

PACIFIC GAS AND ELECTRIC COMPANY

**GENERAL ORDER 165
ANNUAL ELECTRIC DISTRIBUTION INSPECTION REPORT
FOR 2018**

June 27, 2019

PRIVILEGED AND CONFIDENTIAL

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I. 2018 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 2018 electric distribution patrol and inspection activities.

Table 1 lists five categorical types¹ 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 2018 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 2018, and is, as of June 27, 2019, 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, 2018, 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 2018 due dates.

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.

Table 1 – 2018 Electric Distribution Inspection Summary

Type of Inspections (1)	Due (2)	Outstanding / Late (3)
OH Patrols	1,602,062	0 / 3
OH Detailed Inspections	456,672	0 / 7
UG Patrols	186,385	0 / 0
UG Detailed Inspections	76,374	0 / 6
Wood Pole Intrusive	98,587	0 / 0

Notes:

(1) Definition of Reporting Unit Basis

- a. OH: PG&E defines an overhead unit as any PG&E solely owned poles, PG&E jointly owned poles, and PG&E equipment on 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. Prior to January 1, 2018, these units were inspected under the UG detailed inspection cycle.
- 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 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 2018.

In addition to regularly scheduled patrol and inspection units, this column includes re-inspection units that PG&E scheduled for completion in 2018.

(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 2018).

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, 2018. There are a total of three (3) OH patrol units, seven (7) OH detailed inspection units, and six (6) 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. Three (3) OH patrol units are in the “Outstanding / Late” column of Table 1 due to human error in the creation of the patrol map package. North Bay Division identified two maps with the same map name but are located in two different districts with different units associated with each map. The PG&E Resource Management Center’s clerical staff printed map OO40 in the same district twice which led to missing the patrol for the (3) OH units in the different district with the same map name OO40. As a result, the three padmount units (included as OH units) were not patrolled by the due date as the facilities were not shown on the map that was provided. This error was discovered past the CPUC due date of the map. After discovering the error, PG&E completed its patrol of the three (3) OH units on map OO40 on August 10, 2018, after the CPUC due date of June 19, 2018. PG&E is in the process of identifying appropriate corrective measures to mitigate recurrence.
- b. Seven (7) OH detailed inspection units in the “Outstanding/Late” column of Table 1 in PG&E’s Humboldt Division were not inspected on time due to human error. An interim supervisor for the Humboldt Division performed a map review and missed

that the inspector did not highlight seven poles, an indication that the poles had not been inspected. This error was discovered after the CPUC due date of the map by the Humboldt Division Specialist while performing a secondary review of the map package. After discovering the error, PG&E completed its detailed inspection of the seven (7) OH units on map O13 on September 17, 2018, after the CPUC due date of August 31, 2018. The Humboldt Division Compliance Supervisor position has now been filled, and there are two review steps that occur for each map completed by inspectors. Each completed map package is now reviewed by the Compliance Supervisor and Specialist before the CPUC due date of the map. PG&E is in the process of identifying appropriate corrective measures to mitigate recurrence.

- c. Four (4) UG detailed inspection units in PG&E's North Bay Division were not inspected on time due to human error. Map QQ4312 was erroneously reported as completed due to a clerical entry error. This error was discovered during a work verification review. PG&E completed its detailed inspection of the four (4) units on December 4, 2018, after the CPUC due date of November 20, 2018. The North Bay Division patrol and inspection data is now validated by the Compliance Supervisor and a Specialist as a control to address the clerical error. PG&E is in the process of identifying appropriate corrective measures to mitigate recurrence.
- d. One (1) UG detailed inspection unit in PG&E's Humboldt Division was not completed on time due to human error. This map was originally assigned to an inspector in a timely manner, however, the inspector was assigned other work, and the interim supervisor did not re-assign the map to another inspector. After the error

was discovered, PG&E completed its detailed inspection of the one (1) underground unit on Map T1609 on October 2, 2018, after the CPUC due date of September 25, 2018. The Humboldt Division Compliance Supervisor position has now been filled, and a weekly review of maps assigned and unassigned that are coming due are performed by the Compliance Supervisor and a Specialist. In addition, Humboldt Division has reiterated to all their inspectors the importance of completing all work prior to the CPUC due date. PG&E is in the process of identifying appropriate corrective measures to mitigate recurrence.

- e. One (1) UG detailed inspection unit in PG&E's San Jose Division was not inspected on time. PG&E identified the unit during PG&E's GO 165 automation process review and determined the UG unit did not have a maintenance plan. Once the error was discovered, PG&E created a maintenance plan for Map F1925 and inspected the unit on November 20, 2018. PG&E is in the process of identifying appropriate corrective measures to mitigate recurrence.

III. MISSED DISTRIBUTION UNDERBUILDS

During PG&E's GO 165 automation process review, PG&E discovered three maps with a total of 11 transmission poles with primary conductor distribution underbuilds in PG&E's San Jose Division that have not been previously inspected and patrolled by Distribution Compliance.

After identifying this issue, San Jose Division completed inspections of the poles on the three maps as follows:

- Map P2611 - three transmission poles with conductor only distribution underbuilds were inspected on October 3, 2018
- Map I1723 - six transmission poles with conductor only distribution underbuilds were inspected on October 24, 2018
- Map I1822 - two transmission poles with conductor only distribution underbuilds were inspected on December 17, 2018

PG&E is in the process of identifying appropriate corrective measures to mitigate recurrence.

IV. 2018 GO 165 PROGRAM CHANGES

Padmount Facilities

Beginning January 1, 2018, padmount facilities are patrolled and inspected as part of the OH detailed inspection cycle. Inspection of padmount facilities will occur every five years, in accordance with GO 165. PG&E completed training and communication of this program change to Compliance Inspectors, Specialists and Supervisors in January 2018. This program change was shared with the CPUC during the North Bay Division audit on March 5, 2018.

Enclosures with No Oil-Filled or Operating Equipment

Beginning January 1, 2018, PG&E Compliance Inspectors discontinued inspections of primary enclosures with no oil-filled or operating equipment. PG&E completed training and communication of this program change to Compliance Inspectors, Specialists and Supervisors in January 2018. This

program change was shared with the CPUC during the North Bay Division audit on March 5, 2018.

VERIFICATION


I, the undersigned say:

I am an officer of Pacific Gas and Electric Company, a corporation, and am authorized to make this Verification for and on behalf of said corporation, and I make this Verification for the following reason, that I have read the foregoing:

Pacific Gas and Electric Company's (U 39 M) General Order 165
Annual Electric Distribution Inspection Report for 2018

I am informed and believe matters therein are true and on the ground, I allege that the matters stated therein are true.

I declare under penalty of perjury that the foregoing is true and correct. Executed in San Ramon, California, this 27th day of June 2019.



Kenneth Wells
VICE PRESIDENT
ELECTRIC DISTRIBUTION
PACIFIC GAS AND ELECTRIC COMPANY