

**PACIFIC GAS AND ELECTRIC COMPANY**

**GENERAL ORDER 165  
2021 ANNUAL ELECTRIC DISTRIBUTION INSPECTION REPORT**

**JULY 1, 2022**

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**I. 2021 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 2021 electric distribution patrol and inspection activities.

Table 1 lists five categories<sup>1</sup> 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 2021 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 2021, and is accurate based on the data available as of July 1, 2022, the date this report was signed by the verifying officer. As shown in the table, by December 31, 2021, PG&E had completed 87.99% of its OH patrols, 85.11% of its OH detailed inspections, 100% of

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<sup>1</sup> 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.

its UG patrols, 99.99% of its UG detailed inspections, and 100% of its wood pole intrusive inspections by their 2021 due dates.

**Table 1 – 2020 Electric Distribution Inspection Summary**

<b>Type of Inspections (1)</b>	<b>Due (2)</b>	<b>Outstanding / Late (3)</b>
OH Patrols	1,326,512	0 / 159,328
OH Detailed Inspections	880,534	0 / 131,144
UG Patrols	260,389	0 / 0
UG Detailed Inspections	146,279	0 / 9
Wood Pole Intrusive	164,889	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, 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.
- b. UG: PG&E defines an underground unit as any PG&E-owned 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.

(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 2021. In addition to regularly scheduled patrol and inspection units, this column includes re-inspection units that PG&E scheduled for completion in 2021.

(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 2021).

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.

## **II. EXPLANATION OF OUTSTANDING AND LATE UNITS**

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

### **a. Late – Human Error**

Two (2) UG detailed inspection units are reported as “Late” in the “Outstanding / Late” column of Table 1, which occurred in the San Jose Division and were not inspected on time due to human error. While validating a routine report for maps at risk, the Compliance Specialist discovered two assets on UG Map H1414 were inspected late. The San Jose Division completed the two (2) UG detailed inspections on June 1, 2021 after the CPUC due date of May 20, 2021.

### **b. Late – Prioritized Inspections in HFTDs:**

One Hundred and Fifty Nine Thousand and Three Hundred and Twenty Eight (159,328) OH patrols and One Hundred and Thirty One Thousand and One Hundred and Forty Three (131,143) OH detailed inspections in PG&E’s service territory are late in the “Outstanding/Late” column of Table 1 based on PG&E’s Wildfire Mitigation Plan commitment in 2020 to prioritize its detailed inspections in HFTD areas prior to peak fire season. This change in inspection priorities caused a misalignment to CPUC due dates as defined in GO 165. Consequently by the end of

2021, overhead detailed inspections were completed after their GO 165 due dates. PG&E has mitigated this error by ensuring the 2022 workplan reflects both the Wildfire Mitigation Plan (WMP) commitment date and the GO 165 due date allowing the team the opportunity to meet both WMP and GO 165 dates. Please see Attachment 1 for a detailed list of assets and/or plat maps with their completion dates through December 31, 2021.

**c. Late – Can’t Get Ins (CGIs):**

Three (3) UG detailed inspections in PG&E’s Central Coast Division, One (1) UG detailed inspection in PG&E’s North Bay Division, Two (2) UG detailed inspections in PG&E’s San Jose Division, One (1) UG detailed inspection in PG&E’s Stockton Division, and One (1) OH detailed inspection in PG&E’s Yosemite 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 cannot get in to complete a detailed inspection for the various reasons listed on the below summary table. Please see Attachment 2 for a detail explanation of these assets and their completion dates from August through December 2021.

<b>Division</b>	<b>Category</b>	<b>Total</b>
<b>CC</b>	Access Constraints	1
	Customer Access Issue	2
<b>CC Total</b>		<b>3</b>
<b>NB</b>	Human Error	1
<b>NB Total</b>		<b>1</b>
<b>SJ</b>	Customer Access Issue	2
<b>SJ Total</b>		<b>2</b>
<b>ST</b>	Access Constraints	1
<b>ST Total</b>		<b>1</b>
<b>YO</b>	Customer Refusal	1
<b>YO Total</b>		<b>1</b>
<b>Grand Total</b>		<b>8</b>