



February 16, 2022

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**SUBJECT: PG&E 2021 Q4 Quarterly Data Reports and 2022 Wildfire Mitigation Plan Data**

Mr. Greenacre,

Pursuant to Energy Safety's Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines,<sup>1</sup> adopted on December 14, 2021,<sup>2</sup> utilities were required to submit their 2021 Fourth Quarter (Q4) Quarterly Data Reports (QDRs) by February 1, 2022. Attachment 1 of the 2022 WMP Guidelines provides a summary of key changes to the template, including four new guidelines related to non-spatial data reporting, which are reflected in the new non-spatial data template (Attachment 3) and are as follows:

- **New Guideline 2.3a:** Table 2 of Attachment 3 includes additional entries (rows) to delineate the outcome metrics data by HTFD tier and wind condition ("wind warning status") for risk events and utility-related ignitions.
- **New Guideline 2.3b:** Table 7.1 no longer includes ignition data, while Table 7.2 includes ignition data previously reported in Table 7.1.
- **New Guideline 2.3c:** Table 7.2 requires the utility to report on HFTD tier(s) and line type(s) in rows, allowing the use of Excel's filtering tool.
- **New Guideline 2.3d:** Table 12 reflects all mitigation initiatives including the new requirements in Section 7 of the 2022 Guidelines (e.g., new initiative No. 65 on post-fire vegetation management practices).

The 2022 WMP Guidelines provided a schedule and instructions for QDR submissions (included in Attachment 5), which required that non-spatial data submissions were to follow the schema

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<sup>1</sup> Energy Safety's Final 2022 WMP Update Guidelines (accessed February 3, 2022):

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>.

<sup>2</sup> Energy Safety formally adopted the 2022 WMP Update Guidelines on December 14, 2021, during a public meeting held pursuant to Government Code 15475.6. The meeting agenda, slide deck, and a link to the video recording can be found here (accessed February 3, 2022): <https://energysafety.ca.gov/events-and-meetings/events/adoption-of-the-2022-wmp-update-guidelines/>.

of Attachment 3: 2022 Performance Metrics Data Templates. Further, the final 2022 WMP Guidelines removed the requirement for utilities to submit updated data, including 2022 and 2023 projections, concurrent with submission of a WMP. Instead, Energy Safety intended that the 2021 Q4 QDR submission would include projections and would constitute the utilities' complete WMP data submissions for 2022.

Pacific Gas and Electric Company (PG&E) timely submitted its 2021 Q4 QDR on February 1, 2022; however, it did not use the updated template required by Energy Safety for reporting its non-spatial data, nor did PG&E include 2022 and 2023 projections. Upon discussion with PG&E and other utilities, Energy Safety learned that all utilities, excluding Southern California Edison Company, failed to understand that 2021 Q4 QDR data should be submitted in the 2022 template. Further, the eight utilities required to submit WMPs believed that all projections and updated data would be submitted in a separate filing concurrent with the submission of each electrical corporation's WMP.

After discussion with PG&E, Energy Safety agreed that PG&E must submit updated 2021 Q4 QDR data in the 2022 non-spatial data reporting template, along with projections required for WMP evaluation, according to the schedule set forth below. PG&E timely submitted Tables 3, 4, 5, 6, 8, 9, 10, and 11 on February 11, 2022; however, PG&E informed Energy Safety that after submission, PG&E discovered an error in Table 5. Energy Safety is awaiting further information but expects PG&E to submit a corrected Table 5 by Thursday, February 17, 2022.

<b>Table</b>	<b>Submission Date</b>
Table 1	2/25
Table 2	2/25
Table 3	2/11
Table 4	2/11
Table 5	2/11
Table 6	2/11
Table 7.1	2/25
Table 7.2	2/25
Table 8	2/11
Table 9	2/11
Table 10	2/11
Table 11	2/11
Table 12	2/25

Finally, PG&E submitted its spatial data on February 1, 2022, and Energy Safety discovered an error upon executing its preliminary quality control. PG&E has corrected that error as of issuance of this letter.

Energy Safety appreciates PG&E's cooperation and strict adherence to the timelines set forth above.

Sincerely,

*Melissa Semcer*

Melissa Semcer  
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