



825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

July 1, 2009

***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) 2008 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 2008 annual report of inspection activities for electric distribution facilities. Also attached is a copy of PacifiCorp's California condition correction policy, which became effective January 1, 2008.

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 Mark Tucker, Regulatory Affairs Manager, at (503) 813-5269.

Sincerely,

Andrea L. Kelly  
Vice President, Regulation

Enclosures

cc: Brian D. Schumacher

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Commission Order Instituting Investigation into  
the rates, charges, services, and practices of  
Pacific Gas and Electric Company. (U 39 M)

I.95-02-015  
(Filed February 22, 1995)

Order Instituting Rulemaking for electric  
distribution facility standard setting

R.96-11-004  
(Filed November 8, 1996)

**PACIFICORP'S (U 901-E) IMPLEMENTATION PLAN FOR  
INSPECTIONS USING INDICES SET FORTH IN APPENDIX A OF D.97-03-070  
FOR THE CALENDAR YEAR 2008**

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Date: July 1, 2009

Attorney for PacifiCorp

**TABLE A-1**  
**2008 GENERAL ORDER 165 ANNUAL REPORT**

Reporting Period: 01/01/08 - 12/31/08

**PacifiCorp Wood Pole Inspections**

**Visual Assurance & Detail Inspections**

DISTRICT	NO. OF FACILITIES [1]		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, 4]	% Compliance (Dist. & Trans) [2]	% of Total Poles Inspected [3]
Inspection Cycle			2 Yrs				50%	5 Yrs				20%
<b>Tulelake</b>	13,501	1,738	8,138	100%	92%	99%	53%	1,632	91%	91%	91%	11%
<b>Alturas</b>	4,574	1,103	5,148	100%	99%	100%	91%	1,275	79%	99%	83%	22%
<b>Crescent City</b>	9,886	1,508	7,446	99%	99%	99%	65%	2,282	92%	32%	84%	20%
<b>Yreka/Mt. Shasta</b>	35,107	5,777	31,824	100%	94%	99%	78%	8,195	97%	75%	94%	20%
<b>Main Grid</b>	0	1,684	5,295	N/A	100%	100%	100%	1,973	N/A	100%	100%	100%
<b>California Totals</b>	<b>63,068</b>	<b>11,810</b>	<b>57,851</b>			<b>99%</b>	<b>77%</b>	<b>15,357</b>			<b>91%</b>	<b>21%</b>

**Notes:**

- [1] Reporting unit basis for PacifiCorp is facility point
- [2] Percentage of compliance for the 2008 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, 2008.
- [3] Percentage of Total pole population inspected for the 2008 General Order 165 Annual Report in each District  
 As of January 1st, 2007, PacifiCorp has initiated a project to identify all facilities out of compliance for visual assurance and detail inspections.  
 a. PacifiCorp is in the process of bringing all facility points into compliance 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 and brought into compliance by December 31st of the reporting year.
- [4] Transmission lines are done by year and by line. (Crescent City lines will be completed per schedule during future calendar years.)

**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 Yrs	7%
<b>Tulelake</b>	13,501	1,738	1,269	8%
<b>Alturas</b>	4,574	1,103	896	16%
<b>Crescent City</b>	9,886	1,508	928	8%
<b>Yreka/Mt. Shasta</b>	35,107	5,777	3,178	8%
<b>Main Grid</b>	0	1,684	60	4%
<b>California Totals</b>	<b>63,068</b>	<b>11,810</b>	<b>6,331</b>	<b>8%</b>

[1] Percentage of intrusive inspections completed for the 2008 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**  
**2008 GENERAL ORDER 165 ANNUAL REPORT**

Reporting Period: 01/01/08- 12/31/08

**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	2,596	1,291	1,678	49%	560	725	21%
Switch/Protect Device	Overhead	777	386					
Regs/Caps	Overhead	51	25					
All	Pad Mounted	83	65	28	34%	62	24	28%
<b>Total</b>			1,768	1,706	49%	800	749	21%
<b>Alturas</b>								
Transformers	Overhead	1,064	641	920	75%	269	407	33%
Switch/Protect Device	Overhead	167	101					
Regs/Caps	Overhead	1	1					
All	Pad Mounted	46	20	20	44%	18	16	34%
<b>Total</b>			763	940	74%	329	423	33%
<b>Crescent City</b>								
Transformers	Overhead	3,485	2,413	3,623	66%	1,091	1,785	32%
Switch/Protect Device	Overhead	2,021	1,399					
Regs/Caps	Overhead	3	2					
All	Pad Mounted	1,197	804	821	69%	571	601	50%
<b>Total</b>			4,618	4,443	66%	2,296	2,387	36%
<b>Yreka/Mt. Shasta</b>								
Transformers	Overhead	9,261	5,613	11,429	72%	1,993	4,258	27%
Switch/Protect Device	Overhead	6,494	3,936					
Regs/Caps	Overhead	118	72					
All	Pad Mounted	3,451	1,891	2,177	63%	1,102	820	24%
<b>Total</b>			11,511	13,606	70%	4,519	5,077	26%
<b>California Totals</b>								
Transformers	Overhead	16,406	9,959	17,650	66%	3,913	7,175	27%
Switch/Protect Device	Overhead	9,459	5,823					
Regs/Caps	Overhead	173	100					
All	Pad Mounted	4,777	2,779	3,046	64%	1,753	1,460	30%
<b>Total</b>			18,660	20,696	67%	7,943	8,635	28%

**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 2006 Estimated Census data)

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

[2] Planned inspection cycles:	<u>Patrol</u>	<u>Detailed</u>
Overhead	2 years	5 years
Pad Mounted	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**  
**2008 GENERAL ORDER 165 ANNUAL REPORT**

*Reporting Period: 01/01/08 - 12/31/08*

**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	19	62	41	19	47	0	0	2	0	0	71	41	B and C conditions planned to be completed per attached policy, effective 1/1/2008	Per note
Alturas	0	62	59	0	18	0	0	1	1	0	59	58	B and C conditions planned to be completed per attached policy, effective 1/1/2008	Per note
Crescent City	4	15	51	1	20	3	3	0	0	0	104	48	B and C conditions planned to be completed per attached policy, effective 1/1/2008	Per note
Yreka/Mt. Shasta	11	264	81	17	337	3	1	30	1	0	448	91	B and C conditions planned to be completed per attached policy, effective 1/1/2008	Per note
<b>California Total</b>	<b>34</b>	<b>403</b>	<b>232</b>	<b>37</b>	<b>422</b>	<b>6</b>	<b>4</b>	<b>33</b>	<b>2</b>	<b>0</b>	<b>682</b>	<b>238</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	1	0	0	0	0	0	0	0	0	1	C condition planned to be completed per attached policy, effective 1/1/2008	Per note
Alturas	0	2	8	0	3	0	0	0	0	0	3	8	B and C conditions planned to be completed per attached policy, effective 1/1/2008	Per note
Crescent City	0	1	40	0	0	0	0	3	0	0	12	40	B and C conditions planned to be completed per attached policy, effective 1/1/2008	Per note
Yreka/Mt. Shasta	0	41	141	0	41	1	0	55	0	0	307	142	B and C conditions planned to be completed per attached policy, effective 1/1/2008	Per note
<b>California Total</b>	<b>0</b>	<b>44</b>	<b>190</b>	<b>0</b>	<b>44</b>	<b>1</b>	<b>0</b>	<b>58</b>	<b>0</b>	<b>0</b>	<b>322</b>	<b>191</b>		

**TABLE B-2**  
**2008 GENERAL ORDER 165 ANNUAL REPORT**

Reporting Period: 01/01/08 - 12/31/08

**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	1	1	0	1	5	1	0	2	0	0	26	0	B conditions planned to be completed per attached policy, effective 1/1/2008	Per note
Switch/Protect Device	Overhead	1	0	0	1	2	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	1	0	0	0	0	0	0	0		
<b>Alturas</b>															
Transformers	Overhead	0	0	0	0	0	1	0	0	0	0	0	1	C condition is planned to be completed per attached policy, effective 1/1/2008	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	0	0	0	0	0	0	0	0	0	0	0	0		
<b>Crescent City</b>															
Transformers	Overhead	7	6	4	6	22	1	1	4	0	0	103	4	B & C conditions planned to be completed per attached policy, effective 1/1/2008	Per note
Switch/Protect Device	Overhead	0	3	0	0	0	0	0	0	0	0	4	0	B conditions planned to be completed per attached policy, effective 1/1/2008	Per note
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	1	0	B condition is planned to be completed per attached policy, effective 1/1/2008	Per note
All	Padmounted	0	1	0	0	0	0	0	0	0	0	2	0	B conditions planned to be completed per attached policy, effective 1/1/2008	Per note
<b>Yreka</b>															
Transformers	Overhead	11	31	31	9	36	2	1	49	1	1	665	46	A condition was found on 12/29/2008 and corrected on 1/14/2009 per attached policy, effective 1/1/2008. B and C conditions planned to be completed per attached policy, effective 1/1/2008	Per note
Switch/Protect Device	Overhead	0	0	0	0	1	0	0	1	0	0	1	0	B condition is planned to be completed per attached policy, effective 1/1/2008	Per note
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	4	0	B conditions planned to be completed per attached policy, effective 1/1/2008	Per note
All	Padmounted	2	7	0	2	4	0	0	1	0	0	38	4	B & C conditions planned to be completed per attached policy, effective 1/1/2008	Per note
<b>Mt. Shasta</b>															
Transformers	Overhead														
Switch/Protect Device	Overhead														
Regs/Caps	Overhead														
All	Padmounted														
<b>CA Total</b>															
Transformers	Overhead	19	38	35	16	63	5	2	55	1	1	794	51		
Switch/Protect Device	Overhead	1	3	0	1	3	0	0	1	0	0	5	0		
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	5	0		
All	Padmounted	2	8	0	2	5	0	0	1	0	0	40	4		
<b>California Totals</b>		<b>22</b>	<b>49</b>	<b>35</b>	<b>19</b>	<b>71</b>	<b>5</b>	<b>2</b>	<b>57</b>	<b>1</b>	<b>1</b>	<b>844</b>	<b>55</b>		

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

Author: Tim Rasmussen  
Approval: Tony Rodrigues, Jack Vranish  
Authoring Department: Asset Management  
Revision Number: R0  
Version date: 3/31/09

## 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.