

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2022
Data Response**

PG&E Data Request No.:	CalAdvocates_015-Q14		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_015-Q14		
Request Date:	March 11, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-15
Date Sent:	March 16, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

The following questions relate to your 2022 WMP Update submission.

QUESTION 14

Regarding PG&E's response to data request CalAdvocates-PGE-2022WMP-09:

- a) Does PG&E regularly monitor how many overdue, unresolved corrective notifications it has?
- b) Does PG&E take any special action when a corrective notification is years past its due date?
- c) Does PG&E analyze and track whether adverse outcomes (such as outages, wires down, and ignitions) are causally linked to overdue maintenance?
- d) Does PG&E regularly report any of the information addressed in parts (a) through (c) to its executives or its Board of Directors? If so, please describe this reporting, including when and how this reporting occurs and what information is included.
- e) Does PG&E regularly report any of the information addressed in parts (a) through (c) to the Commission? If so, please describe this reporting, including when and how this reporting occurs and what information is included.
- f) Does PG&E regularly report any of the information addressed in parts (a) through (c) to OEIS? If so, please describe this reporting, including when and how this reporting occurs and what information is included.

ANSWER 14

- a) Yes, PG&E regularly monitors how many open corrective notifications we have.
- b) For transmission and distribution lines, Field Safety Reassessments (FSRs) are conducted on past due notification conditions that can worsen with time, e.g., mechanical or chemical degradation, including fatigue and corrosion for structures where a detailed inspection is not being performed. See e.g., 2022 WMP, pp. 505, 508, 521 (description of FSRs for transmission and distribution maintenance). The number of years a corrective notification has been open is considered for work

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planning. Substation monitors prioritized issues associated with outstanding corrective notifications during routine-based substation inspections that occur monthly or bi-monthly.

- c) PG&E has performed some post-event analysis of how maintenance has related to outages, wire downs and/or ignitions, but it has been limited to specific, targeted events and not every outage event.
- d) The Operations Update to the Safety and Nuclear Oversight Committees of the Boards of Directors occurs twice a year. During these meetings, PG&E provides Operations Updates and the status of our open corrective notifications has been discussed at a high level. Overdue corrective notifications are a subset of open corrective notifications that has not been discussed in detail. All Board members and all Executive Officers are invited to these meetings. Members of the Executive Team attend based on their availability or whether topics in their areas are being discussed, and they all have access to the meeting materials.
- e) Pursuant to Advice Letter (AL) 5934-E and Decision (D.) 20-05-019, PG&E provides quarterly reports to CPUC Safety and Enforcement Division (SED) and Safety Policy Division (SPD). These quarterly reports are also served on service lists R.18-10-007, R.18-12-005, and I.19-11-013. They summarize the status of electric distribution, transmission, and substation maintenance work including the number, status, and location of open corrective notifications, and a summary table of all work. Additionally, these reports include a county-by-county breakdown of the work in an attachment. Overdue corrective notifications are included in the open corrective notifications figures and are not separately identified in these reports. This information will also be provided at part of semi-annual Safety Operational Metrics (SOMs) updates beginning later this month, associated with Rulemaking (R.) 20-07-013.
- f) PG&E provides the Office of Energy Infrastructure Safety (Energy Safety) with a Quarterly Data Report (QDR). Beginning in Q4 2021, PG&E began utilizing the data described in the response to question 14 e above to populate the QDR data tables submitted to Energy Safety, including the number of open corrective notifications and the number of corrective notifications that have been addressed (closed). Overdue corrective notifications are included in the open corrective notifications figures and are not separately identified in these reports.

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