

PACIFIC GAS AND ELECTRIC COMPANY

**GENERAL ORDER 165
2022 ANNUAL ELECTRIC DISTRIBUTION INSPECTION
REPORT**

JUNE 30, 2023

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I. 2022 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 2022 electric distribution patrol and inspection activities.

Table 1 lists five categories¹ 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 2022 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 2022 and is accurate based on the data available as of June 28, 2023, the date this report was signed by the verifying officer. As shown in the table, by December 31, 2022, PG&E had completed 99.98% of its OH patrols, 99.93% of its OH detailed inspections, 99.99% of its UG patrols, 99.99% of its UG detailed inspections, and 99.94% of its wood pole intrusive inspections by their 2022 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 – 2022 Electric Distribution Inspection Summary

Type of Inspections (1)	Due (2)	Outstanding/Late (3)
OH Patrols	1,327,054	0/218
OH Detailed Inspections	803,630	6/530
UG Patrols	266,845	0/10
UG Detailed Inspections	148,179	0/19
Wood Pole Intrusive	170,063	105/0

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 2022. In addition to regularly scheduled patrol and inspection units, this column includes re-inspection units that PG&E scheduled for completion in 2022.

(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 2022)

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 UNIT

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

a. Outstanding – OH Detailed Inspections

Three OH detailed inspections in PG&E’s Yosemite Division (Yosemite), two OH detailed inspections in PG&E’s Stockton Division (Stockton), and one OH detailed inspection in PG&E’s Sierra Division (Sierra) are reported as “Outstanding” in the “Outstanding/Late” column of Table 1 due to access restriction from customer refusals, which prevented the inspections to be completed on time or by the end of 2022. Two inspections in Yosemite were eventually resolved with the customer and completed on May 16, 2023. The rest of these outstanding inspections are currently still pending.

b. Outstanding – Wood Pole Intrusive

One hundred and five wood pole intrusive inspections in PG&E’s territory are reported as “Outstanding” in the “Outstanding/Late” column of Table 1. As part of the Directive imposed on Cellon-treated wood poles,² PG&E elected to perform off-cycle intrusive inspections on 2,086 wood Cellon-treated poles that were prioritized based on the highest safety and wildfire risk scores scattered across the PG&E territory. Out of the 2,086 poles, 22 were not completed by the end of 2022 due to accessibility issues with snow in November/December, as well as customer access issues.³ This reprioritization of off-cycle inspections and shortage of crew members from one of

² On May 7, 2021, PG&E submitted a safety issue notification regarding Cellon-treated wood poles. In response, the Commission’s Safety and Enforcement Division (SED) issued a Directive to PG&E to Take Corrective Actions to Address Safety Concerns with Cellon-Treated Wood Poles on November 22, 2021.

³ PG&E provided a status update to the Commission’s SED on the off-cycle intrusive inspections for the 22 remaining poles on May 12, 2023 via Data Request 7 – Safety Issue Notification on Cellon-Treated Wood Poles (DRU 11715).

our contractor vendors impacted 105 routine inspections that were not able to be completed by the end of 2022 and were, therefore, considered outstanding. These 105 routine inspections will be complete by end of 2023, weather and access permitting.

c. Late – Human Error

A total of three hundred and eighty-nine OH detailed inspections, two hundred and eighteen OH patrols, four UG inspections, and ten UG patrols in PG&E’s territory are reported as “Late” in the “Outstanding/Late” column of Table 1 due to human errors identified by PG&E as explained per the following:

Incomplete or Invalid Inspections

Five OH detailed inspections in PG&E’s Fresno Division (Fresno), three OH detailed inspections in PG&E’s Central Coast Division (Central Coast), two OH detailed inspections in PG&E’s Peninsula Division (Peninsula), and one OH detailed inspection in PG&E’s Sacramento Division (Sacramento) are due to incomplete inspections from documentation/record errors. For Fresno, Peninsula, and Sacramento, missing/incorrect photos or data correction were needed for completion. For Central Coast, the inspector took photos but did not gain access to the pole, and they inadvertently completed the checklist. These inspections were identified as late during an internal quality audit, and the poles were reinspected.

A total of two OH detailed inspections in Sierra are due to invalid inspections. One pole was tagged incorrectly as a distribution pole as it was discovered to be an idle pole. The other pole in Sierra was discovered it no longer exists once the vegetation was removed. These poles are considered late as the pole still existed until the due date and were removed after the due date.

Two OH detailed inspections in PG&E’s San Jose Division (San Jose), one OH detailed inspection in Central Coast, and one OH detailed inspection in Stockton are due to incomplete

inspections from misidentification or unable to locate. For San Jose, these inspections were not correctly identified as Can't Get In (CGI). For Central Coast, the inspector was unable to locate the pole. For Stockton, the inspector was unable to locate the switch that was outside of the substation. Once correctly identified, these inspections were resolved and completed.

Two hundred and fifty-seven OH detailed inspections in Central Coast are due to lack of resources. There was a shortage of crew members from one of our contractor vendors to complete the inspections on time. Please refer to Attachment 1 for a detailed list of assets and/or plat maps with their completion dates through December 31, 2022.

Map Validation and Padmount Analysis

Ninety-five OH detailed inspections in PG&E's Humboldt Division (Humboldt), one hundred and sixty OH patrols in PG&E's Mission Division (Mission), fifty-eight OH patrols in PG&E's Sonoma Division (Sonoma), seventeen OH detailed inspections in Fresno, and three OH detailed inspections in Stockton are identified as late due to map validations after the inspection was completed. The map validations identified that either the map had an earlier CPUC due date or that the map was missing from the workplan when developed. Monthly validations are currently being performed to remediate these errors.

Four UG detailed inspections in PG&E's Diablo Division (Diablo) are identified late from a padmount analysis performed in late 2022. The analysis determined these units were last inspected in 2016. In 2018, they were switched to OH 5-year cycle. Then, the UG maintenance plan was updated to patrol annually. The process changed again in 2020 to switch padmount back to UG 3-year cycle. Since the UG maintenance plan was set to patrol only, these units in Diablo were missed. Once identified, they were flagged to be inspected right away and completed. Please refer to Attachment 1 for a detailed list of assets and/or plat maps with their completion dates

through December 31, 2022.

d. Late – Access Restrictions

A total of one hundred and forty-one OH detailed inspections and four UG detailed inspections in PG&E’s territory are reported as “Late” in the “Outstanding/Late” column of Table 1 due to access restrictions, as explained per the following:

Unresponsive Customer and Refusals

Two OH detailed inspections in Sierra are due to access restriction from unresponsive customers. Forty-five OH detailed inspections in Yosemite, twenty-six OH detailed inspections in Humboldt, nineteen OH detailed inspections in Sierra, nine OH detailed inspections and two UG detailed inspections in Stockton, three OH detailed inspections and two UG detailed inspections in De Anza, and two OH detailed inspections in San Jose Divisions are due to access restriction from customer refusals. Please refer to Attachment 1 for a detailed list of assets and/or plat maps with their completion dates through December 31, 2022.

Vegetation Overgrowth

Ten OH detailed inspections in Stockton, two OH detailed inspections in Mission, one OH detailed inspection in Sacramento, one OH detailed inspection in Humboldt, and one OH detailed inspection in North Valley Divisions are due to access restriction from vegetation overgrowth. Please refer to Attachment 1 for a detailed list of assets and/or plat maps with their completion dates through December 31, 2022.

Environmental Factors

Eleven OH detailed inspections in Yosemite are due to the Oak Fire that occurred on July 22, 2022. Since it took 19 days for the fire to be contained, these assets were not accessible due to the unsafe field conditions.

Four OH detailed inspections in Sierra, three OH detailed inspections in Yosemite, and two OH detailed inspections in Humboldt Divisions are due to environmental holds. For Sierra, these inspections were delayed for chemicals being sprayed in the fields where the poles were located. Two of these inspections in Yosemite were due to flooding, and one inspection in Yosemite was delayed because boat access was needed to complete the inspection. For Humboldt, the inspections were delayed for an active bird’s nest. Please refer to Attachment 1 for a detailed list of assets and/or plat maps with their completion dates through December 31, 2022.

e. Late – Can’t Get Ins (CGIs):

Three UG detailed inspections in Sierra, seven UG detailed inspection in Stockton, and one UG detailed inspection in Yosemite Divisions are reported as “Late” in the “Outstanding/Late” column of Table 1 due to CGI issues. During the initial attempt to inspect these assets, notifications were created as CGIs to complete a detailed inspection for the reasons listed on the below summary table. Please see Attachment 2 for a detail explanation of these assets and their completion dates from October through December 2022.

Division	Category	Total
SI	Human error	1
SI	Access constraint	2
SI Total		3
ST	Access constraint	7
ST Total		7
YO	Access constraint	1
YO Total		1
Grand Total		11