

## PG&E's 2019 Corrective Tag Execution Approach

### SUMMARY

This bulletin summarizes PG&E's modification in execution approach for Electric Corrective (EC) / Line Corrective (LC) tags in the field as communicated to the California Public Utilities Commission (CPUC) on August 20, 2019, via Wildfire Safety Inspection Program (WSIP) Compliance Plan and Interim Controls.

Based on a significant increase in volume of the tags from the 2019 Wildfire Safety Inspection Program (WSIP), it is anticipated that some number of open notifications will not be resolved prior to the assigned SAP due date. The modified execution approach will follow a risk-informed, circuit-based (Transmission and Distribution only) approach for all open Priority E and F tags, to which Work and Resource Management group will specify the execution prioritization independent of the associated compliance date.

PG&E will monitor and perform a safety re-assessment on an annual basis before the initiation of Fire Season (as determined by the California Department of Forestry and Fire Protection (CALFIRE)) each year for the tags meeting the following conditions:

- Exceed their compliance date
- Remain open
- Contain time-dependent asset deterioration based on "Facility, Damage, Action" (FDA) SAP work management code of the corrective tag
- On line temporarily de-energized (Transmission Line only)

Level of Use: Informational Use

### AFFECTED DOCUMENT

Wildfire Safety Inspection Program (WSIP) Compliance Plan and Interim Controls, August 20, 2019

### TARGET AUDIENCE

Utility employees, electric inspection, maintenance, and construction employees, electric estimators

### WHAT YOU NEED TO KNOW

#### 1 PG&E's 2019 WSIP Scope and Resulting Tags

- 1.1 PG&E's 2019 WSIP involved inspecting approximately 695,000 distribution structures, 50,000 transmission structures and 200 substations that are in high fire risk areas.
- 1.2 As a result of the inspections, PG&E identified approximately 277,000 corrective actions, which have resulted in the creation of EC or LC tags (see [Table 1](#) on Page 2).

## PG&E's 2019 Corrective Tag Execution Approach

### 1.2 (continued)

**NOTE**

EC is a nomenclature used for distribution, while LC is used for Transmission and Substation.

**Table 1. EC and LC Tags**

Asset Type	Tag Type	Approximate Tag Numbers
Electric Distribution	EC	177,000
Electric Transmission	LC	97,000
Electric Substation	LC	3,000

## 2 Specific Priority Tags (Priority H)

- 2.1 PG&E is forecasting that a significant number of moderate and low priority tags (Priority E and F tags, respectively) will not be completed in accordance with the timelines established in PG&E's programs to meet General Order requirements.
- 2.2 To address identified Priority E tags efficiently, while also mitigating the most risk system-wide, PG&E conducted a holistic desktop review of these identified tags for Distribution and Transmission systems. The review identified the tags that can be most efficiently and safely executed through the following project types:
1. Inclusion into existing capital projects
  2. Cluster of tags into new system hardening projects
  3. Proactive removal of idle or unnecessary electric facilities
- 2.3 Together, these identified tags are designated as specific priority (Priority H) – to distinguish from tags requiring individual execution.

## 3 Issue Prioritization Approach

- 3.1 PG&E utilized the following risk-informed prioritization approach to address the highest risk issues on PG&E's facilities (see [Table 2](#) below).

**Table 2. Tag Prioritization**

Tag's Priority	Tag Type	Response/Timeframe
A	Emergency	Requires immediate response or stand-by
B	Urgent	Address within 3 months of the identification date
E & F	Risk-based	Prioritize based on wildfire risk circuit prioritization
H	Distribution only	Execute as a part of system hardening / proactive removal projects

## PG&E's 2019 Corrective Tag Execution Approach

- 3.2 Aligned with a risk-informed, circuit-based (Transmission and Distribution only) approach for Priority E and F tags, Work and Resource Management group follows the tag execution prioritization independent of compliance date for individual tags. In some cases, execution timing may shift based on unforeseen events such as inclement weather and accessibility or based on resource efficiency.

### 4 Tags Subject to Safety Re-Assessment

- 4.1 PG&E will monitor field conditions and perform safety re-assessments on an annual basis before the initiation of Fire Season (as determined by CAL FIRE) for the tags meeting the following conditions (“tags subject to safety re-assessment”):
- Exceed their compliance date
  - Remain open
  - Contain time-dependent asset deterioration based on “Facility, Damage, Action” (FDA) SAP work management code of the corrective tag
  - On line temporarily de-energized (for Transmission only)
- 4.2 For the tags subject to safety re-assessment, a trained and qualified inspector will re-assess the field condition of the identified open corrective action (including Priority H tags) and create a written record in SAP.
1. The written record will document if there is an urgency in the field condition that would require escalation of the tag to Priority A or B.
- 4.3 For further information, see *VI. Safety Reassessment Process and Interim Controls*, of the Wildfire Safety Inspection Program (WSIP) Compliance Plan and Interim Controls.

### DOCUMENT APPROVER

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### INCLUSION PLAN

This bulletin will be incorporated into Electric Inspection and Maintenance guidance documents in the future.