

November 28, 2022

## VIA ELECTRONIC FILING

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California Natural Resources Agency  
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Re: **Pacific Gas and Electric Company's Comments on the Office of Energy Infrastructure Safety's October 28, 2022 Draft Data Guidelines**  
*Docket: Data Guidelines*

Dear Mr. Lai:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the Draft Data Guidelines from the Office of Energy Infrastructure Safety (Energy Safety). These most recent Draft Data Guidelines now combine V.3 of the Geographical Information System (GIS) Data Standard (or Spatial QDR) together with the Quarterly Data Report (QDR) and Quarterly Initiative Update (QIU) table guidance in a single document. We offer the following comments on Version 3 of the Draft Data Guidelines.

### **SPATIAL DATA**

#### **1. Maintaining a Phased Approach with Clear Prioritization**

PG&E diligently pursues methods to incorporate net new data into our GIS Data Standard submissions every quarter.<sup>1</sup> The majority of data not reported on in our Spatial QDR are due to data: (1) not being collected or known; (2) not stored in a source system or in a manner that is conducive to the GIS Data Standard's schema; (3) or requiring clarification from Energy Safety.

Closing reporting gaps will largely require more involved operational and technological changes and a significant investment of resources and time to collect, curate, and organize the Data Standard submissions on a recurring basis. This would require several large-scale, multi-

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<sup>1</sup> See our latest Q3 2022 data submissions cover letter (PG&E Cover Letter to the Quarterly Data Report (QDR) For Third Quarter 2022) where section "Q3 2022 Spatial Data Submission Updates" discusses new quarterly submission enhancements. Similarly, our appendix section archives historical submission quarterly improvement updates (Nov. 1, 2022) (<https://efiling.energysafety.ca.gov/Search.aspx?docket=2022-QDR>).

year projects<sup>2</sup> with significant resourcing and may come at increased cost to customers. This would also require reprioritizing resources away from other important wildfire mitigation related work. Additionally, the evolving nature of the GIS Data Standard creates complexities around prioritization of efforts to address reporting gaps, especially given that a future version change may modify or remove certain requirements.

Given the estimated level of effort required to meet the standard, regular collaboration with Energy Safety is needed to align on expectations, the prioritization of omitted data, technical feasibility issues, and shape modifications to the schema. We recommend that efforts to close the remaining gaps be approached in a phased manner based on value of the data to Energy Safety's objectives and utility business operations.

## 2. Technical Challenges of New Data Guideline Requirements

**Section 2.3.1.2 Photos Submitted with Spatial Data:** In section 2.3.1.2 *Photos Submitted with Spatial Data*, Energy Safety states, "If an electrical corporation has photos to submit along with spatial data, it must compile all photos into a single zipped folder." Historically, we send thousands of photos to Energy Safety with every quarterly submission. The Q2 2022 submission included over 85,000 photos, which equated to almost 100 gigabytes of data shared. The sheer volume of data transmitted every quarter requires more than 10 hours be spent uploading data to Energy Safety's designated SharePoint site. Since consolidating data into a single zipped folder substantially increases the risk of an upload failing, we request that photos be separated into manageable sized zip folders (e.g., 10 gigabytes) by photo data type instead to reduce the risk of an upload failing and support data being received in a timely manner.

**Section 2.4.1 Actuals & Targets:** The data we share in the quarterly submittals represents the best-known data at a point in time when our reports are generated. Although the data submitted accurately reflects statuses when pulled, post submission data may evolve. For example, our GIS source system updates our asset data on a daily basis. Given the short turnaround time to collect, consolidate, reformat, and package data into our quarterly reporting, a better representation of many datasets will be the following day. The guidelines, as stated in section 2.4.1 *Actuals & Targets*, states, "Any time an electrical corporation corrects or revises previously submitted actuals or targets, the electrical corporation must...include a cover letter with any revision file. The cover letter must contain the following information: Inventory of each field and related record being revised, and Explanation for each revision."

We request that guidelines and a threshold be established for allowable data variances before a revision or correction is expected and that these corrections be in tabular formatting. We also ask that corrections and revisions not be mandated for spatial reporting since final reporting format for the GIS Data Standard is a single File Geodatabase meant to show comprehensive

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<sup>2</sup> For example, in the 3.7.6.1 Other Power Line Connection Location feature class, we do not collect much of the information being requested regarding the other line information (e.g., OtherConductorMaterial) for private line owners. We do not keep record of customer owned facilities and views private or customer line owners as separately accountable to compliance with electric line regulations. Collecting this information would require considerable support and coordination with private owners.

relationships amongst a magnitude of feature classes and related tables. To revise and resubmit only portions of evolving spatial data may not prove useful in documenting key data connections.

**Section 4.2 Overall Data File Requirements:** *Section 4.2 Overall Data File Requirements* instructs that data submitted in the “wildfire mitigation data tables must be internally consistent with the geospatial data submitted by the electrical corporation. This is to ensure that data reported in the different submission types is from the same source (e.g., ignitions reported for a given quarter is consistent with ignitions reported for the same quarter in the GIS data.)”

We strive to use the same source for data across all our submission types. However, as stated in our previous comments, there are technical challenges involved with fully aligning the Spatial Quarterly Data Report (SQDR) with the QIU and QDR reports.<sup>3</sup> Data included in the SQDR submission must have the ability to transform from our internal data architecture into the FGDB required data architecture set by Energy Safety. Tabular reports such as the QIU are not subject to such data schema/architectural technical requirements that are needed in the spatial report. For example, data supporting QIU reporting can be in the form of vendor invoices, contractor progress reports, and field crew trackers. Although these data types can be integrated into tabular reporting, they do not meet requirements for transformation into the GIS Data Standard schema.

Similarly, timing differences exist between collection of initiative data and the population of said data into a geospatial format/database (GIS) due to the processes needed to document data, verify work performance, and update geospatial records. Tabular reporting on miles completed or otherwise can be readily collected through field updates and/or work tracking tools, leading to differentials in timing for which data can be used for the QIU and QDR versus spatial data submissions.

Lastly, we previously communicated that a full assessment for spatial data quality in our submissions is not possible in the allotted time provided to produce this reporting post quarter end.<sup>4</sup> The newest Draft Data Guidelines introduce the requirement of internally aligning all three quarterly reports in their entirety without extending the window of time to produce and submit all the reports. This will prove challenging since, in addition to the 42 2022 WMP initiatives we strive to align between reports, there are also 13 shared data types that are presented by HFTD and other shared reporting metrics. This equates to attempting alignment in over 800 different ways.

### **3. Reformatting Publicly Available Data**

With the addition of the High Wind Warning Day Polygon Feature Class, we would like clarity as to the value derived by extracting and reformatting already available public information on behalf of Energy Safety within this submission. In addition to the new High Wind

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<sup>3</sup> See PG&E Comments on GIS Data Reporting Standard version 2.2 Draft Guidelines at p. 3 (Jun. 8, 2022) (<https://efiling.energysafety.ca.gov/Search.aspx?docket=2022-GIS-DRS>)

<sup>4</sup> See PG&E Q4 2021 Submission Cover Letter at p. 7 (Feb. 1, 2022)

Warning Day dataset, the Red Flag Warning Day, Camera, and Weather Station datasets are also available publicly. Energy Safety can collect this information any time to support their monitoring and evaluating utility safety, wildfire risk reduction, and compliance activities.

## **NON-SPATIAL DATA**

### **1. Red Flag Warning and High Wind Warning Overhead Circuit Mile Days**

Metric 3 of Table 4 of the draft guidelines is entitled “Red flag warning and high wind warning overhead circuit mile days.” We are concerned that the data requested by this metric could be misleading because the National Weather Service Red Flag Warnings are subjective and evaluating year-to-year trends based on this data could result in analytical errors. Therefore, given the low probative value of this data and the significant amount of time it takes the utilities to gather and analyze it, we would urge Energy Safety to consider removing it from the draft guidelines.

### **2. Fire Potential Index Overhead Circuit Mile Days**

Metric 4 of Table 4 seeks to determine the “Fire potential index overhead circuit mile days.” In the “Unit(s)” column, it is unclear how a day with “a high FPI” should be calculated. Specifically, if the FPI is high (R3 and above) for only an hour or portion of a day, should that be counted as a high FPI day? If so, this could cause discrepancies in data and cause this metric to significantly overestimate the actual FPI data. As with the previous metric, given the substantial amount of work involved and questionable accuracy of this metric, we would request that Energy Safety consider removing it from the final guidelines. However, if it is to be included, we would request Energy Safety consider removing any request for historical data on this issue.

### **3. Ignition Driver – Splice/Clamp/Connection**

For the ignition drivers “conductor damage” and “splice damage” in Table 6, we do not believe we will be able to separate these metrics as requested. Given that our inability to disjoin this granular data could cause data errors, we request that Energy Safety consider revising the template to keep these items together in one metric.

### **4. Template for Q4 2022**

Previously Energy Safety instructed the utilities to submit their Q4 2022 quarterly data using the new data template. However, we believe that using the new template would make it hard to compare the Q4 data with the data from the previous quarters that used the old template. Therefore, we request that Energy Safety consider maintaining the previous template for Q4 2022 to ensure consistency and aid in analysis.

### **5. Number of Trees Inspected for Vegetation Compliance**

Within metric 17 of Table 2, there are numerous sub-metrics that seek the “Number of trees inspected for vegetation compliance.” Unfortunately, these sub-metrics will not provide an accurate understanding of the tree work performed in our territory because we do not have a

database of every single tree that is inspected in our territory, only those trees in our territory that are worked. However, if this latter number is used, it will materially underestimate the total number of trees inspected. Therefore, we recommend these sub-metrics be removed because it will not be possible to provide accurate data for this metric.

**6. Number of Trees Inspected Where At Least Some Vegetation Was Found in Non-Compliant Condition**

Table 2, metric 17 contains many sub-metrics that request the “Number of trees inspected where at least some vegetation was found in non-compliant condition.” Given that these metrics require us to determine regulatory compliance, in order to provide this information, we would need a description of the applicable rules or regulations it envisions. For example, General Order 95, Public Resources Code Section 4293, and PG&E’s internal standards could all potentially be rules or regulations for which vegetation could be non-compliant. Identifying the applicable rules and regulations would make the data gathered by this metric more meaningful.

**7. Time Between Vegetation Inspection Finding and Resulting Trimming Activity**

Metric 2 in Table 2 seeks to determine the “Time between vegetation inspection finding and resulting trimming activity.” However, given that the timelines for the performance of work vary by vegetation management (VM) program, we would not be able to calculate an accurate median time or 95<sup>th</sup> percentile time without Energy Safety specifying which type of VM program data is being requested. Consequently, we recommend that this metric be revised to specify which VM program data is being sought, so as to allow for a more accurate analysis.

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We appreciate the opportunity to provide feedback on this draft GIS Data Standard and to continue to work with Energy Safety to promote wildfire safety.

Sincerely,

/s/ Jay Leyno

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