

PACIFIC GAS AND ELECTRIC COMPANY

**GENERAL ORDER 165
2020 ANNUAL ELECTRIC DISTRIBUTION INSPECTION REPORT**

JULY 1, 2021

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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 2020 electric distribution patrol and inspection activities.

I. 2020 GO 165 PROGRAM CHANGES

In 2019, PG&E developed detailed and objective inspection criteria based on asset wildfire risk analysis that was informed by Failure Mode and Effects Analysis (FMEA). Those analyses identified single points of failure on electric components that could lead to fire ignition. This inspection criteria was used to launch accelerated inspections of electric facilities in the High Fire Threat Districts (HFTDs) in 2019 to identify and repair non-conformances on facilities that posed an ignition, safety, or reliability risk. These are known as the Wildfire Safety Inspection Program (WSIP) inspections.

In 2020, PG&E expanded upon the 2019 WSIP inspection criteria to ensure it meets all the inspection requirements for General Order (GO) 165. The combined WSIP and GO 165 inspection protocols are referred to as enhanced inspections. In addition, PG&E transitioned the inspection program in 2020 to perform enhanced inspections based on risk, which resulted in including all Tier 3 poles, 33% of Tier 2 poles, and 20% of non-HFTD poles. More specifically, PG&E has developed an electric circuit risk ranking methodology that ranks those electric circuits by their risk of igniting a wildfire and its associated consequence. These changes are to

directly address wildfire, safety and reliability risks within the distribution and transmission system. Electric Overhead Assets changed from every five-year detailed inspection cycle to a High Fire Threat District (HFTD) detailed inspection cycle.

Overhead Asset Tier	Detailed Inspection Cycle
HFTD Tier 3	Annually
HFTD Tier 2	Every 3 years
All other Non-HFTD Areas	Every 5 years

II. 2020 ELECTRIC DISTRIBUTION INSPECTION SUMMARY

Table 1 lists five categories¹ of electric distribution inspections required by GO 165: Overhead (OH) Patrols, Underground (UG) Patrols, OH Detailed Inspections, UG Detailed Inspections, and Wood Pole Intrusive Inspections. Table 1 denotes the total units of work due by inspection type for the 2020 reporting period and the number of outstanding or late (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/late in 2020 and is accurate based on the data available as of July 1, 2021, the date this report was signed by the verifying officer. As shown in the table, by December 31, 2020, PG&E had completed 98.63% of its OH patrols, 90.65% of its OH detailed inspections, 99.84%

¹ GO 165 only requires four categorical types, but in order to present the data in a more meaningful format, this report divides the “Patrol” category in the sample report template in GO 165 into the subcategories “OH Patrols” and “UG Patrols.” The use of five categorical types is consistent with past GO 165 Annual Inspection reports submitted by PG&E.

of its UG patrols, 99.30% of its UG detailed inspections, and 100% of its wood pole intrusive inspections by their 2020 due dates.

Table 1 – 2020 Electric Distribution Inspection Summary

Type of Inspections (1)	Due (2)	Outstanding / Late (3)
OH Patrols	1,638,518	0 / 22,464
OH Detailed Inspections	733,851	54,755 ² / 13,892
UG Patrols	258,746	0 / 417
UG Detailed Inspections	142,616	0 / 994
Wood Pole Intrusive	232,917 ³	0 / 0

Notes:

(1) Definition of Reporting Unit Basis

- a. OH: PG&E defines an overhead unit as any PG&E solely-owned or PG&E jointly-owned poles, or third party-owned poles for which PG&E has inspection obligations. 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. OH units also include any PG&E-owned and third party-owned padmount facilities containing PG&E primary cables or equipment.
- b. UG: PG&E defines an underground unit as any PG&E-owned 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.

² On May 7, 2021, PG&E submitted a Self-Report letter reporting 54,755 incomplete OH detailed inspections in 2020.

³ On May 28, 2021, PG&E submitted a Self-Report letter reporting missing up-to-date Pole Test & Treat 20-year Intrusive Inspection records for 41,343 poles. Of those 41,343 missing intrusive inspection records, 2,775 of these poles were on circuits that were already included in the 2020 workplan. The remaining poles of the 41,343 poles (excluding the 2,775 poles already included in the 2020 workplan) were intrusively inspected as a result of PG&E's Self-Report letter. Out of the 41,343 poles, 4,469 poles were discovered to have no inspection tags found on the pole as evidence of prior inspection and exceeded the 25 years to inspect within the requirements of GO 165.

- c. Wood Pole Intrusive: PG&E defines a wood pole intrusive unit as any intrusively inspected PG&E solely or jointly owned pole.

(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 2020. In addition to regularly scheduled patrol and inspection units, this column includes re-inspection units that PG&E scheduled for completion in 2020.

(3) Definition of “Outstanding” and “Late”

Pursuant to the definition of “Outstanding” as provided in Note 3 of the Sample Report Template in GO 165 Section III.D, the “Outstanding” entries represents the total required inspections that were not completed in the reporting period (i.e., not completed in 2020).

The “Late” Units 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.

III. EXPLANATION OF OUTSTANDING AND LATE UNITS

PG&E provides an explanation below for inspections that were “Outstanding” and “Late.”

a. Outstanding:

Fifty Four Thousand Seven Hundred and Fifty Five (54,755) OH detailed inspections are reported as “Outstanding” in the “Outstanding / Late” column of Table 1 due to primarily a result of differences between the inspection processes used during the WSIP in 2019 and the traditional GO 165 inspection program. The 54,755 poles should have had a GO 165 inspection completed no later than 2020 (five years after the last GO 165 inspection in 2015), or earlier. Although the majority of poles at issue were inspected under the WSIP inspection program in 2019, which was a comprehensive inspection program focused on identifying and repairing non-

conformances on facilities that posed an ignition, safety, or reliability risk, the inspections did not meet all of the GO 165 inspection requirements that came due in 2020.⁴

b. Late - Map Printing Errors:

A total of thirty (30) UG patrol units are reported as “Late” in the “Outstanding / Late” column of Table 1, which occurred in PG&E’s North Bay Division due to a map printing error for maps UU3223B (3 units) and UU3210 (27 units). Initial map packages sent by the PG&E’s Resource Management Center’s (RMC) clerical staff did not contain the printed maps. The Compliance Specialist notified the RMC clerical team of this error and had the paper maps printed and mailed to the local office. When the paper maps arrived at the local office, they were inserted into the corresponding map package folders. The assigned inspectors completed the UG patrols on April 26, 2020 and May 12, 2020 respectively. During a map review process after the units’ patrol dates had passed, PG&E discovered the area depicted on both maps was incorrect, even though the paper maps themselves had the correct printed label and heading. Corrected copies of these maps were printed, and both UG map patrols were completed on June 8, 2020, seventeen days after the CPUC due date of May 22, 2020.

⁴ The 2019 WSIP inspections differed from the requirements of GO 165 inspections in the following ways:

- It did not require contract qualified electrical workers (QEWs) performing the 2019 WSIP to pass the test for the ELEC-1000 GO 165 New Inspector Training course. This requirement is described in the Electric Distribution Preventive Maintenance Manual. ELEC-1000 provides direction on map corrections, verification of pending corrective notifications at the locations, patrol of secondary enclosures, and identification of new idle facilities.
- It did not require 2019 WSIP inspectors to identify the lowest priority issues (i.e., “F tags”), including missing high voltage signs, visibility strips, guy markers, or pole steps.

c. Late – Human Error:

Central Coast Division

Fifty Four (54) UG patrol units and Forty Three (43) UG detailed inspection units are reported as “Late” in the “Outstanding / Late” column of Table 1, which occurred in the Central Coast Division due to human error. The Compliance Specialist misunderstood the new patrol and inspection cycle changes (as explained in the *Program Changes* section above) were exclusive to OH assets. The Compliance Specialist did not realize that all UG maps retained their original CPUC map due dates. On July 9, 2020 the Compliance Specialist was questioning why eleven (11) UG maps were showing past due on a routine report. It was brought to her attention that UG maps were not part of the new program changes and were, therefore, late. After identifying this issue, Central Coast Division completed all eleven (11) UG patrol and detailed inspection maps between July 5, 2020 and July 13, 2020, approximately a month after the CPUC due dates between June 6, 2020 to June 25, 2020.

Humboldt and Sonoma Divisions

One Hundred and Thirty Seven (137) UG detailed inspections in PG&E’s Humboldt Division, Two Hundred and Eleven (211) UG patrols, and One Hundred and Eighty One (181) UG detailed inspections in PG&E’s Sonoma Division are reported “Late” in the “Outstanding / Late” column of Table 1 due to human error. During a work verification on February 25, 2021, it was discovered that some underground inspections and patrols were falsely documented by a Contract Inspector in PG&E’s

Sierra Division, and the Contract Inspector was terminated immediately. The Compliance Supervisor was aware that this same Contract Inspector conducted work during November 2020 in PG&E's Humboldt and Sonoma Divisions, and therefore, notified the respective Compliance Supervisors. The impacted 2020 maps were reperfomed and completed by March 26, 2021. ⁵

d. Late - External Weather Events:

Thirteen Thousand Eight Hundred and Ninety Two (13,892) OH detailed inspections, Twenty Two Thousand Four Hundred and Sixty Four (22,464) OH patrols, Six Hundred (600) UG details inspections, and One Hundred and Twenty Two (122) UG patrols in PG&E's territory are reported as "Late" in the "Outstanding / Late" column of Table 1 due to external weather events. On August 15, 2020, unprecedented lightning strikes occurred throughout PG&E territory resulting in multiple fires across California. As these fires grew, they were blended into the August Complex, the North Complex, the LNU Lightning Complex, the SCU Lightning Complex, the SQF Complex, and the Creek Fire. Because it took several months for these fires to be contained, many of PG&E's assets were not accessible due to the unsafe field conditions. During the time of the fires, PG&E's priority was to restore service to our customers safely, which also impacted these units from being completed on time. Furthermore, PG&E had multiple PSPS events take place in September, October, and November compounding the planned patrol and detailed inspections. All of these late units were completed by year end 2020 (see Attachment 1 for details).

⁵ PG&E submitted a Self-Report letter on June 11, 2021 for falsification of records of GO 165 inspections.

e. Late – Can’t Get Ins (CGIs):

Three (3) UG detailed inspections in PG&E’s Central Coast Division, Twelve (12) UG detailed inspections in PG&E’s Humboldt Division, One (1) UG detailed inspection in PG&E’s Kern Division, Two (2) UG detailed inspections in PG&E’s North Bay Division, Thirteen (13) UG detailed inspections in PG&E’s Sonoma Division, and Three (3) UG detailed inspections in PG&E’s Stockton Division are reported “Late” in the “Outstanding / Late” column of Table 1 due to various access issues. During the initial attempt to inspect these assets, notifications were created as CGIs to complete a detailed inspection for the various reasons listed on the below summary table. Please see Attachment 2 for detail explanation of these assets and their completion dates from October to December 2020.

Div	Category	Total
CC	Customer Access Issue and External Event	2
	External Event	1
CC Total		3
HB	Customer Access Issue	2
	Customer Refusal	1
	Map Error	2
	Access Constraints	7
HB Total		12
KE	Human Error	1
KE Total		1
NB	Human Error	1
	Map Error	1
NB Total		2
SO	Customer Access Issue and External Event	2
	Customer Refusal	1
	External Event	9
	Access Constraints	1
SO Total		13
ST	External Event	3
ST Total		3
Grand Total		34