

## Priority P for Transmission Notifications Not Related to Compliance Requirements

### SUMMARY

This utility procedure explains how to use Line Corrective (LC) notifications with Priority P to support tracking of proactive and programmatic work that is not tied to a specific compliance requirement.

Continue to address notifications that do have associated compliance requirements in accordance with the [Electric Transmission Preventive Maintenance \(ETPM\) Manual](#) (TD-1001M) and [Utility Procedure TD-8123P-103, "Electric Transmission Line Guidance for Setting Priority Codes."](#)

This procedure applies only to work performed on overhead transmission assets. Continue to create and prioritize LC notifications for land, roads, and vegetation in accordance with the [ETPM Manual](#) and [Utility Procedure TD-8123P-103](#).

Level of Use: Informational Use

### TARGET AUDIENCE

This procedure applies to the following electric transmission personnel involved in the maintenance of transmission line facilities:

- Asset Strategy
- Asset Management
- Standards
- Maintenance and Construction (M&C)
- Work Management
- System Inspections Work Management
- System Inspections (SI)
- Centralized Inspection Review Team (CIRT)
- M&C Compliance
- Transmission Line Engineering

### SAFETY

This procedure describes administrative tasks that do not expose personnel or the public to any specific hazards.

### BEFORE YOU START

NA

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### PROCEDURE STEPS

#### 1 Background Information

- 1.1 Most LC notifications are created for compliance-related conditions with maximum allowable deadlines for completion specified in California Public Utilities Commission (CPUC) [General Order \(G.O.\) 95, “Rules for Overhead Electric Line Construction,” Rule 18, “Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards.”](#)
1. Under [Utility Procedure TD-8123P-103](#), these notifications receive priority codes A, E, and F that correspond to Levels 1, 2, and 3 in [G.O. 95, Rule 18](#). The deadlines for notifications with these priorities must not exceed the maximum durations specified in [Rule 18](#).
- 1.2 Historically, a smaller number of LCs have tracked work that is not tied to external (e.g., [G.O. 95](#)) or internal (e.g., [TD-8123P-103](#)) compliance requirements. Examples of such notifications include, but are not limited to, the following:
- Proactive helicopter washing program
  - Collection of sampled assets for testing
  - Condition monitoring
- 1.3 The proactive and programmatic LCs typically received Priorities E or F that were also used for compliance-related conditions, making it hard to differentiate between these types of notifications during work planning, executing, and compliance reporting.
- 1.4 Identifying notifications that are not tied to compliance requirements typically requires understanding each program’s scope and performing keyword searches of the notification long text to filter for notifications corresponding to a particular program.
- 1.5 With the recent expansion of proactive strategic programs, accurately identifying LC notifications that are not tied to compliance requirements has become more difficult. This development has prompted the introduction of a dedicated Priority P to track LC notifications that are not tied to compliance requirements.

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### 2 Creating Priority P Notifications

#### 2.1 Evaluating Compliance-Related Work

1. Before creating a notification with Priority P, REVIEW the following documents to confirm that the planned notification is not for a condition that has a compliance requirement:
  - [G.O. 95](#)
  - [Utility Procedure TD-8123P-103](#)
  - Job aids associated with the [ETPM Manual](#)
2. REVIEW [Attachment 1, "Program Codes and Information for Priority P Notifications,"](#) for the list of programs that involve work not tied to compliance requirements and thus qualify for Priority P notifications.
3. DO NOT ASSIGN Priority P to the following:
  - a. Notifications with compliance requirements.
    - (1) Notifications with compliance requirements must receive compliance-related priorities A, E, or F.
  - b. Notifications for access roads, land, and vegetation management.
    - (1) DO NOT USE Priority P for notifications that do not involve working on or monitoring the health of overhead transmission assets.
  - c. Notifications that are not managed under a program manager (SEE "Programmatic work" and "Program manager" in the [Definitions](#) section on Page 6).
    - (1) For notifications that are not tied to compliance requirements and that are not managed as a program, USE LR notifications.

#### 2.2 Creating a New Notification

1. COLLECT the information needed to generate the notification.
  - a. USE a form for individual notifications or a spreadsheet for multiple notifications. At a minimum, the following information is required:
    - (1) SAP equipment ID (if the notification is for a specific asset); some notifications, such as helicopter washing program work, may specify an entire circuit rather than a single asset
    - (2) SAP structure number (e.g., 001/005)

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### 2.2 (continued)

- (3) Functional location (e.g., ETL.1234)
- (4) Circuit name
- (5) Name of submitter (program manager)
- (6) LAN ID of submitter (to populate the "Identified by" field in SAP)
- (7) Facility, Damage, and Action (FDA) codes
- (8) Order number
- (9) Priority
  - USE Priority P.
  - SEE [Section 2.1, "Evaluation for Compliance-Related Work,"](#) on Page 3 to identify work that is not tied to compliance requirements.
- (10) Required End Date: Deadline to complete work that is not related to a compliance requirement.
- (11) Comment
  - INCLUDE work description.
  - To identify a particular program, INCLUDE a program code formatted as 'ZZZPRG\_', followed by a short program description in all-caps (e.g., 'ZZZPRG\_HELIWASH').
  - Existing codes, created in 2023 or earlier, that have a different format (e.g., 'ZZZATS\_COLLECTION') may be used.
- (12) Planner Group: The Planner Group in SAP that the work should be assigned to.

2. SUBMIT the completed form to a clerk.

3. The clerk CREATES the notification.

### 2.3 Gatekeeping by CIRT

1. Notifications created with Priority P automatically bypass CIRT gatekeeping.

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### 3 Managing Priority P Notifications

#### 3.1 Tracking

1. Each program manager or work sponsor TRACKS Priority P notifications for their program, as identified in [Attachment 1, "Program Codes and Information for Priority P Notifications."](#)
  - a. IDENTIFY notifications for a particular program using the SAP "Identified by" field and/or program code embedded in the long text comments ('ZZZPRG\_...').
  - b. REVIEW notifications for completion at a frequency determined by the program manager or work sponsor.

#### 3.2 Closure

1. Program managers or work sponsors DEFINE specifications for the record of evidence required for tag closures.
  - a. At a minimum, the record of evidence must indicate the work completion date.
2. PROVIDE documentation of the completed work (e.g., photos, completed checklists, as-builts).
3. The program manager or work sponsor SENDS the record of evidence to the clerk when requesting closure of the Priority P notification.
4. The clerk ATTACHES the record of evidence to the notification before closing.

#### 3.3 Recurring Work

##### NOTE

Some notifications not related to compliance requirements may involve recurring work performed at a particular frequency (e.g., personnel going to a structure to gather device data every 6 months).

1. SUBMIT a new notification for each instance that work is performed.

**Example:** If collecting device data every 6 months, generate a new notification every 6 months. Separate notifications for each recurrence ensure readily queryable tracking of each instance of completed work, including the date completed.
2. SUBMIT a new notification at the same time as the record of evidence for the previous recurrence (SEE [Section 2.2, "Creating a New Notification,"](#) on Page 3).

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### 3.3 (continued)

3. When online monitoring technologies do not require physical access to get the data, DO NOT CREATE recurring notifications.
  - a. Only CREATE a notification for the initial installation of the monitoring technology. Data obtained through these technologies is tracked through the data source system.

### 3.4 Converting an Existing Notification to Priority P

1. Only CIRT can CHANGE the priority of an existing notification.
2. EMAIL a request to [TLineCIRT@pge.com](mailto:TLineCIRT@pge.com) to review the existing notification and convert it to Priority P, if the review confirms that it meets the criteria listed in [Section 2.1, "Evaluation for Compliance-Related Work,"](#) on Page 3.
  - a. INCLUDE the information in Steps [2.2.1.a.10](#) and [2.2.1.a.11](#) with the request to CIRT.

### 3.5 Stakeholder Review

1. In the fourth quarter (Q4) of each year, Asset Management LEADS a stakeholder review meeting for all Priority P programs.
2. IDENTIFY AND SOLVE gaps to quality tag closure.
3. UPDATE this procedure, as required.

### END of Instructions

## DEFINITIONS

**Proactive work:** Work that is selected based on strategic objectives and not on compliance.

**Programmatic work:** A set of related work being managed together, which occurs on a recurring basis or with a regularly evolving scope and with a dedicated budget.

**Program manager:** The person responsible for tracking execution of a program.

**Work sponsor:** A representative of the group nominating or identifying work not tied to compliance requirements.

## IMPLEMENTATION RESPONSIBILITIES

Transmission Line Asset Strategy personnel ensure that this document is provided to M&C, Work Management, System Inspections, CIRT, and other appropriate personnel.

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### GOVERNING DOCUMENT

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

### COMPLIANCE REQUIREMENT / REGULATORY COMMITMENT

[CPUC G.O. 95, "Rules for Overhead Electric Line Construction," Rule 18, "Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards," Part B, "Maintenance Programs," Section 1.b.](#)

#### Information and Records Management:

PG&E data, information, and records are Company assets that must be traceable, verifiable, accurate, and complete and can be retrieved upon request. Functional areas are responsible for complying with the Information and Records Governance policy, standards, and the Information and Records Retention Schedule. Refer to [GOV-7101S, "Enterprise Records and Information Management Standard,"](#) for further guidance or contact Information and Records Governance at [Information&RecordsGovernance@pge.com](mailto:Information&RecordsGovernance@pge.com).

### REFERENCE DOCUMENTS

#### Developmental References:

NA

#### Supplemental References:

[Electric Transmission Preventive Maintenance \(ETPM\) Manual](#) (TD-1001M)

[Utility Procedure TD-8123P-103, "Electric Transmission Line Guidance for Setting Priority Codes"](#)

### APPENDICES

NA

### ATTACHMENTS

[Attachment 1, "Program Codes and Information for Priority P Notifications"](#)

### DOCUMENT RECISION

NA

### DOCUMENT APPROVER

, Director, Transmission and Substation Asset Management

## Priority P for Transmission Notifications Not Related to Compliance Requirements

### DOCUMENT OWNER

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### DOCUMENT CONTACT

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### REVISION NOTES

| Where? | What Changed?                    |
|--------|----------------------------------|
| NA     | This is a new utility procedure. |