

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

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Request Date:	February 19, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-07
Date Sent:	February 24, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

SUBJECT: ASSET INSPECTION TIMELINES

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

QUESTION 01

On page (p.) 9 of PG&E's 2021 WMP, Table PG&E-ExecutiveSummary-1 *Summary of 2020 and 2021 Wildfire Mitigation Activities* states that, in 2021, PG&E plans to complete asset inspections of 100% of HFTD Tier 3 and Zone 1 assets, and 33% of Tier 2 assets by July 31st. Footnote (a) reads,

“This timeline for the completion of asset inspections in HFTD areas excludes Can't Get In (CGI) locations where external factors including environmental restrictions, inability to access, or other issues prevent the scheduled inspection, which may then extend beyond July 31st.”

On p. 47, PG&E states, “We are going to complete all inspections in HFTD areas before the late summer peak of wildfire season,” with a footnote (2) that reads,

“Before September 1, with the possible exception of locations where an inspection was attempted before September 1 but access restrictions, customer refusals or other external factors prevent initial completion of the inspection.”

- a. Please explain the discrepancy regarding the completion of asset inspections in HFTD areas, between the two statements above.
- b. Which of these two target completion dates—July 31 or September 1—for asset inspections applies in 2021?
- c. Please explain how PG&E will track and verify that asset inspections are on schedule to be completed by the target completion date.
- d. Please describe PG&E's process for handling CGIs and customer refusals in order to complete inspections in a timely manner.
- e. Does PG&E maintain a list of locations that have had past CGI or customer refusal issues?
- f. If the answer to part (e) is yes, does PG&E schedule these inspections early in the inspection cycle in order to resolve access issues prior to the target completion date?

ANSWER 01

- a. The footnote on page 47 is an error, PG&E intended the date referenced in that footnote to be July 31st as is noted in other locations of the WMP (including on page 9, as identified). PG&E apologizes for this error in the 2021 WMP and remains committed to completing all planned inspections in the HFTD areas by July 31st, with the possible exception of Can't Get In ("CGI") locations.
- b. See subpart (a).
- c. PG&E will track and verify the completion of asset inspections on at least a weekly basis through an "attainment" report leveraged by multiple levels of PG&E management to review the volume of inspections completed as compared to those planned for the given period.
- d. Once CGI locations are identified by the system inspections team they are referred to the Customer Liaison team who engages with our customers to obtain access as needed.
- e. PG&E generates and tracks CGIs to completion through a "CGI" EC (distribution) or LC (transmission) notification in SAP. Therefore, a list of active or closed CGI locations can be pulled from PG&E's SAP system. PG&E is working to implement CGI locations and the reasons of the access restriction into a Geospatial overlay to show an indicator for each location as applicable and allow for better pre-planning of potential access restriction issues.
- f. Potential CGI locations are generally not used to prioritize system inspection work. PG&E schedules asset inspection work primarily based on wildfire risk prioritization and operational constraints or coordination. Driving the inspection schedule based on past CGIs would not optimize for wildfire risk mitigation and may not be necessary as some of our access issues are due to repeat customer challenges but others are due to weather, terrain, sensitive environmental factors, etc.