Pacific Gas and Electric Company

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May 1st, 2026 **BY ENERGY SAFETY E-FILING**

Shafi Mohammed
Chief Data Officer, Data Analytics Division
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: **Spatial and Non-Spatial Data Submission Revision of 2023-2025 Filings**
Docket: 2025 Data Submissions

Dear Mr. Mohammed:

Pacific Gas and Electric Company (PG&E) is notifying you of the resubmission of PG&E's 2023-2025 Wildfire Mitigation Data Reports (WMDR). Pursuant to the Data Guidelines, v4.1, Section 2.4 – Revisions to Previously Submitted Data, Energy Safety instructs that, when an electrical corporation becomes aware of a need for revisions to previously submitted data, the electrical corporation provide the revisions by the next quarterly submission date.[1]

Description

Revision 1:

The following are subject to ongoing, updated record information:

- 2025 Q4 3.6.6.3 Unplanned Outage feature class;
- 2025 Q4 3.6.6.4 Wire Down Event feature class;
- PG&E 2025 Q4 WMDR, Table 5.

Revision 2:

Our Grid Hardening Point following was subject to realignment as follows:

- 2025 Q4 3.6.3.2.3 Grid Hardening Point feature class;
- 2025 Q3 3.6.3.2.3 Grid Hardening Point feature class;
- 2025 Q2 3.6.3.2.3 Grid Hardening Point feature class;
- 2024 Q4 3.6.3.2.3 Grid Hardening Point feature class;
- 2024 Q2 3.6.3.2.3 Grid Hardening Point feature class;
- 2024 Q1 3.6.3.2.3 Grid Hardening Point feature class.

[1] *See* Energy Safety Data Guidelines, Version 4.01 (Mar. 21, 2025) at Section 2.4 ("Revisions to Previously Submitted Data.").

Explanation for Each Revision

Revision 1:

Our unplanned outage and wire down data are consistently evolving as additional details emerge regarding outages. We recreate the previous quarter's risk event feature classes every subsequent quarter, and will continue to do so, so that Energy Safety receives the most up-to-date feature classes. We are unable to review all unplanned outages and wire down records individually given the time constraints driven by quarterly reporting cadence and the need to ensure data submitted represents recent version available.

We, along with SDG&E and SCE, have expressed to Energy Safety during our quarterly joint Data Guideline check-ins, that all risk event data is subject to daily changes. Data changes will not always be captured in the subsequent quarter as investigations and system outage reviews expand throughout the year. As such, even with a quarterly resubmittal of the last quarter's submission every quarter, Energy Safety will not receive the most up-to-date data as the reviews can expand beyond a single quarterly refresh. Alternatively, we propose that Energy Safety consider the adoption of reporting that represents year-to-date data which will better align with the CPUC year-to-date reporting and help ensure each submission contains the most accurate data available as further described in the Conclusion section below.

Revision 2:

2024 & 2025 datasets for System Hardening – Transmission Shunt Splices [GH-06] underwent a thorough review and reconciliation against construction As-Built drawings. This corrective action resulted in the removal of errant, over-reported records initially included due to source system inaccuracies – as well as the addition of records where applicable.

The Downed Conductor Detection Device [GM-06] dataset for 2025 Q2 initially reported the location of a DCD device incorrectly as identified by OEIS in Notice of Data Inaccuracy NODI_PAD_AXS_20241104_1051. We have corrected the inaccurate location as discussed in our response to that NODI.

Related Feature or Table Name

Revision 1:

3.6.6.3 Unplanned Outage Feature class and 3.6.6.4 Wire Down Event.

2025 Q4 Wildfire Mitigation Data Report Table 5

Revision 2:

3.6.3.2 Grid Hardening Point feature class.

Record IDs

We are resubmitting impacted tabular and GIS data feature classes and tables in its entirety.

Conclusion

Given that data produced each quarter represents a snapshot in time, the only way to ensure all changes are known and communicated under the current Data Guidelines would be to recreate and compare the entire previous submission for the Initiatives, Risk Event, PSPS Event and Other feature datasets. Even then, the resubmission will still only represent data generated as a snapshot but at a later point in time. Additional data changes will continue throughout the year and Energy Safety will remain unaware of these changes given the revision guidelines are only for the previous quarter's reporting. Similarly, since we need time to package this refreshed data into its own geospatial database for the resubmittal, additional changes may also be unaccounted beyond the snapshot date, as the source systems change daily. The time constraints needed to reproduce the previous quarter's submission, on top of the current quarter's submission, also do not support having the ability to have a proper QC of the data shared.

We would like to reiterate our suggestion, which other electrical corporations support, that Energy Safety revise the Data Guidelines to allow the quarterly submissions to reflect cumulative, year-to-date reporting for the Risk Event, PSPS Event, and Initiative feature datasets. This will prevent the need to resubmit last quarter's submission every quarter, allow electrical corporations to focus efforts on the current report only which supports better quality control of the data provided to Energy Safety, and will be the only way to get Energy Safety the most accurate data for the year quarter over quarter. Another option will be to have an annual true up report for the Risk Event, PSPS Event, and Initiative feature datasets.

We appreciate this opportunity to update our WMDR data. Please do not hesitate to reach out should you have any questions or concerns

Very truly yours,

_____/S/_____

Jay Leyno

Senior Director, Wildfire Mitigation PMO