



Martin Wyspianski
Vice President
Electric Asset Management

300 Lakeside Drive
Oakland, CA 94612

Mailing Address:
Mail Code N13V
P.O. Box 770000
San Francisco, CA 94177

Ms. Nika Kjensli
Program Manager, ESRB, SED, CPUC
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Supplemental to the Self-Report for Pole Inspections

Dear Ms. Kjensli:

Pursuant to Decision 18-05-023, we are providing a supplemental update to our October 26, 2022, Self-Report, notifying SED of additional findings with our Pole Test & Treat (PT&T) program, involving potential non-compliance and failure to meet the intrusive inspection record keeping and inspection cycle requirements of General Order (GO) 165, III.C, IV, and Table 1.

I. Pole Failure That Prompted Our Further Review and Learnings

On September 16, 2022, we became aware of an outage due to a line-to-line fault on the Sand Creek 1103 12kV overhead distribution circuit near Ashom Valley Drive in the community of Badger, Tulare County. We identified the cause of the fault as a failed pole that fell into a tree leading to an ignition. The ensuing fire was between 1-3 meters in size and was included in our Q3 EOSI quarterly reporting and will be included in our CPUC 2022 annual ignition report.

Though the pole failure did not cause severe damage or injury, our Asset Failure Analysis Team analyzed the failure and determined the pole failed due to internal rot and exterior shell rot. The pole's PT&T records from the most recent inspection cycle in 2013 documented a "No Pole" result, indicating that the inspector did not locate the pole in the field. The record for a previous inspection cycle in 2002 showed that the pole had passed with 100% wood strength.

II. Our Further Extent of Condition Review

Once we realized that an existing pole had been recorded as "No Pole" but was counted by PT&T as an intrusive inspection, our Asset Failure Analysis Team performed an extent of condition analysis by examining our pole database records. In addition to identifying pole records showing "No Pole" result fields, the team looked for pole records showing "Visual Only" results. A "Visual Only" inspection entails a visual observation of the pole's exterior condition and a sounding test in which the inspector will tap the pole with a hammer to interpret the strength of the pole based on the sound

produced. Because “Visual Only” inspections are not intrusive and do not meet the intrusive inspection requirements of GO 165,¹ we included poles with “Visual Only” inspection records in our extent of condition analysis if: (1) the last valid intrusive inspection record for a pole occurred more than 20 years ago, or (2) there was no previous valid intrusive record for a pole and the pole’s age was greater than 25 as of January 1, 2023. We located approximately 52,000 distribution and 600 transmission PT&T records with “No Pole” or “Visual Only” references that lacked records of intrusive inspections within GO 165’s required timeframe.

It was unclear if these poles had not been inspected consistent with the GO requirement, or if they had been inspected, but we lacked the associated records to update the pole database. To gain a clearer understanding of the issue, we decided to conduct a sample field validation because poles with intrusive inspections are physically marked in the field with metal tags. A cross-functional team began to develop a plan, assess safety risk, and perform a compliance analysis, and a task force immediately began performing field visits to start the validation effort. We entered this issue into our corrective action program, CAP # 124835222, on November 4, 2022.

- **Field Validation Campaign**

- We performed field validation on a sample of approximately 750 distribution and 200 transmission wood poles with “No Pole” or “Visual Only” records. Our findings are as follows:
 - 403 poles (41%) did not receive or require intrusive inspections because the poles had been installed less than 25 years ago (i.e., were not due for an intrusive inspection), were not found in the field (e.g., had been removed), or were not PG&E wood poles.²
 - 366 poles (37%) had evidence at the poles of completed intrusive inspections within GO 165 compliance timeframes.³
 - 213 poles (22%) did not have evidence at the poles of intrusive inspections within compliance timeframes.

¹ GO 165 Section 3.5 defines an intrusive inspection as one involving movement of soil, taking samples for analysis, and/or using more sophisticated diagnostic tools beyond visual inspections or instrument reading.

² We identified a population of customer-owned poles, third-party poles, steel poles, and streetlights.

³ Poles in the field have manufacturing stamps notating the manufacture dates and date nails with the install dates. We used this information during our field visits to determine the timeline required for initial intrusive inspections. Inspectors also mark poles during intrusive inspections with unique inspection tags. The inspection tags identify the inspector (company name), the inspection year, and the type of chemical treatment used to prevent rot. If intrusive inspections fail, inspectors also tag the poles with unique markers to designate if the poles are deteriorated, need to be stubbed, or need to be replaced. We used this evidence during our field visits to determine if we performed intrusive inspections.

DISTRIBUTION:

	Total population of concern from database review	Sample count	Population of sample with no evidence of timely intrusive inspection	Population of sample with timely intrusive inspections	Population of sample not requiring intrusive inspection: < 25 years ⁴ ; not found in the field; not PG&E wood pole
No Pole	12,628	389	52 (13%)	177 (46%)	160 (41%)
High-Fire Threat District (HFTD)	2,244	33	4 (12%)	24 (73%)	5(15%)
Non-HFTD	10,384	356	48 (13%)	153 (43%)	155(44%)
Visual Only	39,473	406	104 (26%)	175 (43%)	127 (31%)
HFTD	5,630	87	22 (25%)	52 (60%)	13 (15%)
Non-HFTD	33,843	319	82 (26%)	123 (39%)	114 (36%)
Total	52,101	795	156 (20%)	352 (44%)	287 (36%)

TRANSMISSION:

	Total population of concern from database review	Sample count	Population of sample with no evidence of timely intrusive inspection	Population of sample with timely intrusive inspections	Population of sample not requiring intrusive inspection: < 25 years ⁴ ; not found in the field; not PG&E wood pole
Visual Only	583	187	57 (30%)	14 (7%)	116 (62%)
HFTD	171	3	2 (67%)	0 (0%)	1 (33%)
Non-HFTD	412	184	55 (30%)	14 (8%)	115 (63%)
Total	583	187	57 (30%)	14 (7%)	116 (62%)

These field validation activities indicate that over 75% of the sampled poles did not require intrusive inspections or they complied with GO 165's inspection timelines.

- **Prior Actions Addressing PT&T Inspection and Record Concerns**

As part of our regular, continual improvement of PT&T procedures, we had previously revised our procedures and adopted new technology that already addresses the “No Pole” and “Visual Only” concerns. As a result, the no pole and visual only concerns reported here reflect legacy issues that should no longer arise going forward.

- We revised TD-2325P-01 Intrusively Inspecting, Reinforcing, and Reusing Wood Poles on November 19, 2021, which eliminated the option to complete a PT&T based on visual only inspections.
- As of April 1, 2022, the PT&T program started using “Inspect App” (an application that allows employees to document inspections in a live environment that updates to and from SAP) to track and record distribution PT&T inspections. We are scheduled to add transmission PT&T inspections to Inspect App starting in 2023.

⁴ If we performed an intrusive inspection on a pole installed less than 25 years ago, it is included in the population that received timely intrusive inspections. It is not duplicated into this population.

- The inspection records are saved into SAP from Inspect App, which will replace handing off PT&T inspection records from the field for database entry.
- If field personnel do not find a pole in the field, then the response recorded in Inspect App will prompt a verification process to check if the pole is missing and correct the asset status, or to re-send an inspector.

Additionally, we are performing an end-to-end program assessment to identify if past and/or present unresolved gaps continue to exist in our PTT program. We are striving to find and fix potential issues prospectively, before discovering them by failure or incident investigation. We will keep you apprised of the results.

- **Risk Mitigation Actions**

- During our field validations, patrollers identified potential safety conditions. Qualified electrical workers (QEW) reviewed these conditions. The QEWs determined no immediate hazards required creation of new priority A or priority B corrective tags.
- To address the legacy issue of the approximate 52,000 distribution and 600 transmission poles, we will continue to perform field visits on all poles missing timely intrusive records.
 - If a pole is not found in the field or does not require an intrusive inspection, we will perform appropriate due diligence to confirm the asset status and update our system of records.
 - If a pole is in the field, we will perform an intrusive inspection by no later than July 1, 2023, for poles in HFRA/HFTD areas and end of September 2023, for all other poles, barring unforeseen circumstances (e.g., permitting, access, weather, or clearance issues). We will then follow the PT&T procedure to determine if the pole requires repairs or replacement.

We anticipate completing this work for distribution and transmission poles by September 30, 2023. We will provide you with regular quarterly updates on the progress of the corrective actions. In the meantime, please contact me at (415) 265-2902 for any additional questions regarding this notification.

Sincerely,



Martin Wyspianski
Vice-President, Electric Asset Management

cc: Lee Palmer, Director, Safety and Enforcement Division, SED
Banu Acimis, Program & Project Supervisor, ESRB
Rickey Tse, Senior Utilities Engineer Supervisor, ESRB
Nathan Sarina, Senior Utilities Engineer Supervisor, ESRB