PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans
Rulemaking 18-10-007
Data Response

PG&E Data Request No.:	CalAdvocates_043-Q11		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_043-Q11		
Request Date:	February 25, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-09
Date Sent:	March 2, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

SUBJECT: ASSET INSPECTIONS

The following questions related to PG&E's 2021 Wildfire Mitigation Plan (WMP) Update.

QUESTION 11

P. 619 of PG&E's 2021 WMP states, "Similarly, inspection work verification sampling and data analysis seek to rapidly sample and monitor performance to enable timely corrective interventions such as re-training, guidance clarification, and even re-inspection."

a. Please describe PG&E's process for "inspection work verification sampling and data analysis." Does it entail a review of inspection records, a physical re-inspection in the field, or something else?
b. In 2019, how many inspection work samples did PG&E select for work verification?
c. In 2019, how many times was re-inspection performed following inspection work verification?
d. In 2020, how many inspection work samples did PG&E select for work verification?
e. In 2020, how many times was re-inspection performed following inspection work verification?
f. In the cases in parts (c) and (e), did PG&E also re-inspect other assets that had been inspected by the same inspector and had passed work verification?

ANSWER 11

a. The following process does entail a review of the inspection records. It does not include a physical re-inspection in the field.

   Due to the large volume of detailed inspection conducted, the Desktop QC process will only review a sample from the overall completed inspection population. Statistically valid sampling plans will be established which will utilize key system risk information available during the inspection period to select appropriate confidence level and compliance error rates.

Each Specialist will be assigned a set number of Divisions or Main Work Centers (MWC) each month based on volume of work. The Division or MWC will be rotated between QC Specialists each month to promote unbiased reviews and allow different Specialists to assess the same Inspector over time.

Work is dispatched to the Specialist via the online web application by the QC Business Analyst. An online web application form is generated for each equipment ID to be assessed. The form gets pre-populated with asset basic data that will be used for reporting.

QC Specialist downloads the Equipment Inspection PDF record via the url provided in the online web application form.

QC Specialist runs SAP report for all open notifications for the equipment ID so existing notification can be verified for accuracy compared to the inspection.

The QC Specialist reviews the entire Inspection log for overall accuracy and completeness, verifying the following:

- Use of the correct inspection form for the asset structure type.
- Photo quantity and quality.
- Review and confirm conditions marked as “Yes” for each section are applicable and comments are accurately noted.
- Review and confirm conditions marked as “No” for each section are not applicable and have not been skipped in error.
- All required Record Keeping and Declaration items have been identified and noted.
- All existing notifications at location have been reviewed and records updated in SAP.
- All new compelling abnormal field conditions identified have been logged into an existing notification or a new notification with correct FDA and priority assignment.
- That the inspector did not fail to identify or missed reporting on a compelling abnormal field condition present during the initial inspection.

All discrepancies found during QC review will be recorded in detail under the specific Inspection checklist section. Specialist will provide detailed objective evidence supporting their finding(s) and list procedural or guidance documentation references where applicable.

QC Specialists will suggest recommended corrections/corrective actions as “Follow Up” items in the QC form when applicable. Impacted reference documentation will be noted.

Discrepancies are divided into two different classifications:

- Observation – minor documentation error or a low risk requirement failure that will not necessitate an update to the inspection record, creation of a new notification or a re-inspection of the structure.

- Non-Conformance – major deficiency in record keeping or failure of inspector to properly assess and document an abnormal field condition per the stated requirements. A non-conformance will require a follow up action to remediate the deficiency or correct the condition.

If a QC Specialist needs additional clarification related to a non-conformance issue before finalizing it, they should discuss the item with the QC Work stream lead. The Lead will engage the correct SMEs with the assistance of the QC Manager to disposition the non-conformance appropriately.

Once the QC Specialist has completed the initial assessment, records that have discrepancies are routed for peer review and approval. Based on subject matter expertise or workload, peer reviewers will be assigned appropriately by the initial QC Specialist. Records with no discrepancies migrate to "Completed" status without requiring any additional peer review.

b. System Inspections did not exist for 2019 WSIP. QC was managed through the WSIP Program.

c. Not applicable. System Inspections did not exist for 2019 WSIP. QC was managed through the WSIP Program.

d. QC was being developed through 2020 and dependent on being moved into mobile, processing the completed data, and building a QC program surrounding this change. We have sampling for Q4 of 2020.

2020 QC Reviews

	October	November	December	Total
Transmission	440	907	980	2327
Distribution	495	1057	2333	3885

e. No re-inspections were performed as a result as QC desk sampling.

f. Not applicable. No re-inspections were performed as a result as QC desk sampling.