

Field Safety Re-Assessment (FSR) Process and Procedures

SUMMARY

This utility procedure describes the electric corrective (EC) Field Safety Re-assessment (FSR) process related to the following scenarios:

- EC tags for overhead assets with time-dependent Facility Damage and Action (FDA) codes.
- EC tags that are either past due or are not included in the current year's plan for completion.
- EC locations that are not in the current year's [General Order \(G.O.\) 165, "Inspection Requirements for Electric Distribution and Transmission Facilities,"](#) inspection plan.

Level of Use: Informational Use

TARGET AUDIENCE

This procedure targets the following groups:

- Electric distribution employees involved in maintaining distribution line facilities
- System inspections managers, supervisors, specialists, clerical staff, and inspectors
- Maintenance and construction (M&C) employees
- Program managers
- Work and resource planning managers, supervisors, planners, and clerical employees
- Asset strategy employees

SAFETY

Based on a significant increase in the volume of EC notifications identified from the 2019 Wildfire Safety Inspection Program (WSIP), some open notifications will not be resolved before their assigned due dates. PG&E will continue to monitor these open EC notifications by conducting FSRs on notifications that have potential safety impacts.

Employees must follow all safety protocols throughout the entire FSR process.

Field Safety Re-Assessment (FSR) Process and Procedures

BEFORE YOU START

For an overview of PG&E's distribution Failure Mode Effect Analysis (FMEA), REFER to [Utility Manual TD-8123M, "Electric System Inspections and Preventative Maintenance Manual," Distribution Failure Mode Effect Analysis \(FMEA\)."](#)

TABLE OF CONTENTS

SECTION	TITLE	PAGE
1	General Information.....	2
2	Generating the FSR List.....	2
3	Process for FSR Qualifications.....	3

PROCEDURE STEPS

1 General Information

Since 2019, a substantial number of assets have been inspected more rigorously than in previous years. Detailed inspections are performed with enhanced inspection protocols. These changes resulted in a significant increase in the volume of EC notifications, leading to a backlog of notifications that cannot be completed within the prescribed timelines as outlined by the Company's Priority Code.

The sections below include the procedural steps and criteria table for High Fire Threat District (HFTD), High Fire Risk Area (HFRA), and Non-HFTD FSR-eligible tags, as well as roles and responsibilities for identifying the past-due or expected-past-due EC tags with time-dependent FDA codes requiring an FSR.

2 Generating the FSR List

2.1 The operations organization, with guidance from asset strategy, GENERATES the FSR list by the first business day in February. This list includes a planned date to perform annual quality control inspections. A minimum of one additional quality control measure must be planned as well for later in the year. Program management, asset strategy, and system inspection leadership PLAN the additional dates using the following criteria:

- Wildfire Work Execution (WWE) file showing all open ECs
- Approved, detailed inspection plan Maintenance Activity Type (MAT) BFB
- Risk elements including HFRA and Public Safety Consequence Areas (PSCAs)
- Time-dependent EC notifications

Field Safety Re-Assessment (FSR) Process and Procedures

- 2.2 As a quality control measure, if there are **any changes** to the WWE that extend tag completion past the compliance due date and/or FSR due date (as referenced in [Table 1, "FSR Requirements and Due Dates,"](#) on Page 5), operations personnel must DISTRIBUTE those FSR updates by June 15, 20YY.

3 Process for FSR Qualifications

3.1 Generating the Annual (February) List

1. EC notifications include an FSR if they meet **all** the following criteria:
 - a. Notifications involve an **overhead** asset.
 - b. Notifications are Priority E, F, or H.
 - c. Notifications include a time-dependent FDA.
 - d. Notifications are past due or are not in the current year's plan to be completed.
 - e. Notifications are not included in overhead inspection plan.
 - f. Notifications are in HFTD, HFRA, or Non-HFTD within the PSCA above the threshold established by asset strategy
2. EC notifications do not require FSR in the following situations:
 - a. Priority A or Priority B overhead EC notifications do not require an FSR because work is expected to be completed immediately (Priority A) or within 90 days (Priority B).
 - b. EC notifications identified using infrared inspections. (Asset family owners must PROVIDE additional guidance to ensure risk is mitigated.)
 - c. Vegetation-generated EC notifications (e.g., Work Type Code [WTC] 564) as they follow compliance due dates.
 - d. Junk yard (JY) SAP ID.
 - e. FSRs with a notification date in the current year.
 - f. Mat Code "GAC" notifications with additional FDAs that are canceled or completed.
 - g. Notifications identified as 311A. These are assessment notifications conducted by vegetation management and are treated as Priority B notifications.

Field Safety Re-Assessment (FSR) Process and Procedures

3.1 (continued)

3. Generating Additional Quality Control FSR Lists

a. The following HFTD and HFRA notifications require an FSR:

- (1) Notifications that meet the criteria in [Subsection 3.1.2](#) on Page 3.
- (2) Notifications that are not on the FSR list from the first quarter (Q1) and **will not be completed** by July 31 (i.e., the execution date is outside the acceptable date range). Examples include the following:
 - Notifications not yet identified
 - Notifications with a work plan date after July 31 of the current year
 - Notifications with a work plan date in a previous year
 - Notifications with a work plan date after the compliance date

b. Other tags requiring an FSR include non-HFTD notifications meeting the criteria in [Subsection 3.1.1](#) and [Subsection 3.1.2](#) (on Page 3) that are not on the previous FSR list(s) and will not be completed by December 31.

Field Safety Re-Assessment (FSR) Process and Procedures

3.1 (continued)

Table 1. FSR Requirements and Due Dates

EC Notification Priority	#	HFTD ⁽¹⁾	Time Dependent FDA ⁽²⁾	Past Required End Date	OH Inspection Planned in Current Year	FSR ⁽³⁾ Required	Due Dates for OH Inspection or FSR	Comments
A	1	HFTD and Non-HFTD	Yes	Yes	Yes / No	No	NA	Follow the emergency process.
B	2	HFTD and Non-HFTD	Yes	Yes	Yes / No	No	NA	Expectation is tag will be completed by the due date or will follow the exemption process.
E/F/H	3	Tier 3	Yes	Yes	Yes	No	OH Inspection by 7/31/yy	No FSR required because inspection will be completed.
	4	Tier 3	Yes	Yes	No	Yes	FSR by 7/31/yy	FSR required. Starting in 2023, 1/3 of Tier 3 will be inspected annually.
	5	Tier 2, Zone 1, HFRA	Yes	Yes	Yes	No	OH Inspection by 7/31/yy	No FSR required because inspection will be completed.
	6	Tier 2, Zone 1, HFRA	Yes	Yes	No	Yes	FSR by 7/31/yy	Attempt to complete before 7/31 to provide time for escalation in priority.
	7	Non-HFTD	Yes	Yes	Yes	No	OH Inspection by 12/31/yy	No FSR required because inspection will be completed.
	8		Yes	Yes	No	Yes if PSCA	FSR by 12/31/yy	Complete public safety consequence locations by 12/31. PSCA will be defined annually by asset strategy.



Field Safety Re-Assessment (FSR) Process and Procedures

3.1 (continued)

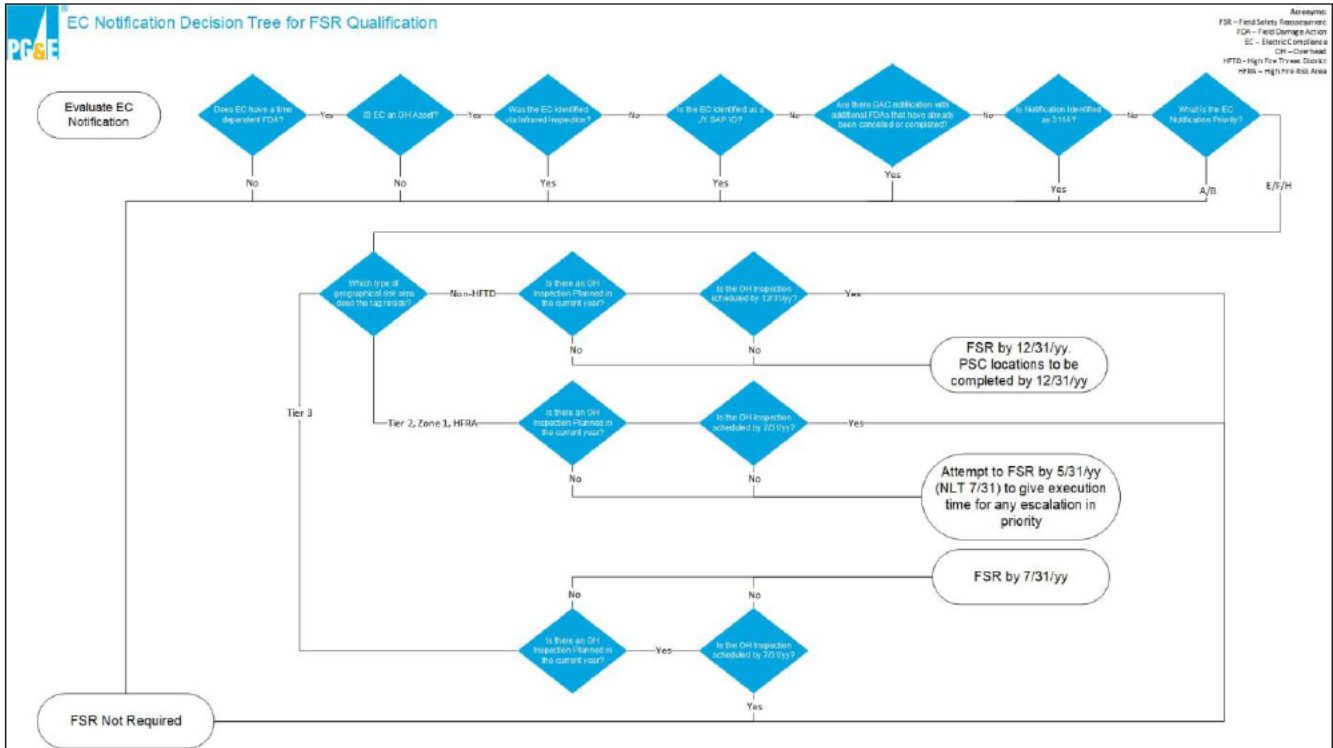


Figure 1. EC Notification Decision Tree for FSR Qualification

- ⁽¹⁾ **High Fire Threat District (HFTD):** Tier 2, Tier 3, and Zone 1 are HFTD.
- ⁽²⁾ **Time Dependent FDA:** Facility, damage and action codes (FDAs) have been categorized as being time dependent or time independent. Time-dependent FDAs represent conditions that potentially could worsen over time and, therefore, would benefit from re-inspection.
- ⁽³⁾ **Field Safety Reassessment (FSR):** To field-verify that the nonconformance poses no additional risk to safety or reliability, although the tag is in excess of its compliance date, PG&E performs an annual safety re-assessments of tags. A trained and qualified inspector will re-assess the field condition of the identified nonconformance and create a written record. The written record documents changes to the field condition of the nonconformance that pose an increased risk to safety or reliability, prompting repair of the asset sooner than planned.
- ⁽⁴⁾ **yy** = current year

Field Safety Re-Assessment (FSR) Process and Procedures

DEFINITIONS

Electric Corrective (EC) Notification: A form or electronic record used as a checklist to identify and record a rating for a specific, abnormal maintenance condition(s) that impacts safety or service reliability.

Field Safety Re-Assessment (FSR): A standalone field visit completed by a Qualified Electrical Worker (QEW) to a pole structure with an open EC tag that meets specific criteria to mitigate safety risk. Additional significant safety conditions may be identified as part of the field visit.

High Fire Risk Area (HFRA): Mapping terminology that aligns with other California utilities use of maps supplemental to the California Public Utilities Commission (CPUC) HFTD Map. While the HFTD is a foundational tool used to identify areas of elevated or extreme wildfire risk for utilities, it was not developed at the electric asset level and is not operationally informed for the Public Safety Power Shutoff (PSPS) program scoping and execution. HFRA refinements may also serve to inform future adjustments or recommendations to improve the HFTD map.

High Fire Threat District (HFTD): Categorized as HFTD and non-HFTD. HFTD includes Zone 1, Tiers 2 and 3. Non-HFTD includes all other zones and tiers and is sometimes classified as Tier 1 or Tier 0.

Maintenance Actiity Type (MAT) Code: An attribute used by PG&E to aggregate costs for unit cost reporting. A MAT is linked to each order when it is created.

Past-Due EC Notification: Notifications not completed by the compliance timeline per the priority code. In order to create an EC notification in SAP, an end date is a required field. ECs with completed FSRs having specific due dates are shown in the Work Plan Master List (WPML) For Reference Only (FRO) date field.

Priority A: Immediate response required.

Priority B: 3 months.

Priority Code: The tag classification specifying maximum time periods for corrective actions associated with potential violation of [G.O. 95, "Overhead Electric Line Construction,"](#) or a safety hazard.

Priority E: 12 months. (If Priority E is a Tier 3 extreme fire threat asset, the maximum duration is 6 months.)

Priority F: 5 years for overhead assets and 3 years for underground assets.

Public Safety Consequence Area (PSCA): Directly impacts the public's safety. Includes safety impacts to people, property, and/or the local environment, due to a failure of a PG&E electric facility or multiple PG&E electric assets on a PG&E electric facility.

Field Safety Re-Assessment (FSR) Process and Procedures

DEFINITIONS (continued)

Time-dependent FDA: Facility, Damage and Action (FDA) codes are categorized as being either time dependent or time independent. Time-dependent FDAs represent conditions that potentially could worsen over time and, therefore, would benefit from re-inspection. For example, an FDA such as “pole, broken/damaged, replace” can involve a condition that could worsen over time. An example of a non-time-dependent FDA would be “high sign, missing, install.” Conditions, in this instance, will not worsen over time.

Wildfire Risk Score: The quantification of wildfire risk represented by the frequency of ignitions associated with electric grid infrastructure combined with the consequences if that ignition propagates into a wildfire.

Wildfire Work Execution (WWE): The file maintained by program management employees that shows all tags (i.e., Open, Completed and Cancelled) with columns inclusive of, but not limited to, wildfire date, notification due date, estimated completion date, etc.

Work Type Code (WTC): An attribute which categorizes work that is identified by the combination of Order Types and MAT codes.

ACRONYMS

EC: Electric Corrective

FDA: Facility/ Damage/ Activity

FMEA: Failure Mode Effect Analysis

FSR: Field Safety Reassessment

HFRA: High Fire Risk Area

HFTD: High Fire Threat District

JY: Junk yard

OH: Overhead

PSCA: Public Safety Consequence Area

PSPS: Public Safety Power Shutoff

QEW: Qualified Electrical Worker

UG: Underground

Field Safety Re-Assessment (FSR) Process and Procedures

ACRONYMS (continued)

WPML: Work Plan Master List

WSIP: Wildfire Safety Inspection Program

WTC: Work Type Code

IMPLEMENTATION RESPONSIBILITIES

Electric distribution asset strategy personnel approve, review, and distribute this procedure and ensure the supporting documentation is communicated to the targeted audience.

GOVERNING DOCUMENT

[Utility Standard TD-8123S, "Electric System \(T/S/D\) Patrol, Inspection, and Maintenance Program"](#)

COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

Records and Information Management:

The document owner, or designee, ensures any records generated by this procedure are maintained in accordance with the Enterprise Records and Information (ERIM) program policy, standards, and Enterprise Records Retention Schedule (ERRS). Refer to [GOV-7101S, "Enterprise Records and Information Management,"](#) and related standards.

Management of records includes, but is not limited to:

- Integrity
- Storage
- Retention and Disposition
- Classification and Protection

[G.O. 95, "Overhead Electric Line Construction"](#)

[G.O. 165, "Inspection Requirements for Electric Distribution and Transmission Facilities"](#)

Field Safety Re-Assessment (FSR) Process and Procedures

REFERENCE DOCUMENTS

Developmental References:

[Utility Manual TD-8123M, *Electric System Inspections and Preventative Maintenance Manual*, "Distribution Failure Mode Effect Analysis \(FMEA\)"](#)

Supplemental References:

NA

APPENDICES

NA

ATTACHMENTS

NA

DOCUMENT REVISION

This document cancels and supersedes Utility Bulletin TD-2305M-B008, "Evaluation of In-Service Wood Distribution Poles," Rev. 0, dated 09/11/2021.

DOCUMENT APPROVER

██████████, Senior Director, Electric Asset Strategy

DOCUMENT OWNER

██████████, Senior Director, Electric Asset Strategy

DOCUMENT CONTACTS

██████████, Asset Mgmt. Proj., P&I, and Mtc. Specialist, Distribution Overhead Asset Strategy

REVISION NOTES

Where?	What Changed?
NA	This is a new procedure.