

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

PG&E Data Request No.:	SPD_024-Q004
PG&E File Name:	WMP-Discovery2023-2025_DR_SPD_024-Q004
Request Date:	January 9, 2025
Requester DR No.:	SPD_WSPS_PG&E_2025_001
Requesting Party:	Safety Policy Division
Requester:	Henry Sweat
Date Sent:	January 23, 2025

QUESTION 004

SPD met with PG&E to discuss PG&E's remaining strength calculations. The ISM previously reported to SPD that PG&E plans to transition from using the current remaining strength calculation as criteria for replacement of poles to using the Safety Factor as the primary criteria. SPD also understands that there will also be a remaining strength criterion where poles with less than 25 percent remaining strength will be replaced automatically regardless of the Safety Factor. SPD reviewed the tool used to calculate the remaining strength and found it may not consider failures modes which could become critical for poles that are severely deteriorated. Since these failure modes are not considered, the tool may overestimate the strength of poles (and thus overestimate the Safety Factor) with estimated remaining strengths near, but slightly above 25 percent. SPD understands that under the new criteria for pole replacement, poles at this deterioration level, would have historically been replaced, but will no longer be replaced if the Safety Factor is above a certain threshold. What actions (if any) is PG&E taking to review (1) the accuracy of the remaining strength calculation at low remaining strengths and (2) the initially proposed criteria of 25 percent remaining strength?

ANSWER 004

- 1) In order to assess the accuracy of the remaining strength calculation at low remaining strengths, and in accordance with GO 165, PG&E performs intrusive inspections on our poles, which includes assessing the internal condition of the pole. In order to adequately assess the decay pockets, our inspectors model the observed decay in D-Calc, an industry standard software, which provides a remaining strength of the pole. In accordance with our internal procedures, all poles with 35% or less calculated remaining strength are replaced expeditiously via our Priority-X notification. This threshold allows us to eliminate risk on our system by replacing these severely degraded poles urgently. As a result of our established process, we are preventatively addressing the risk of localized bucking in poles with severe decay.
- 2) PG&E is currently working through the process mapping and data exchanges for transitioning from remaining strength to safety factor. As part of that process, we are evaluating the appropriate thresholds. Additionally, as a further part of this process,

PG&E has not yet committed to the 25% remaining strength as we are still analyzing what should be the appropriate threshold.