on an annual basis all facilities out of compliance for visual assurance and detail inspections. PacifiCorp will ensure inspection compliance for all facilities using the maintenance inspection schedules outlined by Asset Management
  - b. If it is concluded that a facility point is out of compliance for either inspection type (visual assurance or detail inspection) the facility will undergo the respective inspection type for compliance by December 31st of the reporting year.

**Test and Treat (Intrusive) Inspections**

DISTRICT	NO. OF FACILITIES		O/H Test & Treat (Intrusive) Inspection	% of Total Poles w/Intrusive Inspection [1]
	Distribution Poles	Transmission Poles		
Inspection Cycle			10 & 20 Yrs	7%
<b>Tulelake</b>	13,419	1,744	1,219	8%
<b>Alturas</b>	4,513	1,103	505	9%
<b>Crescent City</b>	9,431	1,514	1,048	10%
<b>Yreka/Mt. Shasta</b>	35,117	5,774	2,602	6%
<b>Main Grid</b>	0	1,688	0	0%
<b>California Totals</b>	<b>62,480</b>	<b>11,823</b>	<b>5,374</b>	<b>7%</b>

[1] Percentage of intrusive inspections completed for the 2009 General Order 165 Annual Report for Test and Treat (intrusive) inspections is based on a system-wide average of the number of inspections performed on the total population of facility points in each District.

**TABLE A-2**  
**2009 GENERAL ORDER 165 ANNUAL REPORT**

Reporting Period: 01/01/09- 12/31/09

**PacifiCorp Line Equipment Inspections**

District/Equipment	Type	QTY	Safety (Patrol) Rural <sup>(1)</sup>			Detailed Rural <sup>(1)</sup>		
			Plan <sup>(2)</sup>	Actual	% Complete	Plan <sup>(2)</sup>	Actual	% Complete
			2 Yrs		50%	4 or 5 Yrs		20-25%
<b>Tulelake</b>								
Transformers	Overhead	2,610	1,615	2,021	59%	740	902	26%
Switch/Protect Device	Overhead	786	486			223		
Regs/Caps	Overhead	53	33			15		
All	Pad Mounted	84	107	84	100%	61	63	75%
<b>Total</b>			<b>2,241</b>	<b>2,105</b>	<b>60%</b>	<b>1,039</b>	<b>966</b>	<b>27%</b>
<b>Alturas</b>								
Transformers	Overhead	1,070	714	665	54%	391	345	28%
Switch/Protect Device	Overhead	169	113			62		
Regs/Caps	Overhead	3	2			1		
All	Pad Mounted	46	45	28	60%	23	12	25%
<b>Total</b>			<b>875</b>	<b>692</b>	<b>54%</b>	<b>478</b>	<b>356</b>	<b>28%</b>
<b>Crescent City</b>								
Transformers	Overhead	3,490	2,484	2,759	49%	1,058	1,363	24%
Switch/Protect Device	Overhead	2,098	1,493			636		
Regs/Caps	Overhead	5	4			2		
All	Pad Mounted	1,213	1,381	955	79%	746	398	33%
<b>Total</b>			<b>5,362</b>	<b>3,714</b>	<b>55%</b>	<b>2,442</b>	<b>1,761</b>	<b>26%</b>
<b>Yreka/Mt. Shasta</b>								
Transformers	Overhead	9,178	6,137	8,365	52%	1,963	3,100	19%
Switch/Protect Device	Overhead	6,578	4,398			1,407		
Regs/Caps	Overhead	267	179			57		
All	Pad Mounted	3,495	3,356	2,245	64%	1,593	1,002	29%
<b>Total</b>			<b>14,070</b>	<b>10,611</b>	<b>54%</b>	<b>5,019</b>	<b>4,102</b>	<b>21%</b>
<b>California Totals</b>								
Transformers	Overhead	16,348	10,949	13,810	53%	4,152	5,710	22%
Switch/Protect Device	Overhead	9,631	6,490			2,327		
Regs/Caps	Overhead	328	217			75		
All	Pad Mounted	4,838	4,890	3,312	73%	2,423	1,475	30%
<b>Total</b>			<b>22,547</b>	<b>17,121</b>	<b>55%</b>	<b>8,978</b>	<b>7,185</b>	<b>23%</b>

**NOTES:**

[1] PacifiCorp has no Urban area in its California service territory.

Urban is defined as those areas with a population of more than 1,000 persons per square mile and Rural as those with a population less than 1,000 persons per square mile as determined by the U.S. Bureau of the Census.

U. S. Bureau of the Census reports the population densities below (using 2009 Estimated Census data at <http://quickfacts.census.gov/qfd/states/06/06093.html> <http://quickfacts.census.gov/qfd/states/06/06093.html>)

7.0 persons/sq. mi. Siskiyou County (Tulelake, Yreka, Mt. Shasta)  
27.3 persons/sq. mi. Del Norte County (Crescent City)  
2.4 persons/sq. mi. Modoc County (Alturas)

[2] Planned inspection cycle: 

Overhead	Patrol	Detailed
Pad Moun	2 years	5 years
	2 years	4 years

[3] Percentage complete for Visual Assurance and Detail Inspections for line equipment is based on a system wide percentage of inspections performed on the total population of facility points in each District.

**TABLE B-1**  
**2009 GENERAL ORDER 165 ANNUAL REPORT**

*Reporting Period: 01/01/09 - 12/31/09*

**PacifiCorp Wood Pole Conditions**

DISTRICT	CONDITIONS FOUND			CONDITIONS CORRECTED			REMOVED FROM SYSTEM			CONDITIONS OUTSTANDING			REASON WHY CORRECTION IS OUTSTANDING	DATE CORRECTION WILL BE COMPLETED BY
	A	B	C	A	B	C	A	B	C	A	B	C		
Tulelake	7	34	60	6	29	1	1	1	3	0	77	97	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Alturas	7	23	2	7	21	1	0	0	3	0	69	57	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Crescent City	5	57	3	4	23	2	0	2	1	2	138	48	A conditions cleared in January 2010. B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Yreka/Mt. Shasta	26	47	20	23	92	2	3	18	40	5	440	69	A conditions cleared in January 2010. B and C conditions planned to be completed per attached policy, effective 3/31/2010	Per note
<b>California Total</b>	<b>45</b>	<b>161</b>	<b>85</b>	<b>40</b>	<b>165</b>	<b>6</b>	<b>4</b>	<b>21</b>	<b>47</b>	<b>7</b>	<b>724</b>	<b>271</b>		

**PacifiCorp Street Light Conditions**

DISTRICT	CONDITIONS FOUND			CONDITIONS CORRECTED			REMOVED FROM SYSTEM			CONDITIONS OUTSTANDING			REASON WHY CORRECTION IS OUTSTANDING	DATE CORRECTION WILL BE COMPLETED BY
	A	B	C	A	B	C	A	B	C	A	B	C		
Tulelake	0	0	12	0	0	0	0	0	0	0	0	13	C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Alturas	0	0	7	0	2	0	0	0	0	0	2	15	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Crescent City	0	0	6	0	4	0	0	6	3	0	2	46	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Yreka/Mt. Shasta	0	0	37	0	97	37	0	118	5	0	89	224	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
<b>California Total</b>	<b>0</b>	<b>0</b>	<b>62</b>	<b>0</b>	<b>103</b>	<b>37</b>	<b>0</b>	<b>124</b>	<b>8</b>	<b>0</b>	<b>93</b>	<b>298</b>		



**TABLE B-2**  
**2009 GENERAL ORDER 165 ANNUAL REPORT**

Reporting Period: 01/01/09 - 12/31/09

**PacifiCorp Equipment Conditions**

DISTRICT	Type	CONDITION RATING FOUND			CORRECTIVE ACTIONS COMPLETED			REMOVED FROM SYSTEM			CONDITIONS OUTSTANDING			REASON WHY CORRECTION IS OUTSTANDING	DATE CORRECTION WILL BE COMPLETED BY
		A	B	C	A	B	C	A	B	C	A	B	C		
<b>Tulelake</b>															
Transformers	Overhead	5	0	0	4	1	5	1	27	0	0	0	5	C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Switch/Protect Device	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
All	Padmounted	2	0	0	1	0	0	1	0	0	0	0	0		
<b>Alturas</b>															
Transformers	Overhead	0	0	0	0	0	1	0	0	0	0	0	0		
Switch/Protect Device	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
All	Padmounted	0	0	0	0	0	1	0	0	0	0	0	0		
<b>Crescent City</b>															
Transformers	Overhead	2	1	55	1	9	13	1	89	5	0	6	67	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Switch/Protect Device	Overhead	0	0	0	0	0	0	0	0	0	0	4	0	B conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Regs/Caps	Overhead	0	0	1	0	0	1	0	1	0	0	0	0		
All	Padmounted	0	0	0	0	0	0	0	1	0	0	2	0	B conditions planned to be completed per attached policy, effective 3/31/2009	Per note
<b>Yreka</b>															
Transformers	Overhead	10	6	20	11	49	41	0	627	21	0	24	575	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Switch/Protect Device	Overhead	0	0	0	0	0	0	0	1	0	0	0	1	C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Regs/Caps	Overhead	0	0	0	0	0	2	0	4	0	0	0	2	C conditions planned to be completed per attached policy, effective 3/31/2010	Per note
All	Padmounted	2	2	0	2	17	0	0	2	0	0	21	4	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
<b>Mt. Shasta</b>															
Transformers	Overhead														
Switch/Protect Device	Overhead														
Regs/Caps	Overhead														
All	Padmounted														
<b>CA Total</b>															
Transformers	Overhead	17	7	75	16	59	60	2	743	26	0	30	647		
Switch/Protect Device	Overhead	0	0	0	0	0	0	0	1	0	0	4	1		
Regs/Caps	Overhead	0	0	1	0	0	3	0	5	0	0	0	2		
All	Padmounted	4	2	0	3	17	1	1	3	0	0	23	4		
<b>California Totals</b>		<b>21</b>	<b>9</b>	<b>76</b>	<b>19</b>	<b>76</b>	<b>64</b>	<b>3</b>	<b>752</b>	<b>26</b>	<b>0</b>	<b>57</b>	<b>654</b>		