

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

PG&E Data Request No.:	WSD_011-Q03		
PG&E File Name:	WildfireMitigationPlans_DR_WSD_011-Q03		
Request Date:	March 16, 2021	Requester DR No.:	VM DR for PGE 20210316
Date Sent:	March 23, 2021	Requesting Party:	Wildfire Safety Division
PG&E Witness:		Requester:	Ryan Arba

PG&E has increased the scale and spend of its VM inspection program (7.3.5.2) but does not foresee maturing related Maturity Model Capability 22 and 26 in the 2020-2022 WMP cycle. PG&E discusses improved quality verification for inspections in “5) Future improvements to initiative” and in its response to Action PGE-25 (Class B), subpart 1, (p. 631) but does not address improvement of the inspections themselves, nor prioritization.

QUESTION 03

- 1) PG&E does not expect to mature questions 22b, 22c, 26a, or 26d in the 2020-2022 WMP cycle; When does PG&E anticipate maturing each of these maturity model questions and to what extent? If PG&E has no plans to mature capabilities related to these questions, why not?
 - a. 22b: How are vegetation inspections scheduled?
 - b. 22c: What are the inputs to scheduling vegetation inspections?
 - c. 26a: How is contractor and employee activity audited?
 - d. 26d: How is work and inspections that do not meet utility-prescribed standards remediated?

ANSWER 03

- 1) a. PG&E understands this question to be referring to Routine VM inspections. With that understanding, PG&E does not have a plan to mature beyond annual or periodic scheduling because Routine VM already inspects all overhead primary and secondary distribution facilities annually regardless of whether facilities are in HFTD. As indicated on page 11 of the 2021 WMP, PG&E’s planned routine inspection timeframe for all assets is November 15 of the prior year through November 15 of the current year (i.e. 11/15/20-11/15/21 for the 2021 plan year). However, delays including inaccessible facilities, sensitive environments or other limitations may delay some inspections for the current plan year by a few weeks, but still completing by the end of the calendar year (i.e. 12/31/21). Additionally,

PG&E performs scheduled CEMA patrols approximately six months before or after the routine patrol on all overhead primary and secondary distribution facilities. This scheduling approach exceeds industry best practices.

- b. PG&E understands this question to be referring to Routine VM inspections. At this time, PG&E does not have a plan to mature beyond annually updated static maps of vegetation and environment. Similar to our response for 1(a), Routine VM already inspects all overhead primary and secondary distribution facilities annually regardless of whether facilities are in HFTD, and this practice exceeds industry best practices. Additionally, PG&E is expanding Work Verification to provide a hands-on approach to managing vegetation.
- c. Activity of contractors and employees will continue to be audited through our established and functioning audit processes. Currently, PG&E's plan is to continue to build upon our Work Verification (WV) processes, please refer to 1d.
- d. PG&E's Vegetation Management Inspectors and Work Verification (WV) process also known as the VM QC process, identifies systemic deficiencies in the quality of work and inspections. PG&E would like to ensure the initial program development and execution of this program is fully functional and effective prior to expanding to the next level of maturity.

While PG&E will continue to seek ways to improve our processes, we do not have additional improvements planned at this time. Our WV / QC program continue to serve as an essential part of our evaluation process for reassessing our inspection processes.