

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 25, 2013

TA2013-001

Bret Ball  
Manager, Transmission Construction and Maintenance  
San Diego Gas and Electric  
5488 Overland Avenue  
San Diego, CA 92123

**SUBJECT:** Audit of SDG&E's Electric Transmission Facilities in North San Diego County and Southern Orange County

Dear Mr. Ball:

On behalf of the Safety and Enforcement Branch of the California Public Utilities Commission, Ben Brinkman conducted an audit of SDG&E's electric transmission facilities in the North San Diego County and Southern Orange County areas from February 4 to February 8, 2013. The audit included a review of SDG&E's maintenance records and inspections of SDG&E's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit summary itemizing the violations is enclosed. Please advise me no later than April 30, 2013, 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 Ben Brinkman of my staff at (213) 576-7093 or [benjamin.brinkman@cpuc.ca.gov](mailto:benjamin.brinkman@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Raymond G. Fugere'.

Raymond G. Fugere, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Audit Summary

CC: Ben Brinkman, Senior Utilities Engineer, CPUC

### Audit Summary

**Company:** SDG&E  
**Area:** Electric Transmission System, North San Diego County and Southern Orange County  
**Audit Type:** Electric Transmission Audit  
**Date:** February 4 – 8, 2013

### Violations

1.	Structure ID / Location:	TL674, Structure Z12328
	Previous SDG&E Visit Details:	September 8, 2011
	Date of CPUC Inspection:	February 5, 2013
Explanation of Violation(s):		
<b>Foreign Attachment</b>		
GO 95, Rule 34, Additional Construction, states in part:		
<i>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.</i>		
<i>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.</i>		
<i>All permanent attachments must be approved by the Commission (see Rule 15.1) and the owner(s) involved.</i>		
A customer attached an unauthorized solar floodlight to structure Z12328.		

2.	<b>Structure ID / Location:</b>	TL616, Structure 712333
	<b>Previous SDG&amp;E Visit Details:</b>	April 19, 2012
	<b>Date of CPUC Inspection:</b>	February 6, 2013
	<b>Explanation of Violation(s):</b>	
	<u><b>Guy Guard</b></u> GO 95, Rule 56.9, Guy Marker (Guy Guard) ,states:  <i>A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.</i>  Structure 712333 is missing a guard on the outer anchor guy.	



PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 23, 2014

TA2014-005

Bret Ball  
Manager, Transmission Construction and Maintenance  
San Diego Gas and Electric  
5488 Overland Avenue  
San Diego, CA 92123

**SUBJECT:** Audit of SDG&E's Electric Transmission Facilities in the Mountain, Inland, and Coastal Areas

Dear Mr. Ball:

On behalf of the Safety and Enforcement Branch of the California Public Utilities Commission, Ben Brinkman and Richard Kyo of my staff conducted an audit of SDG&E's electric transmission facilities in the Mountain, Inland, and Coastal areas of San Diego from August 25 to August 29, 2014. The audit included a review of SDG&E's maintenance records and inspections of SDG&E's facilities.

During the audit, we identified violations of one or more General Orders. A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than October 23, 2014, 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 Ben Brinkman of my staff at (213) 576-7093 or [benjamin.brinkman@cpuc.ca.gov](mailto:benjamin.brinkman@cpuc.ca.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read 'Fadi Daye'.

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Audit Findings

CC: Ben Brinkman, Senior Utilities Engineer, CPUC  
Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC

### **Audit Findings**

**Company:** SDG&E  
**Area:** Electric Transmission System, Metro San Diego and East San Diego County  
**Audit Type:** Electric Transmission Audit  
**Date:** August 25 - 29, 2014

General Order 165, Section IV, Transmission Facilities, states, in part:

*Each utility shall prepare and follow procedures for conducting inspections and maintenance activities for transmission lines. Each utility shall maintain records of inspection and maintenance activities.*

*Commission staff shall be permitted to inspect records and procedures consistent with Public Utilities Code Section 314 (a).*

SDG&E's Transmission Line Maintenance practices (TCM807, 7/9/09), section 4.2.1, *Transmission System Inspection Frequency*, requires wood pole ground line inspections to be conducted every ten years.

In its pre-audit preparation, SDG&E discovered 19 late pole ground-line inspections, and reported these late inspections to SED. When necessary, SDG&E performed special inspections to correct this deficiency. All of these inspections are currently up to date. As part of its corrective actions, SDG&E also instituted a new annual review and reporting mechanism for such inspections.

### Field Violations

1.	<b>Structure ID / Location:</b>	TL13823, Structures 188685, 188684	
	<b>Previous SDG&amp;E Visit Details:</b>	October 15, 2012	
	<b>Date of CPUC Inspection:</b>	August 27, 2014	
<b>Explanation of Violation(s):</b>			
<b><u>Missing Ground Wires</u></b>			
General Order 165, Section IV, Transmission Facilities, states, in part:			
<i>Each utility shall prepare and follow procedures for conducting inspections..</i>			
SDG&E "Transmission Line Maintenance Practices", Section 6.1. states, in part:			
<i>Maintenance is performed to correct .... GO95 and GO128 infractions ...</i>			
General Order 95, Rule 31.1, Design, Construction and Maintenance, states, in part:			
<i>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.</i>			
Lattice structures were missing ground wires. SDG&E failed to note this discrepancy during its last inspection.			



2.	<b>Structure ID / Location:</b>	TL6923, Structures Z072823, Z972824, Z972845	
	<b>Previous SDG&amp;E Visit Details:</b>	July 12, 2012	
	<b>Date of CPUC Inspection:</b>	August 26, 2014	
	<b>Explanation of Violation(s):</b>		
	<p><b><u>Missing Guy Guard</u></b>  General Order 165, Section IV, Transmission Facilities, states, in part:</p> <p><i>Each utility shall prepare and follow procedures for conducting inspections ...</i></p> <p>SDG&amp;E "Transmission Line Maintenance Practices", Section 6.1. states, in part:</p> <p><i>Maintenance is performed to correct .... GO95 and GO128 infractions ...</i></p> <p>GO 95, Rule 56.9, Guy Marker (Guy Guard) ,states:</p> <p><i>A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guys required to have a marker.</i></p> <p>Structures are missing guards on the outer anchor guy. SDG&amp;E failed to note this discrepancy during its last inspection.</p>		

STATE OF CALIFORNIA

EDMUND G. BROWN JR., Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



January 20, 2015

Gregory Walters  
Team Lead – Compliance Management  
San Diego Gas & Electric Company (SDG&E)  
8316 Century Park Court CP51D  
San Diego, CA 92123

EA2014-024

**SUBJECT:** Electric Audit of SDG&E's Northeast District

Dear Mr. Walters:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Koko Tomassian of my staff conducted an electric audit of San Diego Gas & Electric's (SDG&E's) Northeast District from December 8, 2014 to December 12, 2014. The audit included a review of SDG&E's records and field inspections 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 February 20, 2015, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent such violations.

If you have any questions, you can contact Koko Tomassian at (213) 576-7099 or [koko.tomassian@cpuc.ca.gov](mailto:koko.tomassian@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

Enclosure: Audit Findings

CC: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC



## AUDIT FINDINGS

The following violations were identified during the field inspection of the audit and were not documented and/or addressed by SDG&E during its last detailed inspection as required by General Order 165:

1.	<b>Location:</b>	Pole No.: P417857
	<b>Previous SDG&amp;E Visit Details:</b>	July 16, 2014 – Overhead (OH) Detailed Inspection
	<b>Date of CPUC Inspection:</b>	December 9, 2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Vegetation in Climbing Space</u></b>	
	Go 95, Rule 54.7, Climbing and Working Space, States in part:	
	<i>Climbing space shall be maintained from the ground level. Climbing space, measured from the center line of pole, shall be provided on one side or one quadrant of all poles or structures...</i>	
	The climbing space on this pole was obstructed by vegetation.	

2.	<b>Location:</b>	Pole No.: P418392
	<b>Previous SDG&amp;E Visit Details:</b>	June 17, 2014 – Overhead (OH) Detailed Inspection
	<b>Date of CPUC Inspection:</b>	December 9, 2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Loose Guy Wire</u></b>	
	GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, States in part:	
	<i>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.</i>	
	The pole had a slack down guy wire.	

3.	<b>Location:</b>	Pole No.: P418388
	<b>Previous SDG&amp;E Visit Details:</b>	June 17, 2014 – Overhead (OH) Detailed Inspection
	<b>Date of CPUC Inspection:</b>	December 9, 2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Loose Guy Wire</u></b>	
	GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, States in part:	
	<i>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.</i>	
	The pole had a slack down guy wire.	

4.	<b>Location:</b>	Pole No.: P610536
	<b>Previous SDG&amp;E Visit Details:</b>	July 16, 2014 – Overhead (OH) Detailed Inspection
	<b>Date of CPUC Inspection:</b>	December 9, 2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Broken/Damaged Visibility Strip</u></b>	
	GO 95, Rule 31.1, Design, Construction and Maintenance, States in part:	
	<i>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.</i>	
	The pole had a damaged visibility strip.	



5.	<b>Location:</b>	Pole No.: P610542
	<b>Previous SDG&amp;E Visit Details:</b>	July 16, 2014 – Overhead (OH) Detailed Inspection
	<b>Date of CPUC Inspection:</b>	December 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Radial Clearance between Electric and Communication Infrastructure Provider (CIP) Service Drops</u></b>		
GO 95, Rule 54.8-C4, Clearances between Supply Service Drops and Other Conductors, States:		
<p><i>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.</i></p>		
The pole supported electric and communication service drops which had less than 12 inches of radial clearance within 15 feet from the point of attachment.		
6.	<b>Location:</b>	Pole No.: P610546
	<b>Previous SDG&amp;E Visit Details:</b>	June 17, 2014 – Overhead (OH) Detailed Inspection
	<b>Date of CPUC Inspection:</b>	December 9, 2014
<b>Explanation of Violation(s):</b>		
<b><u>Insufficient Radial Clearance between Electric and Communication Infrastructure Provider (CIP) Service Drops</u></b>		
GO 95, Rule 54.8-C4, Clearances between Supply Service Drops and Other Conductors, States:		
<p><i>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.</i></p>		
The pole supported electric and communication service drops which had less than 12 inches of radial clearance within 15 feet from the point of attachment.		



7.	<b>Location:</b>	Pole No.: P410692
	<b>Previous SDG&amp;E Visit Details:</b>	July 17, 2014 – Overhead (OH) Detailed Inspection
	<b>Date of CPUC Inspection:</b>	December 9, 2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Loose Guy Wire</u></b>	
	GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires, States in part:  <i>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.</i>  The pole had a slack down guy wire.	

STATE OF CALIFORNIA

EDMUND G. BROWN JR., Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 2, 2015

Gregory Walters  
Team Lead – Compliance Management  
San Diego Gas & Electric Company (SDG&E)  
8316 Century Park Court CP51D  
San Diego, CA 92123

EA2014-020

**SUBJECT:** Audit of SDG&E's Orange County District

Dear Mr. Walters:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Derek Fong of my staff conducted an audit of SDG&E's Orange County District from October 6, 2014 to October 10, 2014. The audit included a review of SDG&E's records and field inspections 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 March 6, 2015, by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent such violations.

If you have any questions, you can contact Derek Fong at (213) 576-6850 or [derek.fong@cpuc.ca.gov](mailto:derek.fong@cpuc.ca.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read 'Fadi Daye'.

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Audit Findings

Cc: Elizaveta Malashenko, Deputy Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC

## AUDIT FINDINGS

The following violations were identified during the field inspection of the audit and were not documented and/or addressed by SDG&E during its last detailed inspection as required by General Order 165:

1.	<b>Location:</b>	Pole No. 28311
	<b>Previous SDG&amp;E Visit Details:</b>	2/18/2014
	<b>Date of CPUC Inspection:</b>	10/7/2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Reduced Clearance Between Wires</u></b>	
	GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, States in part:  <i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind.</i>	
	The pole supported an SDG&E service drop that was contacting a communications service drop.	
2.	<b>Location:</b>	Pole No. 38991
	<b>Previous SDG&amp;E Visit Details:</b>	3/17/2014
	<b>Date of CPUC Inspection:</b>	10/7/2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Loose Down Guy Wire</u></b>	
	GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wires – Use, States in part:  <i>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 .</i>	
	An SDG&E down guy wire was loose.	



3.	<b>Location:</b>	Pole No. 28119
	<b>Previous SDG&amp;E Visit Details:</b>	3/17/2014
	<b>Date of CPUC Inspection:</b>	10/7/2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Communication Cable in the Climbing Space</u></b>	
	GO 95, Rule 54.7: Climbing and Working Space, States in part:  <i>Climbing space shall be maintained from the ground level.</i>  A communications cable was installed across the climbing space. SDG&E did not notify the communications company of this GO nonconformance when it last inspected the pole.	
4.	<b>Location:</b>	Pole No. 126674
	<b>Previous SDG&amp;E Visit Details:</b>	3/13/2014
	<b>Date of CPUC Inspection:</b>	10/7/2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Reduced Clearance Between Wires</u></b>	
	GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, States in part:  <i>The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F. and no wind.</i>  The pole supported an SDG&E service drop that was contacting a down guy wire.	

5.	<b>Location:</b>	Pole No. 126008
	<b>Previous SDG&amp;E Visit Details:</b>	3/13/2014
	<b>Date of CPUC Inspection:</b>	10/7/2014
	<b>Explanation of Violation(s):</b>	
	<b><u>Communication Cable in the Climbing Space</u></b>	
	GO 95, Rule 54.7: Climbing and Working Space, States in part:  <i>Climbing space shall be maintained from the ground level.</i>  A communications cable was installed across the climbing space. SDG&E did not notify the communications company of this GO nonconformance when it last inspected the pole.	

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 8, 2015

Gregory Walters  
Team lead – Compliance Management  
San Diego Gas & Electric Company (SDG&E)  
8316 Century Park Court CP51D  
San Diego, CA 92123

CPUC ID: EA2015-009

**SUBJECT:** Electric Audit of SDG&E's North Coast District

Dear Mr. Walters:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Richard Kyo of my staff conducted an electric audit of San Diego Gas & Electric's (SDG&E's) North Coast District from June 15, 2015 to June 19, 2015. The audit included a review of SDG&E's records and field inspections 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 October 12, 2015 by electronic or hard copy, of all corrective measures taken by SDG&E to remedy and prevent such violations.

If you have any questions, you can contact Richard Kyo at (213) 576-7081 or [richard.kyo@cpuc.ca.gov](mailto:richard.kyo@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Fadi Daye", is positioned above the typed name.

Fadi Daye, P.E.  
Program Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Audit Findings

CC: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC  
Richard Kyo, Utilities Engineer, CPUC – LA



### AUDIT FINDINGS

<b>Location:</b>	SDG&E North Coast District
<b>Date of CPUC Inspection:</b>	06/15/2015
<b>Explanation of Violation(s):</b>	
<b><u>Late Detailed Inspections</u></b>	
<p>GO 165, Rule III-B, Standards for Inspection, states:</p> <p><i>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.</i></p> <p>In 2014, SDG&amp;E's North Coast District conducted 61 detailed inspections late (by at least one year).</p>	

The following violations were not documented and/or addressed by SDG&E during its last detailed inspection as required by General Order 95:

1.	<b>Location:</b>	Pole No. P611367
	<b>Previous SDG&amp;E Visit Details:</b>	May 21, 2015
	<b>Date of CPUC Inspection:</b>	06/16/2015
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Damaged High Sign</u></b></p> <p>GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p><i>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.</i></p> <p>GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p><i>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.</i></p> <p>A high voltage sign attached to this pole was damaged.</p>	

2.	<b>Location:</b>	Pole No. P119572
	<b>Previous SDG&amp;E Visit Details:</b>	May 21, 2015
	<b>Date of CPUC Inspection:</b>	06/16/2015
	<b>Explanation of Violation(s):</b>	
	<p><b><u>Damaged High Sign</u></b></p> <p>GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:</p> <p><i>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.</i></p> <p>GO 95, Rule 51.6-A, High Voltage Marking, states in part:</p> <p><i>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.</i></p> <p>A high voltage sign attached to this pole was damaged.</p>	



September 7, 2018

CPUC ID: EA2018-820

Brian Prusnek  
Director of Regulatory Affairs  
San Diego Gas & Electric Company (SDG&E)  
8316 Century Park Court CP51D  
San Diego, CA 92123

**SUBJECT:** Electric Distribution Audit of SDG&E's Beach Cities District

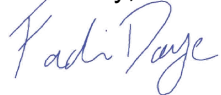
Mr. Prusnek:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission, Derek Fong, Howard Huie, James Miller and Eric Ujiye of my staff conducted an electric distribution audit of San Diego Gas & Electric's (SDG&E's) Beach Cities District from May 7, 2018 to May 11, 2018. The audit included a review of SDG&E's records and field inspections 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 October 8, 2018, 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 Eric Ujiye at (213) 620-2598 or [eric.ujiye@cpuc.ca.gov](mailto:eric.ujiye@cpuc.ca.gov).

Sincerely,



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

Enclosure: Audit Findings

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC  
Lee Palmer, Deputy Director, Office of Utility Safety, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC  
Lonny Saldivar, Compliance Management Manager, San Diego Gas & Electric  
Eric Ujiye, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

## **AUDIT FINDINGS**

### **I. Records Review**

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- Intrusive test records
- SDG&E's documented inspection program.

## II. Field Inspections

My staff inspected the following facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	P831101	Pole	Clairemont
2	P831100	Pole	Clairemont
3	P831099	Pole	Clairemont
4	P164372	Pole	Clairemont
5	P831098	Pole	Clairemont
6	P932055J	Pole	Clairemont
7	P932101	Pole	Clairemont
8	P932100	Pole	Clairemont
9	P932099	Pole	Clairemont
10	P932098	Pole	Clairemont
11	P932097	Pole	Clairemont
12	P932096	Pole	Clairemont
13	P932095	Pole	Clairemont
14	P932044	Pole	Clairemont
15	P932045	Pole	Clairemont
16	P735176J	Pole	Point Loma
17	P2005569310	Pole	Point Loma
18	P931486	Pole	Point Loma
19	P931485	Pole	Point Loma
20	P981484	Pole	Point Loma
21	P832372	Pole	Point Loma
22	P832361	Pole	Point Loma
23	P1997069407	Pole	Point Loma
24	P832343	Pole	Point Loma
25	P832342	Pole	Point Loma
26	P833410	Pole	Pacific Beach
27	P734430J	Pole	Pacific Beach
28	P734429	Pole	Pacific Beach
29	P734428J	Pole	Pacific Beach
30	P734427J	Pole	Pacific Beach
31	P831083	Pole	Clairemont
32	P833890	Pole	Clairemont
33	P836275	Pole	Clairemont
34	P832200	Pole	Clairemont
35	P838315	Pole	Clairemont
36	P836559	Pole	Clairemont
37	P933766	Pole	Clairemont
38	P933769	Pole	Clairemont
39	P933768	Pole	Clairemont
40	P37636	Pole	Clairemont
41	P179642	Pole	Clairemont



42	P670815	Pole	Clairemont
43	P729131	Pole	Clairemont
44	D2403870199	Padmount Transformer	Clairemont
45	D2391070301	Padmount Transformer	Clairemont
46	D2438370802	Padmount Transformer	Clairemont
47	D2425671760	Padmount Transformer	Clairemont
48	D2513270724	Padmount Transformer	University City
49	D103413	Switch	University City
50	U108924	Vault	La Jolla
51	D135389	Switch	San Diego
52	D2024869680	Padmount Transformer	Point Loma
53	D2021369670	Padmount Transformer	Point Loma
54	D2025469642	Padmount Transformer	Point Loma
55	D203056902	Padmount Transformer	Point Loma
56	D132692	Switch	Shelter Island

### **III. Field Inspection Violations List**

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

**GO 95, Rule 54.8-C4, Clearances between Supply Service Drops and Other Conductors**, 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.*

An SDG&E service drop on pole number P1997069407 had a radial clearance from a communications cable of less than 12 inches within 15 feet from the attachment point at 427 Silver Gate, Point Loma.

**GO 95, Rule 54.7, Climbing and Working Space**, states in part:

*Climbing space shall be maintained from the ground level.*

A communication service drop on pole number P932095 was located in the climbing space.

**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.*

**GO 95, Rule 56.2, 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 guy wires on the following SDG&E poles were detached from the guy anchor:

- P734430J
- P734430J

**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 steps on the following SDG&E poles were damaged:

- P932100 – Bent pole step
- P932098 – Inverted pole step
- P931485 – Inverted pole step

**GO 95, Rule 38, Table 2, Case 19, Column C,** requires the radial clearance of “guys and span wires passing conductors supported on the same poles” from “communication conductors” to be 3 inches.

The down guy wire on SDG&E pole number P735176J was contacting a communications cable.

**GO 128, 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.*

**GO 128, 34.3.A, Strength, states in part:**

*The equipment case or enclosure shall be secured in place and be of sufficient strength to resist entrance or damage to the equipment by unauthorized persons*

The following SDG&E padmounted structures were damaged:

- D2021369670 - the enclosure was corroded and damaged to the extent that the facility was unsafe to open to conduct an internal inspection.
- D132692 – the enclosure was corroded near the bottom frame of the entry doors.