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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of PACIFIC GAS AND ELECTRIC COMPANY for Authority Among Other Things, to Decrease its Rates and Charges for Electric and Gas Service, and Increase Rates and Charges for Pipe Expansion Service.

(U 39 M)

A.94-12-005
(Filed December 9, 1994)

Commission Order Instituting Investigation Into the Rates, Charges, Service, and Practices of Pacific Gas and Electric Company.

I.95-02-015
(Filed December 9, 1994)

Order Instituting Rulemaking for Electric Distribution Facility Standard Setting.

R.96-11-004
(Filed December 9, 1994)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 M)
GENERAL ORDER 165 ANNUAL INSPECTION REPORT FOR 2013 SUBMITTED
PURSUANT TO CPUC DECISION NO. 97-03-070, DECISION NO. 09-08-029,
DECISION NO. 12-01-032, AND DECISION NO. 13-06-011**

BARBARA H. CLEMENT

Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
Telephone: (415) 973-3660
Facsimile: (415) 973-5520
E-Mail: BHC4@pge.com

Dated: June 30, 2014

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

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**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 M)
GENERAL ORDER 165 ANNUAL INSPECTION REPORT FOR 2013 SUBMITTED
PURSUANT TO CPUC DECISION NO. 97-03-070, DECISION NO. 09-08-029,
DECISION NO. 12-01-032, AND DECISION NO. 13-06-011**

Pursuant to Commission direction, Pacific Gas and Electric Company submits *Pacific Gas And Electric Company's General Order 165 Annual Inspection Report for 2013 Submitted Pursuant to CPUC Decision No. 97-03-070, Decision No. 09-08-029, Decision No. 12-01-032, and Decision No. 13-06-011*, attached as Exhibit 1.

Respectfully Submitted,

BARBARA H. CLEMENT

By: /s/ Barbara H. Clement
BARBARA H. CLEMENT

Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
Telephone: (415) 973-3660
Facsimile: (415) 973-5520
E-Mail: BHC4@pge.com

Dated: June 30, 2014

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

VERIFICATION

I, the undersigned say:

I am an officer of Pacific Gas and Electric Company, a corporation, and am authorized to make this Verification for and on behalf of said corporation, and I make this Verification for the following reason, that I have read the foregoing:

Pacific Gas and Electric Company's (U 39 M)
General Order 165 Annual Inspection Report for 2013 Submitted Pursuant to CPUC Decision
No. 97-03-070, Decision No. 09-08-029, Decision No. 12-01-032, and Decision No. 13-06-011

I am informed and believe matters therein are true and on that ground I allege that the matters stated therein are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in San Francisco, California, this 26th day of June, 2014.

/s/ Patrick Hogan

PATRICK HOGAN
Vice President, Electric Opers Asset Management

EXHIBIT 1

PACIFIC GAS & ELECTRIC COMPANY
(U 39 M)

GENERAL ORDER 165
ANNUAL ELECTRIC DISTRIBUTION INSPECTION REPORT
FOR 2013

June 30, 2014

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**PACIFIC GAS & ELECTRIC COMPANY (U 39 M)
GENERAL ORDER 165 ANNUAL ELECTRIC DISTRIBUTION
INSPECTION REPORT FOR 2013**

I. 2013 ELECTRIC DISTRIBUTION INSPECTION SUMMARY

Pursuant to Section III.D of the California Public Utilities Commission's (Commission) General Order (GO) 165, adopted in Decision No. (D.) 97-03-070, and modified by D.09-08-029, D.12-01-032, and D.13-06-011, Pacific Gas & Electric Company (PG&E) submits its Annual Inspection Report which details PG&E's 2013 electric distribution patrol and inspection activities.

Table 1 lists five categorical types of electric distribution inspections required by GO 165: Overhead (OH) Patrols^{1/}, Underground (UG) Patrols, OH Detailed Inspections, UG Detailed Inspections, and Wood Pole Intrusive. The table denotes the total units of work due by inspection type for the 2013 reporting period and the number of outstanding (not completed) 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 in 2013, and is, as of the date of submittal to the Commission, deemed as the most accurate data available. As shown in the table, by December 31, 2013, PG&E had completed 99.99% of its OH patrols, 99.89% of its OH detailed inspections, 99.99% of its UG patrols, 99.98% of its UG detailed inspections, and 100% of its wood pole intrusive inspections due in 2013.

1/ 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".

Table 1 – 2013 Electric Distribution Inspection Summary

Type of Inspections (1)	Due (2)	Outstanding (3)
OH Patrols	1,187,557	2
OH Detailed Inspections	464,783	488 ^{2/}
UG Patrols	233,206	5
UG Detailed Inspections	131,584	22
Wood Pole Intrusive	292,383	0

Notes:

(1) Definition of Reporting Unit Basis

- a. OH: PG&E defines an overhead unit as any PG&E solely owned, PG&E jointly owned, or third party owned pole supporting PG&E equipment or conductors operating at less than 60,000 volts. 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 padmounted facility, subsurface enclosure, or vault containing primary cables or equipment that operate at less than 60,000 volts. PG&E also patrols padmounted 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.

The patrol unit counts are generally based on the most recent preceding detailed inspection map unit counts.

(2) Definition of “Due”

Units in the “Due” column represent the total units of work by inspection type that PG&E determined should have been completed by the end of 2013. This data is based on year-end analysis and not on projections made at the beginning of 2013.

2/ The late OH detailed inspection unit count may change due to pending validation of facility counts in the field. See section II.e. for details.

In addition to regularly scheduled patrol and inspection units, this column includes any special inspection and re-inspection units that PG&E scheduled for completion in 2013. Special and re-inspection units are discussed in previously submitted GO 165 Annual Inspection Reports.

Although GO 165 requires padmounted facilities be detail inspected on a minimum five year cycle, PG&E performs detailed inspections of padmounted facilities on a more frequent three year cycle. For the purposes of this report, padmounted facilities are “due” based on PG&E’s more frequent underground three year detailed inspection cycle.

Wood pole intrusive data in this column represents the total poles intrusively tested by PG&E’s Pole Test & Treat Program. PG&E maintains a 10 year inspection cycle for most poles; however, poles under 15 years old and previously tested poles under 50 years old with an original treatment of pentachlorophenol are intrusively tested on a 20 year cycle per the minimum inspection interval of GO 165.

(3) Definition of “Outstanding”

Units in the “Outstanding” column represent the total units of work by inspection type that PG&E determined should have been completed by the end of 2013 but were not (see Section II for more detail).

As discussed above under the definition of “Due”, PG&E performs detailed inspections of padmounted facilities on a more frequent, three year cycle as opposed to the five year cycle of GO 165. For the purposes of this report, padmounted facilities are considered “Outstanding” if they were due to be inspected by the end of 2013 (based on PG&E’s three year inspection cycle) but the inspection was not completed by the end of 2013.

II. EXPLANATION OF OUTSTANDING UNITS

There are a total of 2 OH patrol, 488 OH detailed inspection, 5 UG patrol, and 22 UG detailed inspection units in the “Outstanding” column in Table 1. The patrols or detailed inspections of these units were not completed in 2013 due to the following circumstances:

- a. Accessibility issues represent a common challenge to completing scheduled underground inspections. Two (2) UG detailed inspection units and two (2) OH patrol units in the “Outstanding” column could not be accessed for patrol or inspection before the end of 2013. Specifically, the two (2) outstanding UG detailed inspection

units were splice boxes containing only underground cable. One splice box, located in PG&E's Yosemite Division, was paved over during construction of a state highway, and PG&E could not resolve the accessibility issue with Caltrans before the end of 2013. This splice box was relocated to a more accessible location by June 11, 2014. The second splice box, located in PG&E's Humboldt Division, could not be opened due to deterioration of the bolts securing the lid, and required crew repairs to make it accessible for inspection. This unit was inspected on January 24, 2014. Finally, the two (2) outstanding OH patrol units, located in PG&E's North Bay Division, could not be accessed in 2013 due to customer access limitations. PG&E patrolled the two units on June 4, 2014.

- b. Two (2) OH detailed inspection units and one (1) UG detailed inspection unit located in PG&E's Sacramento Division were missed due to human error. The inspectors assigned to the units overlooked the units on the maps they used to perform the inspections and, as a result, they did not inspect the units. The errors were not discovered until 2014. All units were inspected by March 21, 2014.
- c. Five (5) UG patrol inspection units located in PG&E's Stockton Division were not patrolled in 2013 due to a technological printing error. The patrol map containing the UG units displayed correctly in PG&E's electronic mapping system, but there was an error when the UG unit map layer was being translated onto paper. As a result, the paper map appeared as if it did not have any UG units and the inspector assigned to the map believed that there were no UG facilities on the map to patrol. The inspector subsequently completed the map as a map with zero UG facilities without inspecting the UG facilities in the field. PG&E inspected the missed units by June 04, 2014. To

ensure that any technological printing errors are discovered before units become past due, PG&E's Stockton Division will electronically validate maps with prior reported units that inspectors subsequently flag as zero facility maps.

- d. One (1) UG detailed inspection unit in the "Outstanding" column was not inspected in 2013 due to a clerical error. The unit, located in PG&E's Yosemite Division, was on a map that was renamed incorrectly during a PG&E map renaming project. The misnamed map resulted in the unit's removal from PG&E's patrol and inspection plan. PG&E inspected the unit on June 11, 2014 and has reinstated the map into its plan.
- e. 486 OH detailed inspection units are in the "Outstanding" column due to a technological scheduling error. The units, in PG&E's Yosemite Division, were due to be detailed inspected in 2013. However, PG&E's automated scheduling process incorrectly scheduled the units as patrols in 2013 instead of detailed inspections. As a result, the units were patrolled instead of inspected. PG&E has reviewed its system-wide automated scheduling process and has made adjustments, as necessary, to ensure future compliance. Additionally, PG&E will inspect the outstanding units by August 1, 2014. Note that the count of late units due to this issue may change after field validation of the unit counts during the inspections.
- f. Seventeen (17) UG detailed inspection units are in the "Outstanding" column as a result of supervisor work verification findings related to 2013 work in PG&E's Kern Division. See Section III for additional detail.

- g. One (1) PG&E Los Padres Division UG detailed inspection unit in the “Outstanding” column was not in PG&E’s patrol and inspection plan in 2013. The oversight was discovered during the implementation of an improvement project to automatically detect newly installed units requiring patrol and inspection. See Section IV for additional detail on the unit and the improvement project.

III. WORK VERIFICATION FINDINGS

PG&E continually works to improve the quality of its GO 165 patrol and detailed inspections. Since 2011, PG&E has implemented or initiated several work verification process improvements. These improvements include: the installation of verification tags to provide evidence that inspectors perform underground detailed inspections, additional training to clarify underground detailed inspection expectations to inspectors, more timely performance and documentation of post-inspection work verification to ensure the quality of completed inspections, and the creation of a larger work verification organization.

As discussed with the CPUC on April 23, 2014, PG&E’s improved work verification process identified issues related to underground detailed inspections performed in 2013 by a single GO 165 inspector located in PG&E’s Kern Division. A review of the inspector’s work found that verification tags were missing in seventeen (17) UG units the inspector had recorded as detailed inspected. Due to these findings, PG&E has included all 17 of these UG detailed inspection units in the “Outstanding” column in Table 1. Out of an abundance of caution, PG&E will re-inspect all 2013 and 2014 units recorded as inspected by this inspector.

Also, as discussed with the CPUC, PG&E’s work verification process additionally identified issues related to the overhead detailed inspections performed by a GO 165 inspector in

PG&E's Stockton Division. Although the review of the inspector's work found evidence that the inspector visited the areas he claimed to have inspected (he performed minor work and documented maintenance issues in those areas), the review also found that he had missed several maintenance issues that he should have identified or remediated during his inspections. PG&E is classifying these findings as an inspection work quality issue and not as a missed or outstanding inspection issue, and so is not including the units in the "Outstanding" column in Table 1. Out of an abundance of caution, however, PG&E will re-inspect, for work quality issues, all 2013 and 2014 units recorded as inspected by this inspector.

IV. CONTINUED GO 165 PROGRAM IMPROVEMENTS

As discussed in a November 27, 2012 presentation to the CPUC, PG&E implemented an automated electronic process in 2013 that identifies newly installed PG&E facilities for possible inclusion into PG&E's ongoing patrol and inspection plans. This process was designed to be a forward looking, preventative control to ensure that patrols or inspections on the new units were not missed. However, an added benefit of the automation was the ability to identify facilities installed in prior years that for some reason were not listed on patrol and inspection plans. The automated process is an ongoing process – when it identifies facilities installed in prior years, PG&E takes immediate action to inspect those facilities and include them in its patrol and inspection plan.

In 2013, PG&E reviewed all the facilities installed in prior years identified by the automated process and, as appropriate to each circumstance, added the facilities to its ongoing patrol and inspection plans. The facilities were all, also as appropriate to each circumstance, patrolled or inspected in 2013. Because these facilities were inspected in 2013, they are not included in the "Outstanding" column in Table 1.

In 2014, the automated process also identified one additional, previously installed UG unit in PG&E's Los Padres Division that was not on a PG&E patrol or inspection plan. This unit was not inspected in 2013 and, as a result, PG&E is including it in Table 1 as an "Outstanding" underground detailed inspection unit. This unit was inspected on June 4, 2014.