

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans**  
**Rulemaking 18-10-007**  
**Data Response**

PG&E Data Request No.:	WSD_009-Q02		
PG&E File Name:	WildfireMitigationPlans_DR_WSD_009-Q02		
Request Date:	March 12, 2021	Requester DR No.:	WSD-2021WMP-04
Date Sent:	March 17, 2021	Requesting Party:	Wildfire Safety Division
PG&E Witness:		Requester:	Ryan Arba

**SUBJECT: WMP - DATA REQUEST - DUE MARCH 17 2021 - PGE**

**QUESTION 02**

Provide details on how the scope and content of increased asset inspection efforts differ from routine inspections apart from frequency of execution.

**ANSWER 02**

PG&E addressed this issue on page 582 of the 2021 WMP. An excerpt is included below for convenience:

Preventive maintenance tasks such as enhanced inspections of overhead assets are a key means for PG&E to proactively identify potential failure modes that could lead to wildfire ignition, other public safety hazard or outage if not resolved within an appropriate timeframe. Through a combination of ground inspection, intrusive wood pole testing, aerial inspections, infrared assessments, and patrols, PG&E seeks to identify conditions that require repair or replacement of assets prior to failing.

Previously, PG&E utilized a time-driven cycle to prescribe patrol and inspection activities to transmission lines or distribution plat maps (which encompass all distribution circuits within the geographic coordinates specified on the map). For example, the overhead distribution poles on each plat map would be fully inspected every 5 years. Since 2019, PG&E has undertaken efforts to develop risk-informed models that prioritize preventive asset patrol and inspection activity cycles aligned with the risk of wildfire ignition, including increasing the frequency of such preventive tasks in High Fire Threat District (HFTD) Tiers 2 and 3. Now the distribution assets in a plat map that covers an all Tier 2 area would be fully inspected every third year because of the risk associated with this area. Additionally, the evaluation and finalization of corrective findings by a Centralized Inspection Review Team (CIRT) was established for distribution in 2013, with transmission and substation inspection programs being established in 2019, and continues as a core component of the patrol and inspection program.

For 2020 through 2022, PG&E considers enhanced detailed inspections of overhead assets, which exceed the minimum requirements of General Order (GO) 165 to include the following tasks:

- Distribution: digitized capture of detailed visual inspection via checklists and photographic documentation from a ground vantage point.
- Transmission: digitized capture of detailed visual inspection via checklists and photographic documentation, both from ground position and by aerial vantage, are coupled to complete an enhanced inspection cycle.
- Transmission (500 kilovolt (kV)): this examination also includes structural integrity assessment of tower structures via climbing inspection.

The supplemental (enhanced) substation inspections are conducted in addition to the baseline GO 174 inspections and include digitized capture of detailed visual inspection via checklists and photographic documentation, both from ground vantage and by aerial means, coupled to complete an enhanced inspection. Supplemental enhanced substation inspections also include an infrared (IR) assessment of the station equipment in addition to the visual inspection