

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2022
Data Response**

PG&E Data Request No.:	CalAdvocates_018-Q04		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_018-Q04		
Request Date:	March 25, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-18
Date Sent:	March 30, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

The following questions relate to your 2022 WMP Update submission.

QUESTION 04

PG&E's response to data request OEIS-PG&E-22-005, Question 3, states,

“The QA/QV scope is currently focused on contract Pre-Inspectors and does not evaluate the performance of PG&E Pre-Inspector employees.”

- a. Please describe the role of QA/QV as used in OEIS-PG&E-22-005, Question 3.
- b. Please explain why PG&E's QA/QV scope does not include evaluation of the performance of PG&E Pre-Inspector employees.
- c. How does PG&E currently evaluate the performance of PG&E Pre-Inspector employees?
- d. What quality assurance practices and procedures does PG&E currently use to ensure the quality of the work performed by PG&E Pre-Inspector employees?

ANSWER 04

- a. **QAVM (Quality Assurance Vegetation Management)** – The bulk of QA's work focuses on the overall health of the Defined Scope (Routine) program with regards to meeting the clearance requirements of General Order 95 Rule 35 and California Public Resource Code Section 4293. The intent is to provide assurance that the program is designed correctly and functioning properly. Findings are communicated to the Vegetation Management (VM) organization along with information to help drive appropriate corrective and/or preventive action if needed.

QVVM (Quality Verification Vegetation Management) – QV performs a number of audits for the VM organization:

- Defined Scope for Routine PI and Tree Trim
- CEMA Defined Scope for Routine PI and Tree Trim
- Transmission
- EVM (Enhanced Vegetation Management)

- VC (Vegetation Pole Clearing)

QVVM's audit work is focused on communicating findings for the different audits through the QCD (Quality Control Database). The audit data is shared with the different VM programs to help identify trends (positive or negative) to make sure the respective programs are correctly following processes and procedures. This data is used to help drive the appropriate corrective actions within these VM programs.

- b. **QAVM** - If PG&E pre-inspectors are utilized in the routine VM program inspections in the future, their work will likely be included in QAVM random samples.

QVVM – QVVM has performed work on CEMA defined scope as well as Enhanced Vegetation Management (EVM). Our audit findings are focused on the VM programs and not on the individuals performing the work for these programs. While PG&E Vegetation Management Inspectors (VMI) have performed some of this work for these programs, at this time, we do not have the ability to separate the PG&E VMIs from the contractors performing the inspection work. Based on our further review, we will be revising our response to OEIS-PG&E-22-005, Question 3.

- c. Please see the response to subpart (b). In addition, PG&E's Quality Control (QC) team within the VM Quality Management program performs active field observations of both internal and external Pre-Inspectors (PIs), now called VMIs. QC Program Managers walk side by side with VMIs who are completing inspections to ensure they are completing inspections and prescribing work in accordance with the applicable program standards and procedures. These inspections are performed for both EVM and Routine Vegetation Management. The primary governing procedure, Vegetation Management Distribution Routine Patrol Procedure (DRPP) or TD-7102P-02, is attached as "WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch011.pdf" and "WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch01.pdf" respectively.
- d. Please see subpart (c) above. In addition, as explained above in subpart (b), the QAVM and QVVM audit findings are currently focused on the VM programs and not on individuals performing the work. Currently, we do not have the ability to separate the PG&E VMIs from contractors performing the inspection work. QAVM and QVVM have a number of procedures to address the quality of VMI inspections including:

- Please see attachment(s):
 - "WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch02.pdf" and "WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch01.pdf" for the procedures utilized by QAVM to ensure that the quality of work meets the program and regulatory standards
- Please see attachment(s):
 - "WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch04.pdf", "WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch05.pdf", "WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch06.pdf",

“WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch07.pdf”,
“WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch08.pdf”,
“WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch09.pdf” and
“WMP-Discovery2022_DR_CalAdvocates_018-Q04Atch10.pdf” for
the procedures utilized by QVVM to ensure the quality of work
meets the program and regulatory standards.

For a discussion of PG&E’s QAVM and QVVM programs, please see 2022 WMP, pp.
670-673.