

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

PG&E Data Request No.:	CalAdvocates_043-Q07		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_043-Q07		
Request Date:	February 25, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-09
Date Sent:	March 4, 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 07**

P. 584 of PG&E's 2021 WMP states the following:

Intrusive wood pole inspections of overhead wood poles in the following recurrence interval:

- Within 15 years of wood pole installation date, and every ten years thereafter.
- a. When did PG&E begin performing intrusive wood pole inspections of overhead wood poles within 15 years of wood pole installation date, per the excerpt from its 2021 WMP above?
- b. Please explain the apparent discrepancy between the statement quoted above and the statement quoted in the previous question.
- c. Does PG&E have records confirming every wooden pole within HFTD Tier 2 and Tier 3 was inspected within 15 years of installation?
- d. Does PG&E have records confirming every wooden pole within HFTD Tier 2 and Tier 3 has been inspected every 10 years after the first 15 years following installation?
- e. If the answer to part (c) or (d) is no, what actions is PG&E taking to bring all wooden poles in HFTD Tier 2 and Tier 3 into compliance with the excerpt from its 2021 WMP above?

**ANSWER 07**

PG&E believes that there was some confusion regarding Questions 6 and 7, and wishes to first clarify its response to Question 6 and then respond to Question 7.

Question 6 asked about performing pole test & treat (PT&T) intrusive inspections of wood poles and the correlation between PT&T tests and 25 years. To clarify the response to Question 6, General Order 165 requires that within the first 15 years of a pole being installed it be inspected within the subsequent 10 years. For example, if a pole was installed on January 1, 1960, then it would need to be inspected within 10 years of January 1, 1975 (i.e., 15 years after installation date). In this case, the initial

intrusive inspection would need to be no later than January 1, 1985, a total of 25 years from the installation date (i.e., 15 years from installation + inspection within the subsequent 10 years). After the initial inspection, a pole must be inspected every 20 years. Thus, in the example above, if the pole was inspected on January 1, 1985, it would need to have a second inspection no later than January 1, 2005.

With this clarification, PG&E provides the following response to Question 7.

- a) The excerpt from the 2021 WMP was unclear. A pole must be inspected within the 10 years following the first 15 years from the date of installation as explained above.
- b) Question 6 referred to the initial 25-year interval (i.e., 15 years from installation + inspection within the subsequent 10 years). The language quoted above from the 2021 WMP refers to the same 25 year interval, but was not entirely clear. Thus, there is no inconsistency between the data response and PG&E's 2021 WMP. However, the 2021 WMP could have been clearer.
- c) Based on our current understanding, we cannot confirm that we have inspection records for all Tier 2 and Tier 3 poles. We have hired an independent contractor to support a proper causal evaluation to help answer this question and recommend corrective actions.
- d) See the response to subpart (c) above.
- e) We have hired an independent contractor to support a proper causal evaluation to help answer this question and recommend corrective actions. See *also* 2021 WMP at pp. 602-603.