

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 10, 2023

EA2023-1086

Shivani Sidhar
Director – Regulatory Affairs
San Diego Gas & Electric (SDG&E)
8315 Century Park Court,
San Diego, CA 92123

Subject: Audit of SDG&E's Metro District

Ms. Sidhar:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Kyle King of my staff conducted an electric distribution audit of San Diego Gas & Electric's (SDG&E) Metro District from August 21, 2023 to August 25, 2023. 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 November 10, 2023, 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 Kyle King at (213) 222-3260 or Kyle.King@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
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC
Kyle King, Utilities Engineer, ESRB, SED, CPUC

Audit Findings

I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records
- Late Inspections
- Work Orders Created from Inspections
- Repair Work Orders
- Intrusive Testing Records
- Third Party Notifications
- Vegetation Management Records
- Pole Loading Calculation 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, Distribution Facilities, 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 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.

SDG&E's records indicated that from 2019 through 2022, SDG&E had 18 overhead detailed inspections that were completed or pending completion past SDG&E's scheduled due date.

III. Field Inspection

My staff inspected the following facilities during the field inspection:

No.	Structure Identification	Structure Type	Location
1	P31603	Pole	San Diego
2	P254453	Pole	San Diego
3	P31604	Pole	San Diego
4	P31605	Pole	San Diego
5	P31606	Pole	San Diego
6	P31607	Pole	San Diego
7	P729582	Pole	San Diego
8	P89151	Pole	San Diego
9	P89152	Pole	San Diego
10	P89153	Pole	San Diego
11	P89154	Pole	San Diego
12	P89155	Pole	San Diego
13	P185579	Pole	San Diego
14	P185580	Pole	San Diego
15	P186421	Pole	San Diego
16	P249233	Pole	San Diego
17	P186422	Pole	San Diego
18	P283189	Pole	San Diego
19	P283190	Pole	San Diego
20	P283191	Pole	San Diego
21	P830601	Pole	Coronado
22	P830600	Pole	Coronado
23	P830599	Pole	Coronado
24	P830598	Pole	Coronado
25	P830597	Pole	Coronado
26	P830602	Pole	Coronado
27	P1935671393	Pole	Coronado
28	P830609	Pole	Coronado
29	P193673	Pole	Coronado
30	P830610	Pole	Coronado
31	P830612	Pole	Coronado
32	P830615	Pole	Coronado
33	P830620	Pole	Coronado
34	P830635	Pole	Coronado
35	P830582	Pole	Coronado
36	P830564	Pole	Coronado
37	P832730	Pole	Coronado
38	P832747	Pole	Coronado

39	P832742	Pole	Coronado
40	P832732	Pole	Coronado
41	P177931	Pole	Coronado
42	P832731	Pole	Coronado
43	P832523	Pole	Coronado
44	P832618	Pole	Coronado
45	P832614	Pole	Coronado
46	P832613	Pole	Coronado
47	P832612	Pole	Coronado
48	P830886	Pole	Coronado
49	P832734	Pole	Coronado
50	P832693	Pole	Coronado
51	P832735	Pole	Coronado
52	P832736	Pole	Coronado
53	P832737	Pole	Coronado
54	P832739	Pole	Coronado
55	P832740	Pole	Coronado
56	P832746	Pole	Coronado
57	P832745	Pole	Coronado
58	P832744	Pole	Coronado
59	P832743	Pole	Coronado
60	P830876	Pole	Coronado
61	P830717	Pole	Coronado
62	P830569	Pole	Coronado
63	P830570	Pole	Coronado
64	P830571	Pole	Coronado
65	P830572	Pole	Coronado
66	P830573	Pole	Coronado
67	P830576	Pole	Coronado
68	P225998	Pole	Coronado
69	P830575	Pole	Coronado
70	P830718	Pole	Coronado
71	P830719	Pole	Coronado
72	P830574	Pole	Coronado
73	P830603	Pole	Coronado
74	D197013	Padmounted Fuse Cabinet	San Diego
75	D195862	Padmounted Switch	San Diego
76	D1977274077	Padmounted Transformer	San Diego
77	D199126	Padmounted Fuse Cabinet	San Diego
78	H125306	Primary Handhole	San Diego

79	H1946574853	Primary Handhole	San Diego
80	H1753173746	Primary Handhole	Chula Vista
81	D1753273747	Padmounted Transformer	Chula Vista
82	D175337373748	Padmounted Fuse Cabinet	Chula Vista
83	D1753473749	Padmounted Fuse Cabinet	Chula Vista
84	H1753573750	Primary Handhole	Chula Vista
85	D117194	Padmounted Transformer	Chula Vista
86	D117195	Padmounted Transformer	Chula Vista
87	H109787	Primary Handhole	Chula Vista
88	D129161	Padmounted Fuse Cabinet	Chula Vista
89	H108560	Padmounted Transformer	Chula Vista
90	D133119	Padmounted Transformer	Chula Vista
91	D133944	Padmounted Transformer	Chula Vista
92	D119816	Padmounted Transformer	Chula Vista
93	D145842	Padmounted Transformer	Chula Vista
94	D145840	Padmounted Transformer	Chula Vista
95	D145838	Padmounted Transformer	Chula Vista
96	D145839	Padmounted Transformer	Chula Vista
97	H117728	Primary Handhole	Chula Vista
98	D161046	Padmounted Transformer	Chula Vista
99	D161047	Padmounted Transformer	Chula Vista
100	D160375	Padmounted Dead-Break Terminator	Chula Vista
101	D157492	Padmounted Transformer	Chula Vista

102	D157489	Padmounted Dead-Break Terminator	Chula Vista
103	D157488	Padmounted Transformer	Chula Vista
104	D157487	Padmounted Transformer	Chula Vista
105	D157486	Padmounted Transformer	Chula Vista
106	D154472	Padmounted Fuse Cabinet	Chula Vista
107	H120677	Primary Handhole	Chula Vista
108	D214837	Padmounted Transformer	Chula Vista
109	D161040	Padmounted Transformer	Chula Vista
110	D161035	Padmounted Transformer	Chula Vista
111	D160378	Padmounted Transformer	Chula Vista
112	D161041	Padmounted Transformer	Chula Vista
113	P235394	Pole	San Diego
114	P160308	Pole	San Diego
115	P170212	Pole	San Diego
116	P84040	Pole	San Diego
117	P284095	Pole	San Diego
118	P831667	Pole	San Diego
119	P251636	Pole	San Diego

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection 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.

Facilities on the following poles needed maintenance:

- P283190: a visibility strip was damaged.
- P830575: a visibility strip was damaged.

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:

- P177931
- P830620
- P830564
- P830600
- P830599

GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment.

The following padmounted facilities required maintenance:

- Padmounted transformer D117194 - vegetation was obstructing the opening.
- Padmounted transformer D117195 - vegetation was obstructing the opening.
- Padmounted fuse cabinet D154472 - vegetation was obstructing the opening.
- Padmounted transformer D160378 – there was damage to the door and tie-down metal bracket.