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July 26, 2022

Via E-Mail

melissa.semcer@energysafety.ca.gov

Melissa Semcer, Deputy Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: PG&E 2022 Wildfire Mitigation Plan – Final Revision Notice Responses (Docket #2022-WMPs)

Dear Deputy Director Semcer:

In compliance with The Office of Energy Infrastructure Safety's (Energy Safety) Revision Notice for Pacific Gas and Electric Company's 2022 Wildfire Mitigation Plan Update (Revision Notice), we are providing responses to the following Critical Issues:

- RN-PG&E-22-04: PG&E does not provide planned undergrounding locations beyond 2023, nor adequately demonstrate that it is currently prepared to meet its ambitious undergrounding goals; and,
- RN-PG&E-22-09: PG&E has failed to provide plans to mature in certain vegetation management capabilities

In addition to our Critical Issue responses, we are providing the following documents in response to Energy Safety's request:

- A revised version of our 2022 Wildfire Mitigation Plan (2022 WMP) that includes all changes resulting from the Revision Notice responses, in both a redlined and a clean version of the document.
- A single updated WMP and auxiliary Excel file updating tables required in the WMP submissions that incorporates all required changes across all Critical Issues and

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submitted errata. The Excel file includes a clean version of the file and a change log that documents all adjustments to the file.

Consistent with the Revision Notice direction, we are submitting these items to the 2022 Wildfire Mitigation Plan Updates Docket (#2022-WMPs) and to the California Department of Forestry and Fire Protection.

Below, we provide additional information and context relating to some of the items being submitted today with the 2022 WMP.

First, we have incorporated each of the thirteen Critical Issues identified in the Revision Notice into the 2022 WMP. Following the Table of Figures, we include a table identifying where each Critical Issue response has been incorporated. In several instances, we have created new sections (*e.g.* Sections 7.3.4.17 to 7.3.4.19) to include Critical Issue responses into the relevant portion of the 2022 WMP. The new sections are not initiatives, but rather additional sections to the 2022 WMP where the Critical Issue response appeared to fit most appropriately.

Second, in addition to addressing the Critical Issues, we have included in the 2022 WMP changes to reflect the four errata we previously submitted since February 25, 2022. These changes are included in the red-line and clean version of the 2022 WMP that we are providing today. Changes made from the four errata are included in Attachment A to this cover letter.

Third, we have revised selected portions of the 2022 WMP in light of information presented in response to the thirteen Critical Issues raised by Energy Safety. These changes are included in the red-line and clean version of the 2022 WMP.

Fourth, some of the responses to Critical Issues required new attachments to the 2022 WMP. We include those new attachments with the submission of our 2022 WMP. Our submission also includes any original attachments that have been revised as a result of the Critical Issues raised by Energy Safety. Updates to attachments have been identified in the change log.

We appreciate Energy Safety's careful review of our 2022 WMP. Please let us know if you need any additional materials or clarifications.

Sincerely,

/s/ Jay Leyno

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Cc: California Department of Forestry and Fire Protection
(CALFIREUtilityFireMitigationUnit@fire.ca.gov)
2022 Wildfire Mitigation Plan Updates Docket (#2022-WMPs)

**ATTACHMENT A
ERRATA INCORPORATED INTO 2022 WMP¹**

	Issue	Location in WMP	Source
1	Data Entry Error	2022-02-25_PGE_2022_WMP-Update_R0_Section 7.3.a_Atch01_R1 (Table 2)	3/18/2022 Errata
2	Data Entry / Transposing Errors (multiple)	2022-02-25_PGE_2022_WMP-Update_R0_Section 7.3.a_Atch01_R1 (Table 12)	3/18/2022 Errata
3	RSE Score / Financial Correction (multiple)	2022-02-25_PGE_2022_WMP-Update_R0_Section 7.3.a_Atch06_R1 (Section 7.3.5.2)	3/31/2022 Errata
4	KMZ File Mapping Error	2022-02-25_PGE_2022_WMP-Update_R0_Section 8.6_Atch01_R1	3/31/2022 Errata
5	Enhanced Powerline Safety Settings language	Section 7.3.6.8	3/31/2022 Errata
6	Update to Values (multiple)	Figure PG&E-ES-2: Key Quantitative Commitment Results	3/31/2022 Errata
7	New and Emerging Technology: Footnote Error	Section 7.1.E	4/25/2022 Errata
8	Target Language Update for 7.3.5.2	Table PG&E-5.3-1(A)	4/25/2022 Errata
9	Target Language Update for 7.3.5.2	Section 7.3.5.2	4/25/2022 Errata
10	Enhanced Powerline Safety Settings	Section 5.3.A	4/29/2022 Errata
11	Enhanced Powerline Safety Settings	Section 7.3.6.8	4/29/2022 Errata

¹ Please note that this table does not include: (1) additional information included in the 2022 WMP in response to the Revision Notice which is identified in Table of Revision Notice below the Table of Figures; and (2) changes to the WMP tables resulting from our Revision Notice responses, which are included in a separate change log.