

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

PG&E Data Request No.:	CalAdvocates_037-Q03		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_037-Q03		
Request Date:	February 11, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-03
Date Sent:	February 17, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to PG&E's responses to data request CalAdvocates-PGE-R1810007-32.

**QUESTION 03**

For contractors who perform Enhanced Vegetation Management (EVM) pre-inspection work for PG&E:

- a) Please provide copies of all procedures that contractors are currently required to follow in the course of performing this work for PG&E.
- b) How does PG&E ensure contractors are aware of procedures discussed in Question 3(a)?
- c) How does PG&E currently communicate revisions to procedures, or new procedures, to these contractors?
- d) Is PG&E aware of any cases from 2018-2020 in which a contractor performing this work made an error, and attributed that error to being unaware of or unfamiliar with the relevant procedure (or the latest revision thereto)?
  - i. If the answer to Question 3(d) is yes, please explain each case, including how the issue was discovered, and what actions PG&E took to resolve the issue. Please provide copies of any relevant audit reports or CAP items.

**ANSWER 03**

- a) Please provide copies of all procedures that contractors are currently required to follow in the course of performing this work for PG&E.

Contractors who perform EVM pre-inspection work for PG&E are required to follow the following procedures:

- Distribution Vegetation Refusal Procedure TD-7102P-04  
(See WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q03-Atch01\_CONF.pdf)

Internal

- Distribution Routine Patrol Procedure (DRPP) TD-7102P-01  
(See WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q03-Atch02\_CONF.pdf)
- Enhanced Vegetation Management Pre-Inspection Procedure TD-7106P-01  
(See WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q03-Atch03\_CONF.pdf)
- Reporting Abnormal Field Conditions Procedure TD-7102P-09  
(See WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q03-Atch04\_CONF.pdf)
- Vegetation Management Bird Nest Procedure TD-7102P-27  
(See WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q03-Atch05\_CONF.pdf)
- Vegetation Management Distribution Line Clearance Request Procedure TD-7102P-15  
(See WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q03-Atch06\_CONF.pdf)
- Transmission Right-of-Way Maintenance Procedure (TROW) TD-7103P-03  
(See WildfireMitigationPlans\_DR\_CalAdvocates\_037-Q03-Atch07\_CONF.pdf)

b) How does PG&E ensure contractors are aware of procedures discussed in Question 3(a)?

Prior to starting work, contractors are provided the necessary procedures needed to perform pre-inspector work safely. Additionally, procedural updates are discussed on regular bi-weekly calls with vendor leadership teams to ensure updates are shared with all staff. All procedural documents are available online and the expectation for all vendors is to follow procedural guidance as explicitly stated in all contracts.

c) How does PG&E currently communicate revisions to procedures, or new procedures, to these contractors?

Procedural guidance documentation reminders, updates, and explanations are communicated to contract vendors weekly. Procedural updates are also discussed in bi-weekly calls with vendors.

d) Is PG&E aware of any cases from 2018-2020 in which a contractor performing this work made an error, and attributed that error to being unaware of or unfamiliar with the relevant procedure (or the latest revision thereto)?

PG&E Vegetation Management is not aware of specific cases where a contractor performing EVM work made an error because of their unfamiliarity with procedures.

- e) If the answer to Question 3(d) is yes, please explain each case, including how the issue was discovered, and what actions PG&E took to resolve the issue. Please provide copies of any relevant audit reports or CAP items.

Please see PG&E's response to subpart (d).