

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

PG&E Data Request No.:	CalAdvocates_037-Q07		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_037-Q07		
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 07**

For contractors who perform Asset Inspections<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 7(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 7(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 "Asset Inspections" as used in PG&E's response to CalAdvocates-PGE-R1810007-34.

**ANSWER 07**

In CalAdvocates-PGE-R1810007-34, PG&E responded with the list of vendors that provide a broad range of services supporting asset inspections. Part e) of our response provides details below. For the responses to subparts (a) – (d) below, PG&E interprets these questions to refer to the subset of contractors that perform inspections of PG&E's equipment and who must be aware of PG&E's standards and procedures in order to

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<sup>1</sup> For the purposes of this question, please define "Asset Inspections" in the same manner as in PG&E's response to CalAdvocates-PGE-R1810007-34, in which PG&E provided an Excel spreadsheet including 76 contractors who performed "Asset Inspections" work.

safely perform inspections and effectively determine asset health.

a) Please see the following attachments:

- i. Distribution Manual  
(See Attached: "WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q07-Atch01\_CONF.pdf")
- ii. D-WSIP Execution Compliance & Risk WSIP Mobile Training 5/3/2019  
(See Attached: "WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q07-Atch02.pdf")
- iii. D-WSIP Execution Compliance & Risk WSIP Pronto App Training 5/3/2019  
(See Attached: "WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q07-Atch03\_CONF.pdf")
- iv. D-WSIP Execution Compliance & Risk WSIP Inspect App Training 5/3/2019  
(See Attached: "WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q07-Atch04\_CONF.pdf")
- v. Temporary Repairs Pronto Recordkeeping Section Question 15  
(See Attached: "WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q07-Atch05.pdf")
- vi. Electric Corrective Overhead Form Version 1.12 Effective 02/14/2019  
(See Attached: "WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q07-Atch06.pdf")
- vii. Exempt vs. Non-Exempt Equipment Examples  
(See Attached: "WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q07-Atch07.pdf")
- viii. WSIP Guidance for EC and Vegetation Notifications  
(See Attached: "WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q07-Atch08.pdf")
- ix. Job Aid: Overhead Inspection TD-2305M-JA02, Rev. 6.0, April 6, 2019  
(See Attached: "WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q07-Atch09.pdf")
- x. Transmission Manual  
(See Attached: "WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q07-Atch10\_CONF.pdf")

b) Prior to starting work, contractors are provided the necessary procedures and training needed to perform inspection work safely.

c) All procedural documents are available online and offline and the expectation for all vendors is to follow procedural guidance as explicitly stated in all contracts.

Furthermore, inspector contractors using an iOS device, whether provided by the contractor agency or PG&E, automatically receive new documentation and/or updates to any documentation that is associated with the contractors work. This may include bulletins and/or updates to the manuals themselves. New information is communicated to inspector contractors by PG&E's subject matter experts, supervisors, managers, or leaders.

- d) PG&E has numerous inspections, work verification, and program review activities that can spot errors. Many of these occur during the standard course of supervision and are addressed immediately with the contract employee, tail boarded with contractors and incorporated into lessons learned for improving training going forward. However, PG&E's processes do not formally track inspection errors that were due to a contractor being unaware of or unfamiliar with procedures.
- e) The response to CalAdvocates-PGE-R1810007-34 identified contractors that had charges made to planning orders related to Asset Inspections. These contractors performed a range of activities from environmental permitting to data processing.

The contractors labeled as performing "Asset Inspections" support the inspection of our assets by completing directly, or supporting the completion of, our "enhanced inspection" protocols which encompass inspections of our distribution assets, transmission assets, or substation assets. These incorporate our GO165 and GO 95 protocols for ground inspections on our Distribution and Transmission Assets. In addition, climbing inspections and drone inspections are done on our Transmission assets that go above and beyond our routine inspections.