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May 21, 2021

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

Reference: CPUC-ID: 20190531-02
Notice of Violation: General Order (GO) 95: Rule 18.B.(1), Rule 31.1 and Rule 31.2

Dear Ms. Acimis:

This letter is in response to the April 23, 2021, Electric Safety and Reliability Branch (ESRB) Notice of Violation (NOV) regarding our inspection and repair of the two Ignacio-Alto-Sausalito 60kV transmission lines (IAS) in Marin County. ESRB states 1) that from 2009 through 2018, PG&E failed to properly inspect the IAS Lines, and 2) that PG&E failed to immediately correct 16 of 22 Priority-A LC notifications identified during Spring of 2019. These notifications were primarily to repair the deteriorated transmission towers. We notified ESRB of this matter on May 31, 2019, after meeting with representatives of the Golden Gate National Recreation Area (GGNRA) on May 30, 2019.

ESRB cited three violations as follows:

1) ESRB found PG&E in violation of GO 95, Rule 18.B.(1), which states in part:

“(a) The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

*(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:
Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.”*

“The 22 Priority Code A deficiencies had immediate risks to safety of the IAS Lines and to electric power supply to the City of Sausalito. PG&E’s Priority Code A deficiencies are equivalent to Level 1 potential violations of GO 95, Rule 18 B.(1)(a) (i), which needed to be corrected immediately. However, PG&E failed to correct 16 of the 22 Priority Code A deficiencies within allowed time defined in its ETPM and in GO 95, Rule 18.B.(1)(a)(i).”

2) ESRB found PG&E in violation of GO 95, Rule 31.1 (Design, Construction and Maintenance), which 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 22 Priority Code A deficiencies significantly risked the IAS Lines and the electric power supply safety and reliability to the City of Sausalito. PG&E failed to maintain the IAS Lines to furnish safe, proper, and adequate service to the City of Sausalito. Therefore, PG&E is in violation of GO 95, Rule 31.1.”

3) ESRB found PG&E in violation of GO 95, Rule 31.2 (Inspection of Lines), which states in part:

“Lines shall be inspected frequently and thoroughly for the purpose of ensuring 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.”

“PG&E failed to thoroughly and properly inspect the IAS Lines from 2009 through 2018. PG&E’s WSIP found a total of 22 Priority Code A safety hazards that should have been identified during the previous patrols and detailed inspections conducted prior to 2019. PG&E failed to ensure that the IAS Lines were in good condition through its inspections. Therefore, PG&E is in violation of GO 95, Rule 31.2.”

ESRB requested PG&E’s response to the violations and asked PG&E to identify all corrective actions and preventive measures taken to remedy and prevent recurrence by May 21, 2021.

Background

In March 2019, we began inspections on the IAS Lines as part of our Wildfire Safety Inspection Program (WSIP)¹. As a result of the WSIP inspections conducted from March through June of 2019 for the IAS Lines, we identified a total of 22 Priority-A Line Corrective (LC) notifications.

¹ Wildfire Safety Inspection Program (WSIP) Compliance Plan and Interim Controls was shared with CPUC on 20th August 2019.

We took immediate action to address the emergency conditions identified during the WSIP inspections. We developed action plans and monitored the safety risk of the IAS Line for all company and contract employees and the general public. We had Qualified Company Representatives (QCR) conduct monitoring of the towers within GGNRA 24 hours a day until the temporary line and structures were in place and the towers designated for replacement were safely deconstructed. The QCRs were trained to recognize any signs of danger on the towers. The Grid Control Center (GCC) also monitored electrical data for any issues that cannot be seen on site and were prepared to immediately notify the QCRs for suitable action.

PG&E also met with GGNRA to discuss risk mitigation on May 30, 2019, on the IAS Lines. Both parties determined that trail closures within the GGNRA were potentially required to ensure public safety. Following this meeting, public trails within 100 feet of any tower with an A priority notification were closed to the public.

To assure safety and reliability of service to the city of Sausalito, PG&E installed and energized a “shoo-fly” line within the GGNRA that served as a temporary transmission line and addressed A priority notifications identified on other towers on the IAS Lines. This temporary line ensured that power supply to the city of Sausalito remained intact without any unplanned outages.

On August 16, 2019, in response to CPUC data request Number 1, we provided a detailed narrative of how we determined which transmission towers on the Ignacio-Alto-Sausalito #1 & #2 60 kV Transmission Lines required high-priority safety work, as well as the information on which these determinations were based. We understand “high-priority safety work” to mean corrective actions taken to address Priority Code A conditions, as defined in our Electric Transmission Preventive Maintenance (ETPM) manual. We responded to five data requests that provided a broad narrative of our commitment to providing corrective actions and further inspections that would enable preventive measures.

PG&E Response

Regarding the violation of GO 95, Rule 18.B (1), we acknowledge that we failed to correct 16 of the 22 Priority A LC notifications within the allowed time defined in our ETPM manual. We made efforts to immediately respond to all safety issues, developed action plans to mitigate non-conformances while continuously monitoring the field conditions to ensure safety. Table 1 below provides explanations regarding why these A-tags were completed late.

Table 1: Explanations for 16 of the 22 Priority-A LC Notifications

Tower #	LC Notification #	Deficiency Identification Date	Correction Completion Date	Days for Correction	Days Overdue	Explanation
004/037	117391195	6/4/2019	4/14/2020	315	285	Repair timeline included engineering and constructing specialized repairs, driven by the terrain and location. Both structures needed complex foundation repairs prior to steel mitigation.
004/038	117394273	6/5/2019	4/14/2020	314	284	
009/065	117372276	6/1/2019	9/26/2019	117	87	In 2019, we were responding to a high volume of A notifications, created over a short duration of time that could not be immediately resolved all at once.
013/092	117298066	5/21/2019	6/21/2019	31	1	
013/092	117307041	5/21/2019	8/7/2019	78	48	
013/093	117298064	5/21/2019	6/24/2019	34	4	
014/098	117305604	5/23/2019	6/26/2019	34	4	
014/099	117305260	5/23/2019	9/3/2019	103	73	These nine notifications required extensive work with GGNRA, in addition to closing trails for public safety, emergency permitting, design of temporary shoofly, construction of the shoofly, and removal of existing towers.
014/100	117304876	5/21/2019	9/3/2019	105	75	
014/101	117290073	5/20/2019	9/3/2019	106	76	
014/102	117288536	5/20/2019	9/3/2019	106	76	
015/104	117305651	5/23/2019	9/3/2019	103	73	
015/104	117305128	5/23/2019	9/3/2019	103	73	
015/106	117305040	5/23/2019	9/3/2019	103	73	
015/107	116624078	5/15/2019	9/3/2019	111	81	
015/108	117290087	5/20/2019	9/3/2019	106	76	

We implemented improvements in handling Priority A LC Notifications. We developed guidance on the process for Priority A notification management, including roles and responsibilities for documenting corrective actions performed when addressing immediate safety/reliability risks. The updated guidance is included in a bulletin (Attachment 1: TD-8312M-B001) that was published in August 2020 and applies to all employees and contractors in Electric Operations (Transmission, Substation, and Distribution). This Bulletin provides clarity on the process for taking immediate action by either fully repairing the condition or temporarily repairing the condition, documenting corrective actions performed when addressing immediate safety/reliability risks, and if needed creating a new lower priority notification to complete the permanent repair of the condition. We are continuously working to implement the updated guidance by providing job aids and training materials to QCRs. This implementation effort is a work in progress.

Regarding the violation of GO 95, Rule 31.1, we acknowledge that the deficiencies found during the WSIP warranted immediate action and were classified as Priority A LC notifications. However, we did not have any safety or reliability issues resulting from the 22 Priority A notifications. We responded immediately, monitored field conditions and installed a temporary line of service to Sausalito.

Regarding the violation of GO 95, Rule 31.2, we acknowledge that the 22 Priority A LC notifications identified during the WSIP could have been identified during inspections conducted prior to 2019. From 2009 to 2018, we performed routine air patrols and staggered ground inspections in accordance with the ETPM manual in effect at the time. In late 2018, we implemented WSIP to enhance the thoroughness of our inspections. The 22 Priority A LC notifications described above were a direct result of the WSIP and represented corrective actions identified on the IAS Lines. Following WSIP, we progressed to Enhanced Inspections (EI) and Air Plus Inspections that take place in conjunction with our annual patrols. In addition, we refined our ETPM manual to be more objective, issued updated job aids with decision trees, implemented the Centralized Inspection Review Team (CIRT) to independently evaluate each finding from the field and apply FMEA (Failure Modes and Effects Analysis) to identify and assess highest risk single points of failure that could result in fire ignition. We feel that these combined enhancements are helping standardize our holistic approach to mitigating hazardous conditions.

Please contact me at [REDACTED] if you have any questions regarding this response.

Sincerely,

Lise Jordan

Senior Director, Regulatory Compliance and Quality Assurance

cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
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