



Jay Leyno

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**VIA ELECTRONIC FILING**

Stephen P. Lai  
Data Manager, Data Analytics Division  
Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Re: **Pacific Gas and Electric Company’s Comments on the Office of Energy Infrastructure Safety’s December 15, 2023, Draft Data Guidelines v3.2**  
*Docket: Data Guidelines*

Dear Mr. Lai:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the Draft Data Guidelines v3.2 from the Office of Energy Infrastructure Safety (Energy Safety). We offer the following comments on version 3.2 of the Draft Data Guidelines.

**SPATIAL QUARTERLY DATA REPORT**

**1. Technical Errors of Revised Data Guideline Requirements**

**Key Deliverable Templates Not Provided:** To conduct a complete assessment of the proposed spatial report changes within the draft version 3.2 Data Guidelines, PG&E requires the revised Status Report and GDB templates, which were not provided. These templates will allow PG&E to review the domain values, fields, character limits, data type, layout, and instructions to ensure changes are consistent with those outlined in Draft Data Guidelines. Without these templates, PG&E is unable to complete its assessment of the impacts of the Draft Data Guidelines.

Should Energy Safety provide these revised files to supplement the release of the Draft Data Guidelines, PG&E can complete a comprehensive review of all changes and impacts and inform Energy Safety of any inconsistencies and concerns, should any exist. This could also help prevent potential unidentified issues from carrying over into version 3.3 of the Draft Data Guidelines.

**Clarification Regarding Section 3.5.2 Overview Sheet:** In section 3.5.2 *Overview Sheet*, there is a new column on the overview sheet titled “Locations Confidential? (Yes/No).” Previously, the column was titled “Entire Feature/Table Confidential? (Yes/No).” It is not clear how this new column should be interpreted as there is no associated description section accompanying it. Therefore, PG&E is requesting a definition be added to this column so that it is clear what is being requested with this change.

## **QUARTERLY DATA REPORT**

With the removal of all historical actual fields, PG&E would appreciate clarity on how Energy Safety would like to receive historical data updates. The removal of these columns will prevent true-up corrections to various metrics from previous quarters. The QDR data is used in regulatory audits and, if a historical change is needed, the current template does not have the means for PG&E to communicate this historical change. We are concerned that the inability to correct historical data due to PG&E's internal QA/QC work will end up causing Energy Safety to receive less accurate data, and also cause unnecessary/incorrect audit findings. Therefore, we would urge Energy Safety to provide clarity as to how the template or guidelines can accommodate this issue.

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We greatly appreciate the opportunity to provide feedback on these Draft Data Guidelines and look forward to continuing to work with Energy Safety to promote wildfire safety.

Sincerely,

/s/ Jay Leyno

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