

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigations Plans Discovery 2026-2028
Data Response**

PG&E Data Request No.:	OEIS_002-Q005
PG&E File Name:	WMP-Discovery2026-2028_DR_OEIS_002-Q005
Request Date:	April 11, 2025
Requester DR No.:	OEIS-P-WMP_2025-PG&E-002
Requesting Party:	Office of Energy Infrastructure Safety
Requester:	Nathan Poon
Date Sent:	April 16, 2025

SUBJECT: REGARDING DISTRIBUTION DETAILED AERIAL AND GROUND INSPECTIONS

QUESTION 005

On page 226 of it WMP, PG&E sets a target of 218,000 distribution detailed inspections per year for 2026-2028. The target states the inspections can be either ground or aerial; separate targets are not provided for detailed aerial or detailed ground inspections.

- a. Provide the following information related to scheduling detailed aerial and ground inspections:
 - i. Does PG&E have controls in place to avoid an asset being only subject to one variety of detailed inspection for extended periods of time? (i.e. an asset in an area of extreme consequence and extreme wildfire risk only receiving detailed aerial inspections for 10 years). Provide PG&E's reasoning for its chosen approach.
- b. Some hazardous conditions may be less likely identified via ground inspections while others may be less likely identified via aerial inspections.
 - i. Provide a list of conditions that PG&E has recognized as being more likely identified via aerial inspections and less likely identified via ground inspections. Provide a brief explanation for each condition.
 - A. If PG&E has not recognized any such conditions, briefly discuss its reasoning.
 - ii. Provide a list of conditions that PG&E has recognized as being more likely identified via ground inspections and less likely identified via aerial inspections. Provide a brief explanation for each condition.
 - A. If PG&E has not recognized any such conditions, briefly discuss its reasoning.

Answer 005

- a. PG&E anticipates that the vast majority of detailed inspections completed in HFTD/HFRA in the 2026-2028 time frame will be completed via aerial means. PG&E is working towards having the aerial inspection meet PG&E's GO 165 detailed inspection requirements beginning in 2026. Ground inspections may continue to be used where aerial inspections cannot access the structure due to various issues such as customer or vegetation. Changes in HFTD/HFRA inspection frequency are reviewed and approved through PG&E's Wildfire Risk Governance Committee to ensure changes mitigate wildfire risk. As described in response to part b below, PG&E expects that the detailed aerial inspection will detect all conditions that the ground inspection detects.
- b. PG&E has been improving and maturing its aerial inspections as aerial has evolved from pilot stages to an inspection deployed at scale. In 2023, the pilot aerial inspection focused on only pole top conditions. In 2024, as PG&E deployed the inspection at scale for the first time, we expanded the aerial inspection to include the full structure. The aerial inspection performed by PG&E in 2024 and 2025 is a risk-based inspection, focusing on identifying Level 1 and 2 conditions. It was not a detailed GO 165 inspection for all abnormal compelling conditions. This risk-based aerial inspection demonstrated improved ability to detect most Level 1 and 2 conditions on the assets that are most likely to fail: pole, crossarm/insulator, equipment, and conductor conditions. However, since aerial inspection was limited to Level 1 and 2 conditions, it would not report Level 3 conditions such as high voltage sign, visibility strip, and guy issues that the ground inspection detects. For 2025, PG&E already updated the aerial shot sheet to enable better capture of exposed grounds and issues that require particular angles to detect such as leaning poles and slack guys. There was also a need to create a handheld shot sheet in order to capture photos where drone flights were not able to be completed due to safety concerns or tree obstructions. This shot profile will allow the desktop inspector to do a full inspection using a combination of drone imagery and images captured from the handheld device.

Currently, PG&E is identifying additional requirements to make the aerial inspection a GO-165 detailed inspection beginning in 2026. These include adding the requirement for aerial to report Level 3 conditions as well as the handful of conditions that are currently reported by ground inspections but not part of the aerial inspection. These include idle facilities, third party notifications, and vegetation notifications. Once these changes are implemented, PG&E expects the detailed aerial inspection to detect all conditions the detailed ground inspection detects.