

**PACIFIC GAS AND ELECTRIC COMPANY  
Wildfire Mitigation Plans Discovery 2023  
Data Response**

PG&E Data Request No.:	OEIS_003-Q011		
PG&E File Name:	WMP-Discovery2023_DR_OEIS_003-Q011		
Request Date:	April 21, 2023	Requester DR No.:	P-WMP_2023-PG&E-003
Date Sent:	April 26, 2023	Requesting Party:	Office of Energy Infrastructure Safety
DRU Index #:		Requester:	Colin Lang

**SUBJECT: REGARDING PG&E’S RESPONSE TO P-WMP\_2023-PG&E-002-Q07**

**QUESTION 011**

- a. PG&E states that a Critical Attribute is defined as “a condition that could lead to either an ignition point or wire down situation that could result in a potential fire ignition.” Provide all supporting documentation for procedures PG&E uses to determine whether something is a Critical Attribute. If such procedures do not exist, PG&E must provide the following:
  - i. A description of PG&E’s process for how it determines what qualifies as a Critical Attribute.
  - ii. A list of criteria PG&E uses to qualify an asset as a Critical Attribute.
- b. What does PG&E mean by “as defined by Asset Strategy”?

**ANSWER 011**

- a.
  - i. For distribution, a critical attribute is any question that identifies a condition that could lead to either an ignition point or wire down situation that could result in a potential fire ignition. The determination of critical attribute was created based on discussions with multiple stakeholders/SMEs from Asset Strategy, Standards, and System Inspections. The finalized list was routed through EDRS and was approved by leaders from Asset Strategy and System Inspections. This list is provided as Atch01, included in our response to Question 011.A.II below.  
  
For transmission, the guidance within “Electric Transmission Line Guidance for Setting Priority Codes” provided in our response to Question 009, in accordance with GO-95 Rule 18, informs whether issues identified through inspection are critical attributes in the context of QA/QC for asset inspections. Questions on the inspection form that lead to high priority findings are considered critical. For example, the finding of greater than 50% material loss of a conductor is critical.

- ii. For Distribution asset inspections, please review “WMP-Discovery2023\_DR\_OEIS\_003-Q009Atch01.xlsx” provided in our response to Question 009 for a list of our Distribution assets that we have defined as “Critical Attributes.”

For Transmission asset inspections, PG&E uses the following criteria to qualify critical attributes:

- TD-8123P-103 “Priority A”: The condition is urgent and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard.
- b. “As defined by Asset Strategy” means that the guidance was provided via the Asset Strategy departments within PG&E. PG&E uses the term 'critical attribute' in a variety of contexts, such as the approximately 300 critical data elements noted in WMP Table 22-33-3, Tracking ID 23, which provide information for risk modeling, failure analysis, etc.