

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

PG&E Data Request No.:	CalAdvocates_046-Q06		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_046-Q06		
Request Date:	March 1, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-12
Date Sent:	March 9, 2021	Requesting Party:	Public Advocates Office
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 06

Per Table 1, PG&E reported a ten-fold increase in Level 3 findings in 2019, followed by a sharp decrease in 2020. Please explain this data.

Number of Level 3 findings (PG&E)						
	2015	2016	2017	2018	2019	2020
Total	17,449	21,769	20,930	16,787	220,570	71,009
Per Mile	0.82	0.92	0.90	0.49	5.57	2.06

ANSWER 06

PG&E responded to the same question in response to a Data Request from MGRA during the 2020 WMP review process.¹ The details of that response are below:

There are several contributing factors to this trend, many of which are components of PG&E's Wildfire Safety Inspections Program. Starting in 2019:

- *Inspection criteria were more prescriptive and extended beyond baseline compliance (e.g., FMEA focused on ignitions)*

¹ In particular the response to question 10 of DR MGRA 004 which is available at the following link: https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/reference-docs/MGRA004.zip

- *Tools use was governed by explicit mobile application checklists, in addition to employee training*
- *More conservative internal guidance was issued to inspectors (report anything and everything)*
- *Internal guidance limited the discretion of Gatekeepers to extend or re-prioritize Level 3 findings, even if prior practices would have permitted such*
- *Timelines were more set more aggressively (e.g., GO 95 Rule 18 HFTD durations)*
- *Additional visual inspection methods were deployed (e.g., drone, helicopter, climbing, ground-based)*
- *For transmission inspections, each inspection finding was created as a unique corrective notification. In the past, corrective maintenance may have been nested or coupled into a single corrective notification in SAP.*

That response (provided in March 2020) also stated the following expectation for future inspection findings:

In future years, assuming inspection criteria and governance remain stable and repeat inspections occur as proposed², the level of findings is anticipated to decrease. For 2020, the initial Level 2 and Level 3 "find rates" in non HFTD are expected to approach similar levels as the "find rates" of the initial WSIP 2019 program due to the changes noted above.

The 2020 find rate, as highlighted in the data referenced as part of this question, did, in fact, decrease as was anticipated in this data response.

In summary, PG&E substantially revised our asset inspection program in 2019 as part of the Wildfire Safety Inspection Program (WSIP) which assessed all assets in HFTD areas using enhanced, more conservative inspection methods and guidance. The enhanced inspection protocols combined with this increased volume of inspections performed in 2019 results in the more than ten-fold increase in findings in 2019. In 2020 PG&E continued using those enhanced inspection protocols however the fact that all assets in HFTD had been inspected once already resulted, as expected, in a reduction in the inspection findings.

² PG&E currently plans inspection frequency of once per year for assets in HFTD Tier 3, once every 3 years for assets in HFTD Tier 2, and once every 5-6 years for assets in non-HFTD areas.