

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

PG&E Data Request No.:	CalAdvocates_046-Q05		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_046-Q05		
Request Date:	March 1, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-12
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PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to Table 1 of the non-spatial WMP data tables. All questions specifically concern inspections of distribution facilities in HFTD areas. For purposes of this data request, “high-priority findings” mean Level 1 and Level 2 inspection findings.

SUBJECT: NON-SPATIAL DATA TABLES: DISTRIBUTION INSPECTIONS IN HFTD AREAS

QUESTION 05

Table 1 shows that a much larger percentage of PG&E’s inspection findings are Level 3 than for SCE or SDG&E. Please explain how PG&E ensures that its inspectors assign the appropriate priority of tag to each inspection finding.

Percentage of all findings that are Level 3						
	2015	2016	2017	2018	2019	2020
PG&E	97.1%	97.3%	91.9%	93.1%	95.3%	92.9%
SCE	41.5%	46.5%	43.1%	34.5%	55.6%	41.2%
SDG&E	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

ANSWER 05

PG&E addressed this topic in depth in our response to Condition PGE-15 of our Remedial Corrective Plan.¹ As discussed in that response, PG&E has processes in place to ensure that inspectors assign the appropriate priority to tags identified through inspections.

¹ Starting on page number 33 of the Remedial Corrective Plan available at:
https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/WildfireMitigationPlans_Report.pdf

PG&E classifies field findings by levels of corrective Priority "A," "B," "E," "F" as defined in the Electric Distribution Preventive Maintenance Manual (EDPM, TD-2305M, provided as part of the 2020 WMP at https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/reference-docs/TD-2305M.pdf) and Electric Transmission Line Inspection and Preventive Maintenance Program (ETPM, TD-1001M, provided as part of the 2020 WMP at https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/reference-docs/TD-1001M.pdf).

In general, most field conditions can be submitted by the field inspection with any priority code (A/B/E/F), but the centralized gatekeeper function and guidelines of the EDPM (Electric Distribution Preventative Maintenance) Manual, ETPM (Electric Transmission Preventative Maintenance) Manual, and Job Aids exist to calibrate priority levels across Inspectors. Additionally, the centralized SAP "Gatekeeper" screen where notifications are reviewed has programming and controls that do not allow certain categories of work to be assigned an incorrect priority. As an example, for a Priority "E," EC notification in a Tier 3 area, the Gatekeeper screen has programming that does not allow the Gatekeeper to assign a duration longer than 6 months, as defined in GO 95 Rule 18.

PG&E continues to improve process controls to deliver consistent prioritization of field corrective findings. The assessment of potential impact (or priority) of field condition findings is guided in the field by the inspector personnel, with references to their training, professional experience, mobile inspection checklist application, and published guidance in the ETPM and EDPM. PG&E endeavors to drive consistency in the corrective findings reports by front line staff (Inspectors). Front line staff (Inspectors) are: (1) verified to be Qualified Electrical Workers (also referred to as journeymen linemen) by training and professional experience, (2) trained on how to assess facilities according to PG&E standard, and (3) provided preselected priority options in the mobile app. Inspectors are also given access via their mobile device to references that clarify how to classify field conditions.

Validation

In addition to guiding the Inspectors directly, initial Corrective Notification reports are validated by centralized gatekeepers. A Centralized Gatekeeper is a person responsible for the review and validation of all new, non-emergency Notifications to confirm they meet the requirements as per the EDPM manual and all associated Job Aids. Within the gatekeeping function (also called Centralized Inspection Review Team or CIRT), prioritization is again guided by the ETPM and EDPM, with additional examples (including photographs) contained within Job Aids. To support early identification of inconsistencies, rates of field condition finding are tracked weekly, as are the rates of gatekeeper upgrades/downgrades/cancellations of preliminary field findings.

PG&E is actively deploying desk-based and field sampling of inspector reports for quality management purposes and to create statistical analysis of inspector findings data. Similar oversight of gatekeeper trends was deployed in 2020. Ongoing process

improvement includes annual program reviews with asset strategy and standards teams to clarify electronic inspection checklist wording, provide real world examples, or enhance any aspect of the issue identification and documentation practice.

Improvements in the inspection process are described generally in Section 7.3.4.3 of the 2021 WMP.