

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

PG&E Data Request No.:	OEIS_006-Q001		
PG&E File Name:	WMP-Discovery2023_DR_OEIS_006-Q001		
Request Date:	May 18, 2023	Requester DR No.:	P-WMP_2023-PG&E-006
Date Sent:	May 25, 2023	Requesting Party:	Office of Energy Infrastructure Safety
DRU Index #:		Requester:	Dakota Smith

QUESTION 001

Regarding PG&E’s response to OEIS DR 2 Question 10, Attachment 1:

- a. Explain the difference between a Field Safety Reassessment and a Planned Field Safety Reassessment.
- b. In what instances would PG&E extend a work order due date through a Field Safety Reassessment? Provide all supporting documentation and criteria, including any procedures and inspection protocols demonstrating decision-making.
- c. In what instances would a Standards Change lead to extending a work order due date? Provide all supporting documentation and criteria, including any procedures and inspection protocols demonstrating decision-making. Additionally, provide examples in which this has occurred, including any sweeping changes.
- d. Include any criteria that would fall under “Other reassessment” as seen in Column I “Reason for reinspection (if applicable)”.
- e. PG&E included three Priority A level work orders within the tab labeled “Table 13 – Open”.
 - i. Provide the work order documentation associated with each of these tags (i.e. Electric Corrective notification).
 - ii. Are these tags still open? If not, provide the respective completion date for when each tag was closed, as applicable.
- f. Within non-HFTD, PG&E included 13 Priority H level work orders that were closed in 2022 and 52 that are still open.
 - i. Explain what circumstances would lead to a Priority H tag within non-HFTD.
 - ii. Provide a list of the projects in which the 13 closed work orders were associated with, including details on the associated mitigation being used.
 - iii. Provide a list of the projects in which the 52 work orders were associated with, including details on the associated mitigation being used.
- g. Regarding PG&E’s ignition risk notifications:
 - i. Provide documentation and/or procedures PG&E uses to determine whether or not a work order meets ignition risk criteria, including any relevant thresholds (equipment type, risk score, etc.). This should also include an explanation as to

how PG&E prioritizes within the categorization of ignition risk tags (i.e. planning for timing of correction based on known risk).

- ii. Provide PG&E's list of Facility-Damage-Action (FDA) codes for determining which ones present an ignition risk, as discussed in response to CalAdvocates Data Request 19 Question 8.

ANSWER 001

The CONFIDENTIAL attachments are being provided pursuant to the accompanying confidentiality declaration.

- a. There is no difference between the terms "Field Safety Reassessment" and "Planned Field Safety Reassessment." The transmission team used the term "Planned Field Safety Reassessment" in their QDR reporting while the distribution team used the term "Field Safety Reassessment." We will align our terminology for future reporting by using the term "Field Safety Reassessment."
- b. Due to the current tag backlog, PG&E's execution of some notifications may not meet GO 95, Rule 18 compliance 100% of the time. As a result, we have focused our efforts on risk ranking the outstanding tags and working the riskiest tags first. FSRs are an internal containment activity we perform to mitigate potential safety and wildfire impacts by conducting an additional field visit (FSR) to check if the identified condition requires escalation. Additionally, as part of our 2023 WMP, we committed to closing all newly identified ignition risk tags in HFTD/HFRA in accordance with GO 95, Rule 18 timelines (steady-state).

For distribution tags, if the condition in the field has deteriorated, the priority of the tag can be escalated to complete the work as a Level 1 Emergency (A Tag) or set a revised due date to complete the work within 90 days as a B Tag. When a condition is determined not to require escalation, the work order date is not extended, and the tag is then worked according to the tag's risk ranking. We have committed to reduce the wildfire risk associated with our distribution tag backlog by 48% in 2023 and by 68% by the end of 2024. Please also note that the work order date change is used for internal tag execution planning; the FSR does not extend the GO 95, Rule 18 due date of a tag, which can only be changed by a recognized exemption to GO 95, Rule 18. For more information, please see procedure TD-8123P-200 (*WMP-Discovery2023_DR_OEIS_006-Q001Atch01CONF.pdf*), which is the procedure that is relevant to distribution FSRs.

For transmission tags, the priority of the tag can also be escalated as determined by the FSR if the condition in the field has deteriorated. However, the FSR process does not extend the work order due date (SAP Required End Date). The FSR sets the SAP Funded Repair Date according to Sections 4.4 and 4.5 of TD-8123P-101 (*WMP-Discovery2023_DR_OEIS_006-Q001Atch03CONF.pdf*), which defines the date at which the tag is to be repaired or reassessed again. The funded repair date does not represent an extension of the due date unless it also is accompanied by a recognized exemption to GO 95, Rule 18 (Section 2 of *WMP-Discovery2023_DR_OEIS_006-Q001Atch03CONF.pdf*). Separate from the FSR process, the rollout of TD-8123P-103 (*WMP-Discovery2023_DR_OEIS_006-Q001Atch02CONF.pdf*) described in part (c) below, updated tag prioritization

guidance. This may result in some tags getting a one-time review per the updated standard guidance, and potentially changes to the Required End Date.

- c. Utility Procedure TD-8123-P-103, “Electric Transmission Line Guidance for Setting Priority Codes”, effective on January 3, 2023, provides updates to several tables in the Electric Transmission Preventative Maintenance (ETPM) Manual. Table 2 in the procedure eliminates priority B and updates corrective action timelines to better align with priority levels 1, 2, and 3 and the associated timelines in GO 95, Rule 18. PG&E Transmission Line Standards group updated priority code guidance in Table 4 based on subject matter expertise, supported by technical testing and benchmarking. Open tags generated prior to TD-8123-P-103 are gradually being re-reviewed, during which the priority and due date are evaluated under the updated requirements in the procedure. A common outcome of the review is the extension of due dates for Level 2 (E-priority) tags in non-HFTD areas from the previously required one year to the three years that are allowed and align with Rule 18 for conditions that do not have worker safety implications.

PG&E plans to complete a similar review and update of distribution guidance and priority code assignment in the near future. When this activity is completed, PG&E will perform a similar process in distribution as described above for transmission to review due dates and priorities of open tags.

- d. The ‘other reassessments’ are not readily differentiated by specific codes in the SAP user status or long text. The most common case is reassessments performed during detailed ground inspections, during which inspectors may evaluate open tags. Sometimes reassessments are required when tags are scheduled in the current year’s tag repair plan but cannot be completed on time. Criteria for these execution-related reassessments are provided in Sections 4.2 and 4.3 of TD-8123P-101. There also may be cases when CIRT is asked to re-review a notification based on new information, such as an engineering review of an asset.
- e. We interpret this question as asking for the three Priority A tags in HFTD Tier 2 in the previously referenced attachment. Please see the table below for the corresponding attachments for the three Priority A tags referenced:

Tag Number	Attachment Name
121706053	WMP-Discovery2023_DR_OEIS_006-Q001Atch04CONF.pdf
121890108	WMP-Discovery2023_DR_OEIS_006-Q001Atch05CONF.pdf
124316856	WMP-Discovery2023_DR_OEIS_006-Q001Atch06CONF.pdf

Tags 121706053 and 121890108 are still open. Tag 124316856 was closed out in SAP on April 6, 2023.

f.

- i. H-Tags included in non-HFTD can occur when conductor spans and associated poles are in buffer areas or HFRA, when spans cross from non-tiered areas to tiered areas, when lines are relocated to provide PSPS benefit by removing line from HFTD area, or are added for constructability reasons.
- ii. Please see attachment “*WMP-Discovery2023_DR_OEIS_006-Q001Atch07.xlsx*” for the requested information. Please note, the mitigation type (Column F) is aligned to the project in Columns D (Project Number) and E (Column E).
- iii. Please see attachment “*WMP-Discovery2023_DR_OEIS_006-Q001Atch07.xlsx*” for the requested information. Please note, the mitigation type (Column F) is aligned to the project in Columns D (Project Number) and E (Column E).

g.

i. Transmission:

The identification of ignition-related transmission tags is primarily based on FDAs that align with ignition-related components in the T-line FMEA but can be modified through several additional considerations. Lines that have been permanently de-energized and grounded to mitigate induction are not considered ignition-related. The Debris/Nest FDAs include tags for removal of pole butts, which are not ignition-related conditions and may be identified by the text description. Finally, CIRT may identify non-ignition related conditions (see Table 3 of attachment TD-8123P-103), which are subsequently identified through an SAP user status.

Distribution:

Similar to Transmission, ignition risk distribution tags are based on FDAs that align with failure modes that could cause an ignition. The FDAs that pose an ignition risk were agreed upon by a team of Subject Matter Experts (SMEs) from Electric Asset Strategy, Wildfire Risk, and the Standards and Work Methods teams. The notifications that contain FDAs flagged as potential ignition risk are categorized as ignition risk tags.

PG&E prioritizes within the categorization of ignition risk tags using a risk-informed approach. Our plan consists of working the highest ignition-risk notifications in the HFTD/HFRA in 2023 and then transitioning to a risk spend efficiency (RSE) approach starting in 2024.

- ii. Please see attachment “*WMP-Discovery2023_DR_OEIS_006-Q001Atch08.xlsx*” for the requested list of ignition risk FDAs for Electric Distribution.