

PACIFIC GAS AND ELECTRIC COMPANY

**GENERAL ORDER 165
2023 ANNUAL ELECTRIC DISTRIBUTION INSPECTION
REPORT**

JULY 1, 2024

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I. 2023 ELECTRIC DISTRIBUTION INSPECTION SUMMARY

Pursuant to Section III.D of the California Public Utilities Commission’s (Commission) General Order (GO) 165, Pacific Gas and Electric Company (PG&E) hereby submits our Annual Electric Distribution Inspection Report, which details our 2023 electric distribution patrol and inspection activities.¹

Table 1 lists five categories² of electric distribution inspections required by GO 165: Overhead (OH) Patrols, Underground (UG) Patrols, OH Detailed Inspections, UG Detailed Inspections, and Wood Pole Intrusive inspections. Table 1 denotes the total units of work due by inspection type for the 2023 reporting period and the number of outstanding or late (not completed before the date due) inspections within the same reporting period for each of the five categories.

The data presented in Table 1 is a point-in-time reporting of inspections due and outstanding/late in 2023 and is accurate based on the data available as of June 27, 2024, the date this report was signed by the verifying officer. As shown in the table, by December 31, 2023, we completed 96.51% of our OH patrols, 99.94% of our OH detailed inspections, 99.99% of our UG patrols, 99.85% of our UG detailed inspections, and 80.41% of our wood pole intrusive inspections by their 2023 due dates.

Table 1 – 2023 Electric Distribution Inspection Summary

Type of Inspections (1)	Due (2)	Outstanding/Late (3)
OH Patrols	1,348,610	0/47,121
OH Detailed Inspections	550,927	217/109
UG Patrols	268,088	0/34
UG Detailed Inspections	151,012	0/226
Wood Pole Intrusive	2721	369/164

¹ PG&E considers structures supporting both transmission and distribution assets to be transmission assets and does not include them in this report.

² GO 165 only requires four categorical types, but in order to present the data in a more meaningful format, this report divides the “Patrol” category in the sample report template in GO 165 into the subcategories “OH Patrols” and “UG Patrols.” The use of five categorical types is consistent with past GO 165 Annual Inspection reports submitted by PG&E.

Notes:

(1) Definition of Reporting Unit Basis

- a. OH: We define an OH unit as any PG&E solely-owned or PG&E-jointly-owned, or third-party-owned poles for which we have inspection obligations. We also patrol and inspect our OH equipment, OH conductors, and streetlights on those poles, but these facilities are not counted as additional OH units for the purposes of this report.
- b. UG: We define an UG unit as any PG&E-owned or third party-owned padmount facility, subsurface enclosure or vault containing our primary cables or equipment. We also patrol padmount facilities, subsurface enclosures, and vaults containing only secondary facilities, but these facilities are not counted as UG units for the purposes of this report.
- c. Wood Pole Intrusive: We define a wood pole intrusive unit as any intrusively inspected PG&E-solely or jointly-owned pole.

(2) Definition of “Due”

Units in the “Due” column represent the total units of work by inspection type that we determined should have been completed by the end of 2023. In this report for 2023, we only include wood poles with intrusive inspection deadlines in 2023 per GO 165 Table 1; we do not include intrusive inspections scheduled to be performed in 2023 solely to meet PG&E’s internal inspection cycles, self-reports, and/or mitigation plans. In prior years, we have included wood poles as “Due” that were scheduled to be inspected in the report year per PG&E’s internal procedures, but that may not have been due according to GO 165, resulting in overreporting for those years.

(3) Definition of “Outstanding” and “Late”

Pursuant to the definition of “Outstanding” as provided in Note 3 of the Sample Report Template in GO 165 Section III.D, the “Outstanding” entries represents the total required inspections that were not completed in the reporting period (i.e., not completed in 2023).

The “Late” Units represent the total units of work by inspection type that we did not inspect within a “year” as defined by D.13-06-011, Appendix B, at p. B-3.

II. EXPLANATION OF OUTSTANDING AND LATE UNIT

We provide an explanation below for patrols and inspections that were “Outstanding” and “Late.”

a. Outstanding – Overhead Detailed Inspections

We are reporting 217 OH detailed inspections in our Fresno Division as “Outstanding” in the “Outstanding/Late” column of Table 1 due to environmental access restrictions. In March and April of 2023, storms brought a heavy amount of rainfall that flooded the Tulare Lake basin. All 217 poles located in this area are currently inaccessible to complete an inspection. Please see Attachment 2 for a list of impacted assets.

b. Outstanding – Wood Pole Intrusive

We are reporting 369 wood pole intrusive inspections as “Outstanding” in the “Outstanding/Late” column of Table 1. We are in the process of validating whether these units are distribution wood poles subject to GO 165 intrusive inspection requirements. Our validation process may indicate that some units are not subject to these requirements (e.g., not wood, not owned by PG&E, not supporting supply conductors, not in the field) and will update our records database accordingly.

c. Late – Human Error

We are reporting 47,120 OH Patrols, 31 UG Patrols, and 21 UG Inspections in our service territory as “Late” in the “Outstanding/Late” column of Table 1 due to human error. We validated map due dates after the patrols and inspections were complete. This validation effort identified incorrect due dates for the map, which we updated to reflect the correct dates. This caused these inspections and patrols to be completed late. Please see Attachment 1 for a list of impacted maps.

We are reporting three UG Patrols in our North Bay Division as “Late” in the “Outstanding/Late” column of Table 1 due to human error. The UG Map folder, GG3221, had a roster with an incorrect due date. We discovered the error on the UG Map when we processed

the workplan. We completed the UG Patrol on November 1, 2023, after the map due date. Please see Attachment 1 for a list of impacted maps.

We are reporting one OH Inspection in our Central Coast Division, two OH Inspections in our Humboldt Division, one OH Inspection in our Kern Division, one OH Inspection in our San Jose Division, and one OH Inspection in our Yosemite Division as “Late” in the “Outstanding/Late” column of Table 1 due to human error. The mapping department determined duplicate photos were submitted with map corrections for a different pole; therefore, we had to re-inspect these assets and report the inspections as completed late. Please see Attachment 1 for the list of impacted assets.

d. Late – Inspection Quality

We are reporting 191 UG Inspections in our Stockton Division as “Late” in the “Outstanding/Late” column of Table 1 due to inspection quality. Due to the quality of a few inspections and out of an abundance of caution, we re-inspected maps Z0620 and Z0624 in their entirety. We completed these inspections on November 1 and December 18, 2023, respectively, after the map due dates. Please see Attachment 1 for a list of impacted maps.

We are reporting one OH Inspection in our Kern Division and one OH Inspection in our Stockton Division as “Late” in the “Outstanding/Late” column of Table 1 due to inspection quality. Inspectors uploaded incorrect photos for completed inspections; therefore, we had to re-inspect these assets and report the inspections as completed late. Please see Attachment 1 for the list of impacted assets.

e. Late – Incorrect Map

We are reporting one OH Patrol in our Sacramento Division as “Late” in the “Outstanding/Late” column of Table 1 due to an incorrect map. We incorrectly assigned OH Map, M04, to Main Work Center, Sacramento, however, this map should have been for Main Work Center, Marysville. We discovered the error in December 2023 and completed the OH Patrol on December 28, 2023. Please see Attachment 1 regarding this impacted map.

f. Late – Mapping Discrepancy

We are reporting three OH Inspections in our Kern Division and one OH Inspection in our Sacramento Division as “Late” in the “Outstanding/Late” column of Table 1 due to a mapping discrepancy. In the Kern Division, the inspector executed inspections at the wrong location due to a mapping discrepancy; therefore, we had to re-inspect these assets and report the inspections as completed late. In the Sacramento Division, the asset was not in our Geographic Information System (GIS) database, therefore, the inspector submitted a map correction. However, because the pole had vegetation, we had to wait for it to be trimmed. As a result of the delay, we completed the inspection after the due date on July 5, 2023. Please see Attachment 1 for the list of impacted assets.

g. Late – Customer Refusals

We are reporting four OH Inspections in our North Valley Division as “Late” in the “Outstanding/Late” column of Table 1 due to customer refusal on property. We had to coordinate with our Corporate Security to obtain access onto the customer’s property. This caused the inspections to be completed late. Please see Attachment 1 for the list of impacted assets.

h. Late – Access Restrictions

We are reporting 93 OH Inspections and 14 UG Inspections in our service territory as “Late” in the “Outstanding/Late” column of Table 1 due to access restrictions. During the initial attempt to inspect these assets, we created “Cannot Get In” (CGI) or “Could Not Locate” (CNL) notifications to complete a detailed inspection for the various reasons listed on the below summary table. Please see Attachment 2 for a list of impacted assets details and completion dates through December 2023.

Division	Category	Late	
		OH Inspect	UG Inspect
CC	Access Constraints		1
DA	Customer Refusal	1	
	Unresponsive Customer	1	
FR	Environmental	46	
LP	Customer Refusal		7
NB	Access Constraints	1	
	Customer Refusal	1	
NV	Customer Refusal	4	
SA	Access Constraints	1	1
	Vegetation	1	
SI	Access Constraints	4	2
	Customer Refusal	3	
	Unresponsive Customer	5	
	Unsafe Access	3	
	Vegetation	8	
SJ	Access Constraints	1	1
	Customer Refusal	1	
SO	Access Constraints	9	
ST	Access Constraints		2
	Vegetation	1	
YO	Vegetation	2	
Grand Total		93	14