

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans Discovery 2023-2025**  
**Data Response**

PG&E Data Request No.:	OEIS_023-Q001		
PG&E File Name:	WildfireMitigationPlansDiscovery2023_DR_OEIS_023-Q001		
Request Date:	June 20, 2024	Requester DR No.:	OEIS-P-WMP_2024-PG&E-008
Date Sent:	July 10, 2024	Requesting Party:	Office of Energy Infrastructure Safety
DRU Index #:		Requester:	Nathan Poon/Brad Hill

**SUBJECT: REGARDING PG&E'S DISTRIBUTION ASSET INSPECTION PROGRAMS AND PILOTS**

**QUESTION 001**

- a. Provide the number of inspections performed and find rate of level 1 and 2 conditions from January 1, 2020, to December 31, 2023, for the following inspection initiative or pilot programs. If the inspection initiative or pilot program began after January 1, 2020, please specify the start date of the initiative in the response.
  - i. Infrared inspections
  - ii. LiDAR based pole loading assessments
  - iii. Aerial inspections
  - iv. Detailed ground inspections
  - v. Intrusive pole inspections
  - vi. Patrol inspections
- b. For each inspection initiative or pilot below, please provide the estimated percentage of conditions that PG&E would likely not have identified through detailed ground, patrol, or intrusive pole inspections. Describe how PG&E calculated the estimated percentage.
  - i. Infrared inspections
  - ii. LiDAR based pole loading assessments
  - iii. Aerial inspections

**ANSWER 001**

Please see the tables below for the requested information.

Table 1:

		2020		2021		2022		2023	
Inspection Program	Level	Inspections (in miles)	Find Rate (findings per 100 miles)	Inspections (In miles)	Find Rate (findings per 100 miles)	Inspections (in miles)	Find Rate (findings per 100 miles)	Inspections (in miles)	Find Rate (findings per 100 miles)
Infrared	1	8679	0%	12948	0%	9560	0%	3618	0%
	2	8679	1.80%	12948	0.83%	9560	0.75%	3618	0.97%

Table 2:

		2020		2021		2022		2023	
Inspection Program	Level	No. of Inspections	Find Rate	No. of Inspections	Find Rate	No. of Inspections	Find Rate	No. of Inspections	Find Rate
LiDAR based pole loading assessments	1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Aerial	1	N/A	N/A	N/A	N/A	5779	1.2%	37731	0.26%
	2	N/A	N/A	N/A	N/A	5779	22%	37731	9.13%
Ground	1	N/A	N/A	874,357	0.22%	800,023	0.46%	544,492	0.88%
	2	N/A	N/A	874,357	14.93%	800,023	23.99%	544,492	33.17%
Intrusive pole (PTT)	1	203,814	N/A*	152,236	N/A*	181,681	.023%	106,452	.009%
	2	203,814	1.8%	152,236	3%	181,681	7.5%	106,452	7.2%
Patrol	1	N/A	N/A	1,326,512	0.02%	1,277,656	0.02%	912,767	0.04%
	2	N/A	N/A	1,326,512	0.06%	1,277,656	0.06%	912,767	0.07%

a) Please see the following notes relating to the data in the table above:

- The data in Table 2 above was derived from the dataset used to generate Table 2 in the Q4 – February 1, 2024, WMP Quarterly Data Report (QDR) submission to Energy Safety. The data above is inclusive of both HFTD and non-HFTD areas.
- Infrared inspections are reported in miles instead of structures (see Table 1).
- Aerial inspections data was not reported in the QDR because it was a pilot program that started in 2022 through 2023.
- The Pole Loading Assessment (PLA) Program began in 2020 and conducted a desktop-based assessment of the pole loading by utilizing the pole attributes from EDGIS and LiDAR data. The PLA program is above and beyond the requirements in General Order (GO) 95, Rule 44, because no work is occurring at the poles, as part of the PLA Program, so no new installation or reconstruction is requiring Pole Loading Calculations (PLCs). PG&E is performing proactive pole loading assessments to risk-prioritize maintenance and remediation of in-service poles. The PLA desktop-based assessments are performed by a team of data analysts, who have completed assessments on approximately 530,000 poles in HFTD areas. These assessments highlighted higher risk poles that need further engineering analysis. The higher risk poles are currently being prioritized for a comprehensive engineering analysis (which includes field validation, where needed). Once this engineering analysis is completed, PG&E will have sufficient understanding of the poles condition to determine if any remediation is required.
- PG&E is unable to provide historical data prior to 2021 (i.e. in 2020) for ground and patrol inspections with this level of granularity, per the QDR. PG&E reorganized the way inspection data is managed in 2021, which allows reporting the more granular and accurate data that is being provided in subsequent years. However, PG&E would be happy to meet and confer to discuss this issue if it would be helpful. Please note, PG&E executes ground and patrol inspections according to General Order 165.
- Pole Test and Treat (PTT) intrusive inspections includes routine inspections and some off-cycle inspections.<sup>1</sup> PG&E is not including poles that were only visually inspected in this response. The data included for 2023 also includes inspections from a piloted Comprehensive Pole Inspection program.

Prior to 2022, all PTT created tags were Level 2.

Please note, PG&E is in an ongoing process to improve our data, and the numbers are subject to change.

b) PG&E can confirm conditions identified through inspections, however, does not have a methodology to calculate an estimate of potential conditions that may not have been identified through the referenced inspections.

---

<sup>1</sup> Off-cycle inspections are those that are not performed in the workplan for our 10-year cycle.