

PACIFIC GAS AND ELECTRIC COMPANY

**GENERAL ORDER 165
ANNUAL ELECTRIC DISTRIBUTION INSPECTION REPORT
FOR 2017**

June 29, 2018

PRIVILEGED AND CONFIDENTIAL

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I. 2017 ELECTRIC DISTRIBUTION INSPECTION SUMMARY

Pursuant to Section III.D of the California Public Utilities Commission's (Commission) General Order (GO) 165, Pacific Gas and Electric Company (PG&E) submits its Annual Electric Distribution Inspection Report, which details PG&E's 2017 electric distribution patrol and inspection activities.

Table 1 lists five categorical types¹ of electric distribution inspections required by GO 165: Overhead (OH) Patrols, Underground (UG) Patrols, OH Detailed Inspections, UG Detailed Inspections, and Wood Pole Intrusive. Table 1 denotes the total units of work due by inspection type for the 2017 reporting period and the number of outstanding or late (not completed before the date due) inspections within the same reporting period for each of the five categories.

The data presented in Table 1 is a point-in-time reporting of inspections due and outstanding/late in 2017, and is, as of June 29, 2018, the date this report was signed by the verifying officer, deemed as the most accurate data available. As shown in the table, by December 31, 2017, PG&E had completed 100% of its OH patrols, 99.9% of its OH detailed inspections, 100% of its UG patrols, 99.9% of its UG detailed inspections, and 100% of its wood pole intrusive inspections by their 2017 due dates.

¹ GO 165 only requires four categorical types, but in order to present the data in a more meaningful format, this report divides the "Patrol" category in the sample report template in GO 165 into the subcategories "OH Patrols" and "UG Patrols." The use of five categorical types is consistent with past GO 165 Annual Inspection reports submitted by PG&E.

Table 1 – 2017 Electric Distribution Inspection Summary

Type of Inspections (1)	Due (2)	Outstanding / Late (3)
OH Patrols	1,158,288	0 / 0
OH Detailed Inspections	484,822	0 / 215
UG Patrols	245,963	0 / 0
UG Detailed Inspections	142,653	0 / 66
Wood Pole Intrusive	209,381	0 / 0

Notes:

(1) Definition of Reporting Unit Basis

- a. OH: PG&E defines an overhead unit as any PG&E solely owned, PG&E jointly owned, or third party-owned pole supporting PG&E equipment or conductors operating at less than 60,000 volts. PG&E also patrols and inspects the PG&E-owned overhead equipment, overhead conductors, and streetlights on those poles, but these facilities are not counted as additional overhead units for the purposes of this report.
- b. UG: PG&E defines an underground unit as any PG&E- or third party-owned padmount facility, subsurface enclosure, or vault containing PG&E primary cables or equipment. PG&E also patrols padmount facilities, subsurface enclosures, and vaults containing only secondary facilities, but these facilities are not counted as underground units for the purposes of this report.
- c. Wood Pole Intrusive: PG&E defines a wood pole intrusive unit as any intrusively inspected PG&E solely or jointly owned pole.
- d. The patrol unit counts are generally based on the most recent preceding detailed inspection map unit counts.

(2) Definition of “Due”

Units in the “Due” column represent the total units of work by inspection type that PG&E determined should have been completed by the end of 2017. This data is based on year-end analysis and not on projections made at the beginning of 2017.

In addition to regularly scheduled patrol and inspection units, this column includes re-inspection units that PG&E scheduled for completion in 2017. Re-inspection units are discussed in previously submitted GO 165 Annual Inspection Reports.

Although GO 165, Table 1, requires detailed inspections of padmount facilities on a minimum five-year cycle, PG&E performs detailed inspections of padmount facilities on a three-year cycle. For the purposes of this report, padmount facilities are “due” based on PG&E’s more frequent underground three-year detailed inspection cycle.

Wood pole intrusive inspection data in this column represents the total poles intrusively tested by PG&E’s Pole Test and Treat Program. PG&E maintains a 10- year inspection cycle for most poles; however, poles under 15 years old and previously tested poles under 50 years old with an original treatment of pentachlorophenol are intrusively tested on a 20-year cycle per the maximum inspection interval required by GO 165.

(3) Definition of “Outstanding” and “Late”

Pursuant to the definition of “Outstanding” as provided in Note 3 of the Sample Report Template in GO 165 Section III.D, the “Outstanding” column represents the total required inspections that were not completed in the reporting period (i.e., not completed in 2017).

Units in the “Late” column represent the total units of work by inspection type that PG&E did not inspect within a “year” as defined by D.13-06-011, Appendix B, at p. B-3:

“For the purpose of implementing the patrol and detailed inspection intervals in [GO 165 Table 1], the term ‘year’ is defined as 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months, not to exceed the end of the calendar year in which the next inspection is due. A required inspection may be completed any time before the expiration of the associated inspection interval using this definition of ‘year,’ but not after. The completion of an inspection starts a new inspection interval that must be completed within the prescribed timeframe using this definition of ‘year.’”

See Section II below for additional detail on the “Outstanding / Late” units.

As discussed above under the definition of “Due,” PG&E performs detailed inspections of padmount facilities on a three-year cycle as opposed to the five-year cycle established by GO 165. For the purposes of this report, padmount facilities are considered “Outstanding / Late” if they were due to be inspected by the due dates discussed above, adjusted for PG&E’s three-year inspection cycle, but were not.

For wood pole intrusive inspections, the term “year” is defined in GO 165 as a calendar year. Units in the wood pole intrusive “Outstanding / Late” column in Table 1 represent the total units that PG&E determined should have been intrusively inspected by the end of the 2017 calendar year but were not.

II. EXPLANATION OF LATE UNITS

PG&E has no “Outstanding” patrols or inspections, as all units were completed by December 31, 2017. There are a total of 215 OH detailed inspection and 66 UG detailed inspection units that were not completed by the CPUC due date set forth in Table 1 of GO 165 and are therefore reported as “Late,” although they were all completed within the calendar year and are not “Outstanding.” PG&E provides an explanation below for inspections that were “Late.”

- a. Two hundred fifteen (215) OH detailed inspection units are in the “Outstanding / Late” column of Table 1 due to human error in the creation of the inspection package. For the Stockton Division, the PG&E Resource Management Center’s clerical staff printed an incorrect map, map K31, instead of map package KK31. As a result, the area depicted in map KK31 was not inspected by the due date. This error was discovered by the Stockton Division specialist while physically validating map packages. After discovering the error, PG&E completed its detailed inspection of the 215 OH units of map KK31 on August 18, 2017, after the CPUC Due Date of July 13, 2017.
- b. Six (6) UG detailed inspection units in PG&E’s Sonoma Division were not inspected on time due to human error. The inspection map used for the original inspection coincidentally also identified six OH poles, and the assigned inspector performed detailed inspections on these six OH poles rather than on the six UG units that should have been inspected. This error was discovered by the same inspector during map

- review processes. PG&E inspected all six UG units on December 1, 2017, after the CPUC Due Date of June 8, 2017.
- c. One (1) UG detailed inspection unit in PG&E's Humboldt Division was not inspected on time because the primary splice box had not been mapped. A PG&E troubleman doing work in the area recognized that there should be a splice box at the location, which had become buried under the customer's driveway and covered with gravel. The troubleman issued a work order to trace the splice box and raise it up to grade. The primary splice box was subsequently located, raised to grade, and inspected on September 21, 2017, after the CPUC Due Date of July 28, 2017. The splice box has since been added to PG&E's maps.
 - d. Fifty-seven (57) UG detailed inspection units in PG&E's North Bay Division required manhole inspections and were not inspected on time due to human error. A new specialist misunderstood the process for manhole inspections, and thus did not manage the CPUC due dates correctly. This gap was identified by both the Electric Compliance Supervisor and Manager through an internal review and was subsequently corrected. PG&E conducted a thorough review of the areas requiring manhole inspections, and all units were inspected by September 30, 2017, after the CPUC Due Date of July 21, 2017.
 - e. One (1) primary meter inspection² in PG&E's Peninsula Division was not completed on time due to difficulty coordinating a temporary power shutdown with the one

² For purposes of this report, PG&E categorizes a primary meter inspection as an UG detailed inspection.

affected customer. This shutdown was necessary to perform the inspection. Due to these scheduling difficulties, PG&E was unable to complete the inspection of this unit until December 5, 2017, after the CPUC Due Date of October 21, 2017.

- f. One (1) primary meter inspection in PG&E's Peninsula Division was not completed on time due to circumstances outside of PG&E's control. Similar to the primary meter inspection described in (e), this inspection required a temporary power shutdown to one customer. PG&E coordinated with the customer and scheduled the shutdown and inspection prior to the inspection deadline. However, on the scheduled day of inspection, lightning storms in the surrounding area resulted in numerous outages, and PG&E focused its attention on power restoration efforts. As a result, PG&E missed its inspection deadline. After further coordinating with the customer, PG&E completed the inspection on October 10, 2017, after the CPUC Due Date of September 14, 2017.