

PACIFIC GAS AND ELECTRIC COMPANY

**GENERAL ORDER 165
2024 ANNUAL ELECTRIC DISTRIBUTION INSPECTION
REPORT**

JULY 1, 2025

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I. 2024 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) submits its Annual Electric Distribution Inspection Report, which details PG&E’s 2024 electric distribution patrol and inspection activities.

Table 1 lists five categories¹ 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 2024 reporting period and the number of outstanding 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 2024 and is accurate based on the data available as of July 1, 2025, the date this report was signed by the verifying officer. As shown in the table, by December 31, 2024, PG&E completed 99.60% of its OH patrols, 99.92% of its OH detailed inspections, 99.97% of its UG patrols, 99.97% of its UG detailed inspections, and 99.70% of its wood pole intrusive inspections by their 2024 due dates.

Table 1 – 2024 Electric Distribution Inspection Summary

Type of Inspections (1)	Due (2)	Outstanding/Late (3)
OH Patrols	1,934,721	0/721
OH Detailed Inspections	331,105	0/261
UG Patrols	280,614	0/77
UG Detailed Inspections	155,854	0/41
Wood Pole Intrusive	1,662 ²	5/N/A

¹ 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.

² Approximately 150 poles identified as due for an intrusive inspection in 2024 did not receive an intrusive test due to an inspection finding indicating that they did not require a distribution intrusive inspection.

Notes:

(1) Definition of Reporting Unit Basis

- a. OH: PG&E defines an overhead unit as any PG&E solely-owned or PG&E jointly-owned, or third party-owned poles for which PG&E has inspection obligations. PG&E also patrols and inspects the PG&E-owned overhead equipment, overhead conductors, and streetlights on those poles, but these facilities are not counted as additional overhead units for the purposes of this report.
- b. UG: PG&E defines an underground unit as any PG&E-owned or third-party owned padmount facility, subsurface enclosure or vault containing PG&E primary cables or equipment. PG&E also patrols padmount facilities, subsurface enclosures, and vaults containing only secondary facilities, but these facilities are not counted as underground units for the purposes of this report.
- c. Wood Pole Intrusive: PG&E defines 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 inspections due in the reporting period (2024) and do not include outstanding inspections from prior years.

Since 2023 we do not include intrusive inspections scheduled to be performed in the compliance period 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.

This report includes only wood poles with intrusive inspection due dates in 2024 per GO 165 Table 1. PG&E’s workplan encompassed poles not covered in Table 1 because they are non-wood, tested under Transmission line procedures, customer owned, or have since been removed. These poles have been excluded

from this report. Other poles included in this category have an indication that they may not require intrusive inspection and may be removed from the inspection scope at a later time through our records update process.

(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 2024).

The “Late” Units represent the total units of work by inspection type that PG&E did not inspect within a “year” as defined by D.13-06-011, Appendix B, at p. B-3. The “Late” definition does not apply to wood pole intrusive inspections, as the term “year” is defined as a calendar year in GO 165. Therefore all wood pole intrusive inspections completed in the reporting year are considered completed on time.

II. EXPLANATION OF OUTSTANDING UNITS AND LATE UNITS

PG&E provides an explanation below for inspections that were “Outstanding” and “Late”. There is a total of 721 OH Patrol, 261 OH detailed Inspection, and 77 UG Patrol, and 41 UG detailed inspection assets that were not completed by the CPUC due date set forth in Table 1 of GO 165 and are being reported as “Late”. There is a total of five Wood Pole Intrusive Inspections that were not completed by the due date set forth in Table 1 of GO 165 and are being reported as “Outstanding”. PG&E is providing an explanation below for the assets completed “Late” or “Outstanding”.

a. Late – Overhead Patrols

Three Overhead (OH) Patrol assets in our Kern Division territory, 67 Overhead (OH) Patrol assets in our Stockton Division territory, 257 OH Patrol assets in our Yosemite Division

territory, 316 OH Patrol assets in our Humboldt Division territory, 21 OH Patrol assets in our North Bay Division territory, and 57 OH Patrol assets in our Sacramento Division territory are reported late in the “Outstanding/Late” column of Table 1 due to human error. We validated map due dates after the patrols were completed. This validation effort identified incorrect due dates for the maps referenced in Attachment 1 tab name, OHP. The updated map due dates caused the patrols to be completed late. All referenced OH map patrols were completed before December 31, 2024. Please see Attachment 1 tab name, OHP, for more details.

b. Late – Overhead Detailed Inspections

Five OH Detailed Inspections in our Los Padres Division territory, and one OH Detailed Inspection in our San Jose Division territory are reported late in the “Outstanding/Late” column of Table 1 due to access constraints. In the Los Padres Division, an initial attempt to inspect all five assets was prevented due to the customer refusing access to the property. In the San Jose Division, an initial attempt to inspect the asset was unsuccessful due to a third-party non-utility access constraint. In each instance the inspector created Electric Corrective (EC) Notifications for applicable assets. All OH detailed inspections for these assets were completed before December 31, 2024, after their due date. Please see Attachment 2 for more details.

One OH Detailed Inspection in our Yosemite Division territory, four OH Detailed Inspections in our North Valley Division territory, and 250 OH Detailed Inspections in our Central Coast Division territory are reported late in the “Outstanding/Late” column of Table 1 due to human error. We validated asset due dates after the inspections were completed. This validation effort identified incorrect due dates which were subsequently updated. These updates caused the inspections to be completed late. All referenced OH Inspections for these assets were completed before December 31, 2024. Please see Attachment 1 tab name, OHI, for more details.

c. Late – Underground Patrols

One Underground (UG) Patrol asset in our Central Coast Division territory and 76 Underground (UG) Patrol assets in our Fresno Division territory are reported late in the “Outstanding/Late” column of Table 1 due to human error. In Central Coast Division Map D0907 was initially patrolled on-time, but later Division was unable to locate the file record.

The map was re-patrolled after the due date, causing it to be reported late. In Fresno Division 10 maps: 14205B, 14203B, 15191, 15212B, 16213C, 16213D, 1622224, 1622223, 16223C, and 15213A were completed late due to an oversight by the Compliance Supervisor in not tracking the due dates. All map patrols were completed before December 31, 2024, after their due date. Please see Attachment 1 tab name, UGP, for more details.

d. Late – Underground Detailed Inspections

Three Underground (UG) Detailed Inspections in our Kern Division territory, one Underground (UG) Detailed Inspection in our North Valley Division territory, and 13 Underground (UG) Detailed Inspections in our Peninsula Division Territory are reported late in the “Outstanding/Late” column of Table 1 due to human error. In two Kern Division maps: 3128012 for one asset and map 3129252 for two assets, inspections were completed late due to an oversight by the Compliance Supervisor in not tracking the due dates. For the Peninsula Division map B0702 for 13 assets, inspections were completed late also due to an oversight by the Compliance Supervisor in not tracking the due dates. For the North Valley Division map F4506 one asset inspection was completed late due to a map validation discovery. The UG Inspection was added to division’s workplan; however, they were not able to execute timely. All map inspections were completed before December 31, 2024, after their due date. Please see Attachment 1 tab name, UGI, for more details.

Nine Underground (UG) Detailed Inspections in our Stockton Division territory are reported late in the “Outstanding/Late” column of Table 1 due to external events. The initial attempt to inspect the remaining nine assets on map Q1403 was not successful as the area was not accessible due to flooding. In June 2024, the Stockton Division had several weather events (heat, fire, lightning) that impacted daily operations’ ability to execute timely. All asset inspections were completed before December 31, 2024, after their due date. Please see Attachment 1 tab name, UGI, for more details.

Three Underground (UG) Detailed Inspections in our North Bay Division territory and 12 Underground (UG) Detailed Inspections in our Sierra Division territory, are reported late in the “Outstanding/Late” column of Table 1 due to access constraints. In the North Bay Division, an initial attempt to inspect one asset was impeded by a third-party non-utility and two assets

required additional internal resources to locate. In the Sierra Division, the initial attempt to inspect twelve assets was not successful due to unsafe snow levels. In each instance the inspector created Electric Corrective (EC) Notifications for applicable assets. All UG detailed inspections for these assets were completed before December 31, 2024, after their due date. Please see Attachment 2 for more details.

e. Outstanding – Wood Pole Intrusive

Five Wood Pole Intrusive inspections are reported outstanding in the “Outstanding/Late” column of Table 1 due to access constraints. Initial attempts to inspect four assets were impeded by third-party non-utility (customer refusal/can’t get in (CGIs)). One initial attempt to inspect one asset was impeded by safety factors due to natural occurrences (access road was unsafe to use due to damage). In each instance, the inspector created Electric Corrective (EC) notifications for applicable assets. Two inspections (1 customer refusal and 1 natural factor) have been completed after December 31, 2024, after their due date. Three are still EC Notifications due to customer refusal. Please see Attachment 3 tab name, CGI, for more details.