

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023-2025
Data Response

PG&E Data Request No.:	SPD_016-Q006		
PG&E File Name:	WMP-Discovery2023-2025_DR_SPD_016-Q006		
Request Date:	May 30, 2024	Requester DR No.:	SPD_WSPS_PG&E_2024_006
Date Sent:	June 4, 2024	Requesting Party:	Safety Policy Division
PG&E Witness:		Requester:	Henry Sweat

SUBJECT: REQUEST FOR CONFIDENTIAL FILES

QUESTION 006

PG&E describes in "WMP-Discovery2023_DR_CalAdvocates_015-Q018Atch01.docx" a brief description of "Critical attributes" and "Conformance attributes" used to define pass rate. For the following questions, Vegetation Programs refer to the following programs: *Distribution Routine, Distribution Second Patrol, Focus Tree inspections, Vegetation Management for Operational Mitigations, Tree Removal Inventory, Focused Tree Inspection (FTI), Transmission, Pole Clearing and Field Quality Control (FQC).*

- a. Provide the criteria for "critical attributes" evaluated by QA/QC inspectors for each Vegetation Program.
- b. Provide three examples of "critical attributes" evaluated by QA/QC inspectors for each Vegetation Program.
- c. Provide the criteria for "conformance attributes" evaluated by QA/QC inspectors for each Vegetation Program.
- d. Provide three examples of "conformance attributes" evaluated by QA/QC inspectors for each Vegetation Program.
- e. Define the criteria assessed for the "critical pass rate" for each Vegetation Program. Comment on how it relates to "critical attributes" and "conformance attributes."
- f. Provide PG&E's standards for QA and QC for each Vegetation Program.
- g. Provide the survey used by QA and QC inspectors to record information for each Vegetation Program.
- h. Describe how an attribute is assessed as a pass/fail and then aggregated up to the pass rate for Vegetation Program.
- i. Define "Locations", as used in Table 8-18-1 (Revised) and Table 8-18-2 (Revised).
- j. Explain when QC or QA would have different criteria for evaluation and discuss how this manifests in the pass rate for each type. For instance, when would work pass QA but not QC and vice versa.
- k. "WMP-Discovery2023_DR_CalAdvocates_015-Q018Atch01.docx" states the pass rate is: Total Passing responses for Critical and Conformance Attributes divided by (Total Responses for Critical and Conformance Attributes minus N/A responses) whereas footnote 224 on page 708 of "TN13804_20240402T112956_PGE's_20232025_Wildfire_Mitigation_Plan_Revision

_5” indicates that the pass rate is based on: the number of assets reviewed by QC that do not have a Critical Attribute (as defined by Asset Strategy) failure or miss divided by the number of assets reviewed by QC. The definition of pass rate appears to be different in a few ways such as (1) the units are different (number of attributes versus number of assets) and (2) one includes conformance attribute, whereas the other does not. Explain the discrepancies between these two criteria and describe how they are used.

- l. Provide the last 5 completed QC reviews for Distribution Routine that include a finding.
- m. Provide the last 5 completed QA reviews for Distribution Routine that include a finding.
- n. Explain why “WMP-Discovery2023-2025_DR_CalAdvocates_039-Q001Atch04.docx” has multiple rows of data where there were 0 trees inspected and 0 trees failed? i. Define trees inspected. (Is this number of strike trees between two poles? Is this just five random trees near a pole?)
- o. Explain the process of an inspection for Routine Distribution Inspections and FTI for both QA and QC. Specifically discuss the required/other tasks an inspector performs when sent to a location.

ANSWER 006

PG&E’s Field Quality Control (FQC) is a distinct team within the Quality Management organization that performs active observations of vegetation management personnel to evaluate conformance with procedural requirements. The scope, results, and methodology are separate from VMQC/VMQA functions.

- a. Please see Section 1 of PG&E’s Active Observation Sampling, Data Collection, and Pass Rate Calculations provided as “WMP-Discovery2023-2025_DR_SPD_016-Q006Atch01CONF.pdf” for the requested information.
- b. Please see the table below for three examples of “critical attributes” evaluated by QA/QC inspectors for each Vegetation Program:

Distribution Routine	Distribution Second Patrol	Transmission	Vegetation Control
1. Does the VMI independently prescribe work to mitigate risk for green trees with significant defects that may impact the facilities in the event of failure and did not meet P1 or P2 criteria?	1. Did the VMI independently and appropriately prescribe work to address all instances of strain and abrasion encountered during the observation? 2. Does the VMI independently	1. Does VMI prescribe all necessary work to maintain PG&E’s Radial Clearance requirements prior to the next patrol cycle? 2. Does VMI prescribe all necessary work to prevent hazard tree fall-	1. Were all qualifying poles where the VC tech was able to perform work appropriately and independently cleared to scope, including submission of observation report when necessary?

Distribution Routine	Distribution Second Patrol	Transmission	Vegetation Control
<p>2. Does the VMI independently prescribe work to mitigate risk for all dead and dying trees that may impact the facilities in the event of failure, but did not meet P1 or P2 criteria?</p> <p>3. Does the VMI independently prescribe work to maintain MDRs through the next routine cycle for all trees requiring pruning?</p>	<p>prescribe work for all structurally unsound green limbs and dead palm fronds above the conductors with the potential to fail into the facilities before the next routine patrol but did not meet P1 or P2 criteria?</p> <p>3. Does the VMI independently prescribe work to mitigate risk for all dead, dying, and declining trees, or dead portions of trees including dead overhangs that can contact the facilities in the event of failure, but did not meet P1 or P2 criteria?</p>	<p>ins prior to the next patrol cycle?</p> <p>3. If encountered in the field, were all HN-Immediate conditions properly handled?</p>	<p>2. Did the VC tech ensure that the partial/full 1255(c/d) designation was only applied to poles that qualified for an exemption?</p> <p>3. Was VC Tech able to identify all non-exempt equipment types that were encountered over the course of the observation?</p>

- c. Please see Section 1 of PG&E's Active Observation Sampling, Data Collection, and Pass Rate Calculations provided as "WMP-Discovery2023-2025_DR_SPD_016-Q006Atch01CONF.pdf" for the requested information.
- d. Please see the table below for three examples of "conformance attributes" evaluated by QA/QC inspectors for each Vegetation Program.

Distribution Routine	Distribution Second Patrol	Transmission	Vegetation Control
<p>1. Did the VMI independently prescribe using the appropriate priority codes?</p> <p>2. Does the VMI independently utilize correct markings</p>	<p>1. Did the VMI independently prescribe work using the appropriate priority codes?</p> <p>2. Did VMI attempt customer</p>	<p>1. Does the VMI independently utilize correct markings according to the vegetation management marking standard?</p>	<p>1. Did the VC tech complete all necessary pruning cuts to ANSI A300 standards?</p> <p>2. Did VC tech attempt contact with all</p>

Distribution Routine	Distribution Second Patrol	Transmission	Vegetation Control
<p>according to the vegetation management marking standard?</p> <p>3. Does the VMI independently prescribe all necessary pruning to maintain EVM scope elements on the EVM transition to Routine segments?</p>	<p>contact for all parcels where work was prescribed?</p> <p>3. Did VMI issue "Missed Tree" tags for all trees or tree parts which were prescribed work for fall-in risk when the tree conditions requiring work were present and/or predictable during the most recent routine patrol (approximately 6 months prior)?</p>	<p>2. When prescribing tree work in HFTD, does VMI prescribe adequate clearance?</p> <p>3. Does VMI prescribe all necessary work to maintain PG&E's Overhang requirements prior to the next patrol cycle?</p>	<p>customers prior to entering their property?</p> <p>3. Does VC tech perform all work in accordance with applicable BMPs?</p>

- e. The critical pass rate is the aggregate pass/fail rate of all critical attribute questions within a program checklist (survey). Conformance attributes are not considered in the critical pass rate.
- f. Please see the table below for the following QA/QC Standards related to vegetation management:

Attachment Title	Attachment Name
Field Quality Control Business Document	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch02CONF.pdf
Conducting Active Observations	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch03CONF.pdf
QAVMP Focused Tree Inspection Standard Work Document	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch04.pdf
Quality Assurance Vegetation Management Performance	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch05CONF.pdf
Vegetation Management Quality Control (VMQC) for Routine VM Electric Distribution	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch06CONF.pdf

- g. Please see the table below for the following QA/QC surveys related to vegetation management:

Attachment Title	Attachment Name
Focused Tree Inspection Questions	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch07.pdf
QC Work Verification Guide	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch08.pdf
Active Observation Surveys	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch09.xlsx

Attachment Title	Attachment Name
QAP Quality Verification User Guide	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch10.pdf
QAM VM FTI	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch11.pdf

- h. Not applicable for VMQA-P and VMQC. VMQA-P and VMQC doesn't use 'attributes' to obtain Pass Rate.
- i. Location boundaries are pre-assigned to QA-P and are created initially By QC using the below criteria:

Distribution:

'The verifier must determine and define the sample location boundary to perform our QC WV survey by reading the data fields entered by the VMI in the sample location assigned from system of record.' See QC response for additional details on how Distribution locations are defined.

Transmission:

'The verifier must determine and define the sample location boundary to perform our WV survey by reading the data fields entered by the VMI in the sample location assigned from the VM Execution System of Record.' See QC response for additional details on how Transmission locations are defined QC VC defines 'Location' (VC Pole location) the area where the 'subject pole' is.

VMQC:

QC Distribution 'Location' is defined in "*WMP-Discovery2023-2025_DR_SPD_016-Q006Atch06CONF.pdf*" as follows:

'The verifier must determine and define the sample location boundary to perform our QC WV survey by reading the data fields entered by the VMI in the sample location assigned from system of record. The verifier must enter comments to describe exactly what work area is considered the sample area to assess the surrounding vegetation.

If inadequate comments are provided from the system of record sample location, the verifier can either establish the boundary they believe fits the situation or skip the review until further information can be obtained.'

QC Transmission 'Location' is defined in "*WMP-Discovery2023-2025_DR_SPD_016-Q006Atch12CONF.pdf*" as follows:

'The verifier must determine and define the sample location boundary to perform our WV survey by reading the data fields entered by the VMI in the sample location assigned from the VM Execution System of Record.

The verifier must enter comments to describe exactly what work area is considered the sample area to assess the surrounding vegetation.

If inadequate comments are provided from the VM Execution System of Record sample location, the verifier can either establish the boundary they believe fits the situation or skip the review until further information can be obtained. 'QC VC defines 'Location' (VC Pole location) the area where the 'subject pole' is located.

- j. QA and QC would have different criteria as it applies VMQC and VMQA pass rates. QC & QA have aligned criteria for programs currently being reviewed by both QA-P & QC (Distribution, Transmission, Vegetation Control, and Focused Tree Inspection)
- k. The Pass Rate referenced in “WMP-Discovery2023_DR_CalAdvocates_015-Q018Atch01.docx” includes pass rate definitions and calculations for FQC. This pass rate definition does not apply to VMQC or VMQA.

The pass rate denoted in footnote 224 is the pass rate for VMQC, which audits completed work locations with different attributes and pass rate criteria. Pass rate attributes are different for FQC and VMQC/VMQA, based on differences in the methodologies used to evaluate performance.

Field Quality Control (FQC) is a distinct team within the Quality Management organization that performs active observations of vegetation management personnel to evaluate conformance with procedural requirements. The scope, results, and methodology are separate from VMQC/VMQA functions.

- l. Please see the following two attachments for the requested information “WMP-Discovery2023-2025_DR_SPD_016-Q006Atch13CONF.xlsx” for the most recent distribution routine findings and “WMP-Discovery2023-2025_DR_SPD_016-Q006Atch14CONF.xlsx” for the most recent VMQC findings.
- m. Please see the following attachment for the requested information: “WMP-Discovery2023-2025_DR_SPD_016-Q006Atch15CONF.xlsx”
- n. There are locations that have ‘No trees/brush listed by the VMI on the system of record’ and there are ‘No trees/brush failed by the QC WV’, this situation is reflected as ‘0 trees inspected, and 0 trees failed’ in the data.

QC trees inspected are defined in the ‘Vegetation Management Quality Control (VMQC) for “WMP-Discovery2023-2025_DR_SPD_016-Q006Atch06CONF.pdf” as follows:

Total trees inspected = the total number of trees AND brush listed by the VMI on the system of record sample location plus the number of trees AND brush that failed by QC WV but not listed by VMI.

- o. Please see the table below for documents outlining the process of an inspection for Routine Distribution Inspections and FTI for both QA and QC.

Attachment Title	Attachment Name
Conducting Active Observations	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch03.pdf
Vegetation Management Quality Control (VMQC) for Routine VM Electric Distribution	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch06.pdf
Quality Control (QC) Vegetation Management Focused Tree Inspection (FTI)	WMP-Discovery2023-2025_DR_SPD_016-Q006Atch16CONF.pdf