

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

PG&E Data Request No.:	CalAdvocates_037-Q06		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_037-Q06		
Request Date:	February 11, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-03
Date Sent:	February 17, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to PG&E's responses to data request CalAdvocates-PGE-R1810007-32.

**QUESTION 06**

For contractors who perform Distribution Asset Repairs<sup>1</sup> work for PG&E, please explain the following:

- a) Please provide copies of commonly used procedures that contractors are currently required to follow in the course of performing this work for PG&E.
- b) How does PG&E ensure contractors are aware of procedures discussed in Question 6(a)?
- c) How does PG&E communicate revisions to procedures, or new procedures, to these contractors?
- d) Is PG&E aware of any cases from 2018-2020 in which a contractor performing this work made an error, and attributed that error to being unaware of or unfamiliar with the relevant procedure (or the latest revision thereto)?
  - i. If the answer to Question 6(d) is yes, please explain each case, including how the issue was discovered, and what actions PG&E took to resolve the issue. Please provide copies of any relevant audit reports or CAP items.
- e) Please provide the full definition of "Distribution Asset Repairs" as used in PG&E's response to CalAdvocates-PGE-R1810007-34.

**ANSWER 06**

- a. Copies of commonly used procedures that contractures use include:
  - i. Specific Conditions 6603 Ver. 2.5 - Electric Overhead, Underground, and Civil Construction -- This document lists out what procedures and/or standards are to be used when carrying out work related to specific

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<sup>1</sup> For the purposes of this question, please define "Distribution Asset Repairs" in the same manner as in PG&E's response to CalAdvocates-PGE-R1810007-34, in which PG&E provided an Excel spreadsheet including 30 contractors who performed "Distribution Asset Repairs" work.

conditions related to excavating, installing, replacing, modifying, undergrounding and upgrading of overhead and underground electric facilities and underground conduit performed on behalf of PG&E and/or Joint Parties. Please see *“WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q02-Atch01\_CONF.pdf”* and specifically Section 3.1.

- ii. SAFE-300-1S – Standard establishes minimum requirements for contractor safety management and ensures that health and safety expectations associated with the work performed on behalf of PG&E are understood and communicated. Please see *“WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q02-Atch02\_CONF.pdf.”*
  - iii. California Safety Manual Code of Safe Work Practices Accident Prevention Rules (Red Book) – Accident prevention rules outlined by the State of California. Please see *“WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q02-Atch03.pdf.”*
- b. See PG&E’s response to CalAdvocates\_037-Q2(a) and (b).
- c. See PG&E’s response to CalAdvocates\_037-Q2(a) and (b).
- d. PG&E objects to this subpart because the phrase “attributed that error to being unaware of or unfamiliar with the relevant procedure” is vague and ambiguous. It is unclear whether this request means that the contractor attributed its error to being unaware of or unfamiliar with the relevant procedures, PG&E attributed the error to these causes, or something else. Subject to and without waiving this objection, PG&E has identified three cases involving contractor error in which, as a follow-up item after the error occurred, PG&E worked with all of its contractors so that they are familiar with and use PG&E procedures.
- i. Contract crew incorrectly identified primary cable and spiked the incorrect cable causing an unplanned outage. Contractor did not follow the PG&E requirement to identify primary cable prior to performing spiking operations. Issue was discovered when the incident created an unplanned outage. On 1/28/20, PG&E implemented a requirement for all Distribution Contractors to follow our Underground cable spiking procedures (see attached). A second incident occurred on 10/17/20 and in response a conference call review was held with all PG&E Electric Distribution Contractors. We also sent a guidance tailboard of the PG&E requirement to all Electric Distribution Contractors. See attached *“WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q06-Atch03\_CONF.msg”*, & *“WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q06-Atch04\_CONF.msg”*
  - ii. Contract crew pulled an energized dead-break elbow from a junction box on 12/5/2020. Crew did not know the difference between a load-break and dead-break primary elbow. Issue was discovered when the incident created an unplanned outage. In response, PG&E discussed the incident and learnings with all Electric Distribution Contractors. We also sent the attached tailboard communication on Primary UG Separable

Terminations. See attached

“WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q06-Atch05\_CONF.zip”,  
“WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q06-Atch06\_CONF.zip”,  
& “WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q06-  
Atch07\_CONF.zip”

- iii. Contract crew performed incorrect execution of an operation on switch log 20-54268 on 6/15/2020. Switch log called to check voltage and put Cables On Insulated Stand-off. Crew checked voltage but did not stand off cables, this caused the Distribution Operator to back up a step and repeat a “drop and pick-up” affecting customers twice. Issue was discovered when the incident created an unplanned outage. As a result of the incident, PG&E put Underground Construction Company on a safety stand-down and required them to develop a Safety Corrective Action Plan. See attachment “WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q06-Atch01\_CONF.zip & “WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q06-Atch02\_CONF.zip”
- e. The contractors labeled as performing “Distribution Asset Repairs” primarily support the repair of distribution system assets by completing directly, or supporting the completion of, corrective repair tags. These corrective repair tags are generally identified through asset inspections, but can be identified through other processes as well. Common examples of distribution corrective repair tags include replacing poles, replacing cross-arms, replacing equipment, etc. These contractors may support other kinds of work as well (for example proactive system upgrades), but were identified by “the primary activity or wildfire risk mitigation workstream”, as was noted in the response to CalAdvocates-PGE-R1810007-34.