

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

PG&E Data Request No.:	CalAdvocates_001-Q01-07		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_001-Q01-07		
Request Date:	January 5, 2021	Requester DR No.:	CalAdvocates-PGE-R1810007-32
Date Sent:	January 27, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Matthew Yunge, PE

The following questions relate to a December 15, 2020 article from KNTV NBC Bay Area ("NBC Article")<sup>1</sup> and a December 15, 2020 letter from PG&E VP Ahmad Ababneh to the CPUC Safety Enforcement Division (SED).

**QUESTION 01**

The NBC Article states that a PG&E audit found approximately 41,000 poles that appeared to have missed the 20-year intrusive inspection cycle required by General Order 165. Additionally, the NBC Article claims that "in a letter last month, PG&E promised to begin field checks to account for 'potentially missed inspections.'"

- a) Provide all letters and attachments that PG&E sent to SED regarding the approximately 41,000 poles that appeared to have missed the 20-year intrusive inspection cycle.
- b) Provide all internal audit reports that have been completed since January 1, 2018 that relate to intrusive pole inspections.

**ANSWER 01**

- a) PG&E has been advised by the CPUC SED that letters and attachments sent to SED are part of SED's confidential investigation and the CPUC Public Advocates Office should seek the information from SED directly.
- b) PG&E interprets this question to refer to audits conducted by the Electric Quality Assurance (EQA) group within Electric Operations. A Pole Test & Treat Audit was performed by EQA in 2020. Please see the following attachments for copies of the audit reports:

*"WildfireMitigationPlans\_DR\_CalAdvocates\_032-Q01-07Atch01\_CONF.pdf"*

*"WildfireMitigationPlans\_DR\_CalAdvocates\_032-Q01-07Atch02\_CONF.pdf"*

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<sup>1</sup> <https://www.nbcbayarea.com/investigations/pge-scrambles-to-check-41000-power-poles-lacking-key-records/2424389/>.

## QUESTION 02

How did PG&E become aware that 41,000 poles were out of compliance with the intrusive inspection requirements of General Order 165? Please describe, among other things, who identified the problem, how the issue was discovered, and how it was elevated to the attention of PG&E Senior Managers or Directors.

## ANSWER 02

A Quality Assurance Auditor performed Electric Quality Assurance (EQA) audit #434 on the Pole Test and Treat (PT&T) Process and EQA audit #435 on the PT&T Quality Control Procedure. These audits were on the 2020 quality audit schedule as a carryover from 2019. She requested data from the PT&T program for all late poles. At the end of April 2020, the PT&T program supplied the auditor with a spreadsheet with data pulled from SAP listing 41,343 distribution poles assumed to be late based on the recorded pole installation date being greater than 20 years or the absence of the installation date and no corresponding inspection record.

On May 5, 2020 the EQA team met with staff from the PT&T program to discuss the discrepancy and shared the last 4 years of CPUC reports that reflected the reporting of zero late poles.

In late July 2020, the audit analysis phase was complete (this is where the audit team determines if there are non-conformances to report comparing audit evidence against audit criteria). At that time, the audit team met with the leadership in the Electric System Inspections group to provide an update on the audit findings.

On August 13, 2020 the EQA audit team held an exit meeting with the PT&T team. At that time, corrective actions were discussed and assigned to owners to address the data discrepancies. While the audit findings identified the data discrepancies based on available systems data, the actual field condition of the poles had not been verified. The teams working on addressing the findings were exploring additional data reviews to validate and resolve the data gaps. In addition, the audit results were discussed with senior leadership at a monthly Risk and Compliance Committee meeting in October 2020. Subsequent to the Risk and Compliance Committee meeting, Ahmad Ababneh, Vice President of Major Programs and Projects, determined that, while further validation was needed to understand the actual condition of the 41,343 poles, PG&E would report this discrepancy to SED staff, as well as to other stakeholders.

## QUESTION 03

Provide the following information regarding the approximately 41,000 poles that appeared to have missed the 20-year intrusive inspection cycle. Provide the information requested in Excel format, with the columns for each subpart of this question. For each cell where information is missing or unknown to PG&E, mark that cell with an "N/A".

- a) The location (latitude and longitude) of each pole.
- b) The name of the circuit that each pole serves.

- c) The date that each pole was last inspected on or prior to November 17, 2020.
- d) The date that each pole was inspected since November 17, 2020. If a pole has not been inspected since November 17, 2020, mark the related cell with an "N/A".
- e) The date that each pole was installed.
- f) PG&E's determination of whether each pole was exempt from Pole Test and Treat inspection rules.

### **ANSWER 03**

PG&E is providing in excel format a) the location, b) the circuit, and d) the date each pole was inspected since November 17, 2020 for the approximately 41,000 poles. This data represents an extract from the SAP Work Management system, as prepared via internal quality control review in 2020. Where corrected data has been acquired or validated via the field checks, PG&E has made the corrections in this file. In numerous cases, PG&E is unable to provide c) the date each pole was last inspected prior to November 17, 2020 or e) the date that each pole was installed as that particular information is what PG&E is attempting to determine via field checks. This response is based upon the information available at this stage of our investigation and is subject to change. Please see "*WildfireMitigationPlans\_DR\_CalAdvocates\_032-Q01-07Atch03*"

### **QUESTION 04**

The NBC article states that PG&E checked 17,127 poles, most of which were exempt from Pole Test and Treat inspection rules.

- a) Does PG&E conduct test and treat inspections on poles with field marking/records (including date nails, pole brands, visual inspection tags)? If not, explain why PG&E does not conduct test and treat inspections on those poles.

### **ANSWER 04**

PG&E performs Pole Test & Treat (PT&T) on each wood pole as required by GO 165. PG&E did not perform PT&T on a number of poles that, when checked on actual conditions, were identified to be steel poles, customer owned poles, or poles installed within the prior 25 years. In addition, PG&E found that available records had not been updated to reflect removal of some poles and therefore those poles were no longer in the field.

### **QUESTION 05**

Provide all work orders generated by PG&E as a result of the field checks on the approximately 41,000 poles identified in PG&E's November 17, 2020 notification to SED.

## ANSWER 05

PG&E interprets this question to mean work orders that were created in SAP, PG&E's system of record, for poles identified in the field as needing replacement. As of 01/14/2021, PG&E has identified 182 poles requiring replacement, none of which were classified as Priority A (Level 1) emergencies. Upon rejection by intrusive wood pole testing, the structure data is passed to PG&E's estimating teams to complete a quantitative analysis in support of pole replacement. Upon final determination by the estimating group, the corrective notifications and capital work orders are created in SAP to trigger replacement. This creation of SAP work orders has not been completed at this time and is ongoing.

## QUESTION 06

Please state how many intrusive pole inspections PG&E completed in:

- a) Each calendar year from 2014 through 2019, separated out by year;
- b) Each calendar month of 2020, separated out by month;

## ANSWER 06

- a) Yearly intrusive pole inspections are detailed in PG&E's GO 165 Annual Electric Distribution Inspection reports. Please see the following attachments for intrusive pole inspections PG&E completed in 2014 - 2019:

*"WildfireMitigationPlans\_DR\_CalAdvocates\_032-Q01-07Atch04"*

*"WildfireMitigationPlans\_DR\_CalAdvocates\_032-Q01-07Atch05"*

*"WildfireMitigationPlans\_DR\_CalAdvocates\_032-Q01-07Atch06"*

*"WildfireMitigationPlans\_DR\_CalAdvocates\_032-Q01-07Atch07"*

*"WildfireMitigationPlans\_DR\_CalAdvocates\_032-Q01-07Atch08"*

*"WildfireMitigationPlans\_DR\_CalAdvocates\_032-Q01-07Atch09"*

- b) Please see the table below for intrusive pole inspections PG&E completed in each calendar month of 2020:

Month	Intrusive Inspections
January	12,491
February	24,010
March	25,784

April	18,899
May	19,856
June	23,959
July	19,203
August	20,412
September	25,525
October	21,015
November	24,877
December	38,038

#### **QUESTION 07**

Please state how many PG&E employees were assigned to conduct intrusive pole inspections in:

- a) September 2020
- b) October 2020
- c) November 2020
- d) December 2020

#### **ANSWER 07**

Execution of PG&E's Pole Test & Treat (PT&T) is performed by two main contractors, Osmose and Davey. It is the contractors' responsibility to determine how to support and staff the projects. PG&E does not track the number of contract workers on a project.