

**PACIFIC GAS AND ELECTRIC COMPANY**

**GENERAL ORDER 165**

**ANNUAL ELECTRIC DISTRIBUTION INSPECTION REPORT**

**FOR 2019**

JULY 1, 2020

**PRIVILEGED AND CONFIDENTIAL**

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## PACIFIC GAS AND ELECTRIC COMPANY GENERAL ORDER 165 ANNUAL ELECTRIC DISTRIBUTION INSPECTION REPORT FOR 2019

### **I. 2019 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 2019 electric distribution patrol and inspection activities.

Table 1 lists five categorical types<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. Table 1 denotes the total units of work due by inspection type for the 2019 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 2019, and is, as of July 1, 2020, the date this report was signed by the verifying officer, deemed as the most accurate data available. As shown in the table, by December 31, 2019, PG&E had completed 99.99% of its OH patrols, 99.99% of its OH detailed inspections, 100% of its UG patrols, 99.99% of its UG detailed inspections, and 100% of its wood pole intrusive inspections by their 2019 due dates.

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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.

**Table 1 – 2019 Electric Distribution Inspection Summary**

Type of Inspections (1)	Due (2)	Outstanding / Late (3)
OH Patrols	1,599,769	0 / 24
OH Detailed Inspections	489,692	0 / 16
UG Patrols	169,440	0 / 0
UG Detailed Inspections	63,630	0 / 1
Wood Pole Intrusive	174,932	0 / 0

**Notes:****(1) Definition of Reporting Unit Basis**

- a. OH: PG&E defines an overhead unit as any PG&E solely-owned, PG&E jointly-owned, or third party-owned poles. 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.
- 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 2019. In addition to regularly scheduled patrol and inspection units, this column includes re-inspection units that PG&E scheduled for completion in 2019.

**(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” column represents the total required inspections that were not completed in the reporting period (i.e., not completed in 2019).

Units in the “Late” column 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 LATE UNITS**

PG&E has no “Outstanding” patrols or inspections, as all units were completed by December 31, 2019. There are a total of sixteen (16) OH detailed inspection, twenty-four (24) OH patrol, and one (1) UG detailed inspection units that were not completed by the CPUC due date set forth in Table 1 of GO 165 and are therefore reported as “Late,” although they were all completed within the calendar year and are not “Outstanding.” PG&E provides an explanation below for inspections that were “Late.”

- a. One (1) OH detailed inspection unit is reported in the “Outstanding / Late” column of Table 1, which occurred in PG&E’s Sierra Division and was not inspected on time due to human error. During the inspection, the inspector was unable to do a thorough inspection due to the overgrown vegetation on the bottom of the pole. The inspector created an electric corrective (EC) notification to remove the vegetation work for the bottom one-third of the pole asset but failed to identify a second action that will prompt the inspector to return and complete inspection of the bottom one-third of the pole after the vegetation work is complete. The inspector only performed an inspection of the top two-thirds of the pole and erroneously highlighted the asset on the map as a completed inspection. This error was discovered by the Sierra Division clerical support while reading the long text notes for entry from the completed EC notification and prompted a further review of the map folder. After discovering the error, PG&E completed

its detailed inspection of the one (1) OH unit on September 23, 2019, after the CPUC Due Date of June 25, 2019.

- b. Four (4) OH detailed inspection units are reported in the “Outstanding / Late” column of Table 1, which occurred in PG&E’s Los Padres Division and were not inspected on time because the four poles were not mapped on PG&E’s legacy map or electronic mobile technology. As part of PG&E’s 2019 Wildfire Safety Inspection Program (WSIP), an Inspector requested the location of an asset be verified in the field. When the lead Inspector went out to verify the field location, the lead Inspector also found an additional three (3) poles. PG&E completed its detailed inspection of all four (4) OH units on May 2, 2019, after the CPUC Due Date of April 18, 2019. These four poles have been added to PG&E’s maps.
- c. Eleven (11) OH detailed inspection units are reported in the “Outstanding/Late” column of Table 1, which occurred in PG&E’s Kern Division and were not documented as inspected on time due to human error. The Inspector performed inspections on four (4) distribution units and seven (7) transmission poles with distribution underbuild between March 30, 2019 and March 31, 2019 but failed to highlight these units on the map. During PG&E’s map validation process, the Compliance Supervisor and Compliance Specialist noticed there were an additional six (6) transmission poles in a line on the edge of a map and several poles in the vicinity of a substation in the same location that were not highlighted. It was also not clear if there was distribution underbuild on the identified transmission facilities. The Kern Compliance Supervisor visited the area in question and confirmed there were four (4) distribution poles and seven (7)

transmission poles with distribution underbuild in the area in question. The Compliance Supervisor had a discussion with the inspector regarding the missing highlights of these units; the inspector confirmed inspections were performed, but the inspector failed to highlight the units on the map. PG&E Kern Division completed re-inspections of the eleven (11) identified poles on May 2, 2019, after the CPUC Due Date of April 29, 2019.

As a long-term corrective action, PG&E implemented the use of a mobile application, “Engage and Inspect Application for Overhead Inspections” (Engage and Inspect App) in March 2020. This mobile solution combines the following technologies: legacy “paper” maps, mobile app for Maps (Maps+), mobile app for Electric Corrective notifications, and mobile app for inspection questions. The new mobile application has a series of fields that the inspector is required to complete for each overhead asset identified for a detailed inspection. The required fields include a detailed overheard checklist, a field to document any compelling abnormal conditions, regulatory conditions, and/or third-party infractions; and signature declaration field that records the completed inspection. This technology is being used to perform Overhead Inspections for both distribution and transmission assets. Furthermore, PG&E will have the ability to manage inspections at an asset level. The inspection creates a system record that is traceable, accurate, verifiable, and complete. PG&E believes this new technology will mitigate printing issues of paper maps and human errors of a missed highlight or incorrect highlight of an asset.

- d. Twenty-four (24) OH patrol units are reported in the “Outstanding / Late” column of Table 1, which occurred in PG&E’s Stockton Division and were not patrolled on time because the printed map appeared to be blank. A new inspector signed and marked the map as zero facilities without confirming in the Electric Distribution Geographic Information System (EDGIS) as a control validation for potential units. This error was discovered during a map validation of zero units by using EDGIS to return a “value” for support structures (overhead poles) by the Compliance Support Team. After discovering this error, PG&E completed its patrol of all twenty-four (24) OH units on December 23, 2019, after the CPUC Due Date of October 28, 2019.
- e. One (1) UG detail inspection unit is reported in the “Outstanding / Late” column of Table 1, which occurred in PG&E’s Fresno Division and was not inspected on time due to human error. The inspector erroneously highlighted the asset on the map and created a notification to have the enclosure cleaned. During the gatekeeper review process, the notification was returned to the Compliance Department because the comments did not clearly state if the enclosure had been inspected. When the Compliance Supervisor reviewed the returned notification, the Compliance Supervisor discovered that the asset had not been inspected. After the error was discovered, the enclosure was cleaned, and PG&E completed its detailed inspection of the one (1) UG unit on August 7, 2019, after the CPUC Due Date of June 10, 2019.



### **III. 2019 GO165 PROGRAM CHANGES**

There were no program changes in 2019.