

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

PG&E Data Request No.:	OEIS_015-Q01		
PG&E File Name:	WMP-Discovery2022_DR_OEIS_015-Q01		
Request Date:	June 3, 2022	Requester DR No.:	OEIS-P&GE-22-015
Date Sent:	June 15, 2022	Requesting Party:	Office of Energy Infrastructure Safety
PG&E Witness:		Requester:	Kevin Miller

SUBJECT: REGARDING PG&E'S REPAIR BACKLOG

QUESTION 01

Regarding PG&E's repair backlog:

- a. Please provide an Excel table with the following information in new columns added to the Excel table PG&E submitted in response to CalAdvocates-PGE-2022WMP-091 Questions 1, 2, and 3:
 - i. Reason for reinspection (if applicable)
 - ii. New due date post-reinspection (if applicable)
 - iii. New prioritization of work order (if it changed)
 - iv. Equipment type
- b. Also provide a process flow chart illustrating the inspection process or a description of the inspection process from identification of an issue through to resolving it, including the typical timescale.
 - i. Include the length of time between identification to initiation of repair and what triggers initiation of the repair.
- c. Additionally, identify any interactions with external agencies, including for permitting, including the following for each agency:
 - i. Any barriers to completing work orders due to permitting.
 - ii. A list of all work orders that have been initiated but have been delayed due to permitting.
 - iii. A list of all work orders for which repair has not been initiated due to permitting concerns.
 - iv. A list of all work orders dated in the past year that have been marked as urgent for which a permit was required.
 - (1) Provide the amount of time that elapsed from the identification of the issue to when it became urgent.
 - (2) Note whether the repair was initiated prior to it being marked as urgent.

Answer 01

- a) We have interpreted the term “reinspections” to mean the work PG&E describes as Field Safety Reassessments (FSRs), which are field verifications or reassessments of open tags that are considered to have a time dependent condition that could lead to a potential ignition source. These FSRs will document if there has been a change to the field condition of the open tag that poses an increased wildfire risk and if an urgent repair of the asset is warranted, or if the repair can be prioritized for a later date.

We have also interpreted “reinspections” to not include normally scheduled inspections, such as our annual detailed inspections for transmission and distribution facilities, as well as our routine inspections for substations. This is because these types of inspections are performed consistent with the timelines established under General Orders governing inspections. Therefore, under the “Reason for reinspection” column in the attached spreadsheets, blank cells indicate notification condition reviews were performed as part of normally scheduled inspections. We are only highlighting the maintenance tags that have received an FSR.

We have limited the information provided to open tags where reinspections have occurred, new due dates following the post re-inspection (if applicable), and new prioritization of a work order if priority changed following the re-inspection and the equipment type.

Please find attached to this response the requested Excel spreadsheets, which have been updated to include the new columns of information sought:

1. WMP-Discovery2022_DR_OEIS_015-Q01Atch01.xlsx

- Under Column N, we have identified tags that have new due dates post re-inspection where the priority has changed following the FSR. Where this column is blank, the tag priority remains, and the tag is prioritized in a risk-informed fashion for work execution, or continues to be part of the FSR re-inspections until the tag repair is completed.

2. WMP-Discovery2022_DR_OEIS_015-Q01Atch02.xlsx

- The phrase “Complete on arrival (COA),” found in column N (New due date post-reinspection), represents either notifications that were found to be complete in the field during the FSR, or the original condition that the notification document was no longer present in the field at the time of the FSR.

3. WMP- Discovery2022_DR_OEIS_015-Q01Atch03.xls

- The attachment provided for Substation inspections does not highlight any re-inspections in columns N, O, and P because FSRs are not utilized for these assets. Instead, substation utilizes its normally scheduled inspections (monthly or bi-monthly routine inspections) at all locations throughout the year to monitor any conditions identified. PG&E has

updated column Q to update the equipment type.

b) As requested, please find attached a process summary flow chart that illustrates our inspection processes: WMP-Discovery2022_DR_OEIS_015-Q01Atch04.pdf

c) We note that subpart c asks PG&E to identify any interactions with external agencies. Providing a comprehensive response would be significantly burdensome due to volume of maintenance repair work that may span numerous agencies. However, we have provided general responses below regarding barriers and permitting issues.

i. For PG&E Priority "A" tags, we are not required to wait for a permit to complete work orders since the need to perform the work is to ensure the location is made safe and, consequently, permits are not required. For other Priority tags, PG&E may require a permit to conduct the necessary work and permitting may be a barrier to completion in certain instances. Please refer to subpart ii, which identifies common barriers to completing work orders due to permitting.

ii. For distribution, we currently have a backlog of approximately 240,000 maintenance tags in the High Fire Threat District (HFTD) areas that are being managed in a risk-informed approach, where the highest risk tags are prioritized for work execution. Currently, we do not have a process for isolating which distribution maintenance tags have been delayed due to permitting or other factors. However, we do not believe permitting is a significant reason for the majority of the delays, where other factors such as fire rebuild response, PSPS events, and other emergency events have also disrupted our work schedules. For work orders that have been delayed due to permitting, we refer you to our discussion for transmission and substation work orders below.

For transmission assets, please find a list of work order notifications (tags) currently impacted by permitting in the following attachment: WMP-Discovery2022_DR_OEIS_015-Q01Atch05.xlsx

For substation assets, the list of work order notifications (tags) delayed due to permitting reasons is attached: WMP-Discovery2022_DR_OEIS_015-Q01Atch06.xls

iii. PG&E does not track the impact of permitting delays against initiation dates. Please see the response to subsection ii above for information regarding work orders delayed due to permitting reasons for transmission and substations.

iv. Work orders that are deemed to be "urgent" are designated by PG&E as Priority "A" tags. For Priority "A" tags, we are not required to wait for a permit to complete work orders since the need to do the work is to ensure the location is made safe and, thus, permits are not needed to perform this work. Therefore, we do not have any urgent work orders for the past year for which a permit was required.

(1) Since Priority A tags are identified as urgent, the resources deployed must remain at the location until repairs are performed to make the

location safe. Therefore, the issue is deemed urgent at the time of identification.

- (2) Given the safety implications of Priority A tags, the repair is initiated immediately after it is deemed urgent, and the resources remain at the location until repairs are performed to in order make the location safe.