

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

PG&E Data Request No.:	SPD_016-Q009		
PG&E File Name:	WMP-Discovery2023-2025_DR_SPD_016-Q009		
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 009**

Answer the following with regards to QA/QC for system inspections.

- a. Provide the procedures for QA and QC for all System Inspections for transmission and distribution assets.
- b. Provide the procedures for detailed inspections (aerial and ground) of distribution and transmission assets.
- c. Describe what is in a Critical Pass Rate, and how that differs from other types of findings – for Distribution QA the “other” findings appear to be classified as “High,” “Medium,” and “Low” as seen in “WMP-Discovery2023-2025\_DR\_CalAdvocates\_039- Q001Atch01.xlsx.” Provide examples.
- d. Explain when QC or QA would have different criteria for evaluation and discuss how this manifests in the pass rate. For instance, when would an inspection pass QA but not QC and vice versa.
- e. Explain why a CritAtt would not result in a new EC tag. Provide examples. See column P of “WMP-Discovery2023-2025\_DR\_CalAdvocates\_039-Q001Atch01.xlsx” for reference.
- f. Define “STIP” in Column N of “WMP-Discovery2023-2025\_DR\_CalAdvocates\_039-Q001Atch01.xlsx”.
- g. Explain why some findings identified during QA/QC inspections classified as “High” are considered “Critical Attributes” and others are not?
  - i. Referencing “WMP-Discovery2023-2025\_DR\_CalAdvocates\_039-Q001Atch05.xlsx,” justify why the finding in Row 4 is not considered a Critical Attribute, whereas the finding in Row 148 is considered a Critical Attribute. Discuss why the finding in Row 4 is not a Critical Attribute considering (1) the two rows have the same identified description “Molding missing, broken, damaged, or loose,” (2) the risk rank and HFTD risk tier is the same (see Columns L through N), but (3) the finding in Row 4 is a Priority E whereas the finding in Row 148 is a Priority F, especially since (3) implies that Row 4 was more risky and thus a more critical miss.

## ANSWER 009

- a. Please see attachment "*WMP-Discovery2023-2025\_DR\_SPD\_016-Q009Atch01CONF.pdf*" for PG&E's Quality Assurance System Inspections Business Process Document and attachment "*WMP-Discovery2023-2025\_DR\_SPD\_016-Q009Atch02CONF.pdf*" for PG&E's procedure for System Inspections Quality Control.
- b. PG&E uses the guidance set forth in its Electric Distribution Preventative Maintenance (EDPM) Manual for detailed distribution inspections and the Electric Transmission Preventative Maintenance (ETPM) Manual for detailed transmission inspections. Please see attachment "*WMP-Discovery2023-2025\_DR\_SPD\_016-Q009Atch03CONF.pdf*" for the EDPM and the following link for PG&E's ETPM: <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/td-1001m-etpmm.pdf>. Please see attachments "*WMP-Discovery2023-2025\_DR\_SPD\_016-Q009Atch04CONF.pdf*" and "*WMP-Discovery2023-2025\_DR\_SPD\_016-Q009Atch05CONF.pdf*" for aerial inspections.
- c. Critical Pass Rate is the number of unique SAP Equipment IDs with zero Critical Attribute Findings divided by total number of unique SAP Equipment IDs reviewed. Critical Attribute findings differ from "other" findings in that they are the highest priority condition, as defined by Asset Strategy. The "other" findings that are categorized as "High", "Medium", or "Low" risk are not used in calculating the Critical Pass Rate.  
  
See SAP Equipment ID 104088798 for an example of a Critical Attribute finding. See SAP Equipment ID 104138705 for an example of a "High" finding. See SAP Equipment ID 104060532 for an example of a "Low" finding. There were no "Medium" findings in document "*WMP-Discovery2023-2025\_DR\_CalAdvocates\_039-Q001Atch01.xlsx*."
- d. QC and QA utilize the same critical miss criteria that is set by Asset Strategy. Current QC and QA audits do not have a pass/fail acceptance criteria for completed inspections. QC and QA audits review inspection checklist attributes and pass/fail the attribute.
- e. All Critical Attribute findings as defined by Asset Strategy would result in either the creation of a new EC tag or the updating of an existing EC tag. Any Critical Attribute in column P that does not correspond to a Critical Attribute in column N (totalSTIP) is a data entry error that does not adversely affect the pass rate because the pass rate is calculated per column N.
- f. "STIP" in column N refers to the number of Critical Attribute findings for the corresponding SAP Equipment ID.
- g. The QA/QC discrepancy rankings include Critical, High, Medium, and Low. PG&E identified attributes/conditions in the system inspection checklist that posed the potential for wildfire risk if the condition existed in the field. Critical Attribute ranked findings are directly related to wildfire risk and represent the highest-level concerns. High, Medium, and Low findings represent non-wildfire risk concerns related to administrative errors, documentation issues, equipment reliability, public safety, etc.
- h. When referencing "*WMP-Discovery2023-2025\_DR\_CalAdvocates\_039-Q001Atch05.xlsx*," it appears that Row 4 and Row 148 both identify the finding

Description in column “H” as “Molding missing, broken, damaged, or loose,” additionally, both have the same assigned Risk Rank of “High” in column “L”. PG&E is unclear regarding the “Critical Attribute” Risk Rank that was cited in the original question and will require addition information to provide an appropriate response.