

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 29, 2021

EA2021-892

Shivani Sidhar
Director – Regulatory Affairs
San Diego Gas and Electric
8315 Century Park Court,
San Diego, CA 92123

SUBJECT: Audit of SDG&E's North Coast Region

Ms. Sidhar:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Saimon Islam, Kyle King and Mily Vaidya of my staff conducted an electric distribution audit of San Diego Gas and Electric (SDG&E) North Coast Region from March 22, 2021 to March 26, 2021. The audit included a review of SDG&E's inspection and maintenance records and a field inspection of SDG&E'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 July 29, 2021, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Saimon Islam at (213) 266 – 4733 or saimon.islam@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, CPUC
Majed Ibrahim, Senior Utilities Engineer, ESRB, CPUC
Mily Vaidya, Utilities Engineer, ESRB
Kyle King, Utilities Engineer, ESRB

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
- Diagnostic test records
- Third party safety hazard notifications
- SDG&E's inspection and maintenance program
- SDG&E vegetation management records

II. Records Review – Violations List

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

GO 95, Rule 18, Rule 18-B1, Maintenance Programs, states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...

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

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.

SDG&E's records indicated that from 2015 to 2020, SDG&E completed 1 overhead work order (Notification No. 100018015613) past SDG&E's scheduled due date for corrective action.

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.

SDG&E's records indicated that from 2015 to 2020, SDG&E completed 3 underground work orders (Notifications numbered 100010810759, 100008903026 and 100014570546) past SDG&E's scheduled due date for corrective action.

III. Field Inspection

My staff inspected the following facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	P135246	Pole	Vista
2	P34922	Pole	Vista
3	P814300	Pole	Vista
4	P814299	Pole	Vista
5	P318876	Pole	Vista
6	P217851	Pole	Vista
7	P618019	Pole	Vista
8	P317144	Pole	Vista
9	P610868	Pole	Vista
10	P610869	Pole	Vista
11	P611075	Pole	Vista
12	P217850	Pole	Vista
13	P211599	Pole	Vista
14	P112667	Pole	Vista
15	P814391	Pole	Vista
16	P814392	Pole	Vista
17	P1322981	Pole	Vista
18	P810594	Pole	Vista
19	P198172	Pole	Vista
20	P616921	Pole	Vista
21	P616920	Pole	Vista
22	P616919	Pole	Vista
23	P616918	Pole	Vista
24	P247486	Pole	Vista
25	P211845	Pole	Vista
26	P211546	Pole	Vista
27	P110966	Pole	Vista
28	P135346	Pole	Vista
29	P110964	Pole	Vista
30	P325258	Pole	Vista
31	P163903	Pole	Vista
32	P163902	Pole	Vista
33	P163901	Pole	Vista
34	P163900	Pole	Vista
35	P163898	Pole	Vista
36	P613670	Pole	Vista
37	P411576	Pole	Vista
38	P411575	Pole	Vista
39	P317087	Pole	Vista
40	P619286	Pole	Vista

No.	Structure ID.	Type of Structure	Location
41	P619287	Pole	Vista
42	P619288	Pole	Vista
43	P114304	Pole	Vista
44	P114305	Pole	Vista
45	P19953J	Pole	Vista
46	P19954J	Pole	Vista
47	P716541	Pole	Vista
48	P614895	Pole	Vista
49	P519463	Pole	Vista
50	P419182	Pole	Vista
51	P419181	Pole	Vista
52	P204869	Pole	Vista
53	P213898	Pole	Vista
54	P112841	Pole	Vista
55	P415021	Pole	Vista
56	P415020	Pole	Vista
57	P512374	Pole	Vista
58	P412563	Pole	Vista
59	P411962	Pole	Vista
60	P415022	Pole	Vista
61	P415023	Pole	Vista
62	P415024	Pole	Vista
63	P111777	Pole	Vista
64	P112733	Pole	Vista
65	P411519	Pole	Vista
66	P111778	Pole	Vista
67	P112732	Pole	Vista
68	P111776	Pole	Vista
69	P417008	Pole	Vista
70	P417009	Pole	Vista
71	P417010	Pole	Vista
72	P115151	Pole	Vista
73	P224615	Pole	Vista
74	P18619	Pole	Vista
75	P18617	Pole	Vista
76	P112118	Pole	Vista
77	P613019	Pole	Vista
78	P112117	Pole	Vista
79	P613020	Pole	Vista
80	P717731	Pole	Vista
81	P112119	Pole	Vista
82	P122713	Pole	Oceanside
83	P22183	Pole	Oceanside
84	P22184	Pole	Oceanside
85	P210665	Pole	Oceanside

No.	Structure ID.	Type of Structure	Location
86	P21816	Pole	Oceanside
87	P120599	Pole	Encinitas
88	P211535	Pole	Rancho Santa Fe
89	P218092J	Pole	Rancho Santa Fe
90	P14628J	Pole	Rancho Santa Fe
91	P14627	Pole	Rancho Santa Fe
92	P514619	Pole	Rancho Santa Fe
93	P412843	Pole	Rancho Santa Fe
94	H3763765352	Handhole	Oceanside
95	D37770656610	Vault	Oceanside
96	D159318	Vault	Carlsbad
97	D3524268158	Transformer	Carlsbad
98	H101783	Manhole	Carlsbad
99	D118055	Transformer	Carlsbad
100	D134134	Transformer	Carlsbad
101	D143737	Transformer	Carlsbad
102	D143736	Transformer	Carlsbad
103	D143735	Transformer	Carlsbad
104	D143746	Transformer	Carlsbad
105	D143778	Transformer	Carlsbad
106	D134033	Switch	Encinitas
107	D134692	Fuse Cabinet	Encinitas
108	D134837	Transformer	Encinitas
109	D201556	Transformer	Encinitas
110	AK4113	Tree (Vegetation)	Vista
111	AK4099	Tree (Vegetation)	Vista
112	AH7438	Tree (Vegetation)	Vista
113	AH7710	Tree (Vegetation)	Vista
114	AD8141	Tree (Vegetation)	Vista
115	AD8140	Tree (Vegetation)	Vista

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections of SDG&E's North Coast District:

GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, 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 each of the following SDG&E poles was loose and not taut:

- P163900
- P211535

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.

The anchor of the guy wire attached to pole No. P135346 was buried.

GO 95, Rule 18.B, Reporting and Resolution of Safety Hazards Discovered by Utilities, Notifications of Safety Hazards, states in part:

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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.

SDG&E did not report to the third-party (AT&T) safety hazards related to these poles prior to the audit:

- P198172 – AT&T needs to complete pole transfer (first notification created on 6/25/2021)
- P114305 – AT&T needs to complete pole transfer (first notification created on 6/25/2021)
- P717731 – AT&T needs to complete pole transfer (first notification created on 6/25/2021)

GO 95, Rule 54.8-C4, Clearance between Service Drops and Other Conductors, From Communication Service Drops, states in part:

The radial clearance between supply service drop conductors and communication service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9; Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches.

Service drops on the following SDG&E poles had less than the minimum required clearance from a communication service drop:

- P213898– a communication service drop was touching SDG&E’s service drop at the point of the attachment on a house (weather head).

GO 95, Rule 31.6, Abandoned Lines, states in part:

Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.

Guy wires and anchors attached to the following SDG&E’s poles were abandoned but not removed:

- P619287
- P14628J