

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 17, 2023

EA2023-1044

Thomas Miller
Electric Utility Director
Banning Electric Utility
City of Banning
176 E. Lincoln Street
Banning, CA 92222

Subject: Audit of Banning Electric Utility

Mr. Miller:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Stacey Ocampo of my staff conducted an electric distribution audit of Banning Electric Utility's (Banning) service territory from February 13, 2023 to February 17, 2023. The audit included a review of Banning's inspection and maintenance records and a field inspection of Banning'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 May 17, 2023, by electronic or hard copy, of all corrective measures taken by Banning to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Stacey Ocampo at (213) 266-4712 or Stacey.Ocampo@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "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: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC
Stacey Ocampo, Utilities Engineer, ESRB, SED, CPUC

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Pole load calculations
- Intrusive test records
- Safety hazard notifications
- Banning's documented inspection program
- Vegetation Records

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

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.

GO 165, Table 1, require electric utilities to conduct detailed inspections of their overhead electric facilities at least once every 5 years.

Banning Electric Utility was unable to provide a detailed inspection program for its overhead electric facilities.

GO 165, Table 1, requires electric utilities to patrol its underground electric facilities at least once every year in urban areas and once every two years in rural areas.

Banning Electric Utility was unable to provide a patrol inspection program for its underground electric facilities.

GO 165, Rule III (C), Record Keeping, states in part:

The utility shall maintain records for (1) at least ten (10) years of patrol and detailed inspection activities, and (2) the life of the pole for intrusive inspection activities. Such records shall be made available to parties or pursuant to Commission rules upon 30 days notice. Commission staff shall be permitted to inspect such records consistent with Public Utilities Code Section 314 (a).

Banning Electric Utility was unable to provide the CPUC with any patrol, detailed, or intrusive testing records for the ten years preceding the audit.

III. Field Inspection

My staff inspected the following facilities during the field inspection portion of the audit:

No.	Structure ID	Type of Structure	Location
1	6935B	Pole	Banning
2	6936	Pole	Banning
3	6937	Pole	Banning
4	6938	Pole	Banning
5	6939	Pole	Banning
6	6940	Pole	Banning
7	6941	Pole	Banning
8	6942	Pole	Banning
9	3999	Pole	Banning
10	5031	Pole	Banning
11	6175	Pole	Banning
12	6176	Pole	Banning
13	6810	Pole	Banning
14	6687	Pole	Banning
15	5037	Pole	Banning
16	5033	Pole	Banning
17	6859	Pole	Banning
18	6676	Pole	Banning
19	6204	Pole	Banning
20	6205	Pole	Banning
21	6971	Pole	Banning
22	6970	Pole	Banning
23	6969	Pole	Banning
24	6968	Pole	Banning
25	6967	Pole	Banning
26	6966	Pole	Banning
27	6965	Pole	Banning
28	6964	Pole	Banning
29	6963	Pole	Banning
30	6962	Pole	Banning
31	6961	Pole	Banning
32	6960	Pole	Banning
33	6959	Pole	Banning
34	34162	Pole	Banning
35	34160CWT	Pole	Banning
36	6591	Pole	Banning
37	34164	Pole	Banning
38	34165	Pole	Banning
39	3509	Pole	Banning

40	34167	Pole	Banning
41	4803	Pole	Banning
42	4806	Pole	Banning
43	4807	Pole	Banning
44	6156	Pole	Banning
45	4808	Pole	Banning
46	GT117193	Pole	Banning
47	4810	Pole	Banning
48	4406	Pole	Banning
49	3948	Pole	Banning
50	3949	Pole	Banning
51	4209	Pole	Banning
52	4208	Pole	Banning
53	4207	Pole	Banning
54	4206	Pole	Banning
55	4205	Pole	Banning
56	4204	Pole	Banning
57	802	Pole	Banning
58	4203	Pole	Banning
59	3730	Pole	Banning
60	6038	Pole	Banning
61	6036	Pole	Banning
62	4436	Pole	Banning
63	2450	Pole	Banning
64	2301	Pole	Banning
65	4438	Pole	Banning
66	GT65434	Pole	Banning
67	2995	Pole	Banning
68	2302	Pole	Banning
69	6289	Pole	Banning
70	1978	Pole	Banning
71	6957	Pole	Banning
72	6908	Pole	Banning
73	6907	Pole	Banning
74	6906	Pole	Banning
75	6905	Pole	Banning
76	6904	Pole	Banning
77	6903	Pole	Banning
78	6902	Pole	Banning
79	6901	Pole	Banning
80	6900	Pole	Banning
81	6899	Pole	Banning
82	6898	Pole	Banning
83	6897	Pole	Banning
84	6896	Pole	Banning

85	6895	Pole	Banning
86	6894	Pole	Banning
87	6893	Pole	Banning
88	6892	Pole	Banning
89	6891	Pole	Banning
90	6890	Pole	Banning
91	6889	Pole	Banning
92	6888	Pole	Banning
93	6887	Pole	Banning
94	6886	Pole	Banning
95	6885	Pole	Banning
96	6909	Pole	Banning
97	6910	Pole	Banning
98	3126	Pole	Banning
99	6476	Pole	Banning
100	2385	Pole	Banning
101	122115	Pad-mounted Switch	Banning
102	122115	Vault	Banning
103	LV100139	Vault	Banning
104	LV100132	Vault	Banning
105	122104	Pad-mounted Switch	Banning
106	122104	Vault	Banning
107	3491	Handhole	Banning
108	3526	Pad-mounted Transformer	Banning
109	2859	Pad-mounted Transformer	Banning
110	SV100184	Vault	Banning
111	3438	Pad-mounted Transformer	Banning
112	SV100214	Vault	Banning
113	6012 Sierra Place	Handhole	Banning
114	3451	Pad-mounted Transformer	Banning
115	3459	Pad-mounted Transformer	Banning
116	122081	Pad-mounted Switch	Banning
117	122081	Vault	Banning
118	122082	Pad-mounted Switch	Banning
119	122082	Vault	Banning
120	3323	Pad-mounted Transformer	Banning

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections portion of the audit:

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.

Banning’s facilities on the following poles required maintenance:

- Pole 5031: the bracket attached to the control module was damaged.
- Pole 802: the ground wire was damaged.

The “eye” of the Banning down guy anchor attached the following poles was buried:

- 3999
- 4803
- 6908

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, Use, states in part:

Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.

The down guy wire attached to the following poles was loose and not taut:

- 6907
- 6906

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

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

Pole 3730 had an unauthorized cross and a “Forgotten Forever” sign attached to it.

GO 95, Rule 18-A3, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards, A. Resolution of Potential Violations of General Order 95 and Safety Hazards, states in part:

(3) 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 entity of such safety hazard(s) no later than 10 business days after the discovery.

The third-party communications down guy on Pole 3999 was abandoned. Banning did not send the third-party notifications for this hazard.

GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:

The lowest step shall be not 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.

The lowest pole step on each of the following poles was located at a height of less than eight feet:

- 4406
- 4204

GO 95, Rule 51.6, Marking and Guarding, High Voltage Marking of Poles, 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. A pair of signs may be stacked to a height of no more than 12 inches. Such signs shall be of weather and corrosion-resisting material, solid or with letters cut out therefrom and clearly legible.

The “High Voltage” sign or band on each of the following poles was missing or damaged:

- 6175
- 6176
- 6810
- 6205
- 34162
- 6591
- 4806
- 4204
- 6036
- 4436
- 2450
- 4438
- 2995
- 2302
- 1978

GO 95, Rule 54.6-B, Ground Wires, states in part:

That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).

The ground moulding attached to following poles was missing or damaged:

- 6939
- 6969
- 34165
- 4206
- 802
- 3730

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.

The entry way to pad-mounted transformer No. 3438 was obstructed by vegetation within the suggested 8 feet of clearance for the entry way posted on the enclosure door.