

ATTACHMENT D

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 25, 2021

EA2021-913

Lise Jordan, Sr. Director
Regulatory Compliance and Quality Assurance
Pacific Gas and Electric Company (PG&E)
77 Beale Street
San Francisco, CA 94105

SUBJECT: Electric Distribution Audit of PG&E's North Valley Division

Dear Ms. Jordan:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell, Ogeonye Enyinwa, and Dmitriy Lysak of ESRB staff conducted an electric distribution audit of PG&E's North Valley Division from April 19, 2021, through April 23, 2021. During the audit, ESRB staff conducted field inspection of PG&E's distribution facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than July 23, 2021, by electronic copy of all corrective actions and preventive measures taken by PG&E to correct the identified violations and prevent the recurrence of such violations. The response should indicate the date of each remedial action and preventive measure completed. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Sections II & IV of the enclosed Audit Findings.

If you have any questions concerning this audit, please contact Samuel Mandell at (916) 217-8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Banu Acimis".

Banu Acimis, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC Electric Distribution Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC

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Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC

Ogeonye Enyinwa, Senior Utilities Engineer (Specialist), ESRB, SED, CPUC

Dmitriy Lysak, Utilities Engineer, ESRB, SED, CPUC

PG&E NORTH VALLEY DIVISION
ELECTRIC DISTRIBUTION AUDIT FINDINGS
April 19-23, 2021

I. Records Review

During the audit, ESRB staff reviewed the following records:

- Completed work orders with notifications from the past 12 consecutive calendar months, cancelled work orders with notifications from the past 12 consecutive calendar months, and late completed work orders from the last 60 consecutive calendar months.
- Patrol and detailed inspection records from the past 72 consecutive calendar months.
- Feeder reliability metrics and sustained outages in the Division from the last 60 calendar months.
- Master Map displaying approximate locations of the plat maps administered by the Division.
- New Construction (both overhead and underground) projects in the last 12 months not subject to a patrol or detailed inspection.
- Pole loading calculations from the last 12 consecutive calendar months including completion dates.
- Third-party notifications sent in the last 60 consecutive calendar months and received from the last 60 consecutive calendar months.
- List of inspectors and patrolmen active in the Division from 2016 to year to date (YTD).
- Electronic training records for inspectors from 2016 to YTD.
- Completed equipment test records, deferred equipment test records, and temporarily delayed equipment tests during the last five years.

II. Records Violations

ESRB staff observed the following violations during the record review portion of the audit:

1. GO 95, Rule 18-B, Maintenance Programs states in part:

“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.”

GO 95, Rule 31.1, Design, Construction and Maintenance states in part:

“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.

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.”

GO 128, Rule 17.1, Design, Construction and Maintenance states in part:

“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.

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 [the] communication or supply lines and equipment.”

ESRB staff reviewed late work orders completed within the North Valley Division for the past 60 months (from February 1, 2016, to February 26, 2021). PG&E’s Electric Distribution Preventative Maintenance (EDPM) Manual, published on April 1, 2016, defines the priority codes and associated time frames for the response/repair action as follows:

- **Priority A – Safety / Emergency Immediate Response**
An emergency is defined as any activity in response to an outage to customer(s) or an unsafe condition requiring immediate response or standby to protect the public.
- **Priority B – Urgent Compliance (Due within 3 months)**
- **Priority E – Compliance (Due 3-12 months)**
- **Priority F – Compliance (For Regulatory Conditions, the Recommended Repair Date is the due date for the next Inspection (UG = 3 years, OH = 5 years).**

ESRB staff reviewed late work orders and determined that PG&E did not address a total of 56,784 work orders by their assigned due date. Of these 56,784 work orders, 56,667 were classified as “late non-exempt” and 117 were classified as “late-exempt”.

Per GO 95, Rule 18-B(1)(b), *“Correction times may be extended under reasonable circumstances, such as: third party refusal, customer issue, no access, permits required, system emergencies (e.g., fires, severe weather conditions)”*. PG&E classifies work orders

under these circumstances as “late-exempt” as they are exempted from completion by their assigned due date.

Table 1 below breaks down the 56,784 late work orders by their given priority, including the total number of late work orders, as well as non-exempt and cancelled work orders, which are included in the total.

Table 1: Late Work Orders

Priority Code	Total Late Work Orders	Non-Exempt Late Work Orders	Total Cancelled Late Work Orders
A	36,091	36,091	30
B	1,187	1,174	137
E	15,806	15,742	4,576
F	3,700	3,660	731
Total	56,784	56,667	5,473

Table 2 below identifies the most overdue non-exempt work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Order (WO#s)	Number of Days Past Assigned Due Date
A	117042214	1,157
B	114981144	520
E	117300857	678*
F	108891434	588*

*At the time of the record review, the work has not been completed.

PG&E identified work order #117042214 on April 16, 2016, to remove a dead or dying tree. PG&E did not complete the work until June 17, 2019, with the note it should not have been an A tag.

PG&E identified work order #114981144 on September 13, 2018, to remove a dead or dying tree with an expected completion date of December 13, 2019. PG&E did not complete the work until May 16, 2020.

PG&E identified work order #117300857 on May 22, 2019, to replace a decayed pole with an expected completion date of May 30, 2019. PG&E has not completed the work as of February 26, 2021.

PG&E identified work order #108891434 on August 28, 2014, to replace guy anchor with an expected completion date of August 28, 2019. PG&E has not completed the work as of February 26, 2021.

2. GO 95, Rule 31.2, Inspection of Lines states in part:

“Lines shall be inspected frequently and thoroughly for the purpose of insuring that they are in good condition so as to conform with these rules. Lines temporarily out of

service shall be inspected and maintained in such condition as not to create a hazard.”

GO 165, Section III-B, Standards for Inspection states:

“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.”

ESRB staff noted that PG&E completed 119 overhead detailed inspections of electric facilities past an internal PG&E assigned due date of August 31, 2020, for all overhead Tier 2 and Tier 3 High Fire Threat District (HFTD) the following maps:

Table 3: Past Due Overhead Detailed Inspections (PG&E Internal)

Map	Due Date	Completion Date	Previous Inspection Date
A4624	31-Aug-20	22-Sep-20	19-Oct-15
B46	31-Aug-20	22-Sep-20	21-Oct-15
B47	31-Aug-20	4-Sep-20	2-Sep-15
BB2802	31-Aug-20	22-Sep-20	25-Jul-16
BB2811	31-Aug-20	21-Sep-20	17-Oct-16
C3705	31-Aug-20	21-Sep-20	17-Jul-18
C3719	31-Aug-20	21-Sep-20	7-Aug-18
C3807	31-Aug-20	21-Sep-20	24-Jul-18
C47	31-Aug-20	19-Sep-20	27-Sep-15
C50	31-Aug-20	2-Sep-20	17-Sep-15
CC25	31-Aug-20	7-Dec-20	2-Dec-16
D2620	31-Aug-20	Not in 2020 list	19-Dec-16
D2814	31-Aug-20	24-Sep-20	11-Oct-16
D29	31-Aug-20	24-Sep-20	13-Oct-16
D37	31-Aug-20	21-Sep-20	27-Jun-18
D47	31-Aug-20	30-Sep-20	27-Oct-15
D48	31-Aug-20	1-Oct-20	26-Oct-15
E26	31-Aug-20	24-Sep-20	21-Nov-16
E2702	31-Aug-20	24-Sep-20	23-Nov-16
E31	31-Aug-20	25-Sep-20	4-Nov-16
E46	31-Aug-20	26-Sep-20	13-Oct-15
E4620	31-Aug-20	23-Sep-20	12-Oct-15
E47	31-Aug-20	26-Sep-20	5-Oct-15
E48	31-Aug-20	26-Sep-20	5-Oct-15
F29	31-Aug-20	21-Dec-20	17-Dec-16
F30	31-Aug-20	25-Sep-20	6-Dec-16

F43	31-Aug-20	1-Oct-20	18-Nov-15
F44	31-Aug-20	30-Sep-20	16-Nov-15
F45	31-Aug-20	1-Sep-20	5-Nov-15
F4506	31-Aug-20	2-Sep-20	5-Nov-15
F4507	31-Aug-20	2-Sep-20	16-Oct-15
F46	31-Aug-20	30-Sep-20	16-Oct-15
F47	31-Aug-20	1-Oct-20	9-Sep-15
F4710	31-Aug-20	30-Sep-20	3-Sep-15
F48	31-Aug-20	14-Oct-20	4-Sep-15
G30	31-Aug-20	19-Sep-20	7-Dec-16
G33	31-Aug-20	19-Sep-20	10-Aug-18
G3307	31-Aug-20	19-Sep-20	8-Aug-18
G43	31-Aug-20	1-Oct-20	21-Oct-15
G44	31-Aug-20	29-Sep-20	21-Oct-15
G46	31-Aug-20	3-Oct-20	22-Oct-15
G48	31-Aug-20	23-Sep-20	18-Aug-15
H3018	31-Aug-20	5-Sep-20	8-Nov-16
H4424	31-Aug-20	25-Sep-20	1-Jul-15
H4425	31-Aug-20	26-Sep-20	29-Jul-15
H4512	31-Aug-20	30-Sep-20	1-Jul-15
H4516	31-Aug-20	29-Sep-20	6-Aug-15
H4517	31-Aug-20	19-Sep-20	11-Aug-15
H4521	31-Aug-20	30-Sep-20	14-Jul-15
H46	31-Aug-20	1-Sep-20	9-Sep-15
H4606	31-Aug-20	26-Sep-20	24-Aug-15
H4612	31-Aug-20	22-Sep-20	1-Sep-15
I2502	31-Aug-20	19-Sep-20	19-Jun-18
I2504	31-Aug-20	10-Dec-20	21-Aug-18
I2522	31-Aug-20	19-Sep-20	13-Jun-18
I2706	31-Aug-20	23-Sep-20	23-Oct-18
I2810	31-Aug-20	23-Sep-20	24-Oct-18
I2819	31-Aug-20	23-Sep-20	10-Oct-18
I29	31-Aug-20	23-Sep-20	2-Oct-18
I2907	31-Aug-20	23-Sep-20	26-Sep-18
I3010	31-Aug-20	23-Sep-20	13-Sep-18
I3022	31-Aug-20	2-Nov-20	1-Dec-16
I3023	31-Aug-20	8-Oct-20	2-Dec-16
I3102	31-Aug-20	23-Sep-20	19-Sep-18
I32	31-Aug-20	20-Nov-20	20-Sep-18
I44V	31-Aug-20	2-Sep-20	20-Aug-15
I44W	31-Aug-20	3-Sep-20	3-Aug-15
I46	31-Aug-20	30-Sep-20	17-Sep-15
I4608	31-Aug-20	25-Sep-20	11-Aug-15

I4609	31-Aug-20	29-Sep-20	9-Sep-15
J28	31-Aug-20	10-Dec-20	19-Oct-18
L3424	31-Aug-20	9-Dec-20	2-Jul-19
L38	31-Aug-20	22-Sep-20	1-Dec-15
L39	31-Aug-20	22-Sep-20	29-Sep-15
M40	31-Aug-20	24-Sep-20	7-Jun-19
N2716	31-Aug-20	21-Dec-20	24-Apr-19
N2720	31-Aug-20	14-Dec-20	30-Apr-19
P27	31-Aug-20	22-Sep-20	14-Sep-16
P2710	31-Aug-20	22-Sep-20	6-Sep-16
P2718	31-Aug-20	22-Sep-20	21-Sep-16
P2803	31-Aug-20	13-Oct-20	31-Aug-16
P2806	31-Aug-20	22-Sep-20	29-Sep-16
P3218	31-Aug-20	8-Dec-20	21-Mar-19
P3222	31-Aug-20	14-Dec-20	18-Mar-19
P40E	31-Aug-20	9-Dec-20	27-Sep-16
P40J	31-Aug-20	9-Dec-20	26-Sep-16
P5004	31-Aug-20	16-Sep-20	13-Oct-17
Q3001	31-Aug-20	8-Dec-20	5-Feb-16
Q3002	31-Aug-20	8-Dec-20	5-Feb-16
Q3110	31-Aug-20	9-Dec-20	12-Apr-19
Q33G	31-Aug-20	26-Sep-20	15-Jul-15
Q38	31-Aug-20	13-Oct-20	25-Aug-15
Q39	31-Aug-20	21-Sep-20	15-Oct-18
Q3906	31-Aug-20	21-Sep-20	3-Oct-18
Q40	31-Aug-20	23-Sep-20	27-Oct-18
Q4001	31-Aug-20	22-Sep-20	12-Oct-18
Q4002	31-Aug-20	22-Sep-20	13-Oct-18
Q4004	31-Aug-20	22-Sep-20	20-Oct-18
Q4219	31-Aug-20	23-Sep-20	9-Oct-18
R2802	31-Aug-20	18-Nov-20	30-May-17
R42	31-Aug-20	6-Nov-20	15-Oct-18
S3204	31-Aug-20	10-Dec-20	5-Dec-17
S3212	31-Aug-20	10-Dec-20	5-Dec-17
S3213	31-Aug-20	10-Dec-20	6-Dec-17
S3221	31-Aug-20	26-Sep-20	6-Dec-17
S40	31-Aug-20	24-Sep-20	11-May-19
S42S	31-Aug-20	5-Nov-20	20-Aug-19
S43	31-Aug-20	25-Sep-20	14-May-19
T3211	31-Aug-20	21-Dec-20	13-Apr-19
T3305	31-Aug-20	14-Dec-20	1-Apr-19
T3307	31-Aug-20	25-Sep-20	19-Apr-19
T3404	31-Aug-20	17-Dec-20	28-Apr-19

T3414	31-Aug-20	26-Sep-20	10-Jul-19
T3416	31-Aug-20	26-Sep-20	1-Jul-19
T36	31-Aug-20	9-Dec-20	9-Aug-19
U2906	31-Aug-20	Not in 2020 list	3-May-19
U3412	31-Aug-20	21-Dec-20	14-Aug-19
U3707	31-Aug-20	29-Sep-20	27-Jun-16
U44E	31-Aug-20	2-Oct-20	10-May-19

ESRB staff noted that PG&E completed five overhead detailed inspections of electric facilities past their GO 165 required completion date for the following maps:

Table 4: Past Due Overhead Detailed Inspections

Map	Due Date	Completion Date	Previous Inspection Date
DD25	6-Aug-20	23-Sep-20	6-May-15
H4507	17-Sep-20	26-Sep-20	17-Jun-15
H4509	9-Sep-20	26-Sep-20	9-Jun-15
Q34	3-Nov-20	10-Dec-20	3-Aug-15
S3402	28-Jul-20	25-Sep-20	28-Apr-15

ESRB staff noted that PG&E completed one overhead patrol past its GO 165 required completion date for the following map:

Table 5: Past Due Overhead Patrol

Map	Due Date	Completion Date	Previous Inspection Date
U2906	3-Aug-20	6-Nov-20	3-May-19

3. GO 128, Rule 17.2, Inspection states in part:

“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.”

GO 165, Section III-B, Standards for Inspection states in part:

“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.”

ESRB staff noted that PG&E failed to complete GO 165 patrols of underground electric facilities located in five underground maps in 2019:

Table 6: Past Due Underground Patrols

Map	Patrol Due Date	Patrol Completion Date	Previous Inspection Date
Y3622	29-Oct-19	3-Oct-20	29-Jul-17
Y3616	16-Nov-19	3-Oct-20	16-Aug-17
Y3611	16-Nov-19	3-Oct-20	16-Aug-17
Y3509	29-Oct-19	3-Oct-20	29-Jul-17
Y35	29-Oct-19	3-Oct-20	29-Jul-17

ESRB staff noted that PG&E failed to complete GO 165 detailed inspections of underground electric facilities located in five underground maps in 2020:

Table 7: Past Due Underground Detailed Inspections

Map	Inspection Due Date	Previous Inspection Date
Y3622	29-Oct-20	29-Jul-17
Y3616	16-Nov-20	16-Aug-17
Y3611	16-Nov-20	16-Aug-17
Y3509	29-Oct-20	29-Jul-17
Y35	29-Oct-20	29-Jul-17

III. Field Inspection

During the field inspection, ESRB staff inspected the following facilities:

Location	SAP/Equipment Number	Type of Structure	Approximate Location	City
1	101461053	Pole	Across from 20240 Blue Jay Dr.	Redding
2	101461057	Pole	1 Pole West of location 1	Redding
3	101461058	Pole	20207 Blue Jay Dr.	Redding
4	101461059	Pole	20259 Blue Jay Dr.	Redding
5	101516228	Pole	42609-42833 McArthur Rd	Fall River Mills
6	101516229	Pole	1 Pole East of Location 5	Fall River Mills
7	101516230	Pole	1 Pole East of Location 6	Fall River Mills
8	101516227	Pole	1 Pole East of Location 7	Fall River Mills
9	101519184	Pole	5 East on Old Home Ranch	Fall River Mills
10	101519185	Pole	1 Pole North of Location 9	Fall River Mills
11	101519186	Pole	1 Pole North of Location 10	Fall River Mills
12	101479337	Pole	30397 Minnow Creek Ln	Round Mountain
13	101479337	Pole	1 Pole East of Location 12	Round Mountain
14	101479339	Pole	1 Pole East of Location 13	Round Mountain
15	101480162	Pole	1 Pole North of Cut Out Semen Gulch /299	Bella Vista
16	101480156	Pole	1 Pole North of Location 15	Bella Vista
17	101480154	Pole	1 Pole North of Location 16	Bella Vista
18	103992582	Pole	Cheshire and Starwood	Palo Cedro
19	101469513	Pole	1 Pole East of Location 18	Palo Cedro
20	100387502	Pole	190 E High St	Quincy
21	100387506	Pole	East and E High St	Quincy
22		Midspan Service Drop	227 E High St	Quincy
23	100387499	Pole	232 E High St	Quincy
24	100387485	Pole	1 Pole West of Location 23	Quincy
25	100387480	Pole	304 E High St	Quincy
26	100387476	Pole	Across From 325 E High St	Quincy

27	100431025	Pole	2043 Palermo Rd	Palermo
28	100393881	Pole	Southwest Corner of Palermo Rd and Lincoln Blvd	Palermo
29	100431024	Pole	1935 Palermo Rd	Palermo
30	100393878	Pole	1921 Palermo Rd	Palermo
31	100393875	Pole	1 Pole West of Location 30	Palermo
32	100431020	Pole	Southeast Corner of Palermo Rd and Railroad Ave	Palermo
33	119046729	Pole	5026-5052 Wilderness Way	Paradise
34	103939477	Pole	1 Pole East of Location 33	Paradise
35	103939482	Pole	1 Pole East of Location 34	Paradise
36	100328479	Pole	Northwest Corner of A St and Wilderness Way	Paradise
37	104014254	Pole/Riser	3570 Lassen Rd	Paradise
38	103976558	Pole/Riser	3585 Lassen Rd	Paradise
39	100329451	Pole	88 Marleen Ln	Paradise
40	103939369	Pole	Southwest Corner of Marlee Ln and Neal Rd	Paradise
41	T-1952	Padmount Transformer	22581 Adobe Rd	Red Bluff
42	T-956	Subsurface Transformer	22539 Adobe Rd	Red Bluff
43	T-295	Subsurface Transformer	510 Antelope Blvd	Red Bluff
44	J-689	Junction Box	Adjacent to Location 43	Red Bluff
45	T-0296	Padmount Transformer	536 Antelope Blvd	Red Bluff
46	T-0062	Padmount Transformer	482 Chestnut Ave	Red Bluff
47	100408064	Pole	3900 County Road P	Orland
48	100362476	Pole	1 Pole South of Location 47	Orland
49	100362460	Pole	1 Pole South of Location 48	Orland
50	100362461	Pole	1 Pole East of Location 49	Orland
51	100332595	Pole	750 County Road D	Willows
52	100332594	Pole	1 Pole West of Location 51	Willows
53	100332593	Pole	1 Pole West of Location 52	Willows
54	100332590	Pole	1 Pole West of Location 53	Willows
55	100407849	Pole	1 Pole West of Location 54	Willows

IV. Field Inspection Violations

ESRB staff observed the following violations during the field inspection:

1. GO 95, Rule 31.1, Design, Construction and Maintenance states in part:

“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.”

- 1.1) The pole, at 20207 Blue Jay Dr in Redding (Location 3), had a buried guy anchor. PG&E cleared the area around the anchor in the field.
- 1.2) The pole, one span east of 30397 Minnow Creek Ln in Round Mountain (Location 13), is deteriorated. PG&E has an existing tag 117168828.
- 1.3) The second pole, east of 30397 Minnow Creek Ln in Round Mountain (Location 14), had a significant woodpecker damage. PG&E has an existing tag 117751835.
- 1.4) The pole, one west of 232 E Hight St in Quincy (Location 24), had multiple woodpecker holes in the secondary and primary layers.
- 1.5) The pole, at 1935 Palermo Rd in Palermo (Location 29), has a liquid filled fuse that did not have any oil in it.
- 1.6) The pole, at 5026-5052 Wilderness Way in Paradise (Location 33), had an open tag 119046729 for an unsecured ground wire. PG&E addressed the issue in the field and closed the tag.
- 1.7) The pole, one south of 3900 County Road P in Orland (Location 48), is deteriorated and has significant woodpecker damage. PG&E has an existing ticket 119817238.
- 1.8) The pole, one west of 750 County Road D in Willows (Location 52), had a buried anchor guy. PG&E addressed the issue in the field.

2. GO 95, Rule 34, Foreign Attachments states in part:

“Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight 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.

Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the

poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner's or owners' consent."

2.1) The pole, at 190 E High St (Location 20), had a third-party sign attached to the pole. PG&E removed the attachment in the field.

2.2) The pole, at the intersection of East St and E High St, had a third-party sign attached to the pole. PG&E removed the attachment in the field.

3. GO 95, Rule 51.6-A, High Voltage Marking states in part:

"Poles which support line conductors of more than 750 volts shall be marked with high voltage signs. This marking shall consist of a single sign showing the words "HIGH VOLTAGE", or pair of signs showing the words "HIGH" and "VOLTAGE", not more than six (6) inches in height with letters not less than 3 inches in height. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible."

3.1) The pole, at 304 E High St in Quincy (Location 25), did not have high voltage signs.

3.2) The pole, one span west of 1921 Palermo Rd in Palermo (Location 31), did not have high voltage signs.

3.3) The pole, on the southeast corner of Palermo Rd and Railroad Ave in Palermo (Location 32), was missing high voltage signs on the lower primary crossarm.

3.4) The pole, located two spans south of 3900 County Road P in Orland (Location 49), was missing high voltage signs. PG&E had existing notification 119816809 for the issue and addressed it in the field.

4. GO 95, Rule 56.6-A, Guys in Proximity to Supply Conductors of Less than 35,500 Volts states in part:

"All portions of guys within both a vertical distance of 8 feet from the level of supply conductors of less than 35,500 volts and a radial distance of 6 feet from the surface of wood poles or structures shall not be grounded, through anchors or otherwise. Where necessary to avoid the grounding of such portions, guys shall be sectionalized by means of insulators installed at locations as specified in Rule 56.7."

4.1) The pole, located across from 20240 Blue Jay Dr in Redding (Location 1), had vegetation making contact above the guy bob on the primary down guy. PG&E addressed the issue in the field.

4.2) The pole, one north of the cutout at the intersection of Seaman Gulch Rd and Hwy 299 in Bella Vista (Location 15), had vegetation making contact above the guy bob on the primary down guy. PG&E addressed the issue in the field.

4.3) The pole, at 190 E High St in Quincy (Location 20), had vegetation making contact above the guy bob on the secondary down guy. PG&E addressed the issue in the field.

5. GO 95, Rule 91.3 – C, Joint Poles or Poles Jointly Use, Stepping states in part:

“Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.”

5.1) The pole, at 2043 Palermo Rd in Palermo (Location 27), had its lowest pole step set to 7’2”. PG&E addressed the issue in the field.

V. Observations

ESRB staff observed the following during the field inspection:

1. The following locations had potential third-party safety concerns:

1.1) The pole, located across from 20240 Blue Jay Dr in Redding (Location 1), has a communication wire hanging to the ground.

1.2) The communications ground molding on the pole, at 30397 Minnow Creek Ln (Location 12), is damaged and not secured to the pole.

1.3) The pole, at the northwest corner of the intersection of A St and Wilderness Way in Paradise (Location 36), had a communication down guy hanging from the pole that is no longer attached to an anchor. PG&E removed the hanging down guy in the field.