

April 15, 2024

**BY ENERGY SAFETY E-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: **Q4 2023 Non-Spatial Data Submission R2**  
***Docket: 2023-QDR***

Dear Mr. Lai:

PG&E continues to improve our data quantity and quality on a quarterly basis to comply with OEIS Data Guidelines. After the Q4 QDR submission on February 1, 2024, the Public Advocates Office brought to our attention a potential misalignment in our data tables. We reviewed the data, confirmed that it was incorrect, and corrected it in this submission.

Below are the changes in this revision:

- **Table 2:** In the Q2 2023 QDR submission, transmission and distribution data in Table 2, Metrics 3, 4, 5, and 15 was aligned with a formal definition of the filter criteria in our Foundry database. Unfortunately, we did not retroactively apply this new process to our past asset tag data—specifically Table 2 of the Q1 2020 to Q1 2023 & Q3 2023 QDRs—until this submission. We have corrected this misalignment.
- **Table 9:** The Q1 2023 to Q4 2023 reported data in Table 9, Metric Type 1 (Number of Overhead Circuit Miles Planned for Upgrade), which has been updated. This includes data from Q1 2023 to Q4 2023 (columns M – P) and line items 1.d.0.a.i through 1.d.3.c.ii (rows 10 – 27, all Distribution Line Type values). The following corrections were made: (1) a mathematical error was fixed; (2) we clarified the work associated with non-HFTD; and (3) we modified the scope of the data reported in each quarter. Previously, only overhead covered conductor miles were reported; the update now accurately includes all completed System Hardening work under WMP commitment GH-01. The total miles reported—that are broken down by the sub-categories in Table 9—now align with the performance metrics reported for GH-01 in Table 1.

We also updated Metric Type 1 Projected Values for the years 2023 to 2025 (columns Y – AA). The reported projected miles now align with the forecasted work for all System Hardening mitigation types (overhead hardening, undergrounding, and line removal) under 2023-2025 WMP commitment GH-01, as of the beginning of 2023. Previously included were only overhead covered conductor miles.

- **Table 11:** At the direction of Energy Safety, Table 11 was originally not included in the Q4 QDR submitted on Feb 1, 2024. Upon receiving the template for this table from Energy Safety, we have submitted Q4 Table 11 on March 1, 2024. Table 11 has now been updated and resubmitted in the revised Q4 QDR.

The following metrics within Table 11 have been corrected in the revised 2023 Q4 QDR:

1. *Vegetation Management and Inspections - Fire Resilient Right of Ways Financials discrepancy:* While responding to a data request, we identified an erratum in our 2024 Q4 QDR. For this VM metric, we erroneously stated the total amount spent was \$963,908, however, this number only included the amount spent on inspections. The correct number that includes the amount spent on both inspections and remediation (i.e. the entire program) is \$9,252,694. This correction is reflected in this revised 2024 Q4 QDR.
2. *PSPS – Other PSPS Financials discrepancy:* The 2023 CapEx for HFTD was originally identified as \$2,956,227, however, this amount reflects a double counting due to a clerical error. This number has now been corrected to \$1,478,113 in this revised 2024 Q4 QDR.
3. *Vegetation Management and Inspections – Substation Defensible Space Financials discrepancy:* The 2024 and 2025 projected CapEx Values have been updated in the revised 2024 Q4 QDR. There was an error in one of our formulas, which resulted in these incorrect values, and we have corrected this formula as well as updated the numbers in this revised 2024 Q4 QDR.

Please do not hesitate to reach out should you have any questions or concerns.

Very truly yours,

/s/ Jay Leyno

Jay Leyno