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May 14, 2024

**BY ELECTRONIC COMMUNICATION**

Electric Safety Policy Division  
Office of Energy Infrastructure Safety (Energy Safety)  
California Natural Resources Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Re: **Submission of PG&E's 2025 Wildfire Mitigation Plan Update Non-Substantive Errata**

Electric Safety Policy Division:

Pursuant to Section 4.3 2023-2025 Wildfire Mitigation Plan (WMP) Process and Evaluation Guidelines (the Process Guidelines), Pacific Gas and Electric Company (PG&E) hereby submits its non-substantive errata for its 2025 WMP Update.

The errata changes are as follows:

- Attachment 1: Table of identified errata including narrative updates and corrections, figure, and title corrections.
- Attachment 2: Updated Table ACI-PG&E-23-05-3: Ignition Mitigation Effectiveness: Representative Blended Average Values (in its entirety).
- Attachment 3: Updated Table ACI-PG&E-23-23-09-1: Risk Per Structure by Consequence Levels (in its entirety).
- Attachment 4: Updated Table ACI-PG&E-23-23-1: Stations Unable to Visit/Calibrate (in its entirety).

The corrections noted above were identified during our review of the 2025 WMP Update as well as during the discovery process. Please let us know if you need any additional materials or clarifications.

Sincerely

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Jay Leyno  
Director, Wildfire Mitigation PMO

# Attachment 1

## Errata to Pacific Gas and Electric Company’s 2025 Wildfire Mitigation Plan Update

	Issue	Location of Issue in the 2025 WMP Update	Adjustment(s) Made
1	Footnote updated for clarity	Updated Table PG&E-8.1.2-2: PG&E Undergrounding Mileage Forecast, P. 22	<p>Redline changes to footnote (a):</p> <p>Miles provided for 2023 represent the original target miles, and do not reflect the actual miles completed for that year. updated estimated mileage associated with each sub-program. The overall system hardening target miles remains the same (420 miles).</p>
2	Minor wording change for better clarity	Section B.2.1.1.3 PS-07: Reduce PSPS Impacts to Customers (Section 9.1.5), P. 24	<p>Redline changes as follows:</p> <p>As stated above, PG&amp;E must also update target PS-07 in alignment with the change made to GH-04. The 2023-2025 targeted number of customers events being mitigated from PSPS events is directly tied to the number of miles of undergrounding completed and Motorized Switch Operator (MSO) devices replaced installed. The decrease in 2025 targeted undergrounding miles will result in a reduction of the number of customer events mitigated from 22,000 to 13,000. As a result, during the 2023 to 2025 period, the cumulative customer events mitigated are being adjusted from approximately 55,000 customer events to approximately 38,000 customer events. While the number of PSPS customer events mitigated for 2025 will decrease due to the final GRC decision, PG&amp;E will continue to advance other existing mitigation measures to help reduce the impact of PSPS events on customers. The Base 2023-2025 WMP target for PS-07 was calculated using the 2,100 miles of undergrounding that was submitted for the 2023-2026 GRC period, which is 770 miles more than what the CPUC</p>

	Issue	Location of Issue in the 2025 WMP Update	Adjustment(s) Made
			ultimately approved in the final GRC decision. PG&E must adjust the number of customers events mitigated through the undergrounding program to account for this overall reduction in authorized miles. Thus, the number of undergrounding miles for 2025 is being adjusted from 550 miles to 330 miles. This 40% decrease in underground miles corresponds to the proposed 40% decrease in PS-07's targeted customer events reduced. <b>No adjustments will be made to the customer events mitigated through MSO devices replacements since there is no MSO planned work for 2025.</b>
3	Table updated to include downed conductor detection to provide clarity as it was not originally included	Table ACI-PG&E-23-05-3: Ignition Mitigation Effectiveness: Representative Blended Average Values, P. 55	Revised Table ACI-PG&E-23-05-3 to include downed conductor detection (DCD) to accurately represent the basis of the analysis being reported.  See Attachment 2 below.
4	Table updated to include low consequence level data and incorporate HFRA in Tier 2 locations	Table ACI-PG&E-23-09-1: Risk Per Structure By Consequence Levels, P. 75	Revised Table ACI-PG&E-23-09-1 to include "Low" consequence level data and clarify that HFRA locations are also included in Tier 2.  See Attachment 3 below.
5	Table updated with correct calibration dates, lat/long, and reasons for incomplete	Table ACI-PG&E-23-23-1 Stations Unable to Visit/Calibrate, P. 112-114	Replaced Table ACI-PG&E-23-23-1 with updated dates, lat/long and information. The changes are primarily reflected in the column, "Last Calibration Date, Lat, Long or Reasons for Incomplete."  See Attachment 4 below.

## Attachment 2

### TABLE ACI-PG&E-23-05-3: IGNITION MITIGATION EFFECTIVENESS: REPRESENTATIVE BLENDED AVERAGE VALUES

Scenario	Blended Average Effectiveness <sup>(a)</sup>
Alt. 1 – Baseline	0%
Alt. 2 – Underground Primary	97.7%
Alt. 3 – Underground All	99.2%
Alt. 4 – Covered conductor (CC) Overhead with EPSS and downed conductor detection (DCD)	78.2%
Alt. 5 – Bare Conductor Rebuild with EPSS and downed conductor detection	60.9%
Alt. 6 – Line Removal w/ Remote Grid	97.7%
Alt. 7 – EPSS including downed conductor detection (DCD)/Partial Voltage (with bare conductor)	60.4%
Alt. 8 – EPSS, DCD, and PSPS (with bare conductor)	91.3%
Alt. 9 – Rapid Earth Fault Current Limiter (REFCL), CC Overhead, EPSS and DCD	65.0%
Covered Conductor Rebuild – New	66.4%(b)

Assumptions:

- Analysis assumes no Overhead degradation for life of the asset;
- All EPSS solutions include downed conductor detection (DCD);
- EPSS and DCD are only active when conditions are greater than R1;
- Ground sensitivity on 4 wire systems for high impedance faults similar to DCD mitigation; and
- Mitigation effectiveness for other Environmental caused outages: None for Overhead and All for Underground.

(a) These are averages based on review of 8 years of outage history between 2015 and 2022. This historical review differs from the methodology used to calculate the annual effectiveness reported by PG&E for any given year.

All of these effectiveness values represent a blended average effectiveness at the circuit segment level with the exception of “Alt. 9 – REFCL, CC Overhead, EPSS and DCD” which is a substation effectiveness score. Not all substations are capable of having REFCL applied, and it cannot be isolated to a circuit segment only.

The approach to calculating outage risk considered the following outage types, however they were deemed not applicable and therefore excluded:

No improvement for existing Underground Type outages; and

All company-initiated outages, Community Wildfire Safety Program and PSPS outages fire forest/grass outages – potential wildfire cause outage/force out.

(b) The mitigation effectiveness value for CC used in the WBCA (66.4%) is similar to the value arrived at as part of the joint California IOUs CC effectiveness study for 2022 (64%). See PG&E’s 2023-2025 WMP, Revision 1, April 26, 2023, page 900.

### Attachment 3

## TABLE ACI-PG&E-23-09-1: RISK PER STRUCTURE BY CONSEQUENCE LEVELS

Consequence Rank	All HFTD/HFRA Structures	Eyes-on-Risk (EOR)	Risk/Structure
E&S	11,464	10.60%	9.2 x 10 <sup>-6</sup>
E&S-Tier 3	2,874	2.80%	9.7 x 10 <sup>-6</sup>
E&S-Tier 2/HFRA	8,590	7.70%	9.0 x 10 <sup>-6</sup>
High	68,481	37.80%	5.5 x 10 <sup>-6</sup>
High-Tier 3	27,697	15.60%	5.6 x 10 <sup>-6</sup>
High-Tier 2/HFRA	40,784	22.20%	5.4 x 10 <sup>-6</sup>
Medium	93,218	27.40%	2.9 x 10 <sup>-6</sup>
Medium-Tier 3	33,408	10.00%	3.0 x 10 <sup>-6</sup>
Medium-Tier 2/HFRA	59,810	17.40%	2.9 x 10 <sup>-6</sup>
Low	485,488	24.30%	0.5 x 10 <sup>-6</sup>
Low – Tier 3	138,965	8.50%	0.6 x 10 <sup>-6</sup>
Low – Tier 2/HFRA	346,523	15.80%	0.5 x 10 <sup>-6</sup>

TABLE ACI-PG&E-23-23-1: STATIONS  
UNABLE TO VISIT/CALIBRATE  
(CONTINUED)

**Attachment 4**

**TABLE ACI-PG&E-23-23-1: STATIONS UNABLE TO VISIT/CALIBRATE**

Station ID & Name	Work Center	Lat	Long	Last Calibration Date	Attempt Date	Number of Attempts	Reasons for Incomplete
PGE-1238 Jade Canyon Road	San Luis Obispo	35.47261	-120.5855	9/30/2022	8/19/2023	1	The gate to the property was locked. The technician contacted the CGI Hotline and got the property owner's contact information. The property owner did not want the technician on the property and is attempting to remove the Weather Station from his property. The Project team is working on getting this station relocated.
PGE-1264 Bloomer Hill	Chico	39.65268	-121.46339	9/13/2022	9/1/2023	1	The road will need to be repaired before a bucket truck can make it safely across the road. The technician got stuck trying to make it across. A request for support has been submitted and we will continue to work to get this resolved.
PGE-1325 Heller Vineyard	Salinas	36.38912	-121.6468	<del>4/1/2022</del> 8/26/2021	10/28/2023	1	The property owner will not allow PG&E to access the site. The technician and Project Manager are working on relocating the station. Once the station is removed from the property and relocated to a new pole, it will be updated and calibrated.
PGE-1357 Bass Lake Road	Auburn	38.66067	-121.03274	9/10/2022	8/23/2023	2	A new road was built and now there are no access roads to the site. The pole is in a field with tall thick dry grass. There is now a fence up where the access used to be. Additionally, the road has been built up with a large bank with steep sides. There are two drains or dry creeks, one on each side of the pole a few hundred yards away blocking access through the field. The Project team is in the process of having this station relocated.
PGE-1440 Pine Mountain Tow	Bakersfield	35.55264	-118.82338	4/27/2022	5/22/2023	1	The team is currently looking for an alternative location to relocate this station as the technicians have issues accessing the site due to the property owner. Once the station is relocated, it will be calibrated and updated.
PGE-1487 Skyway Road	Chico	39.77729	-121.60652	<del>9/1/2022</del> 8/4/2021	7/4/2023	1	This site was destroyed in car accident on May 21, 2022, according to the Western Weather Group records. A new site is in process to replace the destroyed site.
PGE-1548 Spolini Mountain	Santa Rosa	38.23202	-122.49816	9/6/2022	8/1/2023	1	This pole was replaced and moved down the side of a hill and it is no longer bucket truck accessible. We are in the process of finding a new location for this site.

TABLE ACI-PG&E-23-23-1: STATIONS  
UNABLE TO VISIT/CALIBRATE  
(CONTINUED)

Station ID & Name	Work Center	Lat	Long	Last Calibration Date	Attempt Date	Number of Attempts	Reasons for Incomplete
PGE-1620 Whimsy Mine	Salinas	36.43394	-120.66238	6/4/2022	4/24/2023	1	The access road to the site is completely washed out and the previous culvert is gone. There is not a safe way to pass through this area until the roadway is repaired. A request for support was submitted and we will continue to work to get this resolved.
PGE-1653 Arroyo Seco Road	Salinas	36.24964	-121.44279	6/10/2022	6/24/2023	1	The access road is closed until further notice, as of March 10, 2023. This is believed to be due to landslides and other unstable conditions. We will continue to monitor this location for future repairs. A request for support has also been submitted.
PGE-1735 Calistoga-Lower L	Ukiah	38.68924	-122.59557	9/12/2022	8/20/2023	1	The access road going uphill to the site is too soft and rocky to traverse. The truck started to slide towards the edge and ended up getting stuck. The technician had to get towed and lost a day of work. The road needs to be repaired before the technician can safely complete calibration. A request for support was submitted and we will continue to work to get this resolved.
PGE-1807	San Luis Obispo	35.28012	-120.63117	8/27/2022	7/23/2023	1	The access road is washed out at the sharpest and steepest switchback and is too difficult and dangerous to cross. A request for support was submitted and we will continue to work to get this resolved.
PGE-1978 Skaggs Hill	Santa Rosa	<del>38.67111</del> 38.66833	<del>-123.19447</del> -123.18921	<del>11/1/2022</del> 5/2/2024	8/21/2023	1	The station was removed on <del>September 17, 2022</del> due to excessive shade preventing the station from working properly. It is currently in the process of being relocated. <b>July 19, 2021</b> due to a pole replacement. It was then determined that it should be relocated, rather than reinstalled at the same location, because there was shade preventing the station from working properly. The station was reinstalled at a new site on <b>May 2, 2024</b> .
PGE-1989 Monte Vista	San Jose	37.27948	-122.10709	7/30/2022	7/4/2023	2	The access road had a down tree and once it was able to be removed it was determined that the road was also damaged and needed repairs before a vehicle could safely pass. A request for support was submitted and we will continue to work to get this resolved.
PGE-2225 Gamble Road	Chico	39.63767	-121.39528	9/13/2022	8/21/2023	1	This station was removed in April of 2023 and is in the process of being relocated.

TABLE ACI-PG&E-23-23-1: STATIONS  
UNABLE TO VISIT/CALIBRATE  
(CONTINUED)

Station ID & Name	Work Center	Lat	Long	Last Calibration Date	Attempt Date	Number of Attempts	Reasons for Incomplete
PGE-2333 Dana Foothill	San Luis Obispo	35.04055	-120.44406	4/6/2022	3/2/2023	1	The access road to the site has significant soil erosion which causes unsafe conditions for a bucket truck to park.  A request for support was submitted and we will continue to work to get this resolved.
PGE-2345 San Antonio Valley	San Jose	37.33942	-121.52733	<del>4/1/2022</del> N/A, Installed 6/18/2022	6/5/2023	1	This site is in the process of being relocated due to solar panel being blocked by a tree causing power issues.
PGE-2382 Trinity-Cottonwood	Redding	40.6811	-122.83908	<del>4/1/2022</del> N/A, Installed 7/18/2022	8/19/2023	3	The technician found three possible ways to access the site, but none were safe or available to cross. A request for support was submitted and we will continue to work to get this resolved.