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Manager
EAM Distribution Compliance

Redacted

August 26, 2013

Mr. Raymond Fugere, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 West Fourth Street, Suite 500
Los Angeles, CA 90013

Reference: Meeting with PG&E and SED on July 19, 2013 - Privately Owned Lines Initiative

Dear Mr. Fugere:

This letter is in response to your request at the meeting with Kress, Meredith Allen, Megan Ardell Nykoluk and I had with you and Arthur O'Donnell on July 9th regarding PG&E's Privately Owned Lines Initiative. Private lines are customer-owned distribution main or line extension facilities or service facilities. They can be overhead or underground, and are solely the customer's responsibility to maintain. System-wide PG&E has approximately 250 privately owned lines.

PG&E's Private Line Initiative is designed to improve safety and enhance customer focus on maintaining their lines. We recently completed a system wide inventory and record review of private lines and identified record keeping was handled in local offices. We have addressed going forward by establishing a centralized electronic storage system. We also have the private lines limited exceptions, such as where the line is owned by a generator or patrol. These were completed in early June. Our patrols of these customer owned lines identified approximately sixty third party issues, all of which have been communicated to the private line owners.

In addition to communicating safety issues to the private line owners, we are in the process of communicating with all private owners and customers. The goal of our communication is to remind the owners of their obligation to regularly maintain their facilities, including vegetation management. Going forward, we plan to contact private line owners annually to ensure they are meeting their obligations to maintain their lines.

As you know, General Order 165 requires electric utilities to patrol and inspect their electric distribution facilities on a regular basis in order to ensure safe and reliable electric service. Table 1 of General Order 165 establishes maximum intervals for patrol inspections and detailed inspections in urban and rural areas.

As discussed in our meeting, PG&E identified that we did not have sufficient documentation to demonstrate that two hundred seventy-eight (278) PG&E owned transformers attached to privately lines had been inspected during the last two inspection cycles. After discovering this issue, PG&E conducted inspections of all 278 transformers. These patrols were completed by May 9. No imminent safety hazards were discovered and a total of thirty-one (31) non-emergency maintenance issues were identified. These thirty issues have been categorized and scheduled for repair.

Two underlying causes of this gap were identified. There was a lack of clear guidance for field inspection personnel regarding documenting when company facilities on privately owned lines had been inspected. To address this gap, this August 23rd we issued a bulletin clarifying the process for documenting the status of PG&E transformers on private lines.

Secondly, four maps with PG&E facilities (i.e. privately owned lines) did not have an appropriate inspection cycle (i.e. maintenance plan) created. The PG&E facilities on the maps. As part of the distribution maintenance plan gap analysis performed in 2012, PG&E created an automated method of identifying maps without an appropriate inspection cycle. The automation was implemented earlier this year. Although PG&E is still reviewing and analyzing the results of the automation, we have confirmed that all four missed maps are included in the automation results, thereby closing the process gap that led to this particular issue.

Please contact me at Redacted if you have any questions.

Sincerely,

/s/

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cc: Ms. Elizaveta Malashenko, Deputy Director, Office of Safety and Reliability
Ms. Meredith Allen, Senior Director, Regulatory Relations, PG&E
Mr. Mike Kress, Senior Director, Customer Service Delivery, PG&E
Ms. Megan Ardell Nykoluk, Manager, Customer Engagement, PG&E