

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023
Data Response**

PG&E Data Request No.:	CalAdvocates_019-Q012		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_019-Q012		
Request Date:	April 25, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-19
Date Sent:	April 28, 2023	Requesting Party:	Public Advocates Office
DRU Index #:		Requester:	Holly Wehrman

The following questions relate to your 2023-2025 WMP submission and your responses to data request CalAdvocates-PGE-2023WMP-15.

QUESTION 012

Attachment 1 to PG&E's response to data request CalAdvocates-PGE-2023WMP-14 states that on November 18, 2019, an intrusive inspection indicated that a pole had 18% remaining strength. On January 14, 2020, the inspector issued a priority E tag to replace the pole by January 13, 2021.

- a) Why was the tag for the above pole created approximately two months after the initial finding?
- b) Describe any actions that PG&E took between November 18, 2019 and January 14, 2020 to address the safety of the pole noted above.
- c) Why was the tag created with a one-year deadline based on the tag creation date, rather than a deadline based on the date of the initial finding?
- d) Under PG&E's current procedures and process, is the compliance deadline for a new tag based on the tag creation date or the date of the initial finding? Please explain your answer.
- e) Was a priority E tag the appropriate priority level in this instance? Why or why not?

ANSWER 012

- a) The delay was due to this pole being intrusively inspected using our legacy inspection system, which did not release inspection records until the inspection project was closed, enabling the downstream corrective action notifications to be created. In the legacy inspection system, inspection projects were created with a finite volume of poles (generally between 200 and 400 poles) and the project was not closed until the entire pole population was inspected. Due to access issues and other constraints, it was not unusual for projects to remain open for multiple months. We acknowledged this gap and, in March of 2022, we retired this legacy inspection system. We migrated intrusive inspections onto the updated inspection application, which releases inspection records in real time and creates corrective action notifications on the same day as the inspection.

- b) We did not take any immediate action on this pole between November 18, 2019 and January 14, 2020.
- c) As discussed in subpart (a), this pole was intrusively inspected using our legacy inspection system, which did not release the inspection records until the inspection project was closed. As a result, our work management system automatically populated a due date based on the corrective action notification creation date, as it was not set up to acknowledge the inspection date.

Again, we acknowledged this gap and retired the legacy inspection system. In the updated inspection application, inspection records are released in real time, creating corrective action notification on the same date as the inspection. This functionality ensures that the corrective action notification due dates align with the inspection dates.

- d) As discussed in subparts (a) and (c), beginning in March 2022, intrusive inspections are now performed using the updated inspection application, which creates corrective action notifications on the same date as the inspection, aligning the due date with the inspection date.
- e) Based on our guidance documents, Priority E was appropriate at the time of the inspection and corrective action notification creation. As a result of this event investigation, we acknowledged a gap in assessing the intrusive inspection results and utilizing the percent remaining strength to inform corrective action notification priority. We are actively revising the guidance documents and inspection application to improve our processes.