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Ms. Nika Kjensli
Program Manager, ESRB, SED, CPUC
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Reference: Notification of Missed Intrusive Inspections Associated with PG&E's Pole Test and Treat Program

Dear Ms. Kjensli:

The purpose of this letter is to provide notice to SED of missed inspections associated with PG&E's Pole Test and Treat (PT&T) program. PG&E's Quality Management department, which is part of PG&E's Regulatory Compliance and Quality Assurance organization within Electric Operations, performed an audit of our PT&T program between March and July of this year, with the report completed in September 2020. The audit found approximately 41,000 poles that appear, based on available pole test and treat records, to have missed the 20-year intrusive inspection cycle required by General Order (GO) 165. PG&E is reviewing its pole test records as well as other systems of record (GIS and SAP) to reconcile available data to determine the status of inspections on these poles. Where our records are inconclusive, or where we confirm that inspections have not taken place, we are performing inspections on the poles with the expectation that these inspections are completed this year, barring obstacles such as access issues related to weather or other circumstances.

Additionally, to prevent further recurrence, PG&E is working to adjust the process by which poles are selected for annual program cycles, and to determine where the PT&T results should be stored, how asset data corrections are passed from PT&T to central data systems, and what technology platforms are used to collect the PT&T data. We will provide updates on a bi-weekly basis that will include our progress in addressing the approximately 41,000 poles. The updates will include (1) the number of poles visited during the prior two weeks; (2) of those poles visited, how many had already been inspected; (3) how many poles require inspections; and (4) number of completed inspections.

This audit also identified a need to address our representations made in prior GO 165 reports. To the extent we confirm missed inspections, we will submit a correction to the most recent report submitted in 2020.

Please let me know if you'd like to discuss this matter.

Thank you.

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cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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