

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

PG&E Data Request No.:	CalAdvocates_050-Q03		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_050-Q03		
Request Date:	March 5, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-16
Date Sent:	March 10, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to PG&E’s 2021 Wildfire Mitigation Plan (WMP) Update and PG&E’s Supplemental Filing on February 26, 2021.

QUESTION 03

With respect to vendors who perform asset inspection work for PG&E:

- a. Does PG&E track the quality of work provided by individual vendors? That is, the work/performance of the vendor company as a whole, not individual inspectors.
- b. If the answer to part (a) is yes, please explain PG&E’s processes for assessing and tracking the quality of work of individual vendors.
- c. If the answer to part (a) is yes, please describe the decision process to dismiss a vendor for underperformance (if any is currently in place).
- d. If the answer to part (a) is no, please explain why not.
- e. If the answer to part (a) is no, does PG&E have plans to begin tracking quality of work at the vendor level? Please describe such plans, including the timeline for implementation, if so.

ANSWER 03

- a. Yes, the Inspection Process Control - QC inspection review process does allow for a quality review at the individual vendor level. Additionally, the process also allows for a quality review at the individual inspector level.
- b. See below for PG&E’s processes for assessing and tracking the quality of work of individual vendors.

a. Desktop QC Steps

- i. Each Specialist will be assigned a set number of Divisions or MWC each month based on volume of work. The Division or MWC will be rotated between QC Specialists each month to promote unbiased reviews and allow different Specialists to assess the same Inspector over time.
- ii. Work is dispatched to the Specialist via the online web application

by the QC Business Analyst. An online web application form is generated for each equipment ID to be assessed. The form gets pre-populated with asset basic data that will be used for reporting.

- iii. QC Specialist views the Equipment Inspection PDF record via the url provided in the online web application form.
- iv. QC Specialist runs SAP report for all open notifications for the equipment ID so existing notification can be verified for accuracy compared to the inspection.
- v. The QC Specialist reviews the entire Inspection log for overall accuracy and completeness. Verify the following:
 1. Use of the correct inspection form for the asset structure type (Transmission and Sub Station).
 2. Photos captured per requirements as documented in ELEC-1000 and PSOS-0410 (Inspector Training).
 3. Review and confirm in each section if abnormal conditions have been correctly identified, are marked correctly with a “Yes” or “No” and identified condition/s are correctly selected from a pre-determined drop down.
 4. All required Record Keeping and Declaration items have been identified and noted.
 5. All existing notifications at location have been reviewed and records updated in SAP.
 6. All new compelling abnormal field conditions identified have been logged into an existing notification or a new notification with correct FDA and priority assignment.
 7. That the inspector did not fail to identify or missed reporting on a compelling abnormal field condition present during the initial inspection.
- vi. All discrepancies found during QC review will be recorded in detail under the specific Inspection checklist section. Specialist will provide detailed objective evidence supporting their finding(s) and list procedural or guidance documentation references where applicable.
- vii. QC Specialists will suggest recommended corrections/corrective actions as “Follow Up” items in the QC form when applicable. Impacted reference documentation will be noted.
- viii. Discrepancies are divided into two different classifications:

1. Observation – minor documentation error or a low risk requirement failure that will not necessitate an update to the inspection record, creation of a new notification or a re-inspection of the structure.
 2. Non-Conformance – major deficiency in record keeping or failure of inspector to properly assess and document an abnormal field condition per the stated requirements. A non-conformance will require a follow up action to remediate the deficiency or correct the condition.
- ix. If a QC Specialist needs additional clarification related to a non-conformance issue before finalizing it, they should discuss the item with the QC Work stream lead. The Lead will engage the correct SMEs with the assistance of the QC Manager to disposition the non-conformance appropriately.
 - x. Once the QC Specialist has completed the initial assessment, records that have discrepancies are routed for peer review and approval. Based on subject matter expertise or workload, peer reviewers will be assigned appropriately by the initial QC Specialist. Records with no discrepancies migrate to “Completed” status without requiring any additional peer review.

b. QC Dashboard and Reporting

- i. QC data collected will be used to generate the following master dashboard:
 1. SI Weekly QC Dashboard
 - a. This dashboard will provide data by Inspection method/DIV/MWC/Vendor on:
 - b. # of QC assessments completed, dispatch - in queue, pending
 - c. # of Observation & Non-conformances –by Inspection sections
 - d. # of Missed Compelling abnormal conditions
 - e. # of Notifications recommended for change (Upgrade, Downgrade, Invalid – Cancel, Update/Add FDA)
 - f. Top 5 Non-conformances in the System by issue type
 - g. Top 5 Observations in the System by issue type
 - h. Top 5 Recommended Follow Up activities
 2. Based on stakeholder request, the above data will be

customized to fulfill data requests for specific Execution work streams or Vendors in the system at the desired cadence.

c. QC Quality Outlier Tracking

- i. In addition to conducting QC Assessments, an integral piece of Quality Control program is the on-going tracking and trending of system outliers for inspector work quality. These key metrics are a combination of inspector Productivity, Notification find rate and accuracy. Intended use of the Outlier Tracker:
 1. Used as guide by the Execution team/Vendors to easily identify which inspectors may be high risk so they can appropriately target and conduct their internal quality verification checks.
 2. Used by QC Analyst to draw sample size for the Routine QC "Outlier" inspector records.
 3. These KPIs have appropriate upper/lower control limits generated using the Interquartile range method and outliers are flagged based on inspector performance versus the overall system.
 4. The tracker has the capability to filter data for Inspectors by Division/MWC, Vendor for a specific date range.
 5. The Tracker also shows high level numbers of which FDA combinations are being most impacted by the priority changes from inspector to gatekeeper.
- ii. Quality KPI metrics:
 1. Productivity – average # of inspections/per inspector/per day.
 2. Overall find rate – average # of net new notifications created per total inspections completed.
 3. Notification Conversion rate - # of notifications converted to EC/LC over total number of notifications written.
 4. Notification Upgrade/downgrade rate - # of notifications with priority changed (up/down) over total notifications that have been gatekept and moved to EC/LC status.
 5. Notification Cancel Rate - # of notifications flagged "invalid" over total notifications that have been gatekept.

- c. The 2021 T&D inspection contract structures are setup as Not To Exceed (NTE) unit pricing. Each supplier contract outlines the scope of work, along with the total

number of T&D assets identified by region, and associated pricing. Suppliers are paid based on the actual number of inspections completed. In the event performance of the work is an issue, PG&E reserves the right to move work to another supplier. This would be completed by executing contract change orders decreasing total value for those who performance is problematic and increasing total value and assigned inspections for Suppliers that are performing well.

d. N/A

e. N/A