

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of PACIFIC GAS AND
ELECTRIC COMPANY for Authority
Among Other Things, to Decrease its Rates
and Charges for Electric and Gas Service, and
Increase Rates and Charges for Pipe
Expansion Service.

(U 39 M)

A.94-12-005
(Filed December 9, 2014)

Commission Order Instituting Investigation
Into the Rates, Charges, Service, and Practices
of Pacific Gas and Electric Company.

I.95-02-015
(Filed December 9, 1994)

Order Instituting Rulemaking for Electric
Distribution Facility Standard Setting.

R.96-11-004
(Filed December 9, 1994)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 M)
GENERAL ORDER 165 ANNUAL ELECTRIC
DISTRIBUTION INSPECTION REPORT FOR 2015**

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Dated: June 14, 2016

Attorney for
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GENERAL ORDER 165 ANNUAL ELECTRIC
DISTRIBUTION INSPECTION REPORT FOR 2015**

Pursuant to Commission direction, Pacific Gas and Electric Company submits *Pacific Gas And Electric Company's General Order 165 Annual Inspection Report for 2015*, attached as Exhibit 1.

Respectfully submitted,

STEPHEN L. GARBER

BY: /s/ Stephen L. Garber
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Dated: June 14, 2016

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

VERIFICATION

I, the undersigned say:

I am an officer of Pacific Gas and Electric Company, a corporation, and am authorized to make this Verification for and on behalf of said corporation, and I make this Verification for the following reason, that I have read the foregoing:

Pacific Gas and Electric Company's (U 39 M) General Order 165
Annual Electric Distribution Inspection Report for 2015

I am informed and believe matters therein are true and on that ground I allege that the matters stated therein are true.

I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California, this 9th day of June, 2016.

/s/ Kevin J. Dasso

KEVIN J. DASSO

ACTING VICE PRESIDENT

ELECTRIC ASSET MANAGEMENT

PACIFIC GAS AND ELECTRIC COMPANY

EXHIBIT 1

PACIFIC GAS AND ELECTRIC COMPANY

GENERAL ORDER 165

ANNUAL ELECTRIC DISTRIBUTION INSPECTION REPORT

FOR 2015

June 14, 2016

TABLE OF CONTENTS

I.	2015 ELECTRIC DISTRIBUTION INSPECTION SUMMARY	1
II.	EXPLANATION OF OUTSTANDING UNITS	3

PACIFIC GAS AND ELECTRIC COMPANY GENERAL ORDER 165 ANNUAL ELECTRIC DISTRIBUTION INSPECTION REPORT FOR 2015

I. 2015 ELECTRIC DISTRIBUTION INSPECTION SUMMARY

Pursuant to Section III.D of the California Public Utilities Commission's (Commission) General Order (GO) 165, Pacific Gas and Electric Company (PG&E) submits its Annual Electric Distribution Inspection Report which details PG&E's 2015 electric distribution patrol and inspection activities.

Table 1 lists five categorical types¹ of electric distribution inspections required by GO 165: Overhead (OH) Patrols, Underground (UG) Patrols, OH Detailed Inspections, UG Detailed Inspections, and Wood Pole Intrusive. Table 1 denotes the total units of work due by inspection type for the 2015 reporting period and the number of outstanding (not completed before the date due) inspections within the same reporting period for each of the five categories.

The data presented in Table 1 is a point-in-time reporting of inspections due and outstanding in 2015, and is, as of June 9, 2016, the date this report was signed by the verifying officer, deemed as the most accurate data available. As shown in the table, by December 31, 2015, PG&E had completed 99.99% of its OH patrols, 99.99% of its OH detailed inspections, 99.99% of its UG patrols, 99.96% of its UG detailed inspections, and 100% of its wood pole intrusive inspections by their 2015 due dates.

¹ GO 165 only requires four categorical types, but in order to present the data in a more meaningful format, like prior reports this report divides the "Patrol" category in the sample report template in GO 165 into the subcategories "OH Patrols" and "UG Patrols".

Table 1 – 2015 Electric Distribution Inspection Summary

Type of Inspections (1)	Due (2)	Outstanding (3)
OH Patrols	1,181,839	3
OH Detailed Inspections	482,461	1
UG Patrols	243,428	6
UG Detailed Inspections	123,997	42
Wood Pole Intrusive	305,909	0

Notes:

(1) Definition of Reporting Unit Basis

- a. OH: PG&E defines an overhead unit as any PG&E solely owned, PG&E jointly owned, or third party owned pole supporting PG&E equipment or conductors operating at less than 60,000 volts. PG&E also patrols and inspects the PG&E owned overhead equipment, overhead conductors, and streetlights on those poles, but these facilities are not counted as additional overhead units for the purposes of this report.
- b. UG: PG&E defines an underground unit as any PG&E or third party owned padmount facility, subsurface enclosure, or vault containing PG&E primary cables or equipment. PG&E also patrols padmount facilities, subsurface enclosures, and vaults containing only secondary facilities, but these facilities are not counted as underground units for the purposes of this report.
- c. Wood Pole Intrusive: PG&E defines a wood pole intrusive unit as any intrusively inspected PG&E solely or jointly owned pole.

The patrol unit counts are generally based on the most recent preceding detailed inspection map unit counts.

(2) Definition of “Due”

Units in the “Due” column represent the total units of work by inspection type that PG&E determined should have been completed by the end of 2015. This data is based on year-end analysis and not on projections made at the beginning of 2015.

In addition to regularly scheduled patrol and inspection units, this column includes re-inspection units that PG&E scheduled for completion in 2015. Re-inspection units are discussed in previously submitted GO 165 Annual Inspection Reports.

Although GO 165 requires detailed inspections of padmount facilities on a minimum five year cycle, PG&E performs detailed inspections of padmount

facilities on a three year cycle. For the purposes of this report, padmount facilities are “due” based on PG&E’s more frequent underground three year detailed inspection cycle.

Wood pole intrusive data in this column represents the total poles intrusively tested by PG&E’s Pole Test & Treat Program. PG&E maintains a 10 year inspection cycle for most poles; however, poles under 15 years old and previously tested poles under 50 years old with an original treatment of pentachlorophenol are intrusively tested on a 20 year cycle per the maximum inspection interval required by GO 165.

(3) Definition of “Outstanding”

Units in the “Outstanding” column represent the total units of work by inspection type that PG&E did not inspect within a year as defined by D.13-06-011, Appendix B, at p. B-3:

“For the purpose of implementing the patrol and detailed inspection intervals in [GO 165 Table 1], the term ‘year’ is defined as 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months, not to exceed the end of the calendar year in which the next inspection is due. A required inspection may be completed any time before the expiration of the associated inspection interval using this definition of ‘year,’ but not after. The completion of an inspection starts a new inspection interval that must be completed within the prescribed timeframe using this definition of ‘year.’”

See Section II below for additional detail on the “Outstanding” units.

As discussed above under the definition of “Due”, PG&E performs detailed inspections of padmount facilities on a three year cycle as opposed to the five year cycle established by GO 165. For the purposes of this report, padmount facilities are considered “Outstanding” if they were due to be inspected by the due dates discussed above, adjusted for PG&E’s three year inspection cycle, but were not.

For wood pole intrusive inspections, the term “year” is defined in GO 165 as a calendar year. Units in the wood pole intrusive “Outstanding” column in Table 1 represent the total units that PG&E determined should have been intrusively inspected by the end of the 2015 calendar year but were not.

II. EXPLANATION OF OUTSTANDING UNITS

There are a total of 3 OH patrol, 1 OH detailed inspection, 6 UG patrol, and 42 UG detailed inspection units in the “Outstanding” column in Table 1. There were no “Outstanding” wood pole intrusive inspection units in 2015.

- a. Three (3) OH patrol units in PG&E's North Bay Division are in the "Outstanding" column in Table 1 due to an administrative spreadsheet error. Office personnel erroneously marked the 2015 patrol map containing the three units as completed when it actually was not. The error was only discovered in 2016, after the units' patrol due dates had passed. PG&E patrolled these units on March 14, 2016.
- b. One (1) OH detailed inspection unit in PG&E's Yosemite Division was not inspected on time due to a technical mapping issue. PG&E recently deployed a new, modernized mapping system. This new system adjusted the positioning of some equipment and re-aligned some existing map borders. The adjustments caused this unit to shift from a map due for a 2015 inspection to a map due for a 2015 patrol. As a result, the unit was patrolled when it should have been inspected. After PG&E discovered the issue, this unit was inspected on March 30, 2016.
- c. One (1) UG patrol unit in PG&E's Stockton Division was not patrolled on time due to a printing error by a mapper. The mapper did not turn on the appropriate layer when printing the patrol map containing this unit. As a result, the unit did not appear on the the map, was missed by the inspector, and was not patrolled on time. Once the error was discovered, PG&E inspected the unit on March 15, 2016.
- d. PG&E uses an automated electronic process that is designed to identify facilities, typically newly installed, that are not part of its patrol and inspection plans. This automated process uses data, in part, from PG&E's mapping system. Over the past few years, PG&E has transitioned to a new, more modern mapping system. The switch to the new mapping system caused the automated process to flag a large number of facilities for review, the majority of which are flagged only due to idiosyncrasies in the new mapping system. As PG&E analysts work to validate the data, however, they are finding some legitimately flagged items, some of which PG&E is finding to be late. In 2015 and 2016, analysis of the flagged items identified

five (5) UG patrol units in its Yosemite Division and one (1) UG inspection unit in its Peninsula Division that were not completed on time because they had not been on PG&E's inspection or patrol plans.

The five Yosemite units, padmount transformers installed in 2013, were due for patrol in 2015. However, PG&E only identified these units after validation of automated process data in 2016, after their 2015 patrol due dates had passed. As a result, these patrols were not completed on time. PG&E inspected these units by May 16, 2016 and has added them to its ongoing patrol and inspection plan.

The Peninsula unit, a splice box containing only a primary splice, was installed in 1971. Enclosures without equipment, while on PG&E's maps, were not modeled in PG&E's databases prior to the deployment of the new mapping system. This enclosure was only identified by the automated process and added to PG&E's patrol and inspection plan by analysts in 2015 after transition to the new mapping system. PG&E inspected this unit on August 14, 2015. Though this unit was inspected in 2015, PG&E is including it in the "Outstanding" column in Table 1 because no patrol or inspection records for the splice box prior to 2015 were found.

- e. Ten (10) UG detailed inspection units are in the "Outstanding" column of Table 1 are due to inspection documentation issues identified with one inspector's work in PG&E's Kern Division². PG&E's work verification program found that this inspector did not install underground inspection verification stickers in ten (10) enclosures that he recorded as inspected in 2015. PG&E uses these verification

² PG&E also discussed this incident in its 2014 GO 165 report because similar issues were identified with the inspector's 2014 work. In that report, PG&E committed to re-inspecting all work documented by the inspector, who had also performed work in PG&E's Sierra Division, and another inspector in PG&E's Yosemite Division who was found to have similar work quality issues. These re-inspections were all completed by October 31, 2015.

- stickers as evidence that inspectors in fact perform their inspections. These units are being included as outstanding because PG&E cannot be certain they were inspected before their 2015 GO 165 inspection due dates. These units were re-inspected by May 20, 2015.
- f. Twenty-nine (29) UG detailed inspection units in PG&E's Central Coast Division are in the "Outstanding" column of Table 1 due to a planning error. In 2012, PG&E created a new inspection map containing both OH and twenty-nine newly installed UG units. PG&E added the new map to its OH patrol and inspection plan, but did not add it to its UG plan. As a result, the UG units were not patrolled or inspected until the error was discovered in 2016. PG&E has since added the map to its UG patrol and inspection plan, and completed inspection of all the units by April 13, 2016.
 - g. One (1) UG detailed inspection unit in PG&E's Diablo Division, and one (1) UG detailed inspection in PG&E's San Jose Division are in the "Outstanding" column of Table 1 due to mapping errors. These units, padmounted transformers installed in 2008 and 1976, respectively, were not on PG&E maps prior to being discovered in the field by inspectors in 2015. Though the inspectors inspected the transformers in 2015 when they found these units, these units are being categorized as "Outstanding" because PG&E did not find any records of patrols or inspections on the transformers prior to 2015. The transformers have since been added to PG&E maps and will be visible for future patrols and inspections.