



14	CaPA	Sat WMP-08	CaPA_Sat_WMP-08	2	CaPA_Sat_WMP-08_02	<p>Regarding the new "Tree Removal Inventory Program" described in section 8.2.2.4 of POA's WMP. POA's states:</p> <p>This is a new transitional program for 2023 stemming from the conclusion of the EVM program. This program is intended to work down trees previously identified. POA estimates that our EVM inventory included more than 300,000 trees at the end of 2022. Under the Tree Removal Inventory program, we remove or re-plant trees identified in the EVM program.</p> <p>Based on the on-going re-inspection and evaluation work, we will develop annual risk-ranked work plans and mitigate the highest risk-ranked crown exposures at CPZs in the inventory a) within 3 years.</p> <p>1) Does POA intend to identify new trees for the start of work identified in this inventory?</p> <p>2) If the answer to part (b) is no, please explain why.</p> <p>3) If the answer to part (b) is yes, please explain POA's intent to address comparable risk reduction outcomes to those previously provided by the EVM program.</p> <p>4) What is the frequency of the "on-going re-inspection and evaluation work"?</p> <p>5) Please state the frequency of the "on-going re-inspection and evaluation work" in this new program.</p> <p>6) After the "multi-year program" ends, will POA expect to have a tree inventory?</p> <p>7) If the answer to part (6) is no, please explain how POA intends to address vegetation in high-risk areas going forward.</p> <p>8) If the answer to part (6) is yes, please explain how the tree inventory will be maintained and used going forward.</p> <p>9) When it is stated that "POA estimates that our EVM inventory included more than 300,000 trees at the end of 2022," please explain why this number is an estimate rather than a precise number.</p>	Holly Wilhelm	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.2.4	Vegetation Management and Inspections	Tree Removal Inventory
15	CaPA	Sat WMP-08	CaPA_Sat_WMP-08	3	CaPA_Sat_WMP-08_03	<p>Regarding the new "VM for Operational Mitigations" described in section 8.2.2.3 of POA's WMP. POA states:</p> <p>This is a new transitional program for 2023 stemming from the conclusion of the EVM program. This program is intended to help reduce outages and potential ignition risks using a risk-informed, targeted plan to mitigate potential vegetation contact based on historic vegetation outages or EPSS-enslaved circuits. POA will initially focus on mitigating potential vegetation contact in CPZs that have experienced vegetation contact outages. Scope of work will be developed by using EPSS and historical outage data and vegetation factors from the WDRM risk model. EPSS-enslaved devices, vegetation outages and condition information will generate additional tree work.</p> <p>1) Please explain what is meant by the term "transitional" in the first sentence.</p> <p>2) How frequently will POA update the scope of work for this program (e.g., annually or quarterly)?</p> <p>3) Please explain how POA will use EPSS data to contribute to the scope of work for this program.</p> <p>4) Please explain how POA will use "vegetation failure from the WDRM or risk model" to contribute to the scope of work for this program.</p>	Holly Wilhelm	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.2.3	Vegetation Management and Inspections	VM for Operational Mitigations
16	CaPA	Sat WMP-08	CaPA_Sat_WMP-08	4	CaPA_Sat_WMP-08_04	<p>Regarding the new "Focused Tree Inspections" described in section 8.2.2.5 of POA's WMP. POA states:</p> <p>This is a new transitional program for 2023 stemming from the conclusion of the EVM program. POA is conducting AOCs to identify high-risk areas that have experienced higher rates of vegetation damage during PSPS events, outages, and/or lightning. We have conducted a country-by-country review with regional S&amp;E and used that information to develop a risk-based plan for the program. The plan includes an initial assessment to determine appropriate courses to prioritize pilots. Focused Tree Inspections may be piloted in a wide array of areas. The plan will develop and implement guidelines that inform inspections.</p> <p>1) Please explain what is meant by the term "transitional" in the first sentence.</p> <p>2) Does "AOC" stand for "Areas of Concern" in this instance? If not, please define it.</p> <p>3) Please describe POA's methodology for identifying high-risk areas.</p> <p>4) How does POA determine which focused vegetation inspections can be evaluated?</p> <p>5) How does POA determine which focused vegetation inspections can be implemented?</p> <p>6) How will POA determine in which country or countries to evaluate a pilot or pilots?</p> <p>7) Please describe the following aspects of the pilot or pilots:</p> <ol style="list-style-type: none"> <li>Scope of work.</li> <li>Staff.</li> <li>Duration.</li> <li>Cost.</li> <li>Other objectives.</li> <li>Success metrics.</li> </ol> <p>8) Please describe the following regarding the guidelines that POA will develop based on the pilot(s), as referenced above:</p> <ol style="list-style-type: none"> <li>The extent of the guidelines.</li> <li>How POA expects the guidelines to inform inspections.</li> <li>When POA expects to identify high-risk areas.</li> <li>How POA expects the steps that POA expects a "focused tree inspector" to include.</li> <li>Please describe the criteria that POA expects to use to determine the results performed as part of the EVM program. Describe the limitations and differences.</li> <li>What metrics and trends POA expects to use to determine whether a pilot phase or risk a "focused tree inspector"?</li> </ol>	Holly Wilhelm	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
17	CaPA	Sat WMP-08	CaPA_Sat_WMP-08	5	CaPA_Sat_WMP-08_05	<p>POA states on p. 539 of its WMP:</p> <p>POA is restructuring its VM Program starting in 2023. Based on recent data and analysis, the risk reduction of the EVM Program is less than the risk reduction from the EPSS program. This is in part due to the complexity of the EVM program is less than the risk reduction from the EPSS program."</p> <p>1) Please provide any available workplans, reports, or other documents that support the statement cited above.</p>	Holly Wilhelm	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.3	Vegetation Management and Inspections	FaH Migration
18	CaPA	Sat WMP-08	CaPA_Sat_WMP-08	6	CaPA_Sat_WMP-08_06	<p>POA states on p. 539 of its WMP:</p> <p>Additional Operational Mitigations such as PVD and DCD will also help to mitigate risk previously prescribed to EVM. As a result, POA considered the EVM Program at the end of 2022.</p> <p>1) Does "PVD" stand for "Partial Voltage Detection" in this instance? Please define if not.</p> <p>2) Does "DCD" stand for "Directed Conductor Detection" in this instance? Please define if not.</p> <p>3) How has POA determined that PVD will help to mitigate risk that POA previously sought to mitigate with EVM?</p> <p>4) How has POA determined that DCD will help to mitigate risk that POA previously sought to mitigate with EVM?</p> <p>5) Please provide any available documentation and analysis showing that PVD will help to mitigate risks that POA previously sought to mitigate with EVM?</p> <p>6) Please provide any available documentation and analysis showing that DCD will help to mitigate risks that POA previously sought to mitigate with EVM?</p>	Holly Wilhelm	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.3	Vegetation Management and Inspections	FaH Migration
19	CaPA	Sat WMP-08	CaPA_Sat_WMP-08	7	CaPA_Sat_WMP-08_07	<p>On pp. 314-316 of POA's WMP, POA divides its operational mitigations into four different groups. Group 2 includes "inspections and maintenance programs where we exceed compliance requirements and permanent mitigations we deploy and/or we implement new technologies so that we no longer need to exceed compliance requirements." For the following Group 2 mitigations, please state the group to which POA will assign them to no longer need to exceed compliance requirements, and state the basis for such a determination:</p> <ol style="list-style-type: none"> <li>Inspection and Maintenance Program</li> <li>Wild Management</li> <li>Substation Defensible Space</li> <li>Focused Tree Inspections</li> <li>Transmission Integrated VM</li> <li>Emergency Response VM</li> </ol> <p>POA does not currently have specific criteria for the listed mitigations, though certain permanent mitigations (e.g. substation undergrounding) may reduce risk to a point where exceeding compliance is no longer needed. Continued analysis of options, identification, technology implementation needs, etc. will form the basis of interim mitigation needed. We will continue to implement the Group 2 mitigations based on risk or benefit information.</p>	Holly Wilhelm	3/30/2023	4/5/2023	4/5/2023	0	NA	7.2.3	Wildfire Mitigation Strategy Development	Interim Mitigation Initiatives
20	CaPA	Sat WMP-08	CaPA_Sat_WMP-08	8	CaPA_Sat_WMP-08_08	<p>For all of the following Group 2 mitigations, please state whether POA intends to discontinue the program/initiative once permanent mitigations are deployed or new technologies are implemented:</p> <ol style="list-style-type: none"> <li>Inspection and Maintenance Program</li> <li>Wild Management</li> <li>Substation Defensible Space</li> <li>Focused Tree Inspections</li> <li>Transmission Integrated VM</li> <li>Emergency Response VM</li> </ol> <p>At this time POA does not intend to discontinue any of the program/initiatives listed in Group 2 mitigation. The program/initiatives are designed and managed to ensure that POA maintains compliance with state and federal regulations, as well as mitigate risk. POA will continue to evaluate the risk that cannot be managed through our current programs pending the implementation of System Resilience Initiatives. In the future, for program/initiatives that exceed compliance, POA may determine to stay at compliance requirements based on risk or benefit information.</p>	Holly Wilhelm	3/30/2023	4/5/2023	4/5/2023	0	NA	7.2.3	Wildfire Mitigation Strategy Development	Interim Mitigation Initiatives
21	CaPA	Sat WMP-08	CaPA_Sat_WMP-08	9	CaPA_Sat_WMP-08_09	<p>Regarding the new "Tree Removal Inventory Program" described in section 8.2.2.4 of POA's WMP. POA states:</p> <p>This is a new transitional program for 2023 stemming from the conclusion of the EVM program. This program is intended to work down trees previously identified. POA estimates that our EVM inventory included more than 300,000 trees at the end of 2022.</p> <p>Table 8-14: POA's WMP Targets, p. 502, states that POA will remove approximately 80,000 trees identified from the legacy EVM program through the end of 2025:</p> <p>1) How many trees will be removed from the legacy EVM program "a subset of the trees in POA's EVM inventory"?</p> <p>2) If the answer to part (a) is yes, how will POA mitigate the risk posed by the approximately 240,000 trees that remain in the EVM inventory that will not be removed during the period from 2023-2025?</p> <p>3) If the answer to part (a) is no, please explain the difference between the 80,000 trees to be addressed through ROR and the more than 300,000 trees in the EVM inventory.</p>	Holly Wilhelm	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.2.4	Vegetation Management and Inspections	Tree Removal Inventory

22	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-010	10	CAIPA_Sat WMP-08-010	<p>The Table 6-12: Vegetation Management Implementation Objectives, PG&amp;E's Focused Tree Inspection Program is currently under development. By the end of 2025, PG&amp;E plans to "Fully implement AOC cross-functional team to manage and coordinate all of the AOC's Cross-Functional Team (CFT) activities."</p> <p>Given that PG&amp;E's EVM program has been discontinued, and that its Focused Tree Inspection Program has not yet been implemented, how will PG&amp;E assess the risk of tree failures during the period from 2023-2025?</p>	PG&E will continue to assess the risk of tree failures during the period from 2023-2025 through the Distribution Routine and Second Patrol programs accordingly. The distribution of resources or other emergency priority trees is embedded into all VM tree management and inspection programs, as well as the existing work verification and quality programs. In addition to the Focused Tree Inspection Program, PG&E has also introduced the Tree Removal Inventory (TRI) and the Distribution Routine and Second Patrol programs which will allow us to implement to assess the risk of tree failures. The table below details additional details of the current status.	Holly Wahlman	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.2.25	Vegetation Management and Inspections	Focused Tree Inspections
23	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-011	11	CAIPA_Sat WMP-08-011	<p>Table 6-14: PG&amp;E's VM Targets, states that PG&amp;E will collect LIDAR data on its Transmission System (17,500 road miles).</p> <p>Table 6-2: Operational Information, states that PG&amp;E has a total of 18,111 circuit miles of overhead transmission lines.</p> <p>Does PG&amp;E plan to not collect LIDAR data on approximately 600 overhead circuit miles of transmission?</p> <p>If the answer to part (a) is yes, please explain why.</p> <p>If the answer to part (a) is no, please explain why. Table 6-14 shows a LIDAR target that is smaller than the size of PG&amp;E's overhead transmission system.</p>	Holly Wahlman	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.2.11	Vegetation Management and Inspections	Routine Transmission NERC and Non-NERC	
24	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-012	12	CAIPA_Sat WMP-08-012	<p>Table 6-14: PG&amp;E's VM Targets, states that PG&amp;E will collect LIDAR data on its Transmission System (17,500 road miles).</p> <p>Table 6-18: Vegetation Management CV Program, lists the following audit pass results for 2022 VM work: Transmission: 84.2% Vegetation Control Peak Clearing: 90.3%</p> <p>Does PG&amp;E plan to take during the 2023-2025 period if a program does not achieve a 95% pass rate on audit verification?</p>	Holly Wahlman	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.2.24	Vegetation Management and Inspections	Tree Removal Inventory	
25	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-013	13	CAIPA_Sat WMP-08-013	<p>Table 6-18: Vegetation Management CV Program, lists the following audit pass results for 2022 VM work: Transmission: 84.2% Vegetation Control Peak Clearing: 90.3%</p> <p>Does PG&amp;E plan to take during the 2023-2025 period if a program does not achieve a 95% pass rate on audit verification?</p>	Holly Wahlman	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.5.1	Vegetation Management and Inspections	Quality Assurance and Quality Verification	
26	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-014	14	CAIPA_Sat WMP-08-014	<p>Regarding the "Distribution Second Patrol" described in section 8.2.2.2.2 of PG&amp;E's WMP, PG&amp;E states: "PG&amp;E has developed a plan to complete the identified dead/dying tree work within 180 days for HTD areas and within 365 days for non-HTD areas."</p> <p>What specific steps, actions, or measures are included in the plan noted in the quote above – in other words, what specific steps is PG&amp;E taking to ensure that dead/dying tree work will be completed within the stated timeframe?</p> <p>How does PG&amp;E determine that 180 days was an appropriate and prudent timeframe for completing dead/dying tree work in HTD areas?</p> <p>Does PG&amp;E plan to complete identified dead/dying tree work within 180 days HTD areas for its Distribution Routine Patrol (section 8.2.2.2.1)?</p> <p>If the answer to part (c) is no, please explain why not.</p> <p>What is PG&amp;E's expected time to complete dead/dying tree work identified during its Distribution Routine Patrol?</p>	Holly Wahlman	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.2.22	Vegetation Management and Inspections	Distribution Second Patrol	
27	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-015	15	CAIPA_Sat WMP-08-015	<p>Regarding the "Defensible Space Impediment" described in section 8.2.3.1 of PG&amp;E's WMP, PG&amp;E states: "Landowner related issues continue to prevent PG&amp;E from achieving 100 percent defensible space completion at locations where substation/distribution zones extend into privately owned property."</p> <p>What actions does PG&amp;E plan to take during the 2023-2025 WMP period to address landowner related issues in order to achieve the highest possible defensible space completion status?</p>	Holly Wahlman	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.3.11	Vegetation Management and Inspections	Defensible Space Impediment	
28	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-016	16	CAIPA_Sat WMP-08-016	<p>Regarding "Wood and Slash Management" described in section 8.2.3.2 of PG&amp;E's WMP, PG&amp;E states: "Crews are left on site or removed off site based on landowner preferences." PG&amp;E further states that "Wood Management is a voluntary program in which property owners must opt in to participate."</p> <p>If PG&amp;E is unable to contact a landowner, what steps is PG&amp;E taking to reach them?</p> <p>How does PG&amp;E ensure that landowners are aware of the opt-in Wood Management program?</p> <p>Does a landowner opt into the Wood Management program, how quickly does the program become effective?</p> <p>How does PG&amp;E inform VM contractors of the landowner's Wood Management preferences?</p> <p>Does the Wood Management opt-in remain valid indefinitely or must landowners re-verify their preferences on a regular basis?</p> <p>If a landowner has complaints regarding wood and slash management by PG&amp;E VM employees or contractors, what is the process for recording, resolving, and responding to such complaints?</p>	Holly Wahlman	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.3.2	Vegetation Management and Inspections	Wood and Slash Management	
29	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-017	17	CAIPA_Sat WMP-08-017	<p>Regarding "High-Risk Species" described in section 8.2.3.3 of PG&amp;E's WMP, PG&amp;E states: "There are no growing standards for high-risk species."</p> <p>Does PG&amp;E plan to develop growing standards for high-risk species?</p> <p>If the answer to part (a) is yes, when does PG&amp;E expect to complete development of such standards?</p> <p>If the answer to part (a) is no, please explain why not.</p>	Holly Wahlman	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.3.6	Vegetation Management and Inspections	High-Risk Species	
30	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-018	18	CAIPA_Sat WMP-08-018	<p>PG&amp;E's WMP states, in Table 6-18-3, VM Field QC Metrics Report, that pass rates are "not a VM target" for 2023-2025. Please explain why PG&amp;E has not set target pass rates for VM Field QC for 2023-2025.</p>	Holly Wahlman	3/30/2023	4/5/2023	4/5/2023	0	NA	8.2.5.2	Vegetation Management and Inspections	Quality Control	
31	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-019	19	CAIPA_Sat WMP-08-019	<p>Table 6-10: Priority 1/Priority 2 and Second Patrol Trees Categorized by Age, shows 206 priority 1 or 2 trees that were inspected more than 180 days prior to February 28, 2022.</p> <p>Does PG&amp;E plan to take within the following additional information for these 206 trees:</p> <p>1) The exact number of days since the last inspection, as of February 28, 2022.</p> <p>2) The current priority level of the tree.</p> <p>3) The type of the most recent inspection.</p> <p>4) The HTD area where the tree is located.</p> <p>5) PG&amp;E's expected remediation date for the tree.</p>	Holly Wahlman	3/30/2023	4/5/2023	4/5/2023	1	NA	8.2.6	Vegetation Management and Inspections	Open Work Orders	
32	CAIPA	Sat WMP-08	CAIPA_Sat WMP-08-01	1	CAIPA_Sat WMP-08-01	<p>10 of 10 PG&amp;E's WMP states, "We have completed certain programs and removed some less impactful targets from the 2023 WMP."</p> <p>Does PG&amp;E have "less impactful" targets that were removed from the 2023 WMP?</p> <p>If for each target in part (a), please explain how PG&amp;E determined that the target was "less impactful."</p>	Holly Wahlman	4/4/2023	4/7/2023	4/7/2023	0	NA	1	Executive Summary & Overview	NA	

33	CaPA	Sat WMP-09	CaPA_Sat WMP-09	2	CaPA_Sat WMP-09-02	<p>POE notes that the statement is included in the 2023-2025 WMP as a general observation about the sensitivity of energy electric assets to prevailing temperatures. The record equipment design specifications do not constitute a thorough evaluation of the vulnerability (meaning, the exposure of an asset to a specific climate hazard as well as an asset's ability to resist climate hazard) of a given asset or of the grid as a whole.</p> <p>POE will file its First Climate Vulnerability Assessment pursuant to CPUC Decision 20-08-046 in May 2024. As an addition to the reviews provided below, the 2022 Climate Strategy Report contains a significant amount of detail on the Company's climate mitigation and adaptation activities.</p> <p>(a) POE has substantial existing adaptive capacity to manage the increased risk of asset failures driven by heat-related climate hazards and is taking the following steps to mitigate this risk:</p> <ol style="list-style-type: none"> <li>POE routinely monitors, maintains, and replaces heat-sensitive electric equipment as part of the company's core mission to deliver safe, clean, affordable, reliable energy.</li> <li>POE has developed a predictive transformer failure model to better target existing transformer replacement efforts.</li> <li>POE is currently reviewing electric design standards to ensure that they account for projections of future heat conditions. This will ensure that equipment at the end of its useful life will be replaced with equipment designed to be able to tolerate future conditions.</li> </ol> <p>(b) In addition to the above, POE's Climate Resilience Team provides relevant climate projection data to POE's Operations and Maintenance Management and Planning team to incorporate into the forecasts models that are the foundation of the Risk Assessment and Mitigation Phase (RAM) Plan.</p> <p>(c) POE takes a targeted approach to its forecasts models to ensure that climate projection data sets are translated into near-term frequencies while maintaining statistical validity (climate projections cannot and should not be used to "predict" weather events in a given year). POE and POE's 2020 WMP Plan for the year 2050 will provide more information about the treatment of the climate change cross cutting risk factor.</p> <p>(d) In the 2023-2025 period, POE will continue to manage the risk of asset failure utilizing existing capabilities as mentioned above, including advancing the quantitative Risk Assessment and Mitigation Phase Plan which is focused on quantifying the probability and consequences of asset failure and identifying cost-effective mitigations.</p> <p>(e) Climate projections provide directional guidance as to changes in the average frequency and severity of climate hazards over decades and cannot and should not be used to predict the occurrence of specific weather events in a given year or even sub-decadal multi-year period. In other words, climate projections centered on the year 2050 versus 2025 will show similar conditions on average. This does not preclude that extreme or acute heat events could occur between 2023 and 2025 in addition to the elements of adaptive capacity mentioned above. POE also maintains a robust Emergency Preparedness and Response function to maintain safety and reliability when acute environmental conditions occur.</p>	Huly Wulhagen	4/4/2023	4/7/2023	4/7/2023	<p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p>	0	NA	5.3.4.2	Overview of the Service Territory	Climate Change Phenomena and Trends
34	CaPA	Sat WMP-09	CaPA_Sat WMP-09	3	CaPA_Sat WMP-09-03	<p>P. 596 of POE's WMP states, "In 2022 we continued our assessment through the Electric Program Investment Charge 3.45, "Automated Fire Detection from Wildlife Alert Cameras" program. Through our assessment period we determined that all detection cameras will remove our detection system and in 2023 we will select a vendor to install AI detection on our cameras."</p> <p>(a) How did POE determine that AI detection would improve its detection system?</p> <p>(b) Please identify the assets to which POE anticipates AI detection will improve POE's detection system.</p> <p>(c) Please provide any available studies, analysis or reports to support your statements in response to parts (a) and (b).</p> <p>(d) As of the beginning of 2023, how much has POE spent on the Electric Program Investment Charge 3.45, "Automated Fire Detection from Wildlife Alert Cameras" program?</p> <p>(e) How much does POE forecast spending on the Electric Program Investment Charge 3.45, "Automated Fire Detection from Wildlife Alert Cameras" program in each of the years 2023, 2024, and 2025?</p> <p>(f) When is the earliest date that POE expects to realize benefits from automated fire detection?</p>	Huly Wulhagen	4/4/2023	4/7/2023	4/7/2023	<p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p>	1	NA	8.3.4.2	Operational Awareness and Forecasting	Ignition Detection Systems
35	CaPA	Sat WMP-09	CaPA_Sat WMP-09	4	CaPA_Sat WMP-09-04	<p>P. 174 of POE's WMP states, "The results of the PSPS Consequence Model are then calibrated to POE's Enterprise Risk Model (ERM) Risk Score for any hazards that may be unique to its asset base." POE has also stated that POE anticipates AI detection will improve POE's detection system.</p>	Huly Wulhagen	4/4/2023	4/7/2023	4/7/2023	<p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p>	3	NA	6.2.2.3	Risk Methodology and Assessment	Risk and Risk Components Calculation
36	CaPA	Sat WMP-09	CaPA_Sat WMP-09	5	CaPA_Sat WMP-09-05	<p>P. 161 of POE's WMP discusses Group G, Above-Grade Hardware, in the context of POE's WTRM Group G. See the sub-group POE states, "Sub-Group G consists of components where the life cycle closely aligns with that of the structure. These include the hanger plate and bolt."</p> <p>(a) Does the WTRM apply the same hazards and threats to all components within a group? Please explain your answer.</p> <p>(b) Please explain why the WTRM uses different threats for any hazards that may be unique to a subset of hardware within a group? Please explain your answer.</p> <p>(c) Hanger plates may be subject to wear such as "hydrolysis" that the main structure may not experience. How does POE account for this potential difference in life cycle between hanger plates and the structure?</p> <p>(d) Which group within the WTRM includes anchors?</p> <p>(e) Please explain your justification for your answer to part (b).</p>	Huly Wulhagen	4/4/2023	4/7/2023	4/7/2023	<p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p>	0	NA	6.2.2.1	Risk Methodology and Assessment	Risk and Risk Components Calculation
37	CaPA	Sat WMP-09	CaPA_Sat WMP-09	6	CaPA_Sat WMP-09-06	<p>P. 153 of POE's WMP states, "top-risk areas are defined as the areas corresponding to those 100 to 1000 miles that include POE's critical electrical infrastructure locations and that are in the upper 20th percentile based on WDRM risk scores."</p> <p>(a) By "upper 20th percentile," does POE mean the 80th through 100th percentile, as described above, or does it refer to other metrics, such as the highest quartile of risk scores?</p> <p>(b) In the above statement, does "upper 20th percentile" refer to all WDRM risk scores (which encompasses most of POE's service territory), or a subset, for example, the upper 20th percentile of those WDRM risk scores located within WTRM? Please explain your answer.</p> <p>(c) How many miles were included in the "upper 20th percentile" as this term is used in POE's WMP?</p>	Huly Wulhagen	4/4/2023	4/7/2023	4/7/2023	<p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p>	0	NA	6.4.1.2	Risk Methodology and Assessment	Top Risk Areas Within the HFRS
38	CaPA	Sat WMP-09	CaPA_Sat WMP-09	7	CaPA_Sat WMP-09-07	<p>(a) POE's WMP states, "We created a species-specific stress index model for POE's tree health and mortality."</p> <p>(b) How does POE's species-specific stress index model for tree health and mortality?</p> <p>(c) How does POE utilize its species-specific stress index model for tree health and mortality?</p> <p>(d) Please describe the output of the model.</p>	Huly Wulhagen	4/4/2023	4/7/2023	4/7/2023	<p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p>	0	NA	4.4	Overview of WMP	Risk-Infomed Framework
39	CaPA	Sat WMP-09	CaPA_Sat WMP-09	8	CaPA_Sat WMP-09-08	<p>P. 129 of POE's WMP states, "When consulting BMPs, POE employees and contractors must adhere to POE's Best Management Practices (BMP) where practicable. BMPs are considerations beyond what physically possible and not conflicting with other regulatory requirements (e.g., safety considerations (OO 95 Risk 35 and Public Resources Code 4202 and 4203) or emergency response actions."</p> <p>(a) How do VM contractors determine when adherence to BMPs is not "physically possible"?</p> <p>(b) How does POE advise or inform VM contractors to ensure they are adhering to BMPs where practicable?</p> <p>(c) What actions does POE take if it determines that a VM contractor has not consistently adhered to BMPs where practicable?</p> <p>(d) Please list all instances in 2022 where POE has determined that a VM contractor did not adhere to BMPs where BMPs are practicable.</p> <p>(e) Please list all instances in 2022 where POE has taken action to reprimand or sanction a VM contractor for failing to adhere to BMPs where practicable.</p>	Huly Wulhagen	4/4/2023	4/7/2023	4/7/2023	<p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p> <p><a href="https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf">https://www.pge.com/sites/default/files/2023-04/03-2025-WMP-Climate-Resilience-Team-Provides-Relevant-Climate-Projection-Data-to-POEs-Operations-and-Maintenance-Management-and-Planning-Team-to-Incorporate-into-the-Forecasts-Models-that-are-the-Foundation-of-the-Risk-Assessment-and-Mitigation-Phase-Plan.pdf</a></p>	1	NA	5.4.5	Overview of the Service Territory	Environmental Compliance and Permitting



51	CAIPA	Sat WMP-10	CAIPA_Sat WMP-10	4	CAIPA_Sat WMP-10_04	<p>P. 358 of PGE's WMP states, with regard to DTS-FAST:</p> <p>a) A prototype field test installation was completed on 11/19/2021 in Maricopa and a wood pole in Santa Cruz in 2021. The available lessons learned have been updated to streamline design, increase scalability, and reduce costs. In 2022, we field a non-prototype pilot application for DTS-FAST. For 2023, we have no field installation plans but will be working through the patent examination process.</p> <p>ii) Please provide data on the results of the field test installation in Maricopa.</p> <p>iii) Other than working through the patent examination process, what steps does PGE plan to take in 2023 to develop DTS-FAST?</p> <p>iv) When does PGE expect to begin additional DTS-FAST installations?</p> <p>v) Through the end of 2022, how much has PGE spent on DTS-FAST?</p> <p>vi) What portion of your response to part (ii) is related to the patent application and examination process?</p> <p>vii) What are your forecast costs for DTS-FAST through the 2023-2025 period?</p> <p>viii) What portion of your response to part (ii) is related to the patent application and examination process?</p>	Holly Wulman	4/4/2023	4/10/2023	4/10/2023	<p><a href="https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_04.pdf">https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_04.pdf</a></p> <p><a href="https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_04.pdf">https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_04.pdf</a></p> <p><a href="https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_04.pdf">https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_04.pdf</a></p>	0	NA	8.1.2.6.2	Grid Design and System Hardening	Emerging Grid Hardening Technology Initiatives and Plans
52	CAIPA	Sat WMP-10	CAIPA_Sat WMP-10	5	CAIPA_Sat WMP-10_05	<p>P. 357 of PGE's WMP states, "If deployed, DTS-FAST could have a significant impact on wildfire risk where deployed."</p> <p>ii) Please clarify the phrase "a significant impact on wildfire risk" in the above quote.</p> <p>iii) Please provide any workshops or studies to support your answer to part (a).</p>	Holly Wulman	4/4/2023	4/10/2023	4/10/2023	<p><a href="https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_05.pdf">https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_05.pdf</a></p> <p><a href="https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_05.pdf">https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_05.pdf</a></p> <p><a href="https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_05.pdf">https://www.pge.com/content/dam/pge-compare/documents/2023-04-04-CAIPA_Sat_WMP-10_05.pdf</a></p>	0	NA	8.1.2.6.1	Grid Design and System Hardening	Emerging Grid Hardening Technology Initiatives and Plans
53	CAIPA	Sat WMP-10	CAIPA_Sat WMP-10	6	CAIPA_Sat WMP-10_06	<p>P. 464 of PGE's WMP states, "By 2022, we reduced the Customer Average Interruption Duration Index (CAIDI) and Customer's Experiencing a Significant Outage (CESO) for customers served by EPSS-capable lines when compared to data from the 2021 program pilot."</p> <p>ii) Please provide the CAIDI value for all FTD customers for each year from 2018-2022.</p> <p>iii) Please provide the CESO value for all FTD customers for each year from 2018-2022.</p>	Holly Wulman	4/4/2023	4/10/2023	4/10/2023	<p>Please see "WMP-Discover2023_DR_California_210-020A0101.docx"</p>	1	NA	8.1.1.1	Grid Operations and Procedures	Equipment Settings to Reduce Wildfire Risk
54	CAIPA	Sat WMP-10	CAIPA_Sat WMP-10	7	CAIPA_Sat WMP-10_07	<p>P. 464 of PGE's WMP states, "By the end of 2022, we responded to 89 percent of outages on EPSS-enabled lines within 42 minutes, depending on average within 42 minutes." For all outages on EPSS-enabled lines in 2022, provide the following:</p> <p>i) Average response time</p> <p>ii) 25th percentile response time</p> <p>iii) Median (50th percentile) response time</p> <p>iv) 75th percentile response time</p> <p>v) Longest response time</p>	Holly Wulman	4/4/2023	4/10/2023	4/10/2023	<p>The 42-minute figure is an average of the response time to all outages on EPSS-protected circuits in 2022 since EPSS Outage Response time tracking began. The timeframe covered is May 22 - December 31, 2022.</p>	0	NA	8.1.1.1	Grid Operations and Procedures	Equipment Settings to Reduce Wildfire Risk
55	CAIPA	Sat WMP-10	CAIPA_Sat WMP-10	8	CAIPA_Sat WMP-10_08	<p>P. 464 of PGE's WMP states, "By the end of 2022, we responded to 89 percent of outages on EPSS-enabled lines within 60 minutes, depending on average within 42 minutes." For all outages on EPSS-enabled lines in 2022, provide the following:</p> <p>i) Average response time</p> <p>ii) 25th percentile response time</p> <p>iii) Median (50th percentile) response time</p> <p>iv) 75th percentile response time</p> <p>v) Longest response time</p>	Holly Wulman	4/4/2023	4/10/2023	4/10/2023	<p>2022 EPSS OUTAGE RESPONSE AVERAGE RESPONSE TIME: 37TH PERCENTILE RESPONSE TIME: 42 MESSAGES: 27 MESSAGES: 39 MESSAGES: 52 MESSAGES: 49 MESSAGES: 49</p> <p>Note: Table values reflect available data since EPSS Outage Response time tracking began. The timeframe for responses is 2022 May 22 - 2022 December 31, 2022.</p>	0	NA	8.1.1.1	Grid Operations and Procedures	Equipment Settings to Reduce Wildfire Risk
56	CAIPA	Sat WMP-10	CAIPA_Sat WMP-10	9	CAIPA_Sat WMP-10_09	<p>P. 464 of PGE's WMP states, "By the end of 2022, we responded to 89 percent of outages on EPSS-enabled lines within 42 minutes, depending on average within 42 minutes." For the 10 percent of outages (noted in the quote) on EPSS-enabled lines that PGE did not respond to within 42 minutes, provide the following:</p> <p>i) Average response time</p> <p>ii) Longest response time.</p>	Holly Wulman	4/4/2023	4/10/2023	4/10/2023	<p>2022 EPSS OUTAGE RESPONSE AVERAGE RESPONSE TIME FOR RESPONSES &gt; 60 MINUTES: 60 LONGEST RESPONSE TIME: 102 MESSAGES: 408</p> <p>Note: Table values reflect available data since EPSS Outage Response time tracking began. The timeframe for responses is 2022 May 22 - 2022 December 31, 2022.</p>	0	NA	8.1.1.1	Grid Operations and Procedures	Equipment Settings to Reduce Wildfire Risk
57	CAIPA	Sat WMP-10	CAIPA_Sat WMP-10	10	CAIPA_Sat WMP-10_10	<p>P. 441 of PGE's WMP states, "We plan to implement a QA (quality assurance) program for systems inspections."</p> <p>ii) Please describe the program PGE is planning to implement a QA program for systems inspections.</p> <p>iii) When does PGE expect to implement a QA program for systems inspections?</p> <p>iv) Please describe the main features of the QA program that PGE plans to implement.</p> <p>v) What are the probable limitations of the QA program that PGE plans to implement?</p>	Holly Wulman	4/4/2023	4/10/2023	4/10/2023	<p>i) QA function that has been tested and referred to as "quality verification" is a first component of the QA program for systems inspections and will be referred to as "QA" rather than "QV" moving forward. We have made significant progress on the work and the program has been implemented.</p> <p>ii) The program has already been implemented.</p> <p>iii) Main features are described in Section 8.1.1.1 of our 2023 WMP: "A Quality Verification (QV) function will be implemented in 2023 that provides analysis and program value. The function is related to the end of the QA program referred to above. QV uses a statistically valid sample of OC completion locations. Sample sites are based on completed QC work. QV audits will be ongoing as long as OC is operational. All QV discrepancies are documented in the electronic OC Review Assessment forms. Dashboards are used to show trends and any discrepancies with pre-determined metrics. Stakeholders use these OC Dashboard results to provide testing and training and to develop corrective actions for training materials/procedures updates." (i) We are not presently aware of any probable limitations of the QA program. However, as the program continues, efforts will be taken to proactively identify limitations as they arise.</p>	0	NA	8.1.6.1	Quality Assurance and Quality Control	Quality Assurance
58	CAIPA	Sat WMP-10	CAIPA_Sat WMP-10	11	CAIPA_Sat WMP-10_Q11	<p>P. 441 of PGE's WMP states, "We plan to update existing QV (quality verification) procedures for systems inspections."</p> <p>ii) Please describe the program PGE is planning to update existing QV procedures for systems inspections?</p> <p>iii) When does PGE expect to complete its updates to existing QV procedures for systems inspections?</p> <p>iv) Please describe how the planned updates will improve PGE's existing QV procedures.</p>	Holly Wulman	4/4/2023	4/10/2023	4/10/2023	<p>i) The quality team is currently undergoing a thorough review of the prior QV procedures as an initial step in the development of updated procedures.</p> <p>ii) Expected completion of the program is the end of the third quarter of 2023.</p> <p>iii) The planned updates improve upon PGE's existing QV procedures by accurately reflecting the QV role in the field systems inspection throughout.</p> <p>iv) Please refer to page 831 of our 2023 WMP which defines external factors as follows: "External Factors represent reasonable circumstances which may impact execution against targets, objectives, other work, or performance metrics including, but not limited to, physical conditions, weather, natural events, environmental delays, customer releases or non-compliance, permitting delays/restrictions, weather conditions, removed or destroyed assets, active wildfire, exceptions or exemptions to regulatory/permitting requirements, and other safety considerations." Specifically, each of the items identified in the definition could apply to our asset tag work and cause our work to be delayed. As an example, the severe and repeated storms in the first quarter of 2023 have caused delays in performing our asset tag work and fall under the category of external factors.</p> <p>v) Physical conditions: To mitigate the impacts of physical conditions, we work with our leadership and strategy teams to create solutions specifically tailored to the individual situation. However, despite these efforts, there are times when we must simply await the removal of the external physical conditions in order to proceed with work as there is no other reasonable alternative.</p> <p>vi) Weather conditions: To mitigate the impacts of weather conditions, we work with our leadership, strategy, and maintenance teams to create solutions specifically tailored to the individual situation. However, despite these efforts, there are times when we must simply await the end of the weather conditions in order to proceed with work as there is no other reasonable alternative.</p> <p>vii) Removed or destroyed assets: When removed or destroyed assets are discovered, we reassess the asset condition and proceed with work.</p> <p>viii) Active wildfire: During active wildfires, we focus on emergency operations and assisting impacted customers. While we await external wildfire conditions to be removed to proceed with work, we also plan for these situations with our emergency response and restoration teams.</p>	0	NA	8.1.6.1	Quality Assurance and Quality Control	Quality Assurance
59	CAIPA	Sat WMP-10	CAIPA_Sat WMP-10	12	CAIPA_Sat WMP-10_012	<p>P. 450 of PGE's WMP states, "Along with reducing wildfire risk related to backlog ignition risk tags in HFTD/NFRA, new (EC) notifications identified after January 1st, 2023 HFTD/NFRA ignition risk tags will be completed in compliance with GO 95 rule 18 timelines, barring external factors."</p> <p>ii) What external factors does PGE anticipate may prevent it from completing HFTD/NFRA ignition risk tags in compliance with GO 95 Rule 18 timelines?</p> <p>iii) For each external factor identified in part (ii), what is PGE's plan to mitigate the effect the external factor may have?</p> <p>iv) During the period from 2023-2025, will PGE complete new ignition risk tags in compliance with GO 95 rule 18 timelines for those ignition risk tags located outside the HFTD/NFRA? Please explain your answer.</p>	Holly Wulman	4/4/2023	4/10/2023	4/10/2023	<p>i) Landowner refusals: To mitigate the impacts of landowner refusals, we work with local government affairs teams to help resolve the refusals in the most efficient way possible so that we can proceed with work.</p> <p>ii) Environmental delays: To mitigate the impacts of environmental delays, we work with our leadership and strategy teams to create solutions specifically tailored to the individual situation. However, despite these efforts, there are times when we must simply await the removal of the external environmental conditions in order to proceed with work as there is no other reasonable alternative.</p> <p>iii) Customer releases or non-compliance: To mitigate the impacts of customer releases or non-compliance, we work with our local government affairs teams to resolve the releases and to proceed with the work.</p> <p>iv) Permitting delays/restrictions: To mitigate the impacts of permitting delays and restrictions, we work with our leadership and government affairs teams to have the delays or restrictions resolved as expeditiously as possible and to proceed with work.</p> <p>v) Weather conditions: To mitigate the impacts of weather conditions, we work with our leadership, strategy, and maintenance teams to create solutions specifically tailored to the individual situation. However, despite these efforts, there are times when we must simply await the end of the weather conditions in order to proceed with work as there is no other reasonable alternative.</p> <p>vi) Removed or destroyed assets: When removed or destroyed assets are discovered, we reassess the asset condition and proceed with work.</p> <p>vii) Active wildfire: During active wildfires, we focus on emergency operations and assisting impacted customers. While we await external wildfire conditions to be removed to proceed with work, we also plan for these situations with our emergency response and restoration teams.</p>	0	NA	8.1.7.2	Open Work Orders	Open Work Orders - Distribution Tags
60	CAIPA	Sat WMP-10	CAIPA_Sat WMP-10	13	CAIPA_Sat WMP-10_013	<p>Table PG&amp;E-17-1 on p. 451 of PGE's WMP states, "Third Safety Reassessment (FSR) performed annually on the dependent tags to confirm Priority 1 notification has not escalated to Priority A or B."</p> <p>ii) Under PGE's current procedures and policies, can a FSR re-escalate the priority of a notification? Please describe PGE's current procedures and policies, can a FSR be used to extend the due date of a notification beyond GO 95 rule 18 timeline? Please explain your answer.</p>	Holly Wulman	4/4/2023	4/10/2023	4/10/2023	<p>i) The FSR program is focused on identifying conditions that have escalated to Priority A and B. Inspectors can also recommend that a notification be cancelled if they believe it was created in error. It is no longer required according to PGE's guidelines, or if they find all work completed on the EC is already completed in the field. In certain instances, the FSR can lead to a downgrading in priority. For example, if the tag guideline disagrees with an inspector's recommended escalations or cancellations, the guideline can downgrade the tag rather than cancel or escalate it.</p> <p>ii) FSRs do not extend a notification's required end date beyond GO 95 rule 18 timelines. PGE's current execution of EC notifications does not meet GO 95 Rule 18 compliance 100% of the time. FSRs are an internal containment activity. PGE's notification status is not impacted by FSRs.</p>	0	NA	8.1.7.2	Open Work Orders	Open Work Orders - Distribution Tags



71	OEBIS	001	OEBIS_001	3 SUPP	OEBIS_001_Q3 SUPP	Regarding PG&E's Focused Tree Inspections pilot 1. Describe the current state of development for the pilot area, PG&E's Areas of Concern (AOC), and polygons where focused vegetation inspection can be evaluated to determine appropriate courses to prioritize plants (page 529) and the expected timeline for implementation. 2. Detail the criteria PG&E has and is using to develop the pilot area, PG&E's Areas of Concern (AOC), and polygons where focused vegetation inspection can be evaluated to determine appropriate courses to prioritize plants (page 529). 3. What standards, processes, procedures, and tools are vegetation management personnel using/will use to perform tree risk assessments for this pilot? 4. What PG&E is using its One VM Tool for reworking for this pilot? If not, what system will PG&E use for reworking for this pilot? 5. When is PG&E conducting its Focused Tree Inspections pilot? If PG&E has not yet begun its pilot, when will PG&E be conducting its Focused Tree Inspections pilot? 6. How many acres are included in the pilot? 7. Was the pilot area previously inscope for Enhanced Vegetation Management (EVM)? 8. For each Current Protection Zone (CPZ) in the pilot area provide the: 1) CPZ name 2. The Weighted Risk Score from PG&E's most recent version of its EVM Tree-Weighted Prioritization List. 3. True Weighted Rank from PG&E's most recent version of its EVM Tree-Weighted Prioritization List. 4. Risk Triage 5. Does PG&E have a plan to continue its Focused Tree Inspections assuming the pilot is a success? If so, detail those plans, including how many acres PG&E plans to inspect under the program in 2023 and 2024. 6. Provide a GIS layer of the pilot area, PG&E's Areas of Concern (AOC), and polygons where focused vegetation inspection can be evaluated to determine appropriate courses to prioritize plants (page 529). As applicable, provide the following attributes for each polygon: 1. Number of overhead critical risks within the polygon. 2. Overall Utility Risk 3. Ignition Risk 4. PSPS Risk 5. Conflict from Vegetation Likelihood of Ignition	N 2023 development of Areas of Concern (AOC) used WORM v3 to prioritize CPZs to inform the pilot areas selected in the four AOC selected for pilots. There are 31 CPZs total. 22 of these CPZs match where WORM v3 was used in 2022 and EVM Tree-Weighted Risk Scores are available for those areas. 9 CPZs do not have EVM Tree-Weighted Risk Scores or Rankings. These 9 CPZs are due to circuit configuration and/or operating hours changes that will allow for meeting with the WORM v2 CPZ. Where available EVM Tree-Weighted Risk Score and EVM Tree-Weighted Rank are provided in the table below:	Cook Lang	4/5/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/eng-ahd/worm/v3.html">https://www.pge.com/eng-ahd/worm/v3.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a>	0	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
71	OEBIS	001	OEBIS_001	3 SUPP.2	OEBIS_001_Q3 SUPP.2	Regarding PG&E's Focused Tree Inspections pilot 1. Describe the current state of development for the pilot area, PG&E's Areas of Concern (AOC), and polygons where focused vegetation inspection can be evaluated to determine appropriate courses to prioritize plants (page 529) and the expected timeline for implementation. 2. Detail the criteria PG&E has and is using to develop the pilot area, PG&E's Areas of Concern (AOC), and polygons where focused vegetation inspection can be evaluated to determine appropriate courses to prioritize plants (page 529). 3. What standards, processes, procedures, and tools are vegetation management personnel using/will use to perform tree risk assessments for this pilot? 4. What PG&E is using its One VM Tool for reworking for this pilot? If not, what system will PG&E use for reworking for this pilot? 5. When is PG&E conducting its Focused Tree Inspections pilot? If PG&E has not yet begun its pilot, when will PG&E be conducting its Focused Tree Inspections pilot? 6. How many acres are included in the pilot? 7. Was the pilot area previously inscope for Enhanced Vegetation Management (EVM)? 8. For each Current Protection Zone (CPZ) in the pilot area provide the: 1) CPZ name 2. The Weighted Risk Score from PG&E's most recent version of its EVM Tree-Weighted Prioritization List. 3. True Weighted Rank from PG&E's most recent version of its EVM Tree-Weighted Prioritization List. 4. Risk Triage 5. Does PG&E have a plan to continue its Focused Tree Inspections assuming the pilot is a success? If so, detail those plans, including how many acres PG&E plans to inspect under the program in 2023 and 2024. 6. Provide a GIS layer of the pilot area, PG&E's Areas of Concern (AOC), and polygons where focused vegetation inspection can be evaluated to determine appropriate courses to prioritize plants (page 529). As applicable, provide the following attributes for each polygon: 1. Number of overhead critical risks within the polygon. 2. Overall Utility Risk 3. Ignition Risk 4. PSPS Risk 5. Conflict from Vegetation Likelihood of Ignition	1) GIS layer for each polygon with the additional attributes have been provided. Please see "WMP-Discovery2023_DR_OEBIS_001-Q008A0401.pdf" and "WMP-Discovery2023_DR_OEBIS_001-Q008A0402.pdf". Specifically for Overall Utility Risk, Ignition Risk, and PSPS Risk, these are typically presented in terms of circuit segments or circuit protection zones. The AOC polygons do not always align with circuit segments so circuit segments will be partially included or completely included. Since PG&E does not calculate the percentage of risk within the circuit segments, PG&E provides the risk scores based purely on the percentage of area that fell within the AOC, as an approximation for the data response.	Cook Lang	4/5/2023	4/27/2023	4/27/2023	<a href="https://www.pge.com/eng-ahd/worm/v3.html">https://www.pge.com/eng-ahd/worm/v3.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a>	2	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
72	OEBIS	001	OEBIS_001	4	OEBIS_001_Q4	Regarding PG&E's Tree Removal Inventory On page 528, PG&E states that it is "remove, or re-inspect trees identified in the EVM program". 1. How does PG&E decide whether a tree should be 1) simply staked based on the existing risk assessment or 2) be inspected in the field? 2. What standards, processes, procedures, and tools are vegetation management personnel using/will use to perform tree risk assessments for this program?	1) Trees in the inventory with a TAT result of "stake" will be staked based on the existing risk assessment. 2) All trees in the inventory with either no TAT result or a TAT result other than "stake" are to be re-assessed by a Tree Risk Assessment Qualification (TRAQ) inspector to determine if additional assessment is appropriate. The inspection will determine our action based on tree condition and strike potential. 3) The approach to tree inspections intends to follow the American National Standards Institute (ANSI) A300 tree risk assessment standard per field conditions and individual tree mitigation needs. Inspectors re-assessing these trees will be required to provide a Tree Risk Assessment Qualification (TRAQ) through the International Society of Arboriculture (ISA), which is the same organization that certifies arborists. The result of the TRAQ assessment will be documented in the "Inspection Report" used for the tree.	Cook Lang	4/5/2023	4/10/2023	4/10/2023	<a href="https://www.pge.com/eng-ahd/worm/v3.html">https://www.pge.com/eng-ahd/worm/v3.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a>	0	NA	8.2.2.4	Vegetation Management and Inspections	Tree Removal Inventory
73	OEBIS	001	OEBIS_001	5	OEBIS_001_Q5	Regarding Wood Management On page 536, PG&E says that its wood management program addresses large wood generated by PG&E's VM activities including post-fire activities and wood generated by the EVM Program. 1. Address large wood generated from the EVM program that has not already addressed? 2. Address large wood generated from PG&E's Tree Removal Inventory program, a subset of the EVM program? 3. How is large wood addressed when generated by other VM programs, including Distribution Restoration Services (VM) for Operations, Maintenance, and Construction? 4. When debris and/or large wood generated from PG&E's VM activities are left on-site, what standards, processes, procedures, and protocols does PG&E use to ensure the debris and large wood are placed in a manner that does not: a. Block or hinder ingress or egress. b. Infringe on PRC 4291 defensible space clearance. c. Impede maintenance and dispatches. d. Conflict with property owner's interests. e. Otherwise create a hazard.	1) Yes. We will exhibit commitments to manage wood generated by Enhanced Vegetation Management (EVM) tree work for customers who requested this service. 2) We will continue to follow wood management commitments that have been made to customers. 3) PG&E offers wood management for our wildfire response and EVM program. For all programs, wood generated from trees in damaged is left in a safe position on site as it is legally the property of the landowner. As safety is PG&E's foremost concern, we ensure wood is safely and properly stored or removed. Customer access, crews will address the wood accordingly in coordination with the work. 4) PG&E uses "WMP-Discovery2023_DR_OEBIS_001-Q008A0401.pdf" for PG&E's Wood Management procedure. 5) Our crews are directed to ensure customers are clear of any debris or wood at the time of tree work. If wood poses an access concern, crews will address the wood accordingly in coordination with the work. 6) Our Vegetation Management program is designed to ensure public safety and regulatory compliance. If customers have questions resulting from our work, they can reach out to our dedicated customer teams for support and resolution. 7) If wood poses an environmental concern, crews will address the wood in accordance with PG&E Best Management Practices implemented at the time of tree work. 8) As each property is different, we collaborate with the customer to find an optimal solution for the completion of our work on their property. 9) At the time of all tree work, crews will either chip and spread, pile and scatter or remove wood debris that is smaller than four inches in diameter. Additionally, in alignment with PG&E's stand that everyone and everything is always safe, crews will address any large wood that poses a potential safety hazard at the time of tree work.	Cook Lang	4/5/2023	4/10/2023	4/10/2023	<a href="https://www.pge.com/eng-ahd/worm/v3.html">https://www.pge.com/eng-ahd/worm/v3.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a>	1	NA	8.2.1.2	Vegetation Management and Inspections	Wood and Stump Management
74	OEBIS	001	OEBIS_001	6	OEBIS_001_Q6	Regarding Enhanced Clearances On page 537, PG&E says it "complies with Appendix E of GO 96," then goes on to describe the recommended minimum clearance set forth in Appendix E of GO 96. 1. In the PTO, does PG&E obtain the recommended clearance "where practicable"? 2. If (a) does not describe how PG&E implements the recommended "enhanced" clearances, clarify how PG&E accomplishes this recommended clearance and how it is enforced (GO 96). 3. Regarding Appendix B items that are currently optional "by Request" Only Provide the following, which are outlined in the 2023-2025 Wildfire Mitigation Plan Technical Guidance, Appendix B, if the data is in a table format (table, matrix, graphs, charts) provide it in MS Excel. If the data is not table, provide the information in MS Word. 4. Detailed Model Documentation for each model and sub-model developed as PG&E's response to Section 6.1.2 Summary of Risk Models (Technical documentation should be presented according to ASTM E 1472 - Standard Guide for Documenting Computer Software for Risk Models). 5. Include a list of assumptions and known model limitations according to ASTM E 1996 - Standard Guide for Documenting Uses and Limitations of Deterministic Fire Models. 6. Present verification and validation documentation according to the SFPE's Guidelines for Substantiating a Fire Model for a Given Application or ASTM E 1555 - Standard Guide for Evaluating the Predicting Capability of Deterministic Fire Models. 7. As a minimum, the documentation must include: (1) Purpose of the model/problem identification. (2) Model version. (3) Theoretical foundation. (4) Mathematical foundation. (5) External dependencies. (6) Model validation, and (7) Sensitivity. 8. Model Substantiation 3 9. For each model, provide documentation of the following model substantiation studies: (1) Validation data. (2) Model verification. (3) Model validation, and (4) Model calibration. 10. Additional Model Supporting Risk Calculations 4 11. For each additional model that supports the risk calculations, provide weather analysis and fuel conditions. 12. Calculation of Risk and Risk Components: Likelihood 13. More detailed information on: (1) Emission Likelihood. (2) Emission Likelihood of Ignition. (3) Conflict from Vegetation Likelihood of Ignition. 14. Conflict from Other Likelihood of Ignition.	The requested information is provided in the following four documents: - "WMP-Discovery2023_DR_OEBIS_001-Q008A0401.pdf" - "WMP-Discovery2023_DR_OEBIS_001-Q007A0402CONF.pdf" - "WMP-Discovery2023_DR_OEBIS_001-Q008A0403CONF.pdf" - "WMP-Discovery2023_DR_OEBIS_001-Q008A0404CONF.pdf"	Cook Lang	4/5/2023	4/10/2023	4/10/2023	<a href="https://www.pge.com/eng-ahd/worm/v3.html">https://www.pge.com/eng-ahd/worm/v3.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a>	0	NA	8.2.3.3	Vegetation Management and Inspections	Clearance
75	OEBIS	001	OEBIS_001	7	OEBIS_001_Q7	Regarding Comprehensive Decision Diagram for All Risk Models Used Provides comprehensive system diagrams in MS Visio or PPT for all risk models. 1. A comprehensive diagram for operational models and 2. A comprehensive diagram for planning models. Section 6.1.2 Summary of Risk Models, asks for a summary of risk models in table form with specific fields. Section 6.2.1 Risk and Risk Components Identification, asks for a chart that demonstrates the components of overall utility risk. This request is comprehensive of all models that work together in the Decision-Making Framework (DMF). 1. Model Identification sheet 2. Interaction between the models presented graphically (e.g., inputs and outputs coming in and going from models to other models). 3. Organization with the use of swimlanes where applicable. 4. Naming and coding notes. 5. Decisions and process flows. 6. Use of a legend and colors to classify input/output types and model-to-model interactions, and 7. The full cycle of models working together and creating feedback for model adjustments and fine-tuning.	The requested information is provided in the following four documents: - "WMP-Discovery2023_DR_OEBIS_001-Q008A0401.pdf" - "WMP-Discovery2023_DR_OEBIS_001-Q007A0402CONF.pdf" - "WMP-Discovery2023_DR_OEBIS_001-Q008A0403CONF.pdf" - "WMP-Discovery2023_DR_OEBIS_001-Q008A0404CONF.pdf"	Cook Lang	4/5/2023	4/10/2023	4/10/2023	<a href="https://www.pge.com/eng-ahd/worm/v3.html">https://www.pge.com/eng-ahd/worm/v3.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a>	4	NA	Appendix B	Supporting Documentation for Risk Methodology and Assessment Definition	Detailed Model Documentation
76	OEBIS	001	OEBIS_001	8	OEBIS_001_Q8	Regarding Comprehensive Decision Diagram for All Risk Models Used Provides comprehensive system diagrams in MS Visio or PPT for all risk models. 1. A comprehensive diagram for operational models and 2. A comprehensive diagram for planning models. Section 6.1.2 Summary of Risk Models, asks for a summary of risk models in table form with specific fields. Section 6.2.1 Risk and Risk Components Identification, asks for a chart that demonstrates the components of overall utility risk. This request is comprehensive of all models that work together in the Decision-Making Framework (DMF). 1. Model Identification sheet 2. Interaction between the models presented graphically (e.g., inputs and outputs coming in and going from models to other models). 3. Organization with the use of swimlanes where applicable. 4. Naming and coding notes. 5. Decisions and process flows. 6. Use of a legend and colors to classify input/output types and model-to-model interactions, and 7. The full cycle of models working together and creating feedback for model adjustments and fine-tuning.	PG&E has provided two system diagrams with WMP-Discovery2023_DR_OEBIS_001-Q008A0401.pdf in response to the data request – one for operational models (table 01) and one for planning models (table 02). Each diagram depicts the interaction between the models and inputs/outputs asked for. The diagrams also show the decision points, process flows, feedback loops where adjustments to the models were required. 1) Please see table 01 of WMP-Discovery2023_DR_OEBIS_001-Q008A0401.pdf 2) Please see table 02 of WMP-Discovery2023_DR_OEBIS_001-Q008A0401.pdf. The diagram depicts PG&E's comprehensive Decision-Making Framework from identifying risk drivers to developing mitigation strategies to address risk, defining program scope and developing workplans, balancing the mitigation portfolio, and executing the work.	Cook Lang	4/5/2023	4/24/2023	4/24/2023	<a href="https://www.pge.com/eng-ahd/worm/v3.html">https://www.pge.com/eng-ahd/worm/v3.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a> <a href="https://www.pge.com/eng-ahd/worm/v2.html">https://www.pge.com/eng-ahd/worm/v2.html</a>	1	NA	6.1.2	Risk Methodology and Assessment	Summary of Risk Models









106	CAIPA	Sat WMP-12	CAIPA_Sat WMP-12	4 SUPP	CAIPA_Sat WMP-12_04 SUPP	<p>We have updated our List of Frequently De-energized Circuits based on the errors found in our review. The entries below may not reflect the latest circuits that are mitigated by PSPS protocols. Please see attachment "WMPDiscovery022_DR_CalAfranchise_013-0001App0160701.xlsx" for the updated List of Frequently De-energized Circuits.</p> <p>a) Please refer to Section 9.2 Protocols on PSPS beginning on p. 366 for Distribution.</p> <p>b) The current PSPS Protocols were updated consistent to PSPS protocols from previous years. Based on our current PSPS Protocols, our scoring improved and some of the circuits would not have been de-energized or would have fewer customers impacted than for certain past PSPS events.</p> <p>c) SES DR Distribution customer events would have been mitigated by current PSPS protocols from 2019-2022. A calculation is based on a comparison of historical PSPS events and the 2022 PSPS Five-Year Lookback analysis, which applies current PSPS protocols to the weather conditions present in 2019-2022. This comparison includes 2018-2022 weather conditions. The "Customer-Events" were calculated as a net value. If some circuits would increase customer impacts due to PSPS protocols, the increase in impacted customer events would have been calculated based on the number of mitigated customer events is calculated as a net value. If some circuits would have seen higher customer impacts due to PSPS protocols, the increase in impacted customer events would have been calculated based on the number of mitigated customer events reported here.</p> <p>"Customer-Events" refers to the count of customer impacts over the Five-Year Lookback. If the same customer is impacted from PSPS for three PSPS events in the Five-Year Lookback, this is reported as "three customer-events mitigated" instead of "one unique customer mitigated".</p> <p>d) Customer events referenced in part (c) benefited because they were not de-energized for certain past PSPS events based on the current PSPS Protocols.</p> <p>e) Some of the customers may be de-energized in other PSPS events in the years compared for this analysis but saw a decrease in the number of PSPS event impacts.</p> <p>f) The number of customers mitigated in each PSPS event by PSPS Protocols depends on a look back analysis, updated PSPS Protocols, and the weather conditions seen during that PSPS event. Use the make enhancements to our protocols, we are not able to calculate future customer mitigated. See SA-NA, SA-45, SA-46, PS-02, and PS-04 for additional details on evaluation of enhancements to PSPS protocols.</p> <p>g) See optional table.</p>	Holly Walkman	4/6/2023	4/19/2023	4/19/2023	<a href="https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1204SUPP/FeatureServer/0">https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1204SUPP/FeatureServer/0</a>	0	NA	9.1.2	Public Safety Power Shutoff	Identification of Frequently De-Energized Circuits
107	CAIPA	Sat WMP-12	CAIPA_Sat WMP-12	5	CAIPA_Sat WMP-12_05	<p>Regarding Table 9-2 (Lists of Frequently De-energized Circuits) in Appendix F of PG&amp;E's WMP, transmission circuit Entry Numbers: 193, 195, 197, 198, 199, 201, 202, 203, 204, 205, 206, 208, 209, 210, 211, 212, 213, 215, 217, 218, 219, 220, 221, 222, 224, 226, 228, 231, 232, 233, 234, 235, 236, 238</p> <p>a) Please describe the PSPS protocols referenced in these Entry Numbers. b) Please explain how customers were "Mitigated by PSPS protocols" referenced in these Entry Numbers. c) Please explain how customers were "Mitigated by PSPS protocols." d) State whether the customers referenced in part (c) benefited because they were not de-energized or because they had reduced impacts from PSPS. e) Please state how many customers benefited from mitigation by PSPS protocols in part (c). f) State whether the customers referenced in part (c) benefited because they were not de-energized or because they had reduced impacts from PSPS. g) Please state how many customers PG&amp;E expects to benefit in the future due to mitigation by PSPS protocols. h) State whether the customers referenced in part (c) will benefit because they will not be de-energized or because they will have reduced impacts from PSPS.</p>	Holly Walkman	4/6/2023	4/11/2023	4/11/2023	<a href="https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1205/FeatureServer/0">https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1205/FeatureServer/0</a>	0	NA	9.1.2	Public Safety Power Shutoff	Identification of Frequently De-Energized Circuits
107	CAIPA	Sat WMP-12	CAIPA_Sat WMP-12	5 SUPP	CAIPA_Sat WMP-12_05 SUPP	<p>We have updated our List of Frequently De-energized Circuits based on the errors found in our review. The entries below may not reflect the latest circuits that are mitigated by PSPS protocols. Please see attachment "WMPDiscovery022_DR_CalAfranchise_013-0001App0160701.xlsx" for the updated List of Frequently De-energized Circuits.</p> <p>a) Please refer to Section 9.2 Protocols on PSPS beginning on p. 773 for Transmission.</p> <p>b) See response to 4b.</p> <p>c) SA Transmission customer events would have been mitigated by current PSPS protocols from 2019-2022. A calculation is based on a comparison of historical PSPS events and the 2022 PSPS Five-Year Lookback analysis, which applies current PSPS protocols to the weather conditions present in 2019-2022. This comparison includes 2018-2022 weather conditions. The "Customer-Events" were calculated as a net value. If some circuits would increase customer impacts due to PSPS protocols, the increase in impacted customer events would have been calculated based on the number of mitigated customer events reported here.</p> <p>"Customer-Events" refers to the count of customer impacts over the Five-Year Lookback. If the same customer is impacted from PSPS for three PSPS events in the Five-Year Lookback, this is reported as "three customer-events mitigated" instead of "one unique customer mitigated".</p> <p>d) Customer events referenced in part (c) benefited because they were not de-energized for certain past PSPS events based on the current PSPS Protocols.</p> <p>e) Some of the customers may be de-energized in other PSPS events in the years compared for this analysis but saw a decrease in the number of PSPS event impacts.</p> <p>f) The number of customers mitigated in each PSPS event by PSPS Protocols depends on a look back analysis, updated PSPS Protocols, and the weather conditions seen during that PSPS event. Use the make enhancements to our protocols, we are not able to calculate future customer mitigated. See SA-NA, SA-45, SA-46, PS-02, and PS-04 for additional details on evaluation of enhancements to PSPS protocols.</p> <p>g) See optional table.</p>	Holly Walkman	4/6/2023	4/19/2023	4/19/2023	<a href="https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1205SUPP/FeatureServer/0">https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1205SUPP/FeatureServer/0</a>	0	NA	9.1.2	Public Safety Power Shutoff	Identification of Frequently De-Energized Circuits
108	CAIPA	Sat WMP-12	CAIPA_Sat WMP-12	6	CAIPA_Sat WMP-12_06	<p>PG&amp;E's WMP p. 751, Section 9.1.2, states that "This table [Table 9-2] also includes the mitigation measures taken or planned to be taken to reduce the likelihood of PSPS on these circuits." Regarding Table 9-2 (Lists of Frequently De-energized Circuits) in Appendix F of PG&amp;E's WMP, the only planned action listed in Table 9-2 is regarding "MSD thermal insulation or replacement planned" (which is listed for 6 of 236 circuits). Please explain why none of the other types of mitigation measures listed on p. 751 are listed in Table 9-2 as planned actions for any circuits. b) Please explain whether PG&amp;E plans to take any mitigation measures for any of the remaining 228 circuits in Table 9-2.</p>	Holly Walkman	4/6/2023	4/11/2023	4/11/2023	<a href="https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1206/FeatureServer/0">https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1206/FeatureServer/0</a>	0	NA	9.1.2	Public Safety Power Shutoff	Identification of Frequently De-Energized Circuits
109	CAIPA	Sat WMP-12	CAIPA_Sat WMP-12	7	CAIPA_Sat WMP-12_07	<p>Regarding ACP PG&amp;E-22-35 (Quarterly Mitigation Benefits of Reducing PSPS Scale, Scope, and Frequency) on WMP p. 975-976: a) Please explain why this table shows customer impacts in terms of minutes of outages, rather than in terms of mitigation metrics (i.e., undergrounding and MSD), and what methods (e.g., overhead line, undergrounding, etc.) were not listed in this table. b) Has PG&amp;E analyzed customer impacts for other mitigation methods? c) If the answer to part (b) is yes, please provide the results of PG&amp;E's analysis. d) If the answer to part (b) is no, please explain why not.</p>	Holly Walkman	4/6/2023	4/11/2023	4/11/2023	<a href="https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1207/FeatureServer/0">https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1207/FeatureServer/0</a>	0	NA	Appendix D	Appendix D - Areas for Continued Investment	AD PG&E-22-35 - Quarterly Mitigation Benefits of Reducing PSPS Scale, Scope, and Frequency
110	CAIPA	Sat WMP-12	CAIPA_Sat WMP-12	8	CAIPA_Sat WMP-12_08	<p>In the context of alternatives, such as additional vegetation management and installing automatic reclosers, could insulators reduce the risk of catastrophic wildfire that lowering the need for de-energization. When these measures alone cannot reduce the risk of catastrophic wildfire in areas within the PSPS scope sufficiently to protect public safety, we will move forward with PSPS.</p> <p>b) See response to 4b.</p> <p>c) Other alternatives we considered the OIC further evaluates the forecasted high wind speeds and wind gust speeds, which can break and blow vegetation and debris into power lines and blow sparks onto dry vegetation, when it determined these other measures use not adequate alternatives to mitigate the risk of catastrophic wildfire, and de-energizing in the areas within the PSPS scope is necessary to protect public safety.</p> <p>Furthermore, we implemented efforts to mitigate adverse impacts on the customers and communities in areas where power shutoffs were likely. These efforts include:</p> <ul style="list-style-type: none"> <li>• Enabling greater scope processes to significantly reduce the public safety impacts of de-energizing by de-energizing smaller segments of the grid within the close confines of the fire-critical weather footprint, rather than de-energizing larger segments of customers in more populated areas.</li> <li>• Considering the public safety impacts of de-energizing by reviewing the total count of impacted customers and the impact of potential de-energization upon Medical Baseline customers, critical facilities, and the back-up generation capabilities of critical facilities that pose societal impact risks if de-energized (e.g., critical infrastructure).</li> <li>• Using temporary generation to enable customer supplies of the forecasted fire areas.</li> <li>• Using transportation to remove the scope and number of customers affected.</li> <li>• Considering alternatives for standing, temporary generation, and alternate grid solutions, to reduce and mitigate the number of customers de-energized.</li> <li>• Reducing the public safety impact of de-energizing some affected communities by using back-up generation to serve critical facilities and customers.</li> <li>• Providing local Community Resource Centers (CRCs) to support customers in these impacted communities.</li> <li>• Supporting vulnerable customers through California Foundation for Independent Living Centers (CILC) and Community Based Organizations (CBO) resource partners that offered various services to customers impacted by the WMP.</li> <li>• Making extensive use of Advanced Notifications and outreach tools to notify impacted customers of the expected de-energization.</li> <li>• Using an extensive camera, weather station, and satellite weather monitoring network and on-site ground personnel to collect real-time observations to inform and speed the identification of Weather "At-Risk" times in more precise, smaller areas, to get customers back to service faster.</li> <li>• Seeking and accessing transportation partnerships with the California Foundation for Independent Living Center (CILC), which facilitates the Disability Disaster Access and Resources (DDAR) Program, PG&amp;E's partnership with the California 211 Network, and PG&amp;E's longstanding agreement with four transportation organizations that provide accessible transportation in 12 counties. Furthermore, before and during a PSPS, PG&amp;E provides loaner Paratransit agencies with 24-hour hour triage Notifications, as well as any applicable Weather, Daily, Daily, and Reservation Notifications during an event. This also includes a list of the 20 cities impacted by a PSPS, PG&amp;E provides loaner Paratransit agencies with 24-hour hour triage Notifications, as well as any applicable Weather, Daily, Daily, and Reservation Notifications during an event. These messages include automated phone, text, and email messages that request confirmation that the notification was received. If previous alerts are not acknowledged, we will make additional attempts to notify the customer. This will continue hourly, or be contacted in person, until we are able to reach them.</li> <li>• Providing customer notifications are referenced in attachment "WMPDiscovery022_DR_CalAfranchise_013-0001App0160701.pdf"</li> <li>• Due to changing weather and therefore changes in projected footprints, we do not specifically provide a map to paratransit agencies, but provide paratransit agencies with a list of impacted zip codes along with the ability to look up the impacted or at-risk areas on PG&amp;E's website.</li> </ul>	Holly Walkman	4/6/2023	4/11/2023	4/11/2023	<a href="https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1208/FeatureServer/0">https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1208/FeatureServer/0</a>	0	NA	9.2.3	Public Safety Power Shutoff	Outline of Tactical and Strategic Decision-Making Protocol for Initiating a PSPS/PSPS (Such as Decision Tree)
111	CAIPA	Sat WMP-12	CAIPA_Sat WMP-12	9	CAIPA_Sat WMP-12_09	<p>Regarding WMP p. 783, Section 9.2.4 (Protocol for Mitigating the Public Safety Impacts of PSPS, Including Impacts on Fire Responders, Health Care Facilities, Operations, and Paramedic-Dependent Patients):</p> <p>a) Does PG&amp;E utilize any on-site or paramedic-dependent customers or other specific resources are available, ahead of a potential PSPS event?</p> <p>b) If the answer to part (a) is yes, how in advance of a potential PSPS event does PG&amp;E notify on-site or paramedic-dependent customers?</p> <p>c) If the answer to part (a) is no, please provide a sample of such a notification.</p> <p>d) Please provide an example of a map that has been provided to paramedic agencies.</p>	Holly Walkman	4/6/2023	4/11/2023	4/11/2023	<a href="https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1209/FeatureServer/0">https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1209/FeatureServer/0</a>	1	NA	9.2.4	Public Safety Power Shutoff	Protocol for Mitigating the Public Safety Impacts of PSPS, Including Impacts on Fire Responders, Health Care Facilities, Operations, and Paramedic-Dependent Patients
112	CAIPA	Sat WMP-12	CAIPA_Sat WMP-12	10	CAIPA_Sat WMP-12_10	<p>Regarding PSPS and its relationship with EPSS settings:</p> <p>a) Please describe the decision-making process for a situation in which PG&amp;E anticipates PSPS conditions but decides to utilize EPSS settings instead.</p> <p>b) Please describe all cases in 2021 and 2022 when PG&amp;E anticipated PSPS conditions but utilized EPSS settings instead, if the occurred.</p> <p>c) Please provide a narrative of the decision-making process for any instances listed in part (b) above.</p> <p>d) Please describe how PG&amp;E utilizes EPSS during a PSPS event period.</p>	Holly Walkman	4/6/2023	4/11/2023	4/11/2023	<a href="https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1210/FeatureServer/0">https://www.cpa.com/gis/arcgis/rest/services/CAIPASatWMP1210/FeatureServer/0</a>	0	NA	NA	Public Safety Power Shutoff & Grid Operations and Procedures	NA

113	CAIPA	Sat WMP-12	CAIPA_Sat_WMP-12	11	CAIPA_Sat_WMP-12_011	<p>Regarding communications to customers for EPSS:</p> <p>1) Does PG&amp;E provide notifications or other communications to customers that EPSS settings are enabled? (This may include, but is not limited to, notifications that a customer's service that is subject to EPSS settings, either retroactively or an unannounced outage may occur, retroactively or an unannounced outage may occur, retroactively or an unannounced outage may occur.)</p> <p>2) If the answer to part (a) is yes, please describe the notification approach used for EPSS settings.</p> <p>3) Please provide an example of a message sent to a customer for an unannounced outage.</p> <p>4) At what point (i.e., number of manhours) prior to enabling EPSS settings does PG&amp;E notify customers?</p> <p>5) At what point (i.e., number of manhours) after the beginning of an outage triggered by EPSS settings does PG&amp;E notify customers?</p>	<p>1) We have self-service options for customers and Public Safety Partners to determine EPSS settings are enabled on their service from home or business. When EPSS is used a planned outage, we do not proactively notify customers as daily enablement and disablement decisions are made.</p> <p>2) Our customer outreach and education process includes information about the EPSS program, the benefits, and general information about the High Fire Risk Areas protected by EPSS settings. Customers who experienced eight or more outages on EPSS-affected circuits in 2022 will be contacted by email or letter to inquire about the EPSS program. The letter includes language that indicates that the fire serving their home or business has EPSS capability and that there could be unplanned power outages (both added for emphasis in the response).</p> <p>To help prevent wildfires, we are making the electric system safer and stronger for our customers. This includes safety settings on our powerlines known as Enhanced Powerline Safety Settings (EPSS). While these settings help keep you safe, you may experience unexpected power outages. We are working hard to improve reliability across our electric grid - without sacrificing safety.</p> <p>Real-time enablement status is available for County agencies and Public Safety Partners through PG&amp;E's Outage Power. We do not proactively notify customers directly as EPSS settings are enabled or disabled on a daily basis. However, the PG&amp;E Outage Center or page offers customers the option to search for their address. If EPSS settings are enabled, regardless of current outage status, a text to the top of the page will indicate that the EPSS settings are enabled. Please see "WMP-Discovery2022_DR_California_013-02018000.pdf" for an example of the text message. The text message will include the following information: "The High Fire Risk Areas currently enabled. This functionality is scheduled to be enabled in May 2023."</p> <p>PG&amp;E notifies customers who have not previously opted out or sent an email outage notification when the outage occurs, regardless of EPSS enablement status. Customers can choose to receive the message via phone call, text message and/or email.</p> <p>Customers may choose any combination of notification preference. The notification includes an estimated time of restoration (ETOR) whenever possible. Restoration updates are sent to customers whenever the ETOR is updated.</p> <p>3) The excerpt from the press release and screenshot from the address lookup are included in response (b), above. Samples of the email outage notification for calls, text message and email are included below.</p> <p>Automated call script:</p> <p>This is a PG&amp;E calling with an unplanned outage alert. Para services an expedient, optimal route. Your street address starting with "street number" may be experiencing an unplanned outage. This outage is affecting "number of Customers" customers. We expect power to be restored by "ETOR Date, i.e., December 20, at-ETOR Time, i.e., 10:00 p.m.". When wildfire risk is higher, powerlines in your area shut off routinely when struck by a branch or object. To reduce potential ignition, lines shut off and they're fully inspected and safe to energize. If you see downed power lines, call 911. For more information, visit <a href="http://www.pge.com/outagecenter">www.pge.com/outagecenter</a> or call 1-800-451-1234.</p> <p>4) We plan to implement Outage Detection (OD) only on 3-wire distribution on an ungrounded circuit whose phase to neutral connected load downstream. PG&amp;E will continue to explore the possibility of applying OD to 4-wire multi-grounded systems in the future. Figure 7.4-2 is a currently selected OD application as shown when it should have indicated 5-wire systems.</p> <p>5) As shown in Figure 7.4-2, the 4-wire multi-grounded overhead line is estimated to be 675 miles.</p>	4/6/2023	4/11/2023	4/11/2023	<a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a>	1	NA	8.14.1.1	Grid Outages and Procedures	Protective Equipment and Device Settings
114	CAIPA	Sat WMP-13	CAIPA_Sat_WMP-13	1	CAIPA_Sat_WMP-13_01	<p>Figure POSE 7.1-4.2 (p. 20) of PG&amp;E's WMP shows Over Conductor Detection (OCD) to be implemented on 4-wire distribution.</p> <p>1) Please state the number of overhead circuit miles of 4-wire distribution in PG&amp;E's FPD.</p> <p>2) Please state the number of overhead circuit miles of 3-wire distribution in PG&amp;E's FPD.</p>	<p>1) We have 1,420 miles of 4-wire distribution in PG&amp;E's FPD.</p> <p>2) We have 2,400 miles of 3-wire distribution in PG&amp;E's FPD.</p>	4/6/2023	4/12/2023	4/12/2023	<a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a>	0	NA	8.1.2.1.0.1	Grid Design and System Hardening	Overhead Conductor Detection Devices
115	CAIPA	Sat WMP-13	CAIPA_Sat_WMP-13	2	CAIPA_Sat_WMP-13_02	<p>Table 8.2.7 on p. 166 of PG&amp;E's WMP summarizes grid operation monitoring systems, including:</p> <p>(a) Distribution Fault Anticipation (DFA) is designed to detect conditions that generate current and voltage anomalies including series arcing issues (swells, sags, sags, and short arcing fault line step, vegetation contact, wire down). It can also detect types of load caused by broken conductors.</p> <p>(b) Early Fault Detection (EFD) is designed to detect conditions that generate accumulation of Radio Frequency (RF) signal that are caused by partial discharge from equipment components including broken conductor strands, falling insulators, insulator/energized insulators, class vegetation, and falling conductors in service transformers.</p> <p>(c) DFA is capable of detecting issues which occur over short and/or long repair outages, which are not detected by EFD, unless EFD is also used.</p> <p>(d) EFD is capable of detecting issues which are very subtle and early while the failure modes, which are not detected by DFA. Examples of these issues include broken conductor strands, falling insulators, vegetation near conductors, and transformer overloading.</p> <p>(e) DFA is capable of identifying issues in a circuit. It can locate issues when used in combination with faulted circuit indicators (FCIs) and smart sensors. Smart sensors can also be used to locate issues.</p> <p>(f) DFA can accurately classify the type of issue and the other tools (circuit impedance models, line sensors and SmartMeters) help reduce the issue on the field. Field inspections can be targeted to a small area.</p> <p>(g) EFD is capable of locating issues with high accuracy, to within a span on mainline and large tapline sections directly connected to EFD substations on both ends of a segment.</p> <p>(h) As of Dec 31, 2022, PG&amp;E has 74 DFA devices deployed and is currently in the phase of Operational Deployment (POD). As a result of this work, the DFA system has been used to identify four arcing connections in ungrounded equipment and detect one fault-induced conductor site. Other use cases have not been fully developed.</p> <p>(i) PG&amp;E has EFD installed on four circuits as of Dec 31, 2022, and the technology is still in the pilot phase. As a result of this work, PG&amp;E has been able to detect 11 damaged conductors (flayed or bridged), two arcing flashers, and one broken insulator.</p>	<p>1) We have 1,420 miles of 4-wire distribution in PG&amp;E's FPD.</p> <p>2) We have 2,400 miles of 3-wire distribution in PG&amp;E's FPD.</p>	4/6/2023	4/12/2023	4/12/2023	<a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a>	0	NA	8.3.3.1	Situational Awareness and Forecasting	Existing Systems, Technologies, and Procedures
116	CAIPA	Sat WMP-13	CAIPA_Sat_WMP-13	3	CAIPA_Sat_WMP-13_03	<p>Table 7.3.1 on p. 281 of PG&amp;E's WMP states the following objective with an estimated completion date of 12/31/2025:</p> <p>Develop a process of compiling constraints resolution. As part of the bulk of the constrained constraints team, three major categories will be addressed: customer constraints, environmental constraints (including natural PG&amp;E processes required to perform work) and permitting constraints (including Land and Environmental permits).</p> <p>1) Describe what is required by the process "resolving constraints resolution."</p> <p>2) Please describe the benefits PG&amp;E anticipates from "resolving constraints resolution."</p> <p>3) Please describe the process PG&amp;E plans to take to centralize environmental constraints.</p> <p>4) Please describe the process PG&amp;E plans to take to centralize permitting constraints.</p>	<p>1) We have 1,420 miles of 4-wire distribution in PG&amp;E's FPD.</p> <p>2) We have 2,400 miles of 3-wire distribution in PG&amp;E's FPD.</p>	4/6/2023	4/12/2023	4/12/2023	<a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a>	0	NA	8.2.6	Vegetation Management and Inspections	Open Work Order
117	CAIPA	Sat WMP-13	CAIPA_Sat_WMP-13	4	CAIPA_Sat_WMP-13_04	<p>Table 7.3.1 on p. 282 of PG&amp;E's WMP states the following objective with an estimated completion date of 12/31/2025:</p> <p>For each major constraint category build a process for addressing each constraint type, implement the new process, and create metrics to track constraint type.</p> <p>1) When does PG&amp;E expect to begin implementing its process for centralizing constraints?</p> <p>2) When does PG&amp;E expect to begin implementing its process for centralizing environmental constraints?</p> <p>3) When does PG&amp;E expect to begin implementing its process for centralizing permitting constraints?</p> <p>4) What is the earliest date PG&amp;E expects to begin realizing benefits (e.g., reduced time to resolve constraints) as a result of the objective stated above?</p> <p>5) Why does PG&amp;E expect that it will start and implement 2025 to achieve the objectives in the passage quoted above?</p> <p>6) Between now and December 2025, how is PG&amp;E addressing each constraint type?</p>	<p>1) We have 1,420 miles of 4-wire distribution in PG&amp;E's FPD.</p> <p>2) We have 2,400 miles of 3-wire distribution in PG&amp;E's FPD.</p>	4/6/2023	4/12/2023	4/12/2023	<a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a>	0	NA	8.2.6	Vegetation Management and Inspections	Open Work Order
118	CAIPA	Sat WMP-13	CAIPA_Sat_WMP-13	5	CAIPA_Sat_WMP-13_05	<p>Table 7.4 on p. 307-313 of PG&amp;E's WMP lists the top risk circuit segments (i.e., riskiest segments when sorted by site wildfire risk).</p> <p>1) For each of the riskiest segments, what is the riskiest segment's status, "Accounts for risk reduction associated with EPSS." Please explain how PG&amp;E quantified the risk reduction associated with EPSS for each of the circuit segments in Table 7.4.</p> <p>2) Do the values in the column entitled "Jan. 1, 2025 Overall Risk" account for risk reduction associated with EPSS?</p> <p>3) Do the values in the column entitled "Jan. 1, 2025 Overall Risk" account for risk reduction associated with EPSS?</p> <p>4) Please supplement Table 7.4 with the following additional columns: 1) Forecast SAGD in 2023 if EPSS were not affected; 2) Forecast SAGD in 2023 with EPSS.</p>	<p>1) We have 1,420 miles of 4-wire distribution in PG&amp;E's FPD.</p> <p>2) We have 2,400 miles of 3-wire distribution in PG&amp;E's FPD.</p>	4/6/2023	4/28/2023	4/28/2023	<a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a>	1	NA	7.2.2.3	Wildfire Mitigation Strategy Development	Projected Risk Reduction on High-Risk Circuits Over the 5-Year WMP Cycle
119	CAIPA	Sat WMP-13	CAIPA_Sat_WMP-13	6	CAIPA_Sat_WMP-13_06	<p>Table PG&amp;E-6.2.2-1 (p. 16) of PG&amp;E's WMP lists four consequence values derived from the mean MAVF of historical fires.</p> <p>1) How PG&amp;E performed a sensitivity analysis to determine the effect of these values on the output of PG&amp;E's WRF model. Please see the responses to (b) for an explanation of the data analysis.</p> <p>2) For purposes of High Fire Risk Areas (HFRA) (for non-HFRA), there is only a single variable that determines the consequences of a wildfire, which is the fraction of points that are in the HFRA or in the non-HFRA or in the non-HFRA. There are no other dependencies. Only the variability in the predicted fraction of days that are in the HFRA or in the non-HFRA or in the non-HFRA.</p> <p>3) Changing the values of the four consequence values derived from the mean MAVF of historical fires would not change the output of PG&amp;E's WRF model.</p> <p>4) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model. The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>5) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>6) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>7) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>8) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>9) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>10) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>11) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>12) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>13) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>14) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>15) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>16) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>17) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>18) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>19) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p> <p>20) The WRF model is used to determine the effect of these values on the output of PG&amp;E's WRF model.</p>	<p>1) We have 1,420 miles of 4-wire distribution in PG&amp;E's FPD.</p> <p>2) We have 2,400 miles of 3-wire distribution in PG&amp;E's FPD.</p>	4/6/2023	4/12/2023	4/12/2023	<a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a>	0	NA	6.2.2.2	Risk Methodology and Assessment	Consequence
120	CAIPA	Sat WMP-13	CAIPA_Sat_WMP-13	7	CAIPA_Sat_WMP-13_07	<p>In section 7.2 (p. 275-276) of PG&amp;E's WMP, PG&amp;E states: "We determined that EPSS is more effective at mitigating wildfire risk at a lower cost as shown by comparing the RISE to the cost program from EWP7 in the 2022 GRC; the RISE for EWP7 was 1.5 compared to the EPSS RISE of 105.7."</p> <p>1) How does the RISE for EWP7 compare to the RISE for EPSS in the 2022 GRC?</p> <p>2) EPSS is a reactive mitigation program in contrast to EWP7 which is proactive. Does this reactive vs. proactive categorization have any impact on PG&amp;E's decision to transition away from EWP7?</p> <p>3) How does PG&amp;E's RISE estimate for EWP7 take into account the negative reliability impacts on customers?</p>	<p>1) We have 1,420 miles of 4-wire distribution in PG&amp;E's FPD.</p> <p>2) We have 2,400 miles of 3-wire distribution in PG&amp;E's FPD.</p>	4/6/2023	4/12/2023	4/12/2023	<a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a> <a href="http://www.pge.com/outage-center/outage-center">http://www.pge.com/outage-center/outage-center</a>	0	NA	7.2.1	Wildfire Mitigation Strategy Development	Overview of Mitigation Initiatives and Activities





150	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	1	CAIPA_Sat WMP-15_01	<p>POSE status in response to Question 1 (b) of CalHavacutes-POSE-2023WMP-08</p> <p>POSE will maintain clearances where EVM was occurred. POSE will also be prioritizing a minimum additional clearance of 12 feet throughout the system with HTD/HFRA. Two new programs, Vegetation Management for Operational Mitigation (VMOM) and Focused Tree Inspection, are being implemented. VMOM will maintain clearances where EVM was not implemented. These programs form clearances based on available outage data and trends, as well as site and tree specific conditions. When not called out as a uniform scope, clearances in portions of these targeted circuit segments may be attributed to EVM.</p> <p>POSE will be implementing the following new programs: Vegetation Management for Operational Mitigation (Tree Inspectors) to take place through POSE system, as opposed to just in the HTD or HFRA.</p> <p>POSE describes the circumstances in which an individual tree would warrant enhanced clearances under the Vegetation Management for Operational Mitigation program.</p> <p>POSE describes how each of the two new programs "form clearances based on available outage data and trends, as well as site and tree specific conditions."</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.6	Vegetation Management and Inspections	Discontinued Programs
151	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	2	CAIPA_Sat WMP-15_02	<p>POSE status in response to Question 1 (c) (ii) of CalHavacutes-POSE-2023WMP-08 that its strategy for determining desired clearance distances going forward will be "Minimum of 12 feet of clearance or enough clearance to mitigate potential impacts to facilities if these trees or portions of them are not cut."</p> <p>Please describe POSE's planned methodology for determining sufficient clearance to mitigate potential impacts in the event of tree failure as mentioned above.</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.6	Vegetation Management and Inspections	Discontinued Programs
152	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	3	CAIPA_Sat WMP-15_03	<p>POSE status in its response to Question 2 (b) of CalHavacutes-POSE-2023WMP-08: "Two new programs, Vegetation for Operational Mitigation (VMOM) and Focused Tree Inspection (FTI) will identify new trees for the sort of work identified in the [tree] inventory. Additionally, if any priority trees discovered while completing the FTI scope of work, they would be listed for work consistent with all other VM programs."</p> <p>Please describe how POSE intends to track trees identified for work under VMOM and FTI.</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.4	Vegetation Management and Inspections	The Removal Inventory
153	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	4	CAIPA_Sat WMP-15_04	<p>POSE status in its response to Question 2 (c) (ii) of CalHavacutes-POSE-2023WMP-08 that it will track desired clearance distances. "Based on analysis of outage data and trends by AOC. Additionally, any tree which within AOC will be within the AOC before next completion cycle or at closing gap of immediate failure before next work completion cycle."</p> <p>POSE provides how POSE will determine desired clearances in analysis of outage data and trends by AOC.</p> <p>POSE "MCI" client for "Minimum Distance Requirement" in the instance "Please define it not. (If/If not, is the "Minimum Distance Requirement" referred to here from General Order 16, or from POSE's internal standards?)</p> <p>If/If not, please reference which procedure POSE is utilizing.</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.6	Vegetation Management and Inspections	Discontinued Programs
154	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	5	CAIPA_Sat WMP-15_05	<p>POSE status in its response to Question 2 (c) of CalHavacutes-POSE-2023WMP-08 that it "utilized VM EPSS-enabled outage data, historical VM outage data, and customer outage impact data" in defining the VMOM scope of work.</p> <p>POSE describes how POSE has utilized each of the following data types in defining the VMOM scope of work: VM EPSS-enabled outage data; Historical VM outage data; Customer outage impact data.</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.4	Vegetation Management and Inspections	The Removal Inventory
155	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	6	CAIPA_Sat WMP-15_06	<p>POSE status in its response to Question 2 (c) of CalHavacutes-POSE-2023WMP-08 that it "utilized VM EPSS-enabled outage data, historical VM outage data, and customer outage impact data" in defining the VMOM scope of work.</p> <p>POSE describes how POSE has utilized each of the following data types in defining the VMOM scope of work: VM EPSS-enabled outage data; Historical VM outage data; Customer outage impact data.</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.4	Vegetation Management and Inspections	The Removal Inventory
156	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	7	CAIPA_Sat WMP-15_07	<p>POSE status in its response to Question 2 (b) of CalHavacutes-POSE-2023WMP-08: "The Inventory Program" is intended to last 9 years. In response to Question 2(b) of CalHavacutes-POSE-2023WMP-08, it provides a plan for the next three years of 15,000 trees in 2023, 20,000 trees in 2024, and 25,000 trees in 2025.</p> <p>POSE explain why POSE is forecasting it will take 9 years to work down to previously identified tree inventory.</p> <p>Please state the basis for the above-mentioned pace of work up to the year 2025.</p> <p>POSE quantify, based on the currently available knowledge, the option risk posed by the tree inventory.</p> <p>If POSE had not discontinued EVM at the end of 2022, how long would the EVM program have taken to work down to current tree inventory?</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.4	Vegetation Management and Inspections	The Removal Inventory
157	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	8	CAIPA_Sat WMP-15_08	<p>POSE status in its response to Question 3 (b) of CalHavacutes-POSE-2023WMP-08 that "The Wildlife Data Risk Model (WDRM) is used to prioritize tree work for the VMOM program."</p> <p>POSE provide the CPOs that were prioritized for the VMOM program.</p> <p>How was the WDRM is used to prioritize the tree work?</p> <p>WDRM risk threshold, or other criteria, was used in prioritizing the tree work?</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.3	Vegetation Management and Inspections	VM for Operational Mitigation
158	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	9	CAIPA_Sat WMP-15_09	<p>POSE status in its response to Question 3 (b) of CalHavacutes-POSE-2023WMP-08 that "The Wildlife Data Risk Model (WDRM) is used to prioritize tree work for the VMOM program."</p> <p>POSE provide the CPOs that were prioritized for the VMOM program.</p> <p>How was the WDRM is used to prioritize the tree work?</p> <p>WDRM risk threshold, or other criteria, was used in prioritizing the tree work?</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.3	Vegetation Management and Inspections	VM for Operational Mitigation
159	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	10	CAIPA_Sat WMP-15_10	<p>POSE status in its response to Question 4 (a) of CalHavacutes-POSE-2023WMP-08 that "The AOCs are prioritized using WDRM." The four pilot AOCs selected for 2023 incorporated additional reviews from the VM Execution Operational team to ensure appropriate regional areas to inform the program development."</p> <p>POSE describe how the Pilot AOCs were prioritized using WDRM.</p> <p>How were the VM Execution Operational team using the WDRM-generated prioritization? Or as POSE describe how.</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
160	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	11	CAIPA_Sat WMP-15_11	<p>POSE status in its response to Question 4 (b) of CalHavacutes-POSE-2023WMP-08 that the scope of work for Focused Tree Inspection (FTI) is to:</p> <p>Complete a focused tree inventory pilot project of 300 CHM trees in 2023 to corroborate reports and optimize efficiencies. Inspectors will utilize Tree Risk Assessment Qualification (TRAQ) Certified Arborists. Tree mitigations will be described on necessary based on field and industrial site conditions. Plans will begin in Q3 2023 and are intended to inform detailed SOV during the regional implementations.</p> <p>POSE state the basis for the above-mentioned pace of work up to the year 2025.</p> <p>POSE quantify, based on the currently available knowledge, the option risk posed by the tree inventory.</p> <p>If POSE had not discontinued EVM at the end of 2022, how long would the EVM program have taken to work down to current tree inventory?</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
161	CAIPA	Sat WMP-15	CAIPA_Sat WMP-15	12	CAIPA_Sat WMP-15_12	<p>POSE status in its response to Question 4 (b) of CalHavacutes-POSE-2023WMP-08 that "While inspection tools and data collection are expected to be regionalized, species and failure modes and site conditions to support historical outage data to help us identify problematic tree species and failure modes and site conditions to support the VMOM program, we will also be using regionalized species and failure modes and site conditions to support the VMOM program."</p> <p>POSE describe how POSE will use regionalized species and failure modes and site conditions to support the VMOM program.</p> <p>How was the WDRM is used to prioritize the tree work?</p> <p>WDRM risk threshold, or other criteria, was used in prioritizing the tree work?</p>	Holly Walman	4/11/2023	4/14/2023	4/14/2023	<a href="https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/">https://www.sge.com/eng-internal/operations/vegetation-management-for-operational-mitigation-vmom/</a>	0	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections





172	TURN	004	TURN_004	3	TURN_004_03	<p>Regarding PG&amp;E's response to ACI PG&amp;E 22-35, beginning on page 971 of its WMP:</p> <p>1. Please identify each mitigation discussed in PG&amp;E's current WMP or its 2022 WMP that has the potential to mitigate the scale, scope, frequency, or duration of PSPS events.</p> <p>2. Please explain why Table 22-35-1 only looks at the impact of new mitigations, undergrounding and MSO, and does not consider the other mitigations identified in response to subject (a).</p> <p>3. Please explain why Table 22-35-1 only looks at the impact of new mitigations, undergrounding and MSO, and does not consider the other mitigations identified in response to subject (a).</p> <p>4. Regarding the statement on page 971: "We concluded that none of the 2022 mitigation initiatives estimated any net benefit."</p> <p>5. Please identify each of the "2022 mitigation initiatives" that are referenced in this statement.</p> <p>6. Is the meaning of this statement that none of the 2022 mitigation initiatives reduced the scale, scope, frequency or duration of any event? If not, please explain what is meant by the statement and how it relates to the analysis presented in Table 22-35-1.</p>	Tom Long	4/12/2023	4/17/2023	4/17/2023	<a href="https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf">https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E 22-35: Quarterly Mitigation Benefits of Reducing PSPS Scale, Scope, and Frequency
173	CPUC - SPD (Safety Policy Division)	003	CPUC - SPD (Safety Policy Division)_003_01	1	CPUC - SPD (Safety Policy Division)_003_01	<p>1. Fill in the attached spreadsheet "Wildfire Mitigation Table DR - PG&amp;E." The table asks for a "classroom" which provides definitions for each attribute. The other tabs, "Data Input," "Asset Inspections," and "VM Inspections," all need to be completed with data input from PG&amp;E.</p>	Kevin Milar	4/12/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf">https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf</a>	1	NA	8	Wildfire Mitigation	NA
174	CPUC - SPD (Safety Policy Division)	003	CPUC - SPD (Safety Policy Division)_003_02	2	CPUC - SPD (Safety Policy Division)_003_02	<p>2. In PG&amp;E 2023 WMP, RP Section, 642_Ac0101, PG&amp;E has observed the mitigation effectiveness of Covered Conductor on the order of 46% compared to the value reported in the WMP which is 64% (page 345). Explain the discrepancy.</p>	Kevin Milar	4/12/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf">https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf</a>	0	NA	8.1.2.1	Grid Design and System Hardening	Covered Conductor Installation - Distribution
175	CPUC - SPD (Safety Policy Division)	003	CPUC - SPD (Safety Policy Division)_003_03	3	CPUC - SPD (Safety Policy Division)_003_03	<p>3. Confirm or revise PG&amp;E's Butte County OHS to US conversion factor in the 2023-2025 WMP (currently 1.57) in the CPUC based on actual and estimated US miles for OHS in PG&amp;E 2023 CPUC Report (Doc 223 PG&amp;E forecast 2,000 SH US miles (MAT 089) and 100 Butte County US miles (MAT 591) for 2023-2026.</p>	Kevin Milar	4/12/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf">https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf</a>	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
176	CPUC - SPD (Safety Policy Division)	003	CPUC - SPD (Safety Policy Division)_003_04	4	CPUC - SPD (Safety Policy Division)_003_04	<p>4. Based on WSPF 2018 review of the wildfire systems and general understanding of PG&amp;E's undergrounding program, it appears that undergrounding would have prevented only 67% of CPUC-reportable ignitions in the HTD area between 2002-2022 primarily due to the impact of secondary and service conductor ignitions. Additionally, SPD noted that CPUC-reportable ignitions in PG&amp;E territory during 2022 which were related to undergrounding (the data used in the Ignition data noted here, "Wildfire and Wildfire Safety (as goes) Please note, WSPF is still clearing the data and determining the best methodology to analyze the data).</p> <p>1. Provide the justification for the 67% mitigation effectiveness value for undergrounding reported in the Wildfire Mitigation Plan. Explain how secondary, service conductor, and underground ignitions are accounted for in the 67% mitigation effectiveness.</p> <p>2. Provide the percentage of CPUC-reportable ignitions in the HTD that undergrounding would be expected to prevent, accounting for secondary and service conductors.</p> <p>3. Provide a description of each CPUC-reportable ignition related to undergrounding that occurred in 2022 and describe how PG&amp;E's undergrounding program would or would not mitigate the ignition.</p> <p>4. SPDC general understanding is that ignitions from secondary conductors and service drops are accounted for in the methodology for calculating the effectiveness for both covered conductor and EPSS. But this risk does not appear to be accounted for in the same way for undergrounding. Explain the methodology for how the 67% mitigation effectiveness for undergrounding is calculated as compared to the 64% mitigation effectiveness for covered conductor and EPSS effectiveness in EPSS.</p> <p>5. Explain how the mitigation effectiveness is applied to the risk calculation (such as that approach used in PG&amp;E 2023 WMP, RP Section, 642_Ac0101) and contrast this approach to the approach used for covered conductor and EPSS.</p> <p>7. Provide the number of CPUC-reportable ignitions related to HTDs in secondary and service conductors for each year starting in 2014 onwards.</p>	Kevin Milar	4/12/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf">https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf</a>	1	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
177	CPUC - SPD (Safety Policy Division)	003	CPUC - SPD (Safety Policy Division)_003_05	5	CPUC - SPD (Safety Policy Division)_003_05	<p>5. Regarding the US wildfire table provided to PG&amp;E, 2023-2025_PGE_2023_WMP_RP_Appendix D ACI PG&amp;E 22-18_Ac0101_CONF file:</p> <p>1. Why does Column "O" Risk Rank (O) begin at Rank 7 (as opposed to 1) for circuits?</p> <p>2. Why does it end at 3 or 2?</p> <p>3. Why do the gaps in rank 1 &amp; 2 exist?</p> <p>4. Why does Column "R" Risk Rank (R) begin at Rank 6 (as opposed to 1) for circuits?</p> <p>5. Why does it end at 3 or 2?</p> <p>6. Why do the gaps in rank 1 &amp; 2 exist?</p>	Kevin Milar	4/12/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf">https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E 22-18 - Progress and Update on Undergrounding and Risk Privatization
178	O&E	002	O&E_002	1	O&E_002_01	<p>1. Has PG&amp;E used its Targeted Tree Species study to identify additional clearances for and begin inventory of trees with the highest growth and highest failure potential?</p> <p>2. If so, explain the results and how PG&amp;E has and will integrate this knowledge into its WMP program.</p> <p>3. If not, please explain PG&amp;E's plan to perform this analysis and provide a timeline for completion and operationalization.</p> <p>4. Has PG&amp;E reviewed the Process and Procedures for collecting and enhancing checklists for field inspections and current clearance guidance?</p> <p>5. If so, explain the results and how PG&amp;E has and will integrate this knowledge into its WMP program.</p> <p>6. If not, please explain PG&amp;E's plan to perform this review and provide a timeline for completion and operationalization.</p> <p>7. Has PG&amp;E evaluated how mid-cycle inspections sequence can be adjusted to align with Areas of Concern in highest risk regions?</p> <p>8. If so, explain the results and how PG&amp;E has and will integrate this knowledge into its WMP program.</p> <p>9. If not, please explain PG&amp;E's plan to perform this review and provide a timeline for completion and operationalization.</p> <p>10. Has PG&amp;E evaluated the feasibility of developing a multi-year historical tree data set?</p> <p>11. If so, explain the results and how PG&amp;E has and will integrate this knowledge into its WMP program.</p> <p>12. If not, please explain PG&amp;E's plan to perform this evaluation and provide a timeline for completion and operationalization.</p>	Cook Lang	4/13/2023	4/18/2023	4/18/2023	<a href="https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf">https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E 22-24 - Progress of Vegetation Management Maturity
179	O&E	002	O&E_002	2	O&E_002_02	<p>1. What are the minimum qualifications for an inspector performing the tree-risk assessment for the Focused Tree Inspections?</p> <p>2. Why and how did PG&amp;E choose to use the American National Standards Institute (ANSI) A-300 tree risk assessment standard over PG&amp;E's Tree Assessment Tool (TAT) for Focused Tree Inspections? Include a comparison of the benefits and drawbacks of ANSI A-300 and PG&amp;E's TAT.</p>	Cook Lang	4/13/2023	4/18/2023	4/18/2023	<a href="https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf">https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf</a>	0	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
180	O&E	002	O&E_002	3	O&E_002_03	<p>On page 621, PG&amp;E references to Company Emergency Response Plan (CERP). Provide an unredacted version of the CERP and all references.</p>	Cook Lang	4/13/2023	4/18/2023	4/18/2023	<a href="https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf">https://www.pge.com/pge_data/govcomply/efile/2022/wmp/2022-wmp-planned-mitigation-03-2023.pdf</a>	3	NA	8.4.1	Emergency Preparedness	Overview

181	OBS	002	002	CEIS_002_04	4	CEIS_002_04	<p>a. On page 567, PG&amp;E references the weather stations deployed over their 70,000 square mile territory for monitoring conditions.</p> <p>b. Provide the installation standard that all PG&amp;E weather stations are installed to include height from ground, direction of cross-arm, and which side of the pole/tower they are installed on.</p> <p>c. On page 570, PG&amp;E references the maintenance for fire weather stations and calibrations performed to "our standards."</p> <p>d. Provide the PG&amp;E specific standard that is being referenced for the calibrations as compared to the maintenance standards.</p> <p>e. Provide the total number of stations that are serviced annually over the past 3 years, and the maintenance performed on each station.</p> <p>f. Provide the total number of stations not serviced annually over the past 3 years due to "remoteness of location" and "weather conditions."</p> <p>g. Provide the estimated life span of each sensor and the replacement cycle for each.</p>	Colin Lang	4/15/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf">https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf</a>	2	NA	8.3.2.1	Situational Awareness and Forecasting	Existing Systems, Technologies, and Procedures
182	OBS	002	002	CEIS_002_05	5	CEIS_002_05	<p>Provide an Excel version of Table 7.4- Summary of Risk Reduction for Top Risk Circuit Segments from PG&amp;E's 2023 WMP.</p>	Colin Lang	4/15/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf">https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf</a>	1	NA	7.2.2.3	Wildfire Mitigation Strategy Development	Proposed Risk Reduction on Highest-Risk Circuits Over the 3-Year WMP Cycle
183	OBS	002	002	CEIS_002_06	6	CEIS_002_06	<p>Under Section 8.1.2.3, PG&amp;E only includes additional information for distribution protective devices. What program(s) does PG&amp;E currently have in system automation equipment at the transmission level?</p>	Colin Lang	4/15/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf">https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf</a>	0	NA	8.1.2.9.1	Grid Design and System Hardening	T-Line removal (in HTD) - Transmission
184	OBS	002	002	CEIS_002_07	7	CEIS_002_07	<p>a. Provide a definition for PG&amp;E's "Critical Pass Rate" for its asset inspection QC, as shown in Table PG&amp;E-22-01-1. This should include criteria for what qualifies as "critical" including any risk thresholds, associated equipment types, or other relevant descriptions.</p> <p>b. Does "Critical Pass Rate" differ from the "QA Review HTD Pass Rate" provided in Table RNP-PG&amp;E-22-08-04 in response to Critical Issue RNP-PG&amp;E-22-08-04 (if not, describe how the two differ)?</p> <p>c. Does "Critical Pass Rate" differ from the "QA Review HTD - Failure Rate" provided in Table RNP-PG&amp;E-22-08-04 in response to Critical Issue RNP-PG&amp;E-22-08-04 (if not, describe how the two differ)?</p>	Colin Lang	4/15/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf">https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E-22-01 Asset Inspections Quality Assurance and Quality Control ACI PG&E-22-08 Better Application of Specific Lessons Learned from Liability-Caused Fires
185	OBS	002	002	CEIS_002_08	8	CEIS_002_08	<p>a. How many ignitions were evaluated via PG&amp;E's EIA program in 2021, 2022, and 2023 (if applicable) respectively?</p> <p>b. When would PG&amp;E perform an EIA?</p> <p>c. Provide an example of an ignition PG&amp;E performed EIA for, including supporting documentation and reports as applicable.</p> <p>d. Via Excel format, provide the following information for each ignition when PG&amp;E performed an EIA, following the same format as Table 1 of the QDR:</p> <p>1. IZFA which ignition occurred</p> <p>2. HTD line</p> <p>3. Date of ignition</p> <p>4. Outfall for performing EIA (HTD line, EPSS protected facility, etc.)</p> <p>5. Mitigation type</p> <p>6. Ignition driver</p> <p>7. Line type</p> <p>8. Summary/stat on the cause of the ignition as identified in EIA</p>	Colin Lang	4/15/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf">https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf</a>	4	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E-22-08 Better Application of Specific Lessons Learned from Liability-Caused Fires
186	OBS	002	002	CEIS_002_09	9	CEIS_002_09	<p>a. Provide the definitions for the EPSS Outage Types under Column 1 of the tab labeled "2023 EPSS Outage Data."</p> <p>b. What analysis has PG&amp;E performed on EPSS-caused outages to determine which outages would have led to an ignition?</p> <p>c. What percentage of EPSS-caused outages since the establishment of the EPSS program would have led to an ignition had EPSS not been available?</p> <p>d. Broken down by year since establishment of the EPSS program, how many ignitions have occurred on EPSS-protected circuits while EPSS was available at the time of ignition?</p> <p>e. Broken down by year since establishment of the EPSS program, how many ignitions have occurred on EPSS-protected circuits while EPSS was not available at the time of ignition?</p> <p>f. PG&amp;E's response to RNP-PG&amp;E-22-12, PG&amp;E provided additional reliability measures in Table RNP-PG&amp;E-22-12.03, EPSS System Reliability Mitigation &amp; Correction Actions, such as targeted equipment repairs. PG&amp;E still lists any of the identified reliability measures within the table? If not, provide a list of reliability measures PG&amp;E is longer using, as well as an explanation as to why it is no longer being used.</p> <p>g. Provide the GIS file for Figure PG&amp;E-22-12.03, Causes for Failure of EPSS Outages.</p> <p>h. Provide an updated Excel version of 2023-07_PG&amp;E_2023_WMP_RL Appendix CAC PG&amp;E-22-02. Append additional columns to the file labeled "2023 CAC Data."</p> <p>i. Whether or not the CRF qualifies for additional mitigation based on the cause of the CRF.</p> <p>j. The mitigation specific being used on the CRF as a result of equipment management, installation of animal guards, etc.</p>	Colin Lang	4/15/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf">https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E-22-02 - Update on EPSS Reliability Study
187	OBS	002	002	CEIS_002_010	10	CEIS_002_010	<p>a. Provide an Excel sheet listing all work orders closed by PG&amp;E in 2022 following the same format and information as Table 13 of the QDR, with the additional columns:</p> <p>1. PG&amp;E Priority (A, B, E, H, and F)</p> <p>2. Whether or not the infraction qualified as an "Ignition-Risk HTD/HFRFA" tag</p> <p>3. Whether the infraction is Non-Pole or Pole</p> <p>4. Provide an updated Excel sheet listing all current open work orders following the same format and information as Table 13 of the QDR, with the additional columns:</p> <p>1. PG&amp;E Priority (A, B, E, H, and F)</p> <p>2. Whether or not the infraction qualifies as an "Ignition-Risk HTD/HFRFA" tag</p> <p>3. Whether the infraction is Non-Pole or Pole</p>	Colin Lang	4/15/2023	5/9/2023	5/9/2023	<a href="https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf">https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf</a>	1	NA	8.1.7	Open Work Orders	NA
188	TURN	005	005	TURN_005_1	1	TURN_005_01	<p>PG&amp;E has used three recent decision trees to scope work for System Hardening: (1) System Hardening - (2) Targeted Undergirding, and (3) Fire Risk Reduction (see also an HTD). Before the Targeted Undergirding, PG&amp;E previously used the System Hardening (see attachment WMP_Discussion23_DR_TURN_005-0001A0102) and Fire Risk Reduction Decision trees (see attachment WMP_Discussion23_DR_TURN_005-0001A0102) to scope work. Most of the system hardening work in 2023 was scoped using these decision trees.</p> <p>Since late 2021, PG&amp;E has completed most of one planned scoping using a Targeted Undergirding decision tree (see attachment WMP_Discussion23_DR_TURN_005-0001A0102) after fire removal is considered (if applicable). If undergirding is ultimately determined to be infeasible, we typically proceed with method-based conductor.</p> <p>Since our current scoping efforts primarily utilize the Targeted Undergirding decision tree, and the fire removal decision tree (where appropriate), we provide additional context regarding those trees below in response to this request.</p> <p>The primary approach for selecting undergirding risks used two risk prioritization methodologies: (1) Top 20 percent circuit segments based on the QDR WORMs, and (2) the Wildfire Fuelability Efficacy (WFE) ranked circuit segments based on the 2022 WORMs and considering undergirding feasibility. Both approaches used to select undergirding projects represent approximately 70 percent of our total wildfire risk.</p> <p>Please see attachment "WMP_Discussion23_DR_TURN_005-0001A0101.pdf." This decision tree reflects the process we followed to further analyze our highest risk undergirding circuits included in the WMP. The process, as shown on the decision tree attachment and described below, is split into four key phases:</p> <ol style="list-style-type: none"> <li>1. Circuit Segment Risk Ranking (orange box): First prioritize circuit segments in the locations where wildfire risk is highest based on the latest wildfire distribution risk model (currently WORM v3).</li> <li>2. Circuit Selection Prioritization Process (blue boxes): Then identify potential environmental conditions that impact feasibility of undergirding (weather conditions, rock type, gradient), and evaluate wildfire fuelability efficacy (WFE) by circuit segment to prioritize undergirding in the locations where WFE is the highest.</li> <li>3. Feasibility Study (green boxes): First, we confirm the segment identified is not already completed or included in existing work. Then, engineering team identifies opportunities to improve efficiencies and mitigate additional impacts, including adjusting the project to mitigate EPSS or EPSS impacts, determining if undergirding is infeasible (if so, identifying alternatives such as overhead, remote grid or hybrid), and confirming if there are any recent changes to the electric assets.</li> <li>4. Field Scoping (orange boxes): Field scoping then takes place, which is focused on identifying impediments to the proposed project route and determining if route or scope change is needed. If so, an alternative route is developed. Then, we review the updated risks and update the decision tree output.</li> </ol>	Tom Long	4/15/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf">https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf</a>	3	NA	8.1.2	Grid Design and System Hardening	ALL
189	TURN	005	005	TURN_005_2	2	TURN_005_02	<p>2. If the response to question 1 is that PG&amp;E has no such decision tree schematics, then please describe the process that PG&amp;E uses to decide, for a given location, which mitigation technique to use – i.e., undergirding, overhead conductor, remote grid installation, etc. – including without limitation the criteria that PG&amp;E uses to select the mitigation technique for that location.</p>	Tom Long	4/15/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf">https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf</a>	0	NA	8.1.2	Grid Design and System Hardening	ALL
190	TURN	005	005	TURN_005_3	3	TURN_005_03	<p>3. In choosing among alternative system hardening mitigation techniques – i.e., undergirding, overhead conductor, remote grid installation, etc. – for a given location, please explain how PG&amp;E uses its account the execution and schedule risks associated with undergirding compared to other alternatives. PG&amp;E discusses those risks in its 2022-2025 WMP at pages 346-348. They were also discussed in PG&amp;E's Revised 2021 WMP (version dated 9/30/21) at pages 600-601 (Section 7.3.1.7, 1. Section 3.9) where PG&amp;E uses the terms "avoidance risk" and "schedule risk."</p>	Tom Long	4/15/2023	4/19/2023	4/19/2023	<a href="https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf">https://www.pge.com/pge-global/documents/2023-04-19-002-004A401-ACND2CONF.pdf</a>	0	NA	8.1.2	Grid Design and System Hardening	ALL

191	TURN	005	TURN_005	4	TURN_005_04	4. For the underground work described in POGE's 2023-2025 WMP, please describe POGE's policy concerning undergrounding of service connections and the removal of poles on which service connections are attached. To the extent that this determination varies by project, please describe the criteria that POGE uses to decide whether POGE undergrounds service connections in a given location.	Tom Long	4/13/2023	4/13/2023	4/13/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
192	TURN	005	TURN_005	5	TURN_005_05	5. For the underground work described in POGE's 2023-2025 WMP, please describe POGE's policy concerning undergrounding of secondary distribution lines (as opposed to primary lines) and the removal of poles on which secondary lines are attached. To the extent that this determination varies by project, please describe the criteria that POGE uses to decide whether POGE undergrounds secondary lines in a given location.	Tom Long	4/13/2023	4/13/2023	4/13/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
193	TURN	005	TURN_005	6	TURN_005_06	6. For the distribution circuits on which POGE plans System Hardening undergrounding (as opposed to Rerouting undergrounding as that term is used in POGE's WMP (see, e.g., Table POGE's 1.1-2 on page 37)), please provide POGE's best estimate of the percentage of existing poles in the affected circuits (including poles supporting primary lines, secondary lines, and services) that will be removed as a result of the planned System Hardening undergrounding in 2023-2025. Please explain how POGE made this calculation and provide all trace and assumptions.	Tom Long	4/13/2023	4/13/2023	4/13/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
194	TURN	005	TURN_005	7	TURN_005_07	7. With respect to the values for 2023-2025 in the column for Estimated System Hardening Undergrounding Miles in Table POGE's 1.1-2 on page 347 of POGE's 2023-2025 WMP: a. The estimate provided in part a is for the primary lines only. This information is not available for secondary and service lines. b. The estimate provided in part b is for the primary lines only. This information is not available for secondary and service lines.	Tom Long	4/13/2023	4/13/2023	4/13/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
195	TURN	005	TURN_005	8	TURN_005_08	8. With respect to the values for 2023-2025 in the column for Estimated Butte County Rural Miles in Table POGE's 1.1-2 on page 347 of POGE's 2023-2025 WMP: a. For each year, please provide POGE's estimate of the overhead circuit miles that will be replaced and explain how the estimate was determined. b. For the figures provided in response to subpart a, please provide an estimated breakdown of the overhead circuit miles replaced by: primary lines, secondary lines, and services. c. For the figures provided in response to subpart a, please provide an estimated breakdown of the overhead circuit miles replaced by: primary lines, secondary lines, and services.	Tom Long	4/13/2023	4/13/2023	4/13/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
196	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	1	CAIPA_Sat WMP-16_01	Regarding POGE's SCADA Underground (UG) Switching: a) Please explain POGE's operating procedure for operating a SCADA UG switch to energize and de-energize a circuit or circuit segment. b) Please provide POGE's written procedures or other documentation related to your response to part (a). c) Please explain in detail POGE's operating procedure, from start to finish, for the following operation: after closing a normally closed switch, the switch is returned to its normally closed position during switching. d) Please explain in detail POGE's operating procedure, from start to finish, for the following operation: after closing a normally open switch, the switch is returned to its normally open position during switching.	Holly Waltema	4/18/2023	4/21/2023	4/21/2023	2	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment
197	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	2	CAIPA_Sat WMP-16_02	Regarding POGE's Load Break Elbows: a) Please explain POGE's operating procedure for operating a load break elbow in a vault to energize or de-energize a circuit or circuit segment. b) Please provide POGE's written procedures or other documentation related to your response to part (a). c) Please explain in detail POGE's operating procedure, from start to finish, for the following operation: after closing a load break elbow that is normally in a closed position, the circuit segment is returned to its normally closed position during switching. d) Please explain in detail POGE's operating procedure, from start to finish, for the following operation: after closing a circuit segment via a load break elbow that is normally in an open position, the circuit segment is returned to its normally open position during switching.	Holly Waltema	4/18/2023	4/21/2023	4/21/2023	0	NA	8.1.2.10.3	Grid Design and System Hardening	Motor Switch Operator Switch Replacement
198	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	3	CAIPA_Sat WMP-16_03	Regarding POGE's Junction Boxes: a) Please explain in detail POGE's operating procedure for operating a junction box in a vault to energize or de-energize a circuit or circuit segment. b) Please provide POGE's written procedures or other documentation related to your response to part (a). c) Please explain in detail POGE's operating procedure, from start to finish, for the following operation: after closing a circuit segment via a junction box that is normally in a closed position, the circuit segment is returned to its normally closed position during switching. d) Please explain in detail POGE's operating procedure, from start to finish, for the following operation: after closing a circuit segment via a junction box that is normally in an open position, the circuit segment is returned to its normally open position during switching.	Holly Waltema	4/18/2023	4/21/2023	4/21/2023	0	NA	8.1.2.10	Grid Design and System Hardening	Other Grid Topology Improvements to Minimize Risk of Ignition
199	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	4	CAIPA_Sat WMP-16_04	Please explain POGE's selection criteria for where to install the following equipment on underground circuits: a) SCADA UG switches b) Load break elbows	Holly Waltema	4/18/2023	4/21/2023	4/21/2023	0	NA	8.1.2	Grid Design and System Hardening	Other Grid Topology Improvements to Minimize Risk of Ignition
200	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	5	CAIPA_Sat WMP-16_05	Please explain POGE's selection criteria for where to install the following equipment on underground circuits: a) Pad-mounted transformers b) Subsurface transformers	Holly Waltema	4/18/2023	4/21/2023	4/21/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment

201	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	6	CAIPA_Sat WMP-16_06	<p>For each of the undergrounding projects that PG&amp;E has planned for 2023, please answer the following questions on each project:</p> <p>a) How many SCADA underground switches will be installed?</p> <p>b) How many overhead switches will be removed?</p> <p>c) How many tie switches to adjacent circuits currently exist?</p> <p>d) How many OH tie switches to adjacent circuits will be removed?</p> <p>e) How many tie switches (OH or LG) will exist when the project is complete?</p> <p>f) How many SCADA overhead switches will be installed as tie points to adjacent circuits?</p> <p>g) How many SCADA underground switches will be installed for sectionalizing?</p> <p>h) How many substation transformers will be installed?</p> <p>i) How many pad-mounted transformers will be installed?</p> <p>j) How many vaults will be installed?</p> <p>k) How many junction boxes will be installed?</p> <p>l) How many junction boxes will be installed for sectionalizing?</p> <p>m) How many junction boxes will be installed as tie points to adjacent circuits?</p> <p>n) How many load break allows will be installed?</p> <p>o) How many load break allows will be installed for sectionalizing?</p> <p>p) How many load break allows will be installed as tie points to adjacent circuits?</p> <p>q) How many handholes will be installed?</p> <p>r) How many risers will be installed?</p>	<p>PG&amp;E objects to this request as overhead and unbury burdensome. We do not maintain the requested information in a manner that allows it to be aggregated without a manual review of each project's engineering and construction documentation. Manually collecting the data across hundreds of projects would require significant time and resources and the development of multiple processes to ensure data accuracy. If you would like to discuss this request further, please feel free to reach out to us.</p> <p>Response: In response to a request to provide the results of a manual review of a few projects, PG&amp;E completed this review on a series of four projects at Clark Road T102 (SR208) Phase 1-1+4. PG&amp;E is providing the total quantities for the four projects that are constructed on the same circuit. The following orders are the associated projects that can be found on our undergrounding Worklist: 3520061, 3520066, 3520069, 3520071. Below we also provide the assumptions used to collect this information:</p> <p>a) PG&amp;E assumes "SCADA underground switches installed" includes both padmounted and sub-surface SCADA devices. Because these devices often have multiple positions enabled (e.g. three-way switch), PG&amp;E also collected the number of those with SCADA enabled as these are not always 1:1.</p> <p>- SCADA underground devices - 1  - SCADA positions enabled - 1  b) PG&amp;E assumes "Overhead switches removed" to include both mainline and tap-the switches, protection devices that can be operated as switches, bypass switches and in-line disconnects as installed as part of recloser packages.  - Overhead Switches Removed - 14  c) PG&amp;E assumes "tie switches to adjacent circuit" are only included if part of the project reviewed and excludes ties to itself.  - Tie Switches to Adjacent Circuits - 0  d) PG&amp;E assumes "tie switches to adjacent circuits removed" are only included if part of the project reviewed and excludes ties to itself.  - Tie Switches to Adjacent Circuits Removed - 0  e) PG&amp;E assumes "tie switches (OH and LG) to adjacent circuits installed" are only included if part of the project reviewed and excludes ties to itself.  - Tie Switches (OH and LG) to Adjacent Circuits Installed - 0  f) PG&amp;E assumes "SCADA OH switches removed" to include both mainline, tap-the switches, and protection devices with SCADA that can be operated as switches.  - SCADA Overhead Switches Removed - 3</p>	Holly Waltema	4/18/2023	4/21/2023	4/21/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment
201	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	6 SUPP	CAIPA_Sat WMP-16_06 SUPP	<p>For each of the undergrounding projects that PG&amp;E has planned for 2023, please answer the following questions on each project:</p> <p>a) How many SCADA underground switches will be installed?</p> <p>b) How many overhead switches will be removed?</p> <p>c) How many tie switches to adjacent circuits currently exist?</p> <p>d) How many OH tie switches to adjacent circuits will be removed?</p> <p>e) How many tie switches (OH or LG) will exist when the project is complete?</p> <p>f) How many SCADA overhead switches will be installed as tie points to adjacent circuits?</p> <p>g) How many SCADA underground switches will be installed for sectionalizing?</p> <p>h) How many substation transformers will be installed?</p> <p>i) How many pad-mounted transformers will be installed?</p> <p>j) How many vaults will be installed?</p> <p>k) How many junction boxes will be installed?</p> <p>l) How many junction boxes will be installed for sectionalizing?</p> <p>m) How many junction boxes will be installed as tie points to adjacent circuits?</p> <p>n) How many load break allows will be installed?</p> <p>o) How many load break allows will be installed for sectionalizing?</p> <p>p) How many load break allows will be installed as tie points to adjacent circuits?</p> <p>q) How many handholes will be installed?</p> <p>r) How many risers will be installed?</p>	<p>PG&amp;E objects to this request as overhead and unbury burdensome. We do not maintain the requested information in a manner that allows it to be aggregated without a manual review of each project's engineering and construction documentation. Manually collecting the data across hundreds of projects would require significant time and resources and the development of multiple processes to ensure data accuracy. If you would like to discuss this request further, please feel free to reach out to us.</p> <p>Response: In response to a request to provide the results of a manual review of a few projects, PG&amp;E completed this review on a series of four projects at Clark Road T102 (SR208) Phase 1-1+4. PG&amp;E is providing the total quantities for the four projects that are constructed on the same circuit. The following orders are the associated projects that can be found on our undergrounding Worklist: 3520061, 3520066, 3520069, 3520071. Below we also provide the assumptions used to collect this information:</p> <p>a) PG&amp;E assumes "SCADA underground switches installed" includes both padmounted and sub-surface SCADA devices. Because these devices often have multiple positions enabled (e.g. three-way switch), PG&amp;E also collected the number of those with SCADA enabled as these are not always 1:1.</p> <p>- SCADA underground devices - 1  - SCADA positions enabled - 1  b) PG&amp;E assumes "Overhead switches removed" to include both mainline and tap-the switches, protection devices that can be operated as switches, bypass switches and in-line disconnects as installed as part of recloser packages.  - Overhead Switches Removed - 14  c) PG&amp;E assumes "tie switches to adjacent circuit" are only included if part of the project reviewed and excludes ties to itself.  - Tie Switches to Adjacent Circuits - 0  d) PG&amp;E assumes "tie switches to adjacent circuits removed" are only included if part of the project reviewed and excludes ties to itself.  - Tie Switches to Adjacent Circuits Removed - 0  e) PG&amp;E assumes "tie switches (OH and LG) to adjacent circuits installed" are only included if part of the project reviewed and excludes ties to itself.  - Tie Switches (OH and LG) to Adjacent Circuits Installed - 0  f) PG&amp;E assumes "SCADA OH switches removed" to include both mainline, tap-the switches, and protection devices with SCADA that can be operated as switches.  - SCADA Overhead Switches Removed - 3</p>	Holly Waltema	4/18/2023	5/2/2023	5/1/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment
202	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	7	CAIPA_Sat WMP-16_07	<p>For each of the undergrounding projects that PG&amp;E has planned for 2024, please answer the following questions on each project:</p> <p>a) How many SCADA underground switches will be installed in each circuit.</p> <p>b) How many overhead switches will be removed?</p> <p>c) How many tie switches to adjacent circuits currently exist?</p> <p>d) How many OH tie switches to adjacent circuits will be removed?</p> <p>e) How many tie switches (OH or LG) will exist when the project is complete?</p> <p>f) How many SCADA overhead switches will be installed as tie points to adjacent circuits?</p> <p>g) How many SCADA underground switches will be installed for sectionalizing?</p> <p>h) How many substation transformers will be installed?</p> <p>i) How many pad-mounted transformers will be installed?</p> <p>j) How many vaults will be installed?</p> <p>k) How many junction boxes will be installed?</p> <p>l) How many junction boxes will be installed for sectionalizing?</p> <p>m) How many junction boxes will be installed as tie points to adjacent circuits?</p> <p>n) How many load break allows will be installed?</p> <p>o) How many load break allows will be installed for sectionalizing?</p> <p>p) How many load break allows will be installed as tie points to adjacent circuits?</p> <p>q) How many handholes will be installed?</p> <p>r) How many risers will be installed?</p>	<p>PG&amp;E objects to this request as overhead and unbury burdensome. We do not maintain the requested information in a manner that allows it to be aggregated without a manual review of each project's engineering and construction documentation. Manually collecting the data across hundreds of projects would require significant time and resources and the development of multiple processes to ensure data accuracy. If you would like to discuss this request further, please feel free to reach out to us.</p> <p>Response: PG&amp;E objects to this request as overhead and unbury burdensome. We do not maintain the requested information in a manner that allows it to be aggregated without a manual review of each project's engineering and construction documentation. Manually collecting the data across hundreds of projects would require significant time and resources and the development of multiple processes to ensure data accuracy. If you would like to discuss this request further, please feel free to reach out to us.</p>	Holly Waltema	4/18/2023	4/21/2023	4/21/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment
203	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	8	CAIPA_Sat WMP-16_08	<p>8.1.2.3 - Distribution Pole Replacements and Reinforcements</p> <p>Page 332 of PG&amp;E's WMP states, "Pole replacement and reinforcement reduce outage likelihood which decreases the chances of the area being impacted in future PSPS events. These programs also support public and employee safety because they improve the overall health of the distribution poles."</p> <p>Please provide the average, median, minimum and maximum age of poles that PG&amp;E:</p> <p>a) Replaced in 2020</p> <p>b) Replaced in 2021</p> <p>c) Replaced in 2022</p> <p>d) Replaced in 2022</p>	<p>a) The average, median, minimum and maximum age of poles (in years) replaced in 2020, 2021, and 2022 are as follows:</p> <p>2020  Average 49  Median 49</p> <p>b) Minimum 4  Maximum 47</p> <p>c) Minimum 4  Maximum 47</p> <p>d) PG&amp;E's form of pole repair discussed in Section 8.1.2.3 of the WMP is to reinforce the pole with a steel truss. As such, the age of poles provided below is specific to poles reinforced.</p> <p>2020  Average 51  Median 42</p>	Holly Waltema	4/18/2023	5/5/2023	5/5/2023	0	NA	8.1.2.3	Grid Design and System Hardening	Distribution Pole Replacements and Reinforcements
204	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	9	CAIPA_Sat WMP-16_09	<p>8.1.2.10 - Other Grid Topology Improvements to Minimize Risk of Ignition</p> <p>8.1.2.10.1 Overhead Circuit Breaker Detection Device</p> <p>PG 374-375 of PG&amp;E's WMP states, "Installation of OCB on existing, new, and retrofitted recloser controllers is expected to reduce the number of ignition due to high-impedance line-to-ground faults by quickly detecting and de-energizing the fault, which is the primary existing gap in EPSS protection on primary overhead distribution conductors. Approximately half of OCBs responsible for ignitions in HFTD that occurred in 2022 while EPSS was enabled were the result of high-impedance faults."</p> <p>a) Explain how OCB technology can mitigate this gap to encompass all high-impedance faults.</p> <p>b) List the advantages of having both programs working simultaneously.</p> <p>c) What percentage of high-impedance faults does PG&amp;E anticipate could be mitigated by EPSS alone?</p> <p>d) What percentage of high-impedance faults does PG&amp;E anticipate could be mitigated by OCB alone?</p> <p>e) What percentage of high-impedance faults does PG&amp;E anticipate could be mitigated by the combination of EPSS and OCB?</p>	<p>a) While EPSS has proven to be highly effective in lowering the incident energy during traditional faults and associated potential ignition, reliable detection and de-energization of high-impedance fault conditions continue to be a gap that we are working to close. As part of EPSS, we deployed an expensive use of low set, non-directional ground fault protection, commonly referred to as Directional Ground Fault (DGF) to aid in this effort. While DGF has been effective in closing the gap on high-impedance faults, it also has effectiveness limits and further protection strategies like DCD are being explored to allow for even greater sensitivity, detection, and de-energization of high-impedance fault conditions.</p> <p>In addition to DGF and DCD, partial voltage (PV) focus out and the gang trip functionality which are incorporated under the core EPSS strategy have also been deployed to help close the gap. These practices are all part of a defense in depth strategy to provide layered levels of protection against high-impedance faults.</p> <p>b) DCD implements very sensitive and sophisticated levels of ground fault protection that specifically look for characteristics of arcing associated with line-to-ground faults. With high sensitivity, there is a higher likelihood of protective relay misoperation which may result in an outage for a non-fault condition. DCD works to overcome this by looking for specific arcing characteristics that must be present for an actual fault condition.</p> <p>c) DCD is a further enhancement to EPSS, rather than a separate program. EPSS is designed to lower the incident energy for the majority of faults, and gang, three phase tripping fast fault, and introduce higher impedance fault detection down to 15 amps. DCD and other high-impedance fault detection methods assist in de-energizing fault conditions which are below the normal detection capabilities of traditional ground overcurrent protection, as low as 1 amp.</p> <p>d) As mentioned above, EPSS is a suite of enhanced protection schemes. It is not separate from DCD. Further, given the nature of these fault conditions, we do not readily have access to the data to support this statistic.</p> <p>e) As mentioned above, EPSS is a suite of enhanced protection schemes. It is not separate from DCD. DCD requires EPSS to be enabled to function. Further, given the nature of these fault conditions, we do not readily have access to the data to support this statistic.</p> <p>f) Based upon limited field experience and post event data analysis, we estimate that incrementally approximately 25% of all DCD EPSS high-impedance faults that are ground high-impedance faults would have been mitigated by DCD.</p>	Holly Waltema	4/18/2023	4/21/2023	4/21/2023	0	NA	8.1.2.10	Grid Design and System Hardening	Other Grid Topology Improvements to Minimize Risk of Ignition
205	CAIPA	Sat WMP-16	CAIPA_Sat WMP-16	10	CAIPA_Sat WMP-16_10	<p>Please provide an Excel sheet listing each circuit (in its own row) that had circuit outages that occurred from 2020 to 2022 in any HFTD area. A circuit outage is when the HFTD station circuit tripped and de-energized the entire circuit due to a fault. For each circuit with an outage, the Excel sheet should list for each Circuit Outage as a row. Please provide the following additional information (in columns):</p> <p>a) ID number of the circuit affected</p> <p>b) The date of the outage</p> <p>c) Cause of outage</p> <p>d) All equipment failure outages, please state the specific type of failure (e.g. OH transformer failure, overhead cross arm, LG transformer failure, cable failure, splice failure etc.)</p> <p>e) The outage duration in minutes</p> <p>f) The total number of customers impacted.</p> <p>g) If all or part of the circuit is currently underground, provide the date that OH to LG conversion was completed.</p> <p>h) If all or part of the circuit is in scope of a planned undergrounding project, the forecast completion date of the OH to LG conversion project.</p>	<p>Please see WMP Document 2023_OH_Cableization_Circuits (04/18/2023) also for a list of planned outages in a HFTD in 2020 through 2022. The undergrounding information in responses to subquestions C and H is based on the undergrounding waiver submitted in the 2023-2025 WMP.</p> <p>a) See Column C  b) See Column D  c) See Column F and Column G  d) See Column H  e) See Column I  f) See Column J  g) See Column K  h) See Column L</p> <p>- Cells with multiple years indicate that individual projects have been completed on that circuit within the years listed  - "NA" indicates that there are no completed projects for that circuit  - See Column M  - Cells with multiple years indicate that individual projects are forecasted for that circuit within the years listed  - "NA" indicates that there are no forecasted projects for that circuit</p>	Holly Waltema	4/18/2023	4/21/2023	4/21/2023	1	NA	ODR	NA	NA



220	OEIS	003	OEIS_003	6	OEIS_003_06	<p>Regarding PG&amp;E's Areas of Concern</p> <p>a. Provide a GIS layer of PG&amp;E's Areas of Concern (AOC) with the following attributes for each AOC polygon:          i. Name of the AOC          ii. Number of overhead circuit miles in the AOC that are in scope for Focused Tree Inspections          iii. AOC ID (not FocTree)          iv. Cumulative probability of ignition caused by vegetation coupled with consequence of ignition as given by WDRM (i.e. WDRM x C)          v. Average probability of ignition caused by vegetation coupled with consequence of ignition as given by WDRM x C          vi. Cumulative Overall Utility Risk as defined by the 2023-2025 WMP Technical Guidelines, Appendix B          vii. Cumulative Ignition Risk as defined by the 2023-2025 WMP Technical Guidelines, Appendix B          viii. Cumulative FPPS Risk as defined by the 2023-2025 WMP Technical Guidelines, Appendix B          ix. Cumulative Contact from Vegetation (Childhood of Ignition as defined by the 2023-2025 WMP Technical Guidelines, Appendix B          x. Has PG&amp;E used any vegetation-related data sources to identify the density/occurrence of invasive trees to create the AOC? If so, list the data source(s) and the data the data were collected. (e.g., distribution LRM survey by PG&amp;E in 2015)          xi. Has PG&amp;E used any tree mortality data sets to create the AOC? If so, list the data source(s) and the data the data were collected.          xii. Determine the prioritization of inspection among the AOC's? If so, list the data source(s) and the data the data were collected.</p>	Colin Lang	4/21/2023	4/28/2023	4/28/2023	3	NA	8.2	Vegetation Management and Inspections	NA
221					OEIS_003_07	<p>Regarding Focused Tree Inspections</p> <p>a. During the decision process to discontinue use of the Tree Assessment Tool (TAT) and adopt the ISA's Basic Tree Risk Assessment Form (ISA form), did PG&amp;E consider incorporating elements from the ISA form into the TAT?          b. Is PG&amp;E collecting a digital record of each ISA form generated by inspectors, in OneView or another system?          c. How does PG&amp;E plan to incorporate known localized risk factors (e.g., wind, outage rates) by species into tree risk assessments?          d. Did PG&amp;E perform any analysis or study that compared the outcomes of the TAT and the ISA's checklist to the ISA? If so, provide the analysis or study.          e. Has PG&amp;E benchmarked and/or discussed the latest version of TAT and the associated risk assessment procedure and its new tree risk assessment procedure using the ISA's checklist with other utilities, including, but not limited to SCE and its Tree Risk Calculator? If so, provide a summary of that benchmarking/discussion.          f. Provide the logic and any documentation of methodologies, stakeholders, and data sources for the most recent version of the TAT, include a list of the factors considered in TAT scoring methodology.</p>	Colin Lang	4/21/2023	4/27/2023	4/27/2023	1	NA	8.2	Vegetation Management and Inspections	NA
222	OEIS	003	OEIS_003	8	OEIS_003_08	<p>Regarding Confidential Stakeholder Data Requests</p> <p>a. Provide PG&amp;E's confidential responses and attachments to the following Data Requests:          i. WMP-Discovery2023_California_002-0001          ii. WMP-Discovery2023_California_006-0007          iii. WMP-Discovery2023_California_008-0008          iv. WMP-Discovery2023_California_008-0011          v. WMP-Discovery2023_California_008-0012          vi. WMP-Discovery2023_California_009-0016</p>	Colin Lang	4/21/2023	4/26/2023	4/26/2023	0	NA	7	Wildfire Mitigation Strategy Development	NA
223	OEIS	003	OEIS_003	9	OEIS_003_09	<p>Regarding PG&amp;E's Asset Inspection Program</p> <p>a. Provide the inspection checklists used for both PG&amp;E's patrols and detailed inspections.          b. If PG&amp;E labors its inspections specifically to inspect wildfire risk specific items, identify which items within the checklist the applies to, particularly if such differs from standard GO 59 inspections.          c. On average, how many detailed inspections are completed by inspectors per day?</p>	Colin Lang	4/21/2023	4/26/2023	4/26/2023	5	NA	8.1.3	Asset Inspections	NA
224	OEIS	003	OEIS_003	10	OEIS_003_010	<p>Regarding PG&amp;E's Asset Inventory</p> <p>a. Provide a list of all fields that PG&amp;E's asset inventory captures (i.e. equipment, equipment type, site, installation date).          b. Provide a list of all types of equipment captured within PG&amp;E's asset inventory.          c. Provide a percentage in which PG&amp;E is missing data for each data field listed in part (a) within its asset inventory.          d. Provide an estimated percentage for the amount of assets missing from PG&amp;E's asset inventory.</p>	Colin Lang	4/21/2023	5/10/2023	5/10/2023	2	NA	8.1.5	Asset Management and Inspection (Energy Systems)	NA

225	0EIS	003	0EIS_003	11	0EIS_003_011	<p>1. For distribution, a critical attribute is any question that identifies a condition that could lead to either an ignition point or any down situation that could result in a potential fire ignition. The determination of critical attributes was conducted based on discussions with multiple stakeholders/DEMs from Asset Strategy, Standards, and System Inspectors. The list of critical attributes was reviewed and approved by leaders from Asset Strategy and System Inspectors. This list is provided in Attachment A, included in our response to Question 011.4 below.</p> <p>For transmission, the guideline within "Electric Transmission Line Outages for Setting Priority Codes" provided in our response to Question 009, in accordance with OOS-05 Para. 15, refers to the asset identified through inspection as a critical attribute in the context of SAIC or asset protection. For distribution, the guideline within "Electric Transmission Line Outages for Setting Priority Codes" provided in our response to Question 009, in accordance with OOS-05 Para. 15, refers to the asset identified through inspection as a critical attribute in the context of SAIC or asset protection. For example, the finding of (rather than 50% material loss of a conductor is critical.</p> <p>For Distribution System Inspectors, please refer "WMP Discovery2023_DR_0EIS_003-00004601" sheet provided in our response to Question 009 for a list of our Distribution assets that have been defined as "Critical Attributes."</p> <p>For Transmission asset inspections, please refer the following criteria to identify critical attributes:</p> <ul style="list-style-type: none"> <li>"D1-R12-D10: Priority" - The condition is urgent and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard.</li> <li>"D1-R12-D10: Priority" - The condition is urgent and requires immediate response and continued action until the condition is repaired or no longer presents a potential hazard.</li> <li>"No Safety or Asset Strategy" - The condition was provided via the Asset Strategy departments within PG&amp;E. PG&amp;E uses the term "Critical Attributes" in a variety of contexts, such as the approximately 300 critical asset elements noted in WMP Table 22-33-3, Tracking ID 23, which provide information for risk modeling, failure analysis, etc.</li> </ul>	Colin Lang	4/21/2023	4/26/2023	4/26/2023	<a href="https://www.pge.com/pge_attachments/0EIS_003-00004601.pdf">https://www.pge.com/pge_attachments/0EIS_003-00004601.pdf</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E-22-41 Asset Inspections Quality Assurance and Quality Control ACI PG&E-22-38 Better Application of Specific Lessons Learned from Utility-Caused Fires
226	0EIS	003	0EIS_003_012	12	0EIS_003_012	<p>1. PG&amp;E states that it is still performing targeted equipment repairs relating to EPSS. Is this a program separate from that described within Section 1.7 of the WMP? If so, provide the following:      - Description and procedures in which PG&amp;E uses to decide when and where it performs EPSS-related targeted equipment repairs.      2. PG&amp;E addresses resources to address these EPSS-related targeted equipment repairs (particularly in relation to the program described in Section 8.1.7).      a. The scope of asset EPSS-related targeted equipment repairs (i.e. number of work orders, number of CP2s included in the program).      b. In the attachment "WMP-Discovery2023_DR_0EIS_002-00045402" sheet, targeted equipment repairs are not included as a part of the additional mitigations being completed. Why were these not included if PG&amp;E is still using the measure?      c. Provide a GIS file with the locations of CP2s scoped for additional reliability mitigations based on EPSS events.</p>	Colin Lang	4/21/2023	4/26/2023	4/26/2023	<a href="https://www.pge.com/pge_attachments/0EIS_002-00045402.pdf">https://www.pge.com/pge_attachments/0EIS_002-00045402.pdf</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E-23-32 - Update on EPSS Reliability Study
227	0EIS	003	0EIS_003_013	13	0EIS_003_013	<p>1. PG&amp;E's Enhanced Ignition Analysis (EIA) reports completed for instances in which the qualifier was an EPSS protected facility. A PG&amp;E of Enhanced Ignition Analysis (EIA) reports completed for instances in which the qualifier was an EPSS protected facility.</p>	Colin Lang	4/21/2023	4/26/2023	4/26/2023	<a href="https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf">https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E-23-08 Better Application of Specific Lessons Learned from Utility-Caused Fires
228	0EIS	003	0EIS_003_014	14	0EIS_003_014	<p>Regarding PG&amp;E's Fault Repair Replacements:      1. Provide the number of fault repairs PG&amp;E has replaced by year since 2020.      2. Provide PG&amp;E targets for fault repair replacements in 2022 and 2024, as applicable.      3. Provide the number of fault repair devices within PG&amp;E's HFTD.      4. Provide the number of fault repair devices as well as replacement within PG&amp;E's HFTD.</p>	Colin Lang	4/21/2023	4/26/2023	4/26/2023	<a href="https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf">https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf</a>	0	NA	NA	NA	NA
229	0EIS	003	0EIS_003_015	15	0EIS_003_015	<p>1. What is PG&amp;E's status for review and approval of V4?      2. When does PG&amp;E expect to use V4 output to influence its undergrounding plan? Include discussion on details of how the main PG&amp;E's undergrounding plan.      3. Provide a list of the differences and improvements being made to V4 in comparison to V3.      4. Is V4 undergoing final review similar to V3 and V2? If so, provide a status update on the review, including expected completion date for the revised report.</p>	Colin Lang	4/21/2023	4/26/2023	4/26/2023	<a href="https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf">https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf</a>	0	NA	6.2.1	Risk Methodology and Assessment	Risk and Risk Component Identification
230	0EIS	003	0EIS_003_016	16	0EIS_003_016	<p>1. PG&amp;E's response to OESR Data Request 2 Question 5 Attachment 1      2. How did PG&amp;E determine a mitigation effectiveness of 17.4% for down conductor detection (DCD)?      3. In Table 8.4, PG&amp;E has included 2023, 2024, and 2025 targets for DCD. Additionally, in response to Calkins/Decker Data Request 10 Question 1, PG&amp;E reports that 21,000 miles will be covered by DCD by 2025. However, within the attachment, PG&amp;E only demonstrates goals of approximately 27,341, 4x1, and 3x0 miles in 2023, 2024, and 2025 respectively. Explain this discrepancy.      4. Include the number of miles DCD covered in 2022, as well as how many additional miles will be covered based on PG&amp;E's targets for 2023, 2024, and 2025 broken down by year.      5. How did PG&amp;E determine a mitigation effectiveness of 69% for EPSS?      6. Was it partial outage detection (POD) not included within PG&amp;E's mitigations within the attachment? If it was, what would the mitigation effectiveness be for including POD?</p>	Colin Lang	4/21/2023	4/26/2023	4/26/2023	<a href="https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf">https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf</a>	0	NA	8.1.1.0	Grid Design and System Hardening	Downed Conductor Detection Devices
231	0EIS	003	0EIS_003_017	17	0EIS_003_017	<p>PG&amp;E discusses "tag" customers, "impacted" communities, and "impacted" customers (including cities, counties, and tribal governments) in Section 8.4.6. However, definitions of such terms are not provided.      1. Provide a definition, and examples for both wildfire and PSPS events in the context of Section 8.4.6, and the criteria for these groups being identified as such for:      a. "tag" customers      b. "impacted" communities      c. "impacted" customers      d. "impacted" communities</p>	Colin Lang	4/21/2023	4/26/2023	4/26/2023	<a href="https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf">https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf</a>	0	NA	8.4.6	Emergency Preparedness	Customer Support in Wildfire and PSPS Emergencies
232	CAIPA	See WMP-17	CAIPA_See WMP-17	1	CAIPA_See WMP-17_01	<p>BECON CONFIDENTIAL</p> <p>1. Project not pursued for Undergrounding in first 2100 miles      PG&amp;E's WDRM V3 ranks critical production zones (CPZs) based on risk measured across 17 risk models to create a "cumulative risk score" for each CPZ. In Table 1 below, select CPZs that PG&amp;E has decided not to pursue undergrounding in its first 2100 miles of LGS projects) are compared by:      - Cumulative risk score for the CPZ in WDRM V3      - Total CPZ length in miles measured by projecting the feature class in WDRM V3 to a UTM projection and calculating geometry in GIS      - A calculated "risk per mile" or "average risk" value derived from the two previous values      - Whether the CPZ has experienced outages as to PSPS or EPSS in the past three years      - PG&amp;E 2023 WMP's decision to which program the CPZ belongs (crossed referenced against Question 8 on OESR-202300MHP-04_V4_mitigation_DR_answers) for projects in the 2023-2026 timeframe      - PG&amp;E 2023 WMP's risk rank for each CPZ (crossed referenced against Question 8 on OESR-202300MHP-04_V4_mitigation_DR_answers) for projects in the 2023-2026 timeframe      - PG&amp;E 2023 WMP Wildlife Feasibility (WFE) scores for each CPZ (crossed referenced against Question 7 on OESR-202300MHP-04_V4_mitigation_DR_answers) for projects in the 2023-2026 timeframe      2. Please explain why these select CPZs in Table 1, with large average risk profiles in WDRM V3 and some with reliability concerns from PSPS or EPSS outages, are not being considered potential projects for Undergrounding in the first 2100 miles.      3. Please identify all factors in the selection of CPZ PEORIA PH 2101107502 for "BASE SH" (Base System hardening) rather than Undergrounding PG&amp;E's 2023 WMP project selection.      4. Please identify all factors in the selection of CPZ PEORIA PH 2101107502 for "BASE SH" (Base System hardening) rather than Undergrounding PG&amp;E's 2023 WMP project selection.      5. Please identify all factors that resulted in CPZ CAHARREST 1103101407 not being selected for any WMP system hardening program (including Base SH, Core Remediation, and SH) for projects in the 2023-2026 timeframe.      6. Please identify all factors that resulted in CPZ TONGUE VALLEY 2101250203 not being selected for PSPS and EPSS outages and being a target average risk profile than other projects in Table 1.      7. Please identify all factors that resulted in CPZ SEAR VALLEY 2101250203 not being selected for any WMP system hardening program (including Base SH, Core Remediation, and SH) for projects in the 2023-2026 timeframe.      8. Please identify a specific, known project risk profile that is not included in Table 1.</p>	Matthew Taul	4/21/2023	4/26/2023	4/26/2023	<a href="https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf">https://www.pge.com/pge_attachments/0EIS_003-0001300N_Ap.1.pdf</a>	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution







250	CAFA	Sat WMP-18	CAFA_Sat WMP-18	5	CAFA_Sat WMP-18_Q5	<p>In response to question 190(i)(i) of CalEIR/CAFA 2023 WMP-18, PG&amp;E states: The difference in projected vegetation management costs of \$24,861,000 between 2023 and 2024 is due to several factors, (1) reducing unit costs through efficiencies over the one case period through targeted programmatic adjustments that improve resource efficiency, (2) reducing the amount of Routine VM work conducted each year commensurate with the amount of vegetation management, and (3) reducing unit costs through efficiencies over the one case period through targeted programmatic adjustments that improve resource efficiency.</p> <p>How does transitioning from EVM to three new programs result in a cost reduction?</p> <p>Please provide the following information about anticipated VM cost reductions from underpinning in the below table:</p> <p>Year</p> <p>Number of Underpinning Miles to be Completed</p> <p>Percent Reduction in Number of Routine VM Miles</p> <p>Amount of Routine VM Cost Savings from Underpinning (\$55)</p> <p>2023</p> <p>2024</p> <p>2025</p>	Holly Walther	4242023	4272023	4272023	<p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p>	0	NA	8.2.5.2	Vegetation Management and Inspections	Quality Control
250	CAFA	Sat WMP-18	CAFA_Sat WMP-18	5 SUPP	CAFA_Sat WMP-18_Q5_SUPP	<p>In response to question 190(i)(ii) of CalEIR/CAFA 2023 WMP-18, PG&amp;E states: The difference in projected vegetation management costs of \$24,861,000 between 2023 and 2024 is due to several factors, (1) reducing unit costs through efficiencies over the one case period through targeted programmatic adjustments that improve resource efficiency, (2) reducing the amount of Routine VM work conducted each year commensurate with the amount of vegetation management, and (3) reducing unit costs through efficiencies over the one case period through targeted programmatic adjustments that improve resource efficiency.</p> <p>How does transitioning from EVM to three new programs result in a cost reduction?</p> <p>Please provide the following information about anticipated VM cost reductions from underpinning in the below table:</p> <p>Year</p> <p>Number of Underpinning Miles to be Completed</p> <p>Percent Reduction in Number of Routine VM Miles</p> <p>Amount of Routine VM Cost Savings from Underpinning (\$55)</p> <p>2023</p> <p>2024</p> <p>2025</p>	Holly Walther	4242023	4282023	4282023	<p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p>	0	NA	8.2.5.2	Vegetation Management and Inspections	Quality Control
251	CAFA	Sat WMP-18	CAFA_Sat WMP-18	6	CAFA_Sat WMP-18_Q6	<p>In response to question 190(i)(ii) of CalEIR/CAFA 2023 WMP-18, PG&amp;E states: The difference in projected vegetation management costs of \$24,861,000 between 2023 and 2024 is due to several factors, (1) reducing unit costs through efficiencies over the one case period through targeted programmatic adjustments that improve resource efficiency, (2) reducing the amount of Routine VM work conducted each year commensurate with the amount of vegetation management, and (3) reducing unit costs through efficiencies over the one case period through targeted programmatic adjustments that improve resource efficiency.</p> <p>How does transitioning from EVM to three new programs result in a cost reduction?</p> <p>Please provide the following information about anticipated VM cost reductions from underpinning in the below table:</p> <p>Year</p> <p>Number of Underpinning Miles to be Completed</p> <p>Percent Reduction in Number of Routine VM Miles</p> <p>Amount of Routine VM Cost Savings from Underpinning (\$55)</p> <p>2023</p> <p>2024</p> <p>2025</p>	Holly Walther	4242023	4272023	4272023	<p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p>	0	NA	8.2.5.2	Vegetation Management and Inspections	Quality Control
252	CAFA	Sat WMP-18	CAFA_Sat WMP-18	7	CAFA_Sat WMP-18_Q7	<p>Please provide the following information regarding actual and projected costs for each WMP relative under Chapter 8.2 (Vegetation Management and Inspections). Each relative should be a row in the table below.</p> <p>WMP Initiative Number</p> <p>Relative Name</p> <p>2023 Capital Expenditure (Actual)</p> <p>2024 Capital Expenditure (Forecast)</p> <p>2025 Capital Expenditure (Forecast)</p> <p>2023 Operating Expense (Actual)</p> <p>2024 Operating Expense (Forecast)</p> <p>2025 Operating Expense (Forecast)</p>	Holly Walther	4242023	4272023	4272023	<p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p>	0	NA	8.2	Vegetation Management and Inspections	NA
253	TURN	008	TURN_008	1	TURN_008_Q1	<p>Our most recent calculation of REEs for Underpinning by year from 2023-2025, at the most granular level for which PG&amp;E has completed them. For this question, "Underpinning" refers to all programs that underpin specific programs that PG&amp;E anticipates reducing unit costs in the future.</p> <p>Please provide the supporting inputs and calculations for these REEs in Excel format.</p>	Tom Long	4242023	4272023	4272023	<p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p>	2	NA	7.2	Wildfire Mitigation Strategy Development	Risk Impact of Mitigation Initiatives
254	TURN	008	TURN_008	2	TURN_008_Q2	<p>Our most recent calculation of REEs for Covered Conductor, by year from 2023-2025, at the most granular level for which PG&amp;E has completed them. Please identify all activities that PG&amp;E includes in the calculation of REEs for Covered Conductor. Please provide the worksheets with the supporting inputs and calculations for these REEs in Excel format.</p>	Tom Long	4242023	4272023	4272023	<p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p>	0	NA	7.2.2	Wildfire Mitigation Strategy Development	Risk Impact of Mitigation Initiatives
255	TURN	008	TURN_008	3	TURN_008_Q3	<p>Regarding the Underpinning Decision Tree provided in response to Data Request 5.1, Ach 1, is there an error in the alternative responses to the question at the far right: "Will a route or project require change mitigate implementation?" It appears that the "Yes" and "No" alternatives should be flipped. If there is an error, please provide supporting documentation.</p>	Tom Long	4242023	4272023	4272023	<p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p>	0	NA	8.1.2	Grid Design and System Hardening	ALL
256	TURN	008	TURN_008	4	TURN_008_Q4	<p>The first paragraph of the response to TURN data request 5.4 states that, historically, PG&amp;E has observed more frequent ignitions and larger wildfires associated with the overhead primary distribution powerlines, compared to lower voltage secondary distribution lines, service connections and high-voltage transmission lines.</p> <p>Please provide, in the Excel format, the data on which this statement was based, and provide an explanation of what PG&amp;E believes the data show.</p> <p>Please provide data, from 2015 to the present, showing for each of primary distribution overhead lines:</p> <p>1. Number of ignitions</p> <p>2. Number of ignitions normalized by mileage</p> <p>3. Size (e.g., acres) of fires resulting from ignitions; and</p> <p>4. Number of structures destroyed by fires resulting from ignitions.</p>	Tom Long	4242023	4272023	4272023	<p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p> <p><a href="https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning">https://www.pge.com/california-cafa/underpinning/underpinning-reduction-in-routine-vm-cost-savings-from-underpinning</a></p>	1	NA	8.1.2	Grid Design and System Hardening	Underpinning of Electric Lines and/or Equipment - Distribution







291	CAIPA	CAIPA	CAIPA_Sat_WMP-21	CAIPA_Sat_WMP-21	2	CAIPA_Sat_WMP-21_02	<p>Per Table 2 in PG&amp;E's Revised Quarterly Data Report for quarter 4 of 2022, PG&amp;E had the following numbers of Level 2 and Level 3 findings from distribution inspections in the HFTD in 2020, 2021, and 2022:</p> <p>Distribution Inspection Findings in HFTD</p> <p>2020</p> <p>2021</p> <p>2022</p> <p>Deleted Inspection Level 2 Findings 48,300</p> <p>21,193</p> <p>4,542</p> <p>Deleted Inspection Level 3 Findings 13,047</p> <p>623</p> <p>107</p> <p>Patrol Inspection Level 2 Findings 300</p> <p>104</p> <p>30</p> <p>Patrol Inspection Level 3 Findings 15</p> <p>2</p> <p>Other Inspection Level 2 Findings 10,131</p> <p>12,295</p> <p>3,031</p> <p>Other Inspection Level 3 Findings</p>	<p>After reviewing the data to provide a response to this request, PG&amp;E advised that the data provided in our prior submission was incorrect. This discrepancy was the result of an Excel error that occurred when PG&amp;E revised Table 2 with the additional inspection type details required for Q4 2022. Please see attachment "WMP-Disclosure023_DR_CAIPA004-004-Q000A01.01" for detailed distribution inspection findings in HFTD from 2020 to 2022. Based on the corrected data, PG&amp;E advises the patterns in the findings below (a) to (f) for all deleted patrol inspections, reviewed in findings over these three years (particularly in 2022) in both Tier 2 and Tier 3 HFTD areas can be attributed to our revised focus on training and quality of inspections. These key improvements to our inspection process included the following:</p> <p>1) The addition of indicators for lightning risk conditions on training material</p> <p>2) Fully deployed deck and field crews by the increase inspection team</p> <p>3) Weekly sessions with supervisors to review findings and misses</p> <p>4) Increased training and documentation for identifying issues</p> <p>5) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>6) An increase in the number of Level 2 findings</p> <p>7) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>8) An increase in the number of Level 2 findings</p> <p>9) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>10) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>11) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>12) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>13) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>14) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>15) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>16) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>17) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>18) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>19) The addition of a risk checklist in 2022 that increased certain level 2 findings</p> <p>20) The addition of a risk checklist in 2022 that increased certain level 2 findings</p>	Holly Walman	4/27/2023	5/9/2023	5/9/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_caipa004-004-q000a01.01">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_caipa004-004-q000a01.01</a>	1	NA	QDR	NA	NA
292	CAIPA	CAIPA	CAIPA_Sat_WMP-21	CAIPA_Sat_WMP-21	3	CAIPA_Sat_WMP-21_03	<p>In response to data request CAIPA004-PGE-023WMP-16, question 10, PG&amp;E stated, "The five most common problems identified in the OC process are: C-hooks, insulators, center pins, show issues, and structural issues." For each of the five problems listed above, please list any changes PG&amp;E has made to its inspection process, procedures, or training to reduce the number of inspections with these problems.</p>	<p>The confidential attachment is being provided pursuant to the accompanying confidentiality declaration. Please note, the quiz is in reference to CAIPA004-PGE-023WMP-10, question 15. For transmission inspection training, the top OC findings were shared with all existing and new inspectors as part of 2023 Onboarding and Refresher. Aerial Transmission Inspectors</p> <p>1) C-hooks and center pins: PG&amp;E created visual diagrams to help identify wear and corrosion on c-hooks and center pins. Please see the Air-Handbook page 117-124 and job aid TD-1001M-JA-07.</p> <p>2) Insulators: PG&amp;E developed training and documentation for identifying issues with insulators. Please see the Air-Handbook page 50-112 and job aid TD-1001M-JA-07.</p> <p>3) Center pins: PG&amp;E developed training and documentation for identifying different styles of center pins and when they become corroded, including but not limited to, straight, high, and gaps between legs. Please see the Air-Handbook page 117-119 and job aid TD-1001M-JA-07.</p> <p>4) Show Issues: PG&amp;E developed training and documentation for identifying cracked shoes and making other determinations on damage such as hardware corrosion. Please see the Air-Handbook page 112-123 and job aid TD-1001M-JA-07.</p> <p>5) Structural: PG&amp;E developed training and documentation for identifying different levels of corrosion, and judging when hardware is loose, judging primary vs secondary members, and evaluating the size and severity of any workbacker damage. Please see the Air-Handbook page 55-76 and job aids TD-1001M-JA-04 and TD-1001M-JA-05.</p> <p>In addition to the items listed above, PG&amp;E also had an A-tag presentation and weekly meeting in which we go over any questions or concerns relating to PG&amp;E equipment, along with any uncommon issues identified.</p> <p>Transmission Ground Detailed &amp; Transmission Climbing Detailed Inspections</p> <p>1) C-hooks: PG&amp;E developed training and documentation that provides examples of issues with c-hooks and describe how to identify various levels of material loss that are also included in Inspector initial and refresher training, as well as job aid TD-1001M-JA-07.</p> <p>2) Insulators: PG&amp;E developed training and documentation that provides examples of issues with insulators and describe how to identify various types of damage, corrosion, and material loss that are also included in Inspector initial and refresher training, as well as job aid TD-1001M-JA-07.</p>	Holly Walman	4/27/2023	5/2/2023	5/2/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_caipa004-004-q000a01.03">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_caipa004-004-q000a01.03</a>	3	NA	QDR	NA	NA
293	CAIPA	CAIPA	CAIPA_Sat_WMP-21	CAIPA_Sat_WMP-21	4	CAIPA_Sat_WMP-21_04	<p>Figure PG&amp;E-8.1.8-2 on p. 465 of PG&amp;E's WMP shows that PSPS will be considered under the following conditions:</p> <ul style="list-style-type: none"> <li>Wind gusts 30-40 mph</li> <li>Relative humidity &gt;90%</li> <li>Deer Fat Moisture &lt;9-11%</li> <li>FPI of 80</li> </ul> <p>Figure 768 of PG&amp;E's WMP states that the following thresholds are taken into consideration in PSPS decision-making:</p> <ul style="list-style-type: none"> <li>Sustained wind speed above 10 miles per hour</li> <li>Cloud top moisture (CFM) 10% less than 1 percent</li> <li>CFM 100-hour, &lt;100 hours less than 11 percent</li> <li>Relative Humidity (RH) below 90 percent</li> <li>Herbaceous live fuel moisture below 65 percent</li> <li>Shrub (Chamaecyparis) Live Fuel Moisture below 50 percent</li> <li>FPI above 0.7</li> <li>With respect to the WMP passages noted above:</li> <li>Please explain why these lists are different.</li> <li>What is the difference between an FPI of 85- and an FPI above 0.7?</li> <li>Does PG&amp;E consider sustained wind speeds, gusts, or both in PSPS decision-making? Please explain your answer.</li> </ul>	<p>a) Figure PG&amp;E-8.1.8-2 on p. 465 of PG&amp;E's WMP is intended to be a simplified version of our criteria for general evaluation. Whereas the thresholds on page 768 of PG&amp;E's WMP are the minimum potential conditions with identified factors used during PSPS.</p> <p>b) An FPI of 85- is when there is an occurrence of high FPI (above 0.7) plus the presence of high lightning potential due to wind.</p> <p>c) PG&amp;E considers sustained wind speeds for PSPS decision making on the distribution system.</p>	Holly Walman	4/27/2023	5/2/2023	5/2/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_caipa004-004-q000a01.04">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_caipa004-004-q000a01.04</a>	0	NA	9.2.1	Public Safety Power Shutoff	Risk Thresholds (e.g., WS, FPI, etc.) and Decision-Making Process That Determine the Need for a PSPS.
294	MORA	Data Request No. 4	MORA_Data_Request No. 4	MORA_Data_Request No. 4	1	MORA_Data_Request No. 4_C1	<p>Please provide a description of how the data was created, and from which version of WDRM. Please provide a description of how risk data was assigned to the 100 meter square polygons that make up the layer, specifically if it is an average over the risk scores of the components within the area.</p>	<p>Section 6.4.1.1 is provided in response to Energy Safety's 2023-2025 WMP guidelines which requested a geospatial risk map with risk levels presented in three layers as in top 20%, 5% to 20%, and bottom 80% within the HFRA. PG&amp;E provided more detailed presentation of risk layers than requested. For this reason, the numeric risk value is not provided in the data. The risk values for each 100m pixel are the System Hardening composite value. As described in section 6.2.3.3, pages 171 and 172 in PG&amp;E's 2023-2025 WMP, the pixel level risk value is the product of the cumulative probability of all risk drivers that pose the most and the wildfire consequence.</p>	Joseph Mitchell	4/26/2023	5/3/2023	5/3/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.01">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.01</a>	1	NA	6.4.1.1, 6.4.1.2	Risk Methodology and Assessment	Geospatial Maps of Top Risk Areas Within the HFRA Proposed Updates to HFTD
295	MORA	Data Request No. 4	MORA_Data_Request No. 4	MORA_Data_Request No. 4	2	MORA_Data_Request No. 4_C2	<p>Explain why the vast majority of the polygons show low risk (&lt;25%), and why high risk polygons (&gt;70%) are very rare.</p>	<p>PG&amp;E objects to this question as vague. Subject to and without waiving this objection, PG&amp;E responds as follows: High risk polygons are rare that low risk polygons as the highest wildfire risk is concentrated. The distribution of risk can be seen in Figure 6.2-11.</p>	Joseph Mitchell	4/26/2023	5/3/2023	5/3/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.02">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.02</a>	0	NA	6.4.1.1, 6.4.1.2	Risk Methodology and Assessment	Geospatial Maps of Top Risk Areas Within the HFRA Proposed Updates to HFRA
296	MORA	Data Request No. 4	MORA_Data_Request No. 4	MORA_Data_Request No. 4	3	MORA_Data_Request No. 4_C3	<p>Explain why the polygons do not cover all of the primary distribution lines in the HFTD. Example below:</p>	<p>Upon review, PG&amp;E has confirmed that the original Attachment 2023-03-27_PGE_2023_WMP_R1_Appendix C_Aerial Inspection 023_DR_MORA_004-Q000A01.01 for an updated ODR file. We will reach out to Energy Safety to discuss the data and provide a more detailed response.</p>	Joseph Mitchell	4/26/2023	5/3/2023	5/3/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.03">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.03</a>	1	NA	6.4.1.1, 6.4.1.2	Risk Methodology and Assessment	Geospatial Maps of Top Risk Areas Within the HFRA Proposed Updates to HFRA
297	MORA	Data Request No. 4	MORA_Data_Request No. 4	MORA_Data_Request No. 4	4	MORA_Data_Request No. 4_C4	<p>Please explain why isolated "hot polygons" appear in the data, as shown below, and whether these represent actual risk or an artifact.</p>	<p>It is difficult to determine the location of the provided example based on the information provided. Ophanah pixels such as those shown in the example, may result from missing pixels due to incomplete data or processing of the data. At the pixel-by-pixel level, the model does exhibit some level of noise that can result in high-risk hot spots in an area of generally lower risk areas. As seen in the example below, low risk and higher pixels can co-occur. For this reason, our development is generally guided by circuit segment level aggregations that provide an improved indication of risk levels.</p>	Joseph Mitchell	4/26/2023	5/3/2023	5/3/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.04">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.04</a>	0	NA	6.4.1.1, 6.4.1.2	Risk Methodology and Assessment	Geospatial Maps of Top Risk Areas Within the HFRA Proposed Updates to HFTD
298	MORA	Data Request No. 4	MORA_Data_Request No. 4	MORA_Data_Request No. 4	5	MORA_Data_Request No. 4_C5	<p>Please provide an alternative and more complete version of this data set in which:</p> <ul style="list-style-type: none"> <li>Flow numeric data is provided rather than a 5% binary. This will allow a recalculation of "low" and "high" risks to be more relative and show any gradients across the PG&amp;E territory.</li> <li>Coverage extends to all circuits in the HFTD.</li> </ul>	<p>a. Please find the requested data in "WMP-Disclosure023_DR_MORA_004-Q000A01.01". Results from analysis at the pixel level are provided in different iterations of the spatial pattern of risk that at the aggregated level.</p> <p>b. Specific to this request, the attached file provides risk pixels and associated requested values for all locations in the HFTD and HFRA.</p>	Joseph Mitchell	4/26/2023	5/9/2023	5/9/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.05">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.05</a>	0	NA	6.4.1.1, 6.4.1.2	Risk Methodology and Assessment	Geospatial Maps of Top Risk Areas Within the HFRA Proposed Updates to HFTD
299	MORA	Data Request No. 4	MORA_Data_Request No. 4	MORA_Data_Request No. 4	6	MORA_Data_Request No. 4_C6	<p>If the risk score for each polygon represents an average over the risk in the polygon, please provide an additional version in which the maximum numerical value in the polygon is provided instead.</p>	<p>As described in section 6.2.3.3, pages 171 and 172 in PG&amp;E's 2023-2025 WMP, the pixel level risk value is the product of the cumulative probability of all risk drivers that pose the most and the wildfire consequence. As such, the value is set as an average over risk in a polygon.</p>	Joseph Mitchell	4/26/2023	5/3/2023	5/3/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.06">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.06</a>	0	NA	6.4.1.1, 6.4.1.2	Risk Methodology and Assessment	Geospatial Maps of Top Risk Areas Within the HFRA Proposed Updates to HFRA
300	MORA	Data Request No. 4	MORA_Data_Request No. 4	MORA_Data_Request No. 4	7	MORA_Data_Request No. 4_C7	<p>If possible, please provide two additional sets of GIS data in identical format to the original, one representing the PCI component of the WDRM model and a separate set showing the consequence component of the WDRM score. Output should be in numerical format and not text.</p>	<p>The file "WMP-Disclosure023_DR_MORA_004-Q000A01.01" contains the additionally requested Risk, PCI, and WDRM Consequence Files.</p>	Joseph Mitchell	4/26/2023	5/9/2023	5/9/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.07">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.07</a>	0	NA	6.4.1.1, 6.4.1.2	Risk Methodology and Assessment	Geospatial Maps of Top Risk Areas Within the HFRA Proposed Updates to HFRA
301	MORA	Data Request No. 4	MORA_Data_Request No. 4	MORA_Data_Request No. 4	8	MORA_Data_Request No. 4_C8	<p>Please see "WMP-Disclosure023_DR_MORA_004-Q000A01.01" file.</p>	<p>Please see "WMP-Disclosure023_DR_MORA_004-Q000A01.01" file.</p>	Joseph Mitchell	4/26/2023	5/3/2023	5/3/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.08">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_mora004-004-q000a01.08</a>	0	NA	8.18.1	GIS Operations and Procedures	Protective Equipment and Device Settings
302	TURN	010	TURN_010	TURN_010	1	TURN_010_C1	<p>PG&amp;E's WMP (R1) at page 3 states PG&amp;E undergrounded 180 miles in 2022 and 73 miles in 2021. In each of these years, separately, please provide the number of overhead miles that were converted to undergrounded in these mileage figures.</p>	<p>We currently do not track the overhead miles removed and replaced through undergrounding. Our geospatial system of record only tracks assets currently in the field.</p> <p>Based on the average overhead to underground conversion factor of 1 overhead mile to 1.25 system hardening underground miles and the estimated conversion factor of 1 overhead mile to 1.57 commonly rebuilt underground miles, the estimated overhead miles removed in 2022 and 2021 were approximately 134 and 53 miles, respectively.</p> <p>The below table represents the miles complete in 2021 and 2022, split by System Hardening and Community rebuild that calculate the estimated overhead miles removed based on each program.</p> <p>Program</p> <p>CH to LC Conversion Factor</p> <p>(a)</p> <p>2021</p> <p>2022</p> <p>Undergrounded (B)</p> <p>Eq</p> <p>Overhead Removed (C = B/A)</p> <p>Undergrounded (D)</p> <p>Eq</p> <p>Overhead Removed (E = D/A)</p> <p>System Hardening 1,26 40 32 119 95</p> <p>Community Rebuild 1,57 23 21 81 39</p> <p>Total 2,83 188 136</p>	Tom Long	4/26/2023	5/9/2023	5/9/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_turn010-010-q000a01.01">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_turn010-010-q000a01.01</a>	0	NA	8.1.2.2	Grid Design, Operations, and Maintenance	Undergrounding
303	TURN	010	TURN_010	TURN_010	2	TURN_010_C2	<p>PG&amp;E's WMP (R1) at page 4 states "Between 2020 and 2023, 87 percent of PG&amp;E's undergrounding work is planned for the top 20 percent of risk-rated circuit segments, as identified by our risk models."</p> <p>a. Please provide workpapers and data in Excel that supports this 87 percent figure.</p> <p>b. Please explain what "top 20 percent of risk-rated circuit segments" means, and reference the data and response in part (a) to show how this is calculated.</p>	<p>The confidential attachment is being provided pursuant to a signed Non-Disclosure Agreement with PG&amp;E.</p> <p>a. Please see attachment "WMP-Disclosure023_DR_TURN010-010-Q000A01.02".</p> <p>b. "Top 20% Risk-Rated Circuit Segments" miles can come from either the WDRM V2 or V3 Risk Rank Models. The "V3 Top 20% Risk-Rated Circuit Segments" are miles selected from the WDRM V3 risk model with a V3 Risk Rank greater than 720. Any miles with a V3 Risk Rank above 720 that are completed as part of the program would be considered in the "top 20 percent of risk-rated circuit segments".</p> <p>c. The "V2 Top 20% Risk-Rated Circuit Segments" are miles selected from the WDRM V2 risk model with a V2 Risk Rank of greater than 727. Any miles with a V2 Risk Rank above 727 that are completed as part of the program would be considered outside the "top 20 percent of risk-rated circuit segments".</p>	Tom Long	4/26/2023	5/9/2023	5/9/2023	<a href="https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_turn010-010-q000a01.02">https://www.pge.com/pge/and/or/wmp/disclosure/023_dr_turn010-010-q000a01.02</a>	1	Yes	8.1.2.2	Grid Design, Operations, and Maintenance	Undergrounding





313	CAIPA	Sat WMP-22	CAIPA_Sat_WMP-22	1	CAIPA_Sat_WMP-22_01	<p>During the preal discussion portion of the Grid Operation, Design, and Maintenance session of the WMP workshop held on April 27, 2023, POEAE expressed that, during wetline season (May through November) in 2023, EPSS was installed on approximately 40-50% of circuit days.</p> <p>a) To the above estimate correct? If not, please provide an estimate of the percentage of circuit days that EPSS was installed during the season in 2023.</p> <p>b) Does POEAE have a forecast of the percentage of circuit days on which EPSS will be installed during the season in 2023? If so, please provide it.</p> <p>c) Please define "circuit days."</p>	Holly Walman	5/0/2023	5/0/2023	5/0/2023	<p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-01.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-01.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-01.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-01.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-01.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-01.pdf</a></p>	0	NA	8.1.8.1.1	Grid Design and System Hardening	Protective Equipment and Device Settings
314	CAIPA	Sat WMP-22	CAIPA_Sat_WMP-22	2	CAIPA_Sat_WMP-22_02	<p>During the Q&amp;A portion of the Grid Operation, Design, and Maintenance session of the WMP workshop held on April 27, 2023, a caller raised concerns about the feasibility of undergrounding in rocky and steep terrain and in wetlands. In response, POEAE stated that it was evaluating both techniques to perform undergrounding in rocky terrain. Regarding undergrounding in areas with steep and rocky terrain:</p> <p>a) Please list and describe the current difficulties or obstacles to undergrounding in rocky and steep terrain.</p> <p>b) What tools and techniques is POEAE evaluating to improve the feasibility of undergrounding in rocky and steep terrain?</p> <p>c) What is POEAE's estimate of the current unit cost of undergrounding in rocky and steep terrain?</p> <p>d) Please state whether the unit cost provided in response to part (c) is based on mileage of overhead circuits removed or mileage of underground circuits installed.</p> <p>e) Regarding the unit cost given in response to part (c) of this question, when does POEAE expect to be able to reduce the unit cost to less than \$1.0 million per mile?</p> <p>f) Of the WMP undergrounding projects that POEAE plans to execute in 2023-2024, do any involve installing a significant amount (greater than 1.1 miles) of underground conductor in rocky and steep terrain?</p> <p>g) If the answer to part (f) is yes, please list each such project.</p>	Holly Walman	5/0/2023	5/0/2023	5/0/2023	<p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-02.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-02.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-02.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-02.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-02.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-02.pdf</a></p>	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
315	CAIPA	Sat WMP-22	CAIPA_Sat_WMP-22	3	CAIPA_Sat_WMP-22_03	<p>During the Q&amp;A portion of the Grid Operation, Design, and Maintenance session of the WMP workshop held on April 27, 2023, a caller raised concerns about the feasibility of undergrounding in rocky and steep terrain and in wetlands. In response, POEAE stated that it was evaluating both techniques to perform undergrounding in those areas. Regarding undergrounding in wetland areas:</p> <p>a) Please list and describe the current difficulties or obstacles to undergrounding in wetlands.</p> <p>b) What tools and techniques is POEAE evaluating to improve the feasibility of undergrounding in wetlands?</p> <p>c) Please state whether the unit cost provided in response to part (c) is based on mileage of overhead circuits removed or mileage of underground circuits installed.</p> <p>d) Regarding the unit cost given in response to part (c) of this question, when does POEAE expect to be able to reduce the unit cost to less than \$1.0 million per mile?</p> <p>e) Of the WMP undergrounding projects that POEAE plans to execute in 2023-2024, do any involve installing a significant amount (greater than 1.1 miles) of underground conductor in wetlands?</p> <p>f) If the answer to part (f) is yes, please list each such project.</p>	Holly Walman	5/0/2023	5/0/2023	5/0/2023	<p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-03.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-03.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-03.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-03.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-03.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-03.pdf</a></p>	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
316	CAIPA	Sat WMP-22	CAIPA_Sat_WMP-22	4	CAIPA_Sat_WMP-22_04	<p>Table PG&amp;E-22-11-3 on page 903 of POEAE's WMP states that the cost per circuit mile of covered conductor was \$625,689 in 2022. POEAE's response to data request California-POE-2022WMP-09, question 10 confirms that there are no additional costs associated with overhead hardening that were updated from Table 22-11-3. In response to data request California-POE-2022WMP-06, question 10, POEAE stated that its actual 2022 expenditures related to covered conductor were \$26,544,000 and that POEAE installed 335 miles. This results in \$81,800 per circuit mile of covered conductor in 2022.</p> <p>In response to data request California-POE-2022WMP-09, question 14, POEAE provided a unit cost forecast of \$1,878 million per mile for overhead hardening in 2025.</p> <p>In response to data request California-POE-2022WMP-09, question 10, POEAE provided a unit cost forecast of \$1,878 million per mile for overhead hardening in 2025.</p> <p>Why is POEAE's forecast of covered conductor unit cost in 2025 nearly double the actual unit cost in 2022?</p> <p>Please state the basis of your unit cost forecast of \$1,878 million per mile in 2025.</p> <p>Provide any worklogs or analyses that you used to develop your unit cost forecast of \$1,878 million per mile in 2025.</p>	Holly Walman	5/0/2023	5/0/2023	5/0/2023	<p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-04.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-04.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-04.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-04.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-04.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-04.pdf</a></p>	0	NA	8.1.8.1.2	Grid Design and System Hardening	Covered Conductor Installation - Distribution
317	CAIPA	Sat WMP-22	CAIPA_Sat_WMP-22	5	CAIPA_Sat_WMP-22_05	<p>In response to data request California-POE-2022WMP-19, question 3, POEAE stated:</p> <p>a) Does POEAE expect that the asset management and maintenance needs for covered overhead conductor are identical to those of bare overhead conductor?</p> <p>b) Does POEAE expect that the asset management and maintenance needs for covered overhead conductor are identical to those of bare overhead conductor?</p> <p>c) Does POEAE expect that the asset management and maintenance needs for covered overhead conductor are identical to those of bare overhead conductor?</p> <p>d) Does POEAE currently validate its estimates of the effectiveness of covered conductor in its system over the 2023-2025 WMP period?</p>	Holly Walman	5/0/2023	5/10/2023	5/10/2023	<p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-05.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-05.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-05.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-05.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-05.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-05.pdf</a></p>	0	NA	8.1.2.1	Grid Design and System Hardening	Covered Conductor Installation - Distribution
318	CAIPA	Sat WMP-22	CAIPA_Sat_WMP-22	6	CAIPA_Sat_WMP-22_06	<p>In response to data request California-POE-2022WMP-19, question 3, POEAE stated:</p> <p>a) Does POEAE expect that the asset management and maintenance needs for covered overhead conductor are identical to those of bare overhead conductor?</p> <p>b) Does POEAE expect that the asset management and maintenance needs for covered overhead conductor are identical to those of bare overhead conductor?</p> <p>c) Does POEAE expect that the asset management and maintenance needs for covered overhead conductor are identical to those of bare overhead conductor?</p> <p>d) Does POEAE currently validate its estimates of the effectiveness of covered conductor in its system over the 2023-2025 WMP period?</p>	Holly Walman	5/0/2023	5/0/2023	5/0/2023	<p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-06.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-06.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-06.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-06.pdf</a></p> <p><a href="https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-06.pdf">https://www.ajg.com/wp-content/uploads/2023/05/2023-05-01-CAIPA-Response-02-06.pdf</a></p>	0	NA	8.1.2.1	Grid Design and System Hardening	Covered Conductor Installation - Distribution



332	OEB	004	OEB_004	6	OEB_004_06	<p>Year HFTD Misses Completed Inspected Shive Potential Trees Traced Worked Average Trees Per Mile % of Misses in Top 20% of Risk 2015 2464 misses 1,119,969 196,243 79.95% 2020 1878 misses 1,192,342 167,221 69.43% 2021 1983 misses 1,246,174 336,018 69.98% 2022 1924 misses 1,519,099 271,420 141.99.93% Total</p> <p>a. Please note, for column "average trees per mile", we interpreted that as average number of trees worked per mile. We obtained this number by taking the number of trees worked divided by HFTD Misses completed for the corresponding year. Please note, for % of Misses in Top 20% of Risk, the 2019 percentage was based upon 2019-2020 risk ranking and the 2020 percentage was based upon 2020 risk ranking. b. Please see supporting attachment "WMP-Discovery2023_DR_OEB_004-Q006A01.pdf" for GIS file of EVM work completed between 2015 to 2022.</p>	Cole Lang	5/4/2023	5/9/2023	5/9/2023	1	NA	8.2.2.6	Vegetation Management and Inspections	Discouraged Programs
332	OEB	004	OEB_004	6REV	OEB_004_06REV	<p>Year HFTD Misses Completed Inspected Shive Potential Trees Traced Worked Average Trees Per Mile % of Misses in Top 20% of Risk 2015 2464 misses 1,119,969 196,243 79.95% 2020 1878 misses 1,192,342 167,221 69.43% 2021 1983 misses 1,246,174 336,018 69.98% 2022 1924 misses 1,519,099 271,420 141.99.93% Total</p> <p>a. Please note, for column "average trees per mile", we interpreted that as average number of trees worked per mile. We obtained this number by taking the number of trees worked divided by HFTD Misses completed for the corresponding year. Please note, for % of Misses in Top 20% of Risk, the 2019 percentage was based upon 2019-2020 risk ranking and the 2020 percentage was based upon 2020 risk ranking. b. Please see supporting attachment "WMP-Discovery2023_DR_OEB_004-Q006A01.pdf" for GIS file of EVM work completed between 2015 to 2022.</p>	Cole Lang	5/4/2023	5/15/2023	5/15/2023	0	NA	8.2.2.6	Vegetation Management and Inspections	Discouraged Programs
333	OEB	004	OEB_004	7	OEB_004_07	<p>Q7. Regarding Vegetation-Caused Outages b. Provide the following table of vegetation-caused outages by mode of failure in the HFTD between 2015 and 2022, broken out by year. POAE may add additional rows (i.e., mode of failure) if needed. VEGETATION-CAUSED OUTAGE MODE OF FAILURE 2015 2016 2017 2018 2019 2020 2021 2022 Branch (incl. &lt; 120) Branch (incl. &lt; 40) Branch (incl. distance Unknown) Branch (overhang) Dead Tree Tree Fall (incl. severe defect) Tree Fall (right defect) Tree Fall (no defect) Tree Grow Into Other/Unknown TOTAL</p> <p>POAE does not capture the HFTD part in outage reports therefore the data being provided cannot be filtered to only include outages in HFTD areas. Please see attachment "WMP-Discovery2023_DR_OEB_004-Q007A01.xlsx" for the system wide vegetation-caused outage by mode of failure from 2015-2022 as recorded by POAE.</p>	Cole Lang	5/4/2023	5/9/2023	5/9/2023	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI POAE-22-28 - Progression of Effectiveness of Enhanced Clearance Study
334	OEB	004	OEB_004	8	OEB_004_08	<p>Regarding Vegetation Hazards Mitigated by PSPS a. Does POAE use data on vegetation hazards mitigated by PSPS? If so, populate the following table of vegetation hazards mitigated by mode of failure in the HFTD between 2015 and 2022, broken out by year. POAE may add additional rows (i.e., mode of failure) if needed. MODE OF FAILURE FOR VEGETATION HAZARDS MITIGATED BY PSPS 2015 2016 2017 2018 2019 2020 2021 2022 Branch (incl. &lt; 120) Branch (incl. &lt; 40) Branch (incl. distance Unknown) Branch (overhang) Dead Tree Tree Fall (incl. severe defect) Tree Fall (right defect) Tree Fall (no defect) Tree Grow Into Other/Unknown TOTAL</p> <p>POAE interprets this question as identifying vegetation related damages and hazards after patrolling and inspecting circuits impacted by PSPS. POAE started implementing PSPS in 2016, therefore, did not collect data prior from 2015-2016. While POAE records when or not a PSPS outage or hazard is vegetation-related, because the procedures are designed to prevent potential ignition from vegetation contact, PSPS patrols do not assess vegetation failure modes. PSPS are designed to prevent and mitigate against potential ignition from any vegetation related damages or hazards regardless of failure mode. POAE does include PSPS vegetation-related damages or hazards when submitting 10-Day Post-Event Reports to the CPUC and on the Quarterly Data Standard Filing to OEB.</p>	Cole Lang	5/4/2023	5/9/2023	5/9/2023	0	NA	9.2.2	Public Safety Power Shutoff	Method Used to Compare and Evaluate the Relative Consequences of PSPS and WMEs
335	OEB	004	OEB_004	9	OEB_004_09	<p>Regarding Coordination with Other Utilities on PSPS Wind Thresholds In its response to ACI POAE-23-31, POAE states: "In collaboration with the joint IOU team, POAE has performed effectiveness studies to identify how covered conductors can reduce ignition risk compared to bare conductors." a. Is the collaboration referenced in the Covered Conductor Effectiveness Study (Table 3-8, Line 1)? b. List POAE's other, if any, collaboration efforts in evaluating the effect of covered conductor on PSPS risk. c. Has POAE specifically discussed raising of PSPS wind thresholds in any of its covered conductor collaboration efforts? d. List the collaboration efforts, if any, when adjusting PSPS wind thresholds for covered conductor was discussed. e. Provide a list of POAE's circuits that are fully hardened with covered conductor.</p> <p>POAE did not collaborate with the investor-owned utilities to evaluate the effectiveness of covered conductors related to PSPS. As stated in response to ACI POAE-23-31 in the 2023-2025 WMP, due to our PSPS modeling approach, we would not adjust our final PSPS risk thresholds to account for covered conductor. Our Catastrophic Fire Probability model (discussed in Section 9) is a risk-based assessment of the probability of ignition given an outage modeled by the probability of catastrophic fires (Fire Potential Index). Thus, we would not adjust the threshold at which PSPS is required (each area is isolated by PSPS at the same risk threshold based on covered conductor). POAE does, however, incorporate new outage data each year into our Outage Producing Winds (OPW) and Ignition Probability Weather (IPW) machine learning models. These models account for any updated data to outage to ignition responses in local areas of the grid, including those due to asset upgrades like covered conductor. In addition, POAE has explored if adding covered conductor as a feature of the IPW model in future iterations provides benefits (see Directive SA-04). e. Please reference "WMP-Discovery2023_DR_OEB_004-Q009A01.xlsx" for a list of historical OH covered conductor projects as well as a list of forecasted projects to harden covered conductors.</p>	Cole Lang	5/4/2023	5/9/2023	5/9/2023	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI POAE-23-31 - PSPS Wind Threshold Change Evaluations
336	OEB	004	OEB_004	10	OEB_004_10	<p>Regarding Tree Fall and PSPS In its response to ACI POAE-23-31, POAE states: "based on collaboration with the joint IOU team, one of the biggest hazards during PSPS event is the potential for tree fall into live (P. 56)." a. Explain how the biggest hazards during PSPS event "in terms of risk (P. 56). b. Provide additional information regarding the biggest hazards during PSPS event. c. Provide a list of POAE's circuits that are fully hardened with covered conductor.</p> <p>Based on POAE's review of potential ignition events during a PSPS event, vegetation related hazards pose the highest risk for ignition. Please reference Table 5 and Table 6 of the Quarterly Data Report POAE submits to the OEB. POAE has incorporated tree shive potential and vegetation taps into its PSPS guidance. Catastrophic Fire Probability (CFP). Please see WMP Section 9.1 "Risk, Safety and Decision-Making Process that Determines the Need for a PSPS" for additional information regarding CFP.</p>	Cole Lang	5/4/2023	5/9/2023	5/9/2023	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI POAE-23-31 - PSPS Wind Threshold Change Evaluations
337	OEB	004	OEB_004	11	OEB_004_11	<p>Regarding RSE (Risk by-down) information required by the WMP Guidelines The 2023-2025 WMP Guidelines make specific requests for RSE, optimization of risk reduction and cost, and information disclosure: 7.1.4.1 Identifying and Evaluating Mitigation Initiatives On the procedures for identifying and evaluating mitigation initiatives (compatible to 2015 S-MAP Settlement Agreement, row 26), including the use of risk-by-down estimates (e.g., risk-spent efficiency) and evaluating the benefits and drawbacks of mitigation. 7.1.4.2 Mitigation Initiative Prioritization a) Explain how the electrical corporation is optimizing its resources to maximize risk reduction. Describe how the proposed initiatives are an efficient use of electrical corporation resources and focus on achieving the greatest risk reduction with the most efficient and cost-effective responses. b) The electrical corporation must describe how it prioritizes mitigation initiatives to reduce both wildfire and PSPS risk. This description must include: (i) A high-level schematic showing the procedures and evaluation criteria used to evaluate potential mitigation initiatives. As a minimum, the schematic must demonstrate the role of quantitative risk assessment, resource allocation, evaluation of other performance objectives (e.g., cost, timing), identified by the electrical corporation, and RSE alignment. POAE does provide a graph of HFRA WORM (3) System Hardening Buydown, Figure 8.6.1.1, but the detail provided does not show an evaluation of resources with context from section 7 and it is also missing important components of RSE. In particular, a detailed description of RSE (the risk-by-down process) is needed to reconcile with the information provided in Tables 7.2 and 7.4. Please complete the following, including an Excel file as applicable: a. Provide RSE (Risk by-down) information in a new RSE table as follows, ranked in descending order of RSE. Mitigation (reference Section 2, Table 7.3-1). Mitigation Tracking ID WMP Category Circuit Segment Impacted (reference Table 7-2) Estimated Cost Estimated Risk Reduction Risk Buydown RSE (Risk Reduction/Cost) b. Update Table 7.4 to cross-reference the new RSE table. This can be completed by adding an index number to each Mitigation initiative, where the index number is the RSE rank of the initiative from the RSE table. c. Add a complete description of how the RSE table informs the mitigation decisions. Do not include values</p> <p>POAE met with Energy Safety on May 11, 2023. During that meeting, POAE confirmed the "RSE" and "risk buydown" are distinct terms with different meanings. In its request, Energy Safety used the term "RSE" to describe the calculation of the total risk reduction by the cost of the mitigation in a given year. POAE discussed how this version of RSE considers risk reduced for one year, but it does not take into account the length of each mitigation benefit. POAE agreed to provide RSE using Energy Safety's definition by aggregating the risk reduction from the work completed from 2023-2025 and dividing by the total cost from 2023-2025. These RSEs are incorporated into the short below. POAE said that the definition of RSE used for purposes of this request is not the same as the regulatory definition of RSE from the S-MAP Settlement Agreement. "Risk buydown" refers to the total risk reduction from investment in a particular mitigation. The short below ranks mitigations by their estimated total risk reduction (Risk Buydown). As part of the meeting with Energy Safety, POAE agreed to identify the circuit segments impacted from among the top 41 risk segments identified in the 2023-2025 WMP in Tables 7.2 and 7.4. POAE is unable to isolate the costs for each mitigation for work only on the 41 circuit segments. Therefore, the costs and RSEs identified in the table below reflect the total program costs and total number of circuit segments in HFTD. Mitigation (Reference Section 2, Table 7.3-1) Mitigation Tracking ID WMP Category Circuit Segment Impacted Estimated Cost Estimated Risk Reduction Risk Buydown RSE (Risk Reduction/Cost) Total Cost (\$000) RSE (RSE)</p>	Cole Lang	5/4/2023	5/19/2023	5/19/2023	1	NA	7.1.4	Wildfire Mitigation Strategy Development	Identifying and Evaluating Mitigation Initiatives

338	OEIS	004	OEIS_004	12	OEIS_004_012	<p>Regarding the POSE framework for PSPS risk</p> <p>The sections that relate to models (PSPS-L, PSPS-C, PSPS-V) and PSPS do not sufficiently describe the calculations that ultimately result in a PSPS Risk Score. The Guidelines for section 6.2 Risk Analysis Framework require detailed discussion of likelihood, consequence, exposure potential and vulnerability for Public Safety Power Shutoff (PSPS) Risk:</p> <p>6.1.1 Overview: The electrical corporation must provide a brief narrative describing its methodology for quantifying its overall utility of wildfire and Public Safety Power Shutoff (PSPS).</p> <p>6.2.2.1 Likelihood: The electrical corporation must discuss how it calculates the likelihood of its equipment through normal operations or failure and result in a catastrophic wildfire and the resulting likelihood of losing a PSPS.</p> <p>6.2.2.2 Consequence: The electrical corporation must discuss how it calculates the consequences of a fire originating from its equipment and the consequence of implementing a PSPS event.</p> <p>In order to understand POSE's asset-by-asset calculations that ultimately result in the PSPS Risk Score, please provide the following, including via Excel file as applicable:</p> <p>A. Regarding PSPS Likelihood:</p> <ol style="list-style-type: none"> <li>Provide details on the inputs to the PSPS-L model and calculation.</li> <li>Provide details on the inputs to the PSPS-C model and calculation.</li> <li>The PSPS Likelihood section briefly discusses applying current PSPS protocols against historical climatological data informed by FFI and IPV models, and related PSPS data flow in Figure 6.2.2.3.</li> <li>Explain how PSPS protocols, FFI and IPV models and the WTRM data flow are combined to produce the likelihood of a PSPS event.</li> <li>In particular, how the historical backlog is used to predict future likelihood of a PSPS event.</li> </ol> <p>B. Regarding PSPS Consequence:</p> <ol style="list-style-type: none"> <li>Provide details on the inputs to the PSPS-C model.</li> <li>Provide explanation on the PSPS Consequence schematic, Figure 6.2.1.3.</li> <li>How is Enterprise PSPS Consequence Risk Score calculated?</li> <li>Describe the output of the PSPS Consequence (e.g. a "12-year customer distribution").</li> <li>How does Customer Classification &amp; Weighting affect the results?</li> <li>Provide more detailed schematic similar to the CORE Process Block (Figure 6.2.2.5) to illustrate model flow.</li> <li>Please provide a PSPS Consequence section with a similar level of detail as the Wildfire Consequence section, including figures and tables for transparency (using common web etc).</li> </ol>	<p>4. (b) The details on the inputs to the PSPS-L model are shown in Appendix B (Figure POSE-3) and PSPS-C and its calculation are provided as part of "WMP-Disclosure2023_DR_OEIS_001-000746040000000000.pdf" submitted to the Office of Energy Information and Safety on April 10, 2023. The LRFE framework used to calculate likelihood of a PSPS event is conceptually similar to WMP Figure 6.2.2.1 as shown above. While they are conceptually similar, the inputs into the LRFE calculation for PSPS (shown in the table below) are different from the inputs into the wildfire likelihood calculation. (b)(i) During an operational event, if the conditions forecasted in the FFI and IPV models exceed the threshold conditions to consider PSPS, based on the established PSPS protocols, the preparation for a PSPS event begins. These models are updated throughout the event leading to a projected PSPS event to see if the conditions will warrant PSPS. The PSPS protocols are described in the documentation provided as part of "WMP-Disclosure2023_DR_OEIS_001-000746040000000000.pdf". For planning purposes, we evaluate the likelihood of initiating a PSPS event in a historical period by analyzing the weather and customer conditions. A histogram of them meet the thresholds for initiating a PSPS event. The historical analysis is limited to a 10-year period. From that analysis, we can determine the historical analysis allows POSE to understand how often PSPS would have been initiated by taking back at a historical period and helps us to better identify the units and customers that may be impacted by various weather events. The WTRM model does not impact PSPS likelihood. (b)(ii) Historical backlog does not predict the future likelihood of a PSPS event. The historical backlog is a representation of the expected number of PSPS events per year based on historical weather conditions. The PSPS likelihood above POSE is better data and provides locations and customers expected to be most impacted by a PSPS event based on looking back on historical conditions. (b) The details about the inputs into the PSPS Consequence (PSPS-C) model are shown in WMP Appendix B, Figure POSE-3 and POSE-3-4 and in the PSPS model documentation provided as part of the request "WMP-Disclosure2023_DR_OEIS_001-000746040000000000.pdf". The CORE framework used to calculate likelihood of a PSPS event is conceptually similar to WMP Figure 6.2.2.5 as shown above. While they are conceptually similar, the inputs into the CORE calculation for PSPS (shown in the table below) are different from the inputs into the wildfire likelihood calculation. (b)(i) POSE uses the "High Fire Risk Districts" and assumes this is a reference to "High Fire Risk Areas" (HFRA). As a result in response to Support 11 of "WMP-Disclosure2023_DR_OEIS_003-0010-0010.pdf", POSE is not presently able to quantify the number of assets missing from the asset inventory. However, when missing assets are identified, those assets are added to the inventory. POSE's asset register program identifies and addresses asset inventory completeness (missing asset) improvements in the following ways:</p> <ul style="list-style-type: none"> <li>• Truly processing of as-built documents associated with completed construction work into the asset register.</li> <li>• Asset data inventory corrections (Using Connections) provided by field inspections, and</li> <li>• Asset data projects designed to assess and improve the completeness of records and attribute data for historical assets.</li> </ul> <p>POSE is in the process of distribution primary structure assets to wildfire risk management activities and historical mapping practices. POSE's primary focus has been to ensure that all assets are properly identified and mapped. The addition of GIS wildfire data areas (PFD and HFRA) have undergone an assessment using LRAM data to identify any missing distribution primary structures (assets). Approximately 1,000 structures have been added to the asset register as part of this year's project. The remaining approximately 2% of wildfire not yet completed are planned for completion in 2023.</p> <p>As referenced above, POSE also leverages inspection activities to identify and correct any critical missing or inaccurate asset data attributes. In response to the 2023 WMP Utility Survey, POSE made a commitment (A1-11: Data Fix Rates) to increase the fix rate for missing age data from 86% to 90% (weighted average) across 17 asset component types by end of 2023. These component types are: Transmission Poles, Transmission Towers, Transmission Conductors, Transmission Insulators, Distribution Poles, Distribution Primary Overhead Conductors, Distribution Dynamic Protective Devices, Distribution Fuses, Distribution Surge Arresters, Distribution Capacitor Banks, Distribution Voltage Regulators, and Distribution OH Transformers.</p> <p>5. Data as of May 4th, 2023 for 2022-2023 DCD Outages:</p> <ol style="list-style-type: none"> <li>17 outages have occurred with DCD settings enabled.</li> <li>The table below matches outage causes to the Ignition Drivers used in Table 6 of the 2023 DA Quarterly Data Report.</li> <li>DCD is an additional protection element as part of EPSS. POSE will enable DCD on capable devices when EPSS is enabled to help detect lower current fault levels.</li> <li>4,732, 018 Minutes.</li> </ol> <p>• DCD outages and circuits are already considered in our existing EPSS Reliability program. Specific to DCD, POSE is adding more DCD coverage (devices on circuits) to where feasible, increase automation of DCD protection that will reduce outage size and restoration control areas while maintaining the ignition reduction benefit. Furthermore, in cases of removal of cause DCD outages, or with multiple DCD outages on a single device, or engineering and system protection team can conduct specific reviews of the protection settings of these devices.</p> <p>6. Data as of May 4th, 2023 for 2022-2023 Partial Voltage Fault Outages (PVFO):</p> <ol style="list-style-type: none"> <li>The number of outages broken down by cause (based on ignition drivers listed in Table 6 of the 2023 DA Quarterly Data Report) in 2022 is shown below: WMP-Disclosure2023_DR_OEIS_004-0010-0010 Page 3</li> <li>Partial Voltage Fault Out is a repeat action taken by a distribution control center operator in response to more than one partial voltage alarms detected at the field level or above.</li> <li>4,486,701 minutes.</li> </ol> <p>7. These areas are included in the scope of POSE's existing EPSS Reliability Mitigation programs. In addition, POSE's PV alarm configuration is designed to prevent nuisance alerts from transient conditions by sending the distribution control center operator a PV alarm when multiple meters aggregating to a bus level indicate a partial voltage condition, and further we will clear PV alerts if normal voltage returns.</p> <p>8. Yes, a "DCD outage" is an EPSS outage. POSE also enables PVFO outages when the conditions are met.</p>	<p>0</p>
339	OEIS	004	OEIS_004	13	OEIS_004_013	<p>Regarding POSE's Asset Tracking Database</p> <p>While POSE provided information in the 2022-23 WMP's Appendix F from its overall progress in Asset Inventory Data Steps, it is not clear what POSE's progress is on the high-risk electric distribution assets, such as primary conductors and poles, that are not in the Asset Registry and therefore not included in the WMP's initiatives. In regards to POSE's plans and progress on the Asset Registry Data Quality Program (ARDC), please provide the following, including via Excel file as applicable:</p> <p>A. Greater asset list for identifying and correcting missing electric distribution asset types in High Fire Risk Districts (HFRD).</p> <p>B. Greater details regarding plans and timelines on the known gaps on the level of T&amp;D risk prioritized asset types (Formosa 217, pg. 966) in the HFRD. The content provided should address specific actions being taken and the timeline to address the gaps in the historical data on service-aged poles and primary conductor risk-prioritized asset types located in the HFRD.</p> <p>C. Does the Asset Data Quality Remediation initiative (pg. 966) include a discrete project aimed at addressing specific gaps in the high-risk electric distribution asset types in the HFRD?</p> <p>D. On pg. 966, it states that in 2022, "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>E. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>F. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>G. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>H. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>I. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>J. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>K. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>L. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>M. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>N. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>O. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>P. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>Q. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>R. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>S. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>T. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>U. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>V. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>W. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>X. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>Y. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p> <p>Z. How does POSE ensure that its 2022-23 "over 200 Critical Data Elements (CDE)" were identified. Did this include any poles and/or primary conductors in HFRD?</p>	<p>1</p>	
340	OEIS	004	OEIS_004	14	OEIS_004_014	<p>Regarding POSE's Use of Downed Conductor Detection (DCD) and Partial Voltage Detector (PVD)</p> <p>A. Provide any analysis completed on reliability impacts due to DCD, including:</p> <ol style="list-style-type: none"> <li>The number of outages that occurred due to DCD in 2022 and 2023.</li> <li>The number of outages broken down by cause (based on ignition drivers listed in Table 6 of the DQR) that occurred due to DCD in 2022 and 2023.</li> <li>Options used for DCD evaluation (if applicable).</li> </ol> <p>B. The number of total customer minutes interrupted from DCD outages.</p> <p>C. Any mitigations POSE is using to reduce reliability impacts from DCD implementation, including lessons learned from any piloting.</p> <p>D. Provide any analysis completed on reliability impacts due to PVD, including:</p> <ol style="list-style-type: none"> <li>The number of outages that occurred due to PVD in 2022 and 2023.</li> <li>The number of outages broken down by cause (based on ignition drivers listed in Table 6 of the DQR) that occurred due to PVD in 2022 and 2023.</li> <li>Options used for PVD evaluation (if applicable).</li> </ol> <p>B. The number of total customer minutes interrupted from PVD outages.</p> <p>C. Any mitigations POSE is using to reduce reliability impacts from PVD implementation, including lessons learned from any piloting.</p> <p>D. When evaluating outages due to EPSS, are DCD and PVD outages included as part of this evaluation?</p> <p>E. If so, what is the number of additional outages caused by PVD and DCD respectively in 2022?</p> <p>F. If no, how does POSE account for and track any associated reliability and safety impacts from DCD and PVD implementation, and how does it inform changes to the two programs?</p>	<p>0</p>	
341	OEIS	004	OEIS_004	15	OEIS_004_015	<p>Regarding Feasibility Constraints</p> <p>POSE must provide an explanation of how, if at all, feasibility constraints impact the decision making of its Wildfire Governance Steering Committee in selecting a portfolio of mitigation measures that deviates from the risk informed prioritization. This should include:</p> <ol style="list-style-type: none"> <li>A threshold or explanation of decision-making as processed by the Wildfire Governance Steering Committee, including where feasibility constraints are accounted for.</li> <li>The correlation between V3 risk outputs and WFE.</li> <li>The correlation between WFE and feasibility.</li> <li>Any associated risks in prioritization due to implementing feasibility constraints.</li> <li>A list of any projects not included within LCI scope due to feasibility constraints.</li> </ol>	<p>1</p>	
342	OEIS	004	OEIS_004	16	OEIS_004_016	<p>Regarding Effectiveness of EPSS</p> <p>A. Provide the formulas and calculations used by POSE to determine the effectiveness of EPSS.</p> <p>B. Provide analysis demonstrating adequate overlap between EPSS risk and wildfire risk to ensure POSE's mitigation and risk reduction strategies are aligned with wildfire risk.</p> <p>C. Provide POSE's mitigation for necessary EPSS-declined mitigation measures, including rates and work hours diffused around from wildfire risk mitigations. This should also include asset management related mitigations.</p>	<p>2</p>	

343	OEBIS	004	OEBIS_004	17	OEBIS_004_017	<p>Regarding PG&amp;E's Underlying Program</p> <p>6. Provide the cumulative V2 and V3 risk scores of the 2022 WMP vs. 2023 WMP underlying scope for 2023-2025. The should not include nor account for feasibility.</p> <p>7. Provide the analysis on the remaining risk of the miles no longer scoped for underlying, including:</p> <p>a. Where mitigation being put in place if scoped for underlying in the future</p> <p>b. The number of miles scoped for the future (past 2028)</p> <p>c. Alternative mitigations being used if no longer scoped for underlying</p> <p>d. Alternative mitigations being used if no longer scoped for underlying in the future</p>	Colin Lang	5/4/2023	5/9/2023	5/10/2023	<p><a href="https://www.pge.com/pge_attachments/2023/05/09/2023_V2_V3_Risk_Scores.pdf">https://www.pge.com/pge_attachments/2023/05/09/2023_V2_V3_Risk_Scores.pdf</a></p> <p><a href="https://www.pge.com/pge_attachments/2023/05/09/2023_V2_V3_Risk_Scores.pdf">https://www.pge.com/pge_attachments/2023/05/09/2023_V2_V3_Risk_Scores.pdf</a></p> <p><a href="https://www.pge.com/pge_attachments/2023/05/09/2023_V2_V3_Risk_Scores.pdf">https://www.pge.com/pge_attachments/2023/05/09/2023_V2_V3_Risk_Scores.pdf</a></p>	2	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
344	TURN	012	TURN_012	1	TURN_012_01	<p>1. Please confirm that the Simplified Wildfire Risk Speed Efficiency (SWRSE) and Wildfire Feasibility Expenditure (WFE) means (discussed on page 98) of PG&amp;E's WMP.</p> <p>a. Are only calculated by PG&amp;E for underlying projects, and</p> <p>b. Can be used to compare the cost-effectiveness of underlying projects with any other projects.</p> <p>c. If PG&amp;E does not unequivocally agree with "a" and "b" above, please explain why it does not.</p>	Tom Long	5/5/2023	5/11/2023	5/11/2023	<p><a href="https://www.pge.com/pge_attachments/2023/05/11/2023_WMP_Simplified_Wildfire_Risk_Speed_Efficiency_and_Wildfire_Feasibility_Expenditure.pdf">https://www.pge.com/pge_attachments/2023/05/11/2023_WMP_Simplified_Wildfire_Risk_Speed_Efficiency_and_Wildfire_Feasibility_Expenditure.pdf</a></p>	0	NA	Appendix D	Areas for Continued Improvement	ACI PG&E-23-04 - Review Process of Prioritizing Wildfire Mitigations
345	TURN	012	TURN_012	2	TURN_012_02	<p>2. Comparing the wildfire mitigation work proposed by PG&amp;E's WMP with the wildfire mitigation work proposed in PG&amp;E's last year 2023 GRC (A.1-1-26-21).</p> <p>a. Please identify any differences in wildfire mitigation programs proposed or volume of wildfire mitigation work proposed between the WMP and GRC for the years 2023-2025, and</p> <p>b. For any differences (as described in subpart "a"), please provide a table that shows, on a program by program basis, the WMP proposal, the GRC proposal, and a description of the differences between the two, including without limitation differences in volume or units of work. The table should include any wildfire mitigation programs that are proposed in one of the proceedings but not in the other.</p>	Tom Long	5/5/2023	5/12/2023	5/12/2023	<p><a href="https://www.pge.com/pge_attachments/2023/05/12/2023_WMP_GRC_Comparison.pdf">https://www.pge.com/pge_attachments/2023/05/12/2023_WMP_GRC_Comparison.pdf</a></p>	0	NA	7.2.1	Wildfire Mitigation Strategy Development	Overview of Mitigation Initiatives and Activities
346	CPUC - SPD (Safety Policy Division)	004	CPUC - SPD (Safety Policy Division)_004	1	CPUC - SPD (Safety Policy Division)_004_01	<p>Provides updated CPUC-reportable ignition data. SPD's current data set is attached for 2014-2021. The current data is an aggregated data set based on the data found here, under "Fire Ignition Data." WFRS is requesting an updated data set to resolve four potential issues:</p> <p>1. WFRS generally understands that some ignitions may have been excluded at the time the data was submitted if the cause of the fire was unclear.</p> <p>2. Data may have been corrected once additional information was acquired.</p> <p>3. Data may have been entered inconsistently between years which makes it difficult to perform analysis.</p> <p>4. Update the data to the actual number of acres burned rather than a range of acres.</p> <p>Before submitting final agreed-upon data to WFRS, please set up a conference call to discuss the ignition data available on the central data server. You may contact me at wfrs@pge.com.</p>	Henry Sweet	5/5/2023	5/19/2023	5/17/2023	<p><a href="https://www.pge.com/pge_attachments/2023/05/19/2023_Crucial_Ignition_Data_Update.pdf">https://www.pge.com/pge_attachments/2023/05/19/2023_Crucial_Ignition_Data_Update.pdf</a></p>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E-22-08 - Addressing Increase in Risk Events
347	CPUC - SPD (Safety Policy Division)	004	CPUC - SPD (Safety Policy Division)_004_02	2	CPUC - SPD (Safety Policy Division)_004_02	<p>In addition to the data requested above, please add the following data for each ignition:</p> <p>1. "HFTD" - Classify each ignition as whether it was located in a "Zone 1," "Tier 2" or "Tier 3," or "Non-HFTD" if the Potential Index.</p> <p>Please list the Fire Potential Index for the location on the day of each ignition.</p>	Henry Sweet	5/5/2023	5/19/2023	5/17/2023	<p><a href="https://www.pge.com/pge_attachments/2023/05/19/2023_Crucial_Ignition_Data_Update.pdf">https://www.pge.com/pge_attachments/2023/05/19/2023_Crucial_Ignition_Data_Update.pdf</a></p>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E-22-08 - Addressing Increase in Risk Events
348	CPUC - SPD (Safety Policy Division)	004	CPUC - SPD (Safety Policy Division)_004_03	3	CPUC - SPD (Safety Policy Division)_004_03	<p>Provides the total number of circuit-mile-days for each Fire Potential Index rating year starting in 2014.</p>	Henry Sweet	5/5/2023	5/19/2023	5/17/2023	<p><a href="https://www.pge.com/pge_attachments/2023/05/19/2023_Crucial_Ignition_Data_Update.pdf">https://www.pge.com/pge_attachments/2023/05/19/2023_Crucial_Ignition_Data_Update.pdf</a></p>	0	NA	8.3.6	Situational Awareness and Forecasting	Fire Potential Index
349	CPUC - SPD (Safety Policy Division)	004	CPUC - SPD (Safety Policy Division)_004_04	4	CPUC - SPD (Safety Policy Division)_004_04	<p>Provides the total number of days per year for each Fire Potential Index rating for each Fire Index Area starting in 2014.</p>	Henry Sweet	5/5/2023	5/19/2023	5/17/2023	<p><a href="https://www.pge.com/pge_attachments/2023/05/19/2023_Crucial_Ignition_Data_Update.pdf">https://www.pge.com/pge_attachments/2023/05/19/2023_Crucial_Ignition_Data_Update.pdf</a></p>	0	NA	8.3.6	Situational Awareness and Forecasting	Fire Potential Index
350	CPUC - SPD (Safety Policy Division)	004	CPUC - SPD (Safety Policy Division)_004_05	5	CPUC - SPD (Safety Policy Division)_004_05	<p>Provides the total number of circuit-mile-days for each Fire Potential Index rating on the HFTD per year starting in 2014.</p>	Henry Sweet	5/5/2023	5/19/2023	5/17/2023	<p><a href="https://www.pge.com/pge_attachments/2023/05/19/2023_Crucial_Ignition_Data_Update.pdf">https://www.pge.com/pge_attachments/2023/05/19/2023_Crucial_Ignition_Data_Update.pdf</a></p>	0	NA	8.3.6	Situational Awareness and Forecasting	Fire Potential Index









388	OEIS	008	OEIS_008	1	OEIS_008_01	<p>Regarding Vegetation Management Objectives</p> <p>In Table B-12 of PG&amp;E's 2023-2025 WMP, it states that one of its objectives is to "Determine value of a multi-year historical tree data set."</p> <p>a. Expand on what is meant by "a multi-year historical tree data set."</p> <p>b. How might the use of this tree data set be gathered? (e.g., inspection reports, remote sensing, etc.)</p> <p>c. Would this data set be like SCE and SDG&amp;E's tree inventories?</p>	Dakota Smith	5/25/2023	5/31/2023	5/31/2023	0	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
389	OEIS	008	OEIS_008	2	OEIS_008_02	<p>Regarding Undergrounding Mitigation Targets</p> <p>a. Explain why PG&amp;E has reduced undergrounding targets provided within its workplan when comparing PG&amp;E's 2022 WMP to the 2023-2025 WMP.</p> <p>b. Provide an update to updated Table PG&amp;E's 1.2.3 from PG&amp;E's 2023-2025 WMP in which the Top 20% is based on risk model neutral scores from V2 and V3 respectively, opposed to WFE. Both mileage and % of Portfolio columns should be updated for each respective year and tone.</p>	Dakota Smith	5/25/2023	5/31/2023	5/31/2023	1	NA	8.1.2.3	Grid Design and System Hardening	Distribution Pole Replacements and Reinforcements
390	OEIS	008	OEIS_008	3	OEIS_008_03	<p>Regarding Inspection First Rates</p> <p>a. Provide PG&amp;E's work order first rate for distribution-detailed and patrol inspections respectively, broken down by quarter from 2018 to 2022.</p>	Dakota Smith	5/25/2023	6/5/2023	6/5/2023	0	NA	8.1.3.2	Asset Inspections	Distribution Asset Inspections
391	OEIS	008	OEIS_008	4	OEIS_008_04	<p>Regarding PG&amp;E's response to TURIN DR 10 Question 4</p> <p>a. Provide Attachment 1 with the following additional columns:</p> <p>i. V3 Risk Score</p> <p>ii. V3 Risk Rank</p> <p>iii. If not included above, provide the V3 risk rank for the following CPZs, and explain why they are not included in the above:</p> <p>BRUNSWICK 111063100</p> <p>i. GREEN VALLEY 210111054</p> <p>ii. GREEN VALLEY 210121036</p> <p>iii. GREEN VALLEY 210136800</p> <p>iv. JAMESON 115666448</p> <p>v. LAUREL 11112020</p> <p>vi. MORGAN 11011600</p> <p>vii. MC ATYHR 11011544</p> <p>viii. MORGAN 111100308</p> <p>ix. NARROWS 21022020</p> <p>x. NARROWS 21022116</p> <p>xi. NARROWS 2102426</p> <p>xii. NARROWS 21022148</p> <p>xiii. PANDRAMA 11021342</p> <p>xiv. PANDRAMA 11021326</p> <p>xv. POSO MOUNTAIN 2102181</p> <p>xvi. SHINGLE SPRINGS 21031302</p> <p>xvii. SHINGLE SPRINGS 21039972</p> <p>xviii. SILVERADO 21026826</p> <p>xix. TEMPLETON 21009160</p> <p>xx. WISE 10992400</p>	Dakota Smith	5/25/2023	5/31/2023	5/31/2023	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E-23-34 - Review Process of Prioritizing Mitigation Projects
392	CPUC - SPD (Safety Policy Division)	008	CPUC - SPD (Safety Policy Division)_008	1REV	IC - SPD (Safety Policy Division)_008_01	<p>SPD appreciates the timely response and provision of ignition data as requested, as "WMP-Discovery2023_DR_SPD_008-0001A001.xlsx". However, it appears the data in Column (1) "Outage Data" and V "Outage Time" were provided in an incorrect format for rows beyond row 489. PG&amp;E needs to resubmit the data with correct outage data and time information. Please provide a corrected data file with rows beyond row 489 in the correct format: (i) as data format: V; (ii) as time format; Rows 1-489 of the spreadsheet are in the correct format. Provide corrections to the spreadsheet and resubmit.</p>	Kevin Milar	5/26/2023	5/31/2023	5/31/2023	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	ACI PG&E-23-08 - Addressing Increase in Risk Events
393	OEIS	009	OEIS_009	1	OEIS_009_01	<p>201: Regarding PG&amp;E's Secondary and Service Lines</p> <p>a. What percentage of PG&amp;E's scope 2023-2025 undergrounding projects have associated secondary or service lines? What is the mileage of such lines?</p> <p>b. What is the ratio of undergrounding mileage to secondary or service lines for PG&amp;E's scope 2023-2025 undergrounding projects? (i.e., for every mile of the undergrounding, how many miles of secondary or service lines remain)</p>	Dakota Smith	6/1/2023	6/9/2023	6/9/2023	0	NA	8.1.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution
394	CPUC - SPD (Safety Policy Division)	009	CPUC - SPD (Safety Policy Division)_009	1	PUC - SPD (Safety Policy Division)_009_01	<p>10H page 345-347 of the 2023 WMP PG&amp;E discusses its risk reduction from undergrounding work and states the plan will allow PG&amp;E to target risk reduction in the highest wildfire risk areas to eliminate approximately 18 percent of wildfire risk by the end of 2026. Please elaborate and show how PG&amp;E calculated 18 percent of wildfire risk reduction from undergrounding work.</p> <p>a. Which year baseline of risk did PG&amp;E use?</p> <p>b. How many scenarios were assumed for each year?</p> <p>c. Which version(s) of the WDRM was used?</p> <p>d. Was one version used for some year's risk reduction and another version used for other year(s)?</p> <p>e. Was any other model used to calculate risk reduction and if so, how?</p>	Kevin Milar	6/2/2023	6/9/2023	6/7/2023	1	NA	8.1.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution

395	CPUC - SPD (Safety Policy Division)	009	CPUC - SPD (Safety Policy Division)_009	2	PUC - SPD (Safety Policy Division)_009	<p>ZIDN page 645 of its 2023 WMP PG&amp;E states there has been a "Reduced size and duration of PEPs events" and states "This is an indicator of increased operational maturity, flexibility, and system resilience."</p> <p>Is the claim directed toward PEPs? If yes, is it not at least in part or perhaps implied, that PG&amp;E's increased operational maturity, flexibility, and resilience is also relying on other processes such as EPSS (last 10/1)?</p>	<p>Kevin Milar</p>	6/2/2023	6/9/2023	6/7/2023	<a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a>	0	NA	9.1.2	Public Safety Power Shutoff	Identification of Frequently De-Energized Grids
396	CPUC - SPD (Safety Policy Division)	009	CPUC - SPD (Safety Policy Division)_009	3	PUC - SPD (Safety Policy Division)_009	<p>PG&amp;E has less than the required number of personnel with required training for several categories in Table 5-2: PG&amp;E Personnel Training Programs for Wildfire and PEPs Events. Other tables related to staffing indicate if, for example, all staffing will complete training on time and reasons for not being completed in the setting of safely required provision. Why are there less than required values of personnel not completing the training?</p>	<p>Kevin Milar</p>	6/2/2023	6/9/2023	6/7/2023	<a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a>	0	NA	6.1.8.3	Grid Operations and Procedures	Personnel Work Procedures and Training in Conditions of Elevated Fire Risk
397	CPUC - SPD (Safety Policy Division)	009	CPUC - SPD (Safety Policy Division)_009	4	PUC - SPD (Safety Policy Division)_009	<p>PG&amp;E provides means to verify message receipt in Tables 8-40: PG&amp;E's Protocols for Emergency Communication to Stakeholder Crisis. How accurate is this receipt information with regard to verifying messages are reaching intended recipients/receivers to all intended safety outcomes (e.g. including, but not limited to, messages to be being sent to a new number or person no longer in the household)?</p>	<p>Kevin Milar</p>	6/2/2023	6/9/2023	6/7/2023	<a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a>	0	NA	8.4.4.1	Emergency Preparedness	Protocols for Emergency Communications
398	CPUC - SPD (Safety Policy Division)	009	CPUC - SPD (Safety Policy Division)_009	5	PUC - SPD (Safety Policy Division)_009	<p>PG&amp;E issues notifications to AFNMB responders. How does PG&amp;E know that these notifications are received and that contact information is up to date? Does PG&amp;E have a system to continuously/periodically verify that the contact information on file is current to help ensure such important notices are being received by the intended recipients?</p>	<p>Kevin Milar</p>	6/2/2023	6/9/2023	6/7/2023	<a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a>	0	NA	8.5.3	Community Outreach and Engagement	Engagement With Access and Functional Needs Populations
399	CPUC - SPD (Safety Policy Division)	009	CPUC - SPD (Safety Policy Division)_009	6	PUC - SPD (Safety Policy Division)_009	<p>PG&amp;E mentions pre-pandemic in-person engagement. Does PG&amp;E have data comparing pre-pandemic engagement to pandemic influenza engagement efforts and among other things, attendance? For instance, are there memos/data regarding non-AFNB and AFNBMB?</p>	<p>Kevin Milar</p>	6/2/2023	6/9/2023	6/7/2023	<a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a>	0	NA	8.5.3	Community Outreach and Engagement	Engagement With Access and Functional Needs Populations
400	CPUC - SPD (Safety Policy Division)	009	CPUC - SPD (Safety Policy Division)_009	7	PUC - SPD (Safety Policy Division)_009	<p>PG&amp;E states that if an AFN customer does not answer the door, the notification is considered successful if a door hanger is left. What utility policy/practice is PG&amp;E following that classifies a door hanger as a successful notification?</p>	<p>Kevin Milar</p>	6/2/2023	6/9/2023	6/7/2023	<a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a>	0	NA	8.5.3	Community Outreach and Engagement	Engagement With Access and Functional Needs Populations
405	CAI/PA	Sat WMP-26	CAI/PA_Sat WMP-26	1	CAI/PA_Sat WMP-26_01	<p>a) Please describe your general process or strategy for developing load forecasts. b) Do you have a written process or procedure for developing load forecasts? c) If the answer to (b) is "yes," provide a copy. d) If the answer to (b) is "no," explain why not.</p>	<p>Holly Waltherm</p>	7/27/2023	8/10/2023	8/10/2023	<a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a>	2	NA	8.1.2.2	Grid Design and System Hardening	Underpinning of Electric Lines and/or Equipment - Distribution
406	CAI/PA	Sat WMP-26	CAI/PA_Sat WMP-26	2	CAI/PA_Sat WMP-26_02	<p>a) Do you consider load growth projections when you determine which system hardening measures to deploy for wildfire mitigation purposes? b) If the answer to (a) is "yes," explain how load growth projections influence your mitigation selection process. c) If the answer to (a) is "no," explain why not.</p>	<p>Holly Waltherm</p>	7/27/2023	8/10/2023	8/10/2023	<a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a>	0	NA	8.1.2.2	Grid Design and System Hardening	Underpinning of Electric Lines and/or Equipment - Distribution
407	CAI/PA	Sat WMP-26	CAI/PA_Sat WMP-26	3	CAI/PA_Sat WMP-26_03	<p>a) When you plan system hardening projects for wildfire mitigation purposes, do you design projects to accommodate forecasted load growth? b) If yes, what degree of load growth do you design for? c) Describe your process for incorporating forecasted load growth into the design of system hardening projects (for instance, which scenarios of possible load growth are considered).</p>	<p>Holly Waltherm</p>	7/27/2023	8/10/2023	8/10/2023	<a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a> <a href="http://www.pge.com/pge_email/governance/epss/">http://www.pge.com/pge_email/governance/epss/</a>	0	NA	8.1.2.2	Grid Design and System Hardening	Underpinning of Electric Lines and/or Equipment - Distribution

408	CaPA	Sat WMP-26	CaPA_Sat WMP-26	4	CaPA_Sat WMP-26_O4	(a) In a hybrid bare conductor to covered conductor conversion project, is the intention to maintain, increase, or decrease the load capacity at peak operation temperatures? (b) Explain the reasoning for your response to part (a).	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution	<p>The intention behind covering bare conductor to covered conductor is to lower the risk of catastrophic wildfire. When converting from bare conductor to covered conductor, we ensure that we maintain the load capacity at peak, at a minimum. We also work with our Distribution Planning team to ensure the design for forecasted load growth where required.</p> <p>(a) Designing the system to maintain current capacity and voltage systems allows for continuity not only in the load profile and customer service expectations, but also switching capabilities we have established to handle regular operation and system maintenance.</p> <p>PG&amp;E designs for two basic systems in primary electric distribution: tap-line and mainline.</p> <p>Tap lines are typically served by fuses and interrupters and are generally served less than 100 amps. Our new minimum wire sizes are 1/0 aluminum conductor steel reinforced (ACSR) XLPFE line wire (pole conductor), 4/0 copper CU XLPFE line wire (corrosion), and 1/0 aluminum AL EPR for LGD. Each of these conductor sizes can serve greater than 100 amps so typically all of the load is forecasted higher in a change in protection either to a larger fuse or through the application of a fuseless interrupter. If the load forecast is higher than the load capacity through protection upgrades alone, we would consider extending additional mainline conductor through the area to offload the tap-line and providing a system capable of handling the load.</p> <p>Mainline are typically the backbone of the system served by circuit breakers and line restorers. Our wire sizes are 7/5.0 aluminum conductor (AAC) XLPFE line wire, 300.5 (AAC) XLPFE wire wire, 1.500 AL EPR for LG, and 600 AL EPR for mainline LG further out on the circuit. Each of these conductor/cable choices can serve more than 400 amps and are typically based on their forecasted load, voltage needs, reactive power flow, and operational capacity requirements in the area. Additional measures included in mainline design are voltage regulators, capacitors for reactive power management, mainline protection and SCADA, as well as considerations for new line and mainline to manage customer count and new business/forecasted improvements. In addition, where the load forecast may exceed our maximum wire size or capacity of the circuit, we may choose to install parallel feeders.</p> <p>(b) In general, new covered conductor systems are designed to accommodate forecasted growth in an area, where applicable, and for operational capacity requirements to support switching and regular maintenance. However, not all areas are forecasted to require additional capacity for regular or emergency loads.</p> <p>(c) Please see our response to subject (a).</p> <p>(d) In general, new underground systems are designed to accommodate forecasted growth in an area, where applicable, as well as for operational capacity requirements to support switching and regular maintenance. However, not all areas are forecasted to require additional capacity for regular or emergency loads.</p> <p>(e) Please see our response to subject (a).</p>
409	CaPA	Sat WMP-26	CaPA_Sat WMP-26	5	CaPA_Sat WMP-26_O5	(a) Are all new covered conductor installation projects designed to accommodate loads greater than current capacity for the same circuit? (b) If the answer to (a) is "yes", explain why not. (c) If the answer to (a) is "no", explain why not.	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution	<p>(a) In general, new underground systems are designed to accommodate forecasted growth in an area, where applicable, as well as for operational capacity requirements to support switching and regular maintenance. However, not all areas are forecasted to require additional capacity for regular or emergency loads.</p> <p>(b) Please see our response to subject (a).</p> <p>(c) In general, new underground systems are designed to accommodate forecasted growth in an area, where applicable, as well as for operational capacity requirements to support switching and regular maintenance. However, not all areas are forecasted to require additional capacity for regular or emergency loads.</p> <p>(d) Please see our response to subject (a).</p>
410	CaPA	Sat WMP-26	CaPA_Sat WMP-26	6	CaPA_Sat WMP-26_O6	(a) Are all overhead to underground conductor conversion projects designed to accommodate loads greater than current capacity for the same circuit? (b) If the answer to (a) is "yes", explain why not. (c) If the answer to (a) is "no", explain why not.	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution	<p>(a) In general, new underground systems are designed to accommodate forecasted growth in an area, where applicable, as well as for operational capacity requirements to support switching and regular maintenance. However, not all areas are forecasted to require additional capacity for regular or emergency loads.</p> <p>(b) Please see our response to subject (a).</p> <p>(c) In general, new underground systems are designed to accommodate forecasted growth in an area, where applicable, as well as for operational capacity requirements to support switching and regular maintenance. However, not all areas are forecasted to require additional capacity for regular or emergency loads.</p> <p>(d) Please see our response to subject (a).</p>
411	CaPA	Sat WMP-26	CaPA_Sat WMP-26	7	CaPA_Sat WMP-26_O7	Describe the challenges or advantages entailed in increasing load capacity on a circuit that has previously been handled with overhead conductor.	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution	<p>There are no significant differences in increasing load capacity on a circuit that has been handled with overhead conductor as compared to one that has not been handled. In each case, the engineering and construction team will be required to be required to support larger conductor or an additional overhead circuit. It might be possible to require physical system changes on overhead systems if it was already anticipated to support forecasted growth.</p> <p>The challenges or advantages associated with increasing capacity on an underground electric distribution system will differ depending on whether the underground system was built recently or in the past under different engineering and design standards. Based on current design standards and practices, it is likely that recent underground projects include physical capacity to support forecasted load growth in the areas of spare conductors or larger cables may have already been installed. However, if load capacity above the design of a recently built underground system is required, then additional cable systems and enclosures would likely need to be installed. In these cases, digging new existing underground infrastructure can be more difficult than installing underground assets in the first place, and finding locations for additional load growth without having to do additional trenching or installing additional conductors.</p> <p>If load capacity needs to increase on an underground system built before our current engineering and design standards, then any potential challenges would depend on the health of the existing underground system. If the existing conduit is compromised then it may not be possible to pull new cable through the existing conduit, and a more extensive rebuild would be required involving installing new conduit and, potentially, new enclosures as well. If the existing conduit is generally intact, it may be possible to pull new cable through that conduit to facilitate some load growth without significant effort.</p>
412	CaPA	Sat WMP-26	CaPA_Sat WMP-26	8	CaPA_Sat WMP-26_O8	Describe the challenges or advantages entailed in increasing load capacity on a circuit that has previously been handled with underground conductor.	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution	<p>The attachment to this response contains confidential material and is provided pursuant to the accompanying confidentiality declaration.</p> <p>In this response, PG&amp;E provides the requested data for the distribution circuits in our system. As agreed to, we plan to supplement this response with available data for the transmission circuits by Thursday, August 24, 2023.</p> <p>Please see "WMP-Discovery2023_DR_California0006-008-0009A010CONF" for a list of distribution circuits (subject (a)), 2022 peak load (subject (b)), and their capacity (subject (c)). The list of circuits includes other circuits included in the distribution planning process. Single-customer circuits, tie cables, and site circuits are not included. The 2022 data was obtained from SCADA measurements at distribution substation meters as part of the annual load forecasting process. This data was cleaned by Distribution Engineers to exclude switching and transformer distribution equipment supplemented with AMI data when SCADA data was not present. Please note, peak loads prior to 2022 include, in many instances, no longer relevant because circuit reconfigurations have occurred. In other words, the set of customers presently served by the circuit may not be the same set of customers served by the circuit in previous years. Please note, confidential load data that could reveal individual customer loading is indicated in grey.</p> <p>Please note, we do not model the secondary system nor record secondary distribution loading.</p>
413	CaPA	Sat WMP-26	CaPA_Sat WMP-26	9	CaPA_Sat WMP-26_O9	Provide a list of all circuits in your system. For each circuit, provide: (a) Circuit ID Number (b) Peak load in Amps observed since January 1, 2014. (c) Circuit Capacity in Amps.	1	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution	<p>The attachment to this response contains confidential material and is provided pursuant to the accompanying confidentiality declaration.</p> <p>In this response, PG&amp;E provides the requested data for the PG&amp;E owned active transmission circuits in our system that are calculated from telemetry and included in Energy Management System (EMS). Please note, we do not include information that do not relate between PG&amp;E's GIS system and the CAISO Transmission Register because the GIS system information included some distribution, site, inactive, or removed lines.</p> <p>Please see "WMP-Discovery2023_DR_California0006-008-0009A010CONF" for a list of transmission circuits (subject (a)), 2022 peak load (subject (b)), and their capacity (subject (c)).</p> <p>Where available, we selected the highest telemetered peak value for all line segments and all pieces of each segment. Where telemetered values were not available, the calculated readings were selected with the highest reading in the same segment. Please note, peak loads prior to 2022 are, in many instances, no longer relevant because circuit reconfigurations have occurred. In other words, the set of customers presently served by the circuit may not be the same set of customers served by the circuit in previous years. Additionally, based in the set of customers presently served by the circuit may not be the same set of customers served by the circuit in previous years. Please note, confidential load data that could reveal individual customer loading is indicated in grey.</p> <p>Please note, we do not model the secondary system nor record secondary distribution loading.</p> <p>*Normal Ampacity: The allowable continuous load that can be carried under normal conductor operating temperature.</p> <p>*Emergency Ampacity: Maximum load permitted for short duration in emergencies resulting from the outage of other facilities. Emergency loading is limited to four hours per day and should not exceed a total time of 100 hours in one year.</p> <p>PG&amp;E also notes that we do not maintain the data provided in this response in the format presented in "WMP-Discovery2023_DR_California0006-008-0009A010CONF" during the normal course of business. It was cross-referenced manually to response to Energy Subject 20.</p>
413	CaPA	Sat WMP-26	CaPA_Sat WMP-26	9SUPP	CaPA_Sat WMP-26_O9SUPP	Provide a list of all circuits in your system. For each circuit, provide: (a) Circuit ID Number (b) Peak load in Amps observed since January 1, 2014. (c) Circuit Capacity in Amps.	1	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution	<p>The attachment to this response contains confidential material and is provided pursuant to the accompanying confidentiality declaration.</p> <p>In this response, PG&amp;E provides the requested data for the PG&amp;E owned active transmission circuits in our system that are calculated from telemetry and included in Energy Management System (EMS). Please note, we do not include information that do not relate between PG&amp;E's GIS system and the CAISO Transmission Register because the GIS system information included some distribution, site, inactive, or removed lines.</p> <p>Please see "WMP-Discovery2023_DR_California0006-008-0009A010CONF" for a list of transmission circuits (subject (a)), 2022 peak load (subject (b)), and their capacity (subject (c)).</p> <p>Where available, we selected the highest telemetered peak value for all line segments and all pieces of each segment. Where telemetered values were not available, the calculated readings were selected with the highest reading in the same segment. Please note, peak loads prior to 2022 are, in many instances, no longer relevant because circuit reconfigurations have occurred. In other words, the set of customers presently served by the circuit may not be the same set of customers served by the circuit in previous years. Additionally, based in the set of customers presently served by the circuit may not be the same set of customers served by the circuit in previous years. Please note, confidential load data that could reveal individual customer loading is indicated in grey.</p> <p>Please note, we do not model the secondary system nor record secondary distribution loading.</p> <p>*Normal Ampacity: The allowable continuous load that can be carried under normal conductor operating temperature.</p> <p>*Emergency Ampacity: Maximum load permitted for short duration in emergencies resulting from the outage of other facilities. Emergency loading is limited to four hours per day and should not exceed a total time of 100 hours in one year.</p> <p>PG&amp;E also notes that we do not maintain the data provided in this response in the format presented in "WMP-Discovery2023_DR_California0006-008-0009A010CONF" during the normal course of business. It was cross-referenced manually to response to Energy Subject 20.</p>
414	CaPA	Sat WMP-26	CaPA_Sat WMP-26	10	CaPA_Sat WMP-26_O10	Provide updated GIS layers of primary distribution, secondary distribution, and transmission lines, with the following attributes: (a) Circuit ID Number (b) Peak load in Amps observed since January 1, 2014. (c) Circuit Capacity in Amps	1	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution	<p>The attachment to this response contains confidential material and is provided pursuant to the accompanying confidentiality declaration.</p> <p>Please refer to "WMP-Discovery2023_DR_California0006-008-0009A010CONF" for the requested GIS attributes for our primary distribution system. Line section attributes may include additional circuits not shown in the response (Q00). The list of circuits in Q000 includes those circuits that are studied as part of the distribution planning process. Single-customer circuits, tie cables, and site circuits are not included. Please note, this attachment contains confidential information. Also, we do not model the secondary distribution system nor record secondary distribution loading.</p> <p>As agreed to, PG&amp;E will provide a response to the portion of this request relating to transmission lines as a follow-up response by Thursday, August 24, 2023.</p>
414	CaPA	Sat WMP-26	CaPA_Sat WMP-26	10SUPP	CaPA_Sat WMP-26_O10SUPP	Provide updated GIS layers of primary distribution, secondary distribution, and transmission lines, with the following attributes: (a) Circuit ID Number (b) Peak load in Amps observed since January 1, 2014. (c) Circuit Capacity in Amps	1	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment - Distribution	<p>The attachment to this response contains confidential material and is provided pursuant to the accompanying confidentiality declaration.</p> <p>Please refer to "WMP-Discovery2023_DR_California0006-008-0009A010CONF" for the requested GIS attributes for our primary distribution system. Line section attributes may include additional circuits not shown in the response (Q00). The list of circuits in Q000 includes those circuits that are studied as part of the distribution planning process. Single-customer circuits, tie cables, and site circuits are not included. Please note, this attachment contains confidential information. Also, we do not model the secondary distribution system nor record secondary distribution loading.</p> <p>As agreed to, PG&amp;E will provide a response to the portion of this request relating to transmission lines as a follow-up response by Thursday, August 24, 2023.</p>
415	CaPA	Sat WMP-27	CaPA_Sat WMP-27	1	CaPA_Sat WMP-27_O1	The article states the following: "The California utility company PG&E spent about \$2.5 billion on a yearlong effort aimed at reducing wildfire risk by cutting or clearing more than a million trees growing alongside power lines." I now hope that work was highly effective and is advancing the program, according to an internal analysis reviewed by The Wall Street Journal and interviews with utility executives.	1	NA	8.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections	<p>PG&amp;E did not say that the work was highly effective. PG&amp;E provided the following materials to WSJ, however, PG&amp;E does not know how they were used. Please see description: "WMP-Discovery2023_DR_California0006-007-0001A0010" Please see part (a). (c) The materials were shared on July 25, 2023. (b) Not applicable. (d) Please see part (a).</p>

416	CAIPA	Sat WMP-27	CAIPA_Sat WMP-27	2	CAIPA_Sat WMP-27_02	<p>The article states the following: The California utility company PG&amp;E spent about \$2.5 billion on a yearlong effort aimed at reducing wildfire risk by cutting or clearing more than a million trees growing alongside power lines. It now says that work was largely ineffective and is abandoning the program, according to an internal analysis reviewed by The Wall Street Journal and interviewees with utility executives.</p> <p>a) Please list the utility executives who were interviewed by The Wall Street Journal as described in the article. b) For each executive listed in part (a), provide the date or dates the interview occurred. c) For each executive listed in part (a), please provide transcripts of the interview, if available.</p>	PG&E did not say that the work was largely ineffective. PG&E provided the following materials to WSJ: Review: PG&E did not know how they were using WSJ. Please see attachment "WMP-Discovery2023_DR_California-027-0004A01.mxd". a) The following PG&E executives were interviewed by The Wall Street Journal: - Sumner Singh, PG&E Executive Vice President, Operations and Chief Sustainability Officer - Peter Karmy, Senior Vice President, Major Infrastructure Delivery b) The interview occurred on July 25, 2023. c) PG&E does not have transcripts of the interview, but is providing the following audio recording of the interview. Please see attachment "WMP-Discovery2023_DR_California-027-0004A01.mxd".	Holly Walman	8/4/2023	8/19/2023	8/19/2023	<a href="https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study">https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study</a>	1	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
417	CAIPA	Sat WMP-27	CAIPA_Sat WMP-27	3	CAIPA_Sat WMP-27_03	<p>The article states the following: PG&amp;E now says that work was largely ineffective and is abandoning the program, according to an internal analysis reviewed by The Wall Street Journal and interviewees with utility executives.</p> <p>a) Please explain what is meant by the statement quoted above that the work described in the article was "largely ineffective." b) Please explain "largely ineffective."</p>	a) PG&E did not say that the work was largely ineffective. PG&E provided the following materials to WSJ: Review: PG&E did not know how they were using WSJ. Please see attachment "WMP-Discovery2023_DR_California-027-0004A01.mxd". Please see the recordings of the interviews provided in question 2. b) See recording in a)	Holly Walman	8/4/2023	8/19/2023	8/19/2023	<a href="https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study">https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study</a>	0	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
418	CAIPA	Sat WMP-27	CAIPA_Sat WMP-27	4	CAIPA_Sat WMP-27_04	<p>The article states the following: The California utility giant says the program, which involved creating wide spaces between fire wires and potentially hazardous trees, resulted in a 13% reduction in ignitions during periods when fire risk is highest, typically in autumn, according to the company's internal analysis. Measured across a full year, the work resulted in a 7% reduction in ignitions.</p> <p>a) Please provide the analysis and data to support the 13% reduction in ignitions during periods when fire risk was highest. b) Please provide the analysis and data to support the 7% reduction in ignitions across a full year.</p>	a) PG&E arrived at the analysis of 13% based on our risk from the assessment performed by the General Risk Team. This analysis reflects the use of year-round ignition data, however, historical ignitions and wildfires tend to more consistently occur during the autumn and are reflected in the contribution to the risk. For the purposes of this data request, PG&E summarized the analysis in attachment "WMP-Discovery2023_DR_California-027-0004A01.mxd". Here is a summary of the steps that arrived at such figure: - Based on the wildfire risk assessment for the years of 2015-2022, PG&E looked at the HFTD Ignition by Distribution. - Of which, approximately 52% of HFTD ignitions occurred from vegetation contact, contributing to 61% of the risk. - Based on the scope of EVM, to effectiveness to mitigate ignitions occurred only on a subset of sub-sections of vegetation failures. For example, Fall into the defect is 52% of the vegetation failures but 9% EVM effectiveness. - Based on the weighted effectiveness of the likelihood the type of vegetation failure and the contribution to risk, EVM's effectiveness is expected to be approximately 13%, as seen on slide 10. b) The 7% reduction in ignitions during a full year was based on an ongoing EVM effectiveness study based on actual EVM locations against historical performance. The study (attached "WMP-Discovery2023_DR_California-027-0004A02.pdf") examined several datasets including ignition events, PSPS damage and hazard events and outage events. However, due to limited sample size of ignition data at EVM locations, outages and PSPS damage and hazards were used as a proxy for ignition reduction. This assessment done in August 2022 showed that EVM reduced like-ally outages by 70%. For the other weather outage types, the statistical significance was too small to draw conclusions from the results. PG&E then made an error and multiplied the 70% by the outages ignition ratio of 8.7% to arrive at an incorrect 7% ignition reduction in a year. This multiplication is appropriate to calculate the expected count of ignitions reduced in a year where EVM is performed but not to calculate the percentage of ignitions reduced in a year. The above approximate is in fact the effectiveness of 20% outages reduction.	Holly Walman	8/4/2023	8/19/2023	8/19/2023	<a href="https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study">https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study</a>	2	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
419	CAIPA	Sat WMP-27	CAIPA_Sat WMP-27	5	CAIPA_Sat WMP-27_05	<p>In response to data request California-027-0004A01-14, question 5 on April 17, 2023, PG&amp;E stated that a) requested to complete the Substation Annual Abatement Effectiveness Study by July 14, 2023.</p> <p>a) Has PG&amp;E completed the Substation Annual Abatement Effectiveness Study? b) If the answer to part (a) is no, please state when PG&amp;E currently expects to complete the Substation Annual Abatement Effectiveness Study.</p>	a) We have not yet completed our Substation Annual Abatement Effectiveness Study in partnership with Electric Power Research Institute (EPRI). b) The EPRI study will incorporate industry benchmark data, which is taking longer than anticipated. Completion is expected by Q4 of 2024.	Holly Walman	8/4/2023	8/19/2023	8/19/2023	<a href="https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study">https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study</a>	0	NA	8.1.2.12.2	Grid Design and System Hardening	Other Technologies and Systems - Substation Annual Abatement
420	CAIPA	Sat WMP-27	CAIPA_Sat WMP-27	6	CAIPA_Sat WMP-27_06	<p>In response to data request TURN-PG&amp;E-1, question 2, on April 10, 2023, PG&amp;E stated the following: Additionally, we are in the process of finalizing a study that is planned to be completed by June 30, 2023. This study will assess the recorded reliability improvements at locations that have been undergrounded and/or have been hardened with covered conductor.</p> <p>a) Has PG&amp;E completed the study described above? b) If the answer to part (a) is yes, please provide a copy of any reports or other output from the study described above. c) If the answer to part (a) is no, please state when PG&amp;E currently expects to complete the study described above.</p>	a) We have not yet completed the above referenced study. b) Not applicable. c) PG&E currently expects to complete the study in October 2023.	Holly Walman	8/4/2023	8/19/2023	8/19/2023	<a href="https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study">https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study</a>	0	NA	NA	NA	NA
421	CAIPA	Sat WMP-27	CAIPA_Sat WMP-27	7	CAIPA_Sat WMP-27_07	<p>Please provide a copy of PG&amp;E's 2022 Annual Electric Reliability Report. This should be similar to the documents provided in TURN in response to TURN-PG&amp;E-1, question 2, on April 10, 2023.</p>	Please see "WMP-Discovery2023_DR_California-027-0007A01.pdf" for a copy of our 2022 Annual Electric Reliability Report.	Holly Walman	8/4/2023	8/19/2023	8/19/2023	<a href="https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study">https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study</a>	1	NA	NA	NA	NA
422	CAIPA	Sat WMP-28	CAIPA_Sat WMP-28	1	CAIPA_Sat WMP-28_01	<p>RN-PG&amp;E-23-02 Page 35 of PG&amp;E's response states, "PG&amp;E is currently working to integrate OC with our execution processes to drive quality during initial work execution." a) Describe how PG&amp;E will integrate OC with execution processes. b) Describe the OC and QA processes in place at the beginning of 2023 for a detailed distribution inspection. Describe the process from start to finish from any QA actions that occur prior to the inspection, continuing through the inspection, and ending when the OC and QA are both complete. c) Describe the OC and QA processes that PG&amp;E is proposing—in which OC will be integrated with execution processes—for a detailed distribution inspection. As specified in the previous part, describe the process from start to finish. d) State the percentage of distribution asset inspections that will undergo the integrated OC process that PG&amp;E is proposing.</p>	a) Completed inspection locations enter the queue of OC-eligible locations; b) OC completes their review of the OC-eligible locations through desktop and/or field reviews; c) OC shares any OC failures with the SI execution team; d) OC completed locations become eligible for QA sampling. WMP-Discovery2023_DR_California-028-0001 Page 2 e) QA performs statistical sampling of OC-completed locations per the 95% confidence and 5% margin of error criteria described in the WMP. f) QA auditors perform the field audits as identified during the sampling process. g) QA audits are reviewed by QA subject matter experts (SME) for accuracy and completeness; h) Once approved by a QA SME, a QA audit location is marked as complete; i) QA shares any findings data back to the SI and SI execution teams. j) Please see the responses to subparts (a) and (b) for a description of our OC and QA processes. We intend to further integrate OC with execution, as described in subpart (a), during the second and third bullets of the processes described in subpart (b). PG&E is continuing to explore additional opportunities for further integration of the execution and OC functions. k) PG&E is pursuing OC to 30% of all System Inspections following the to-be-integrated model within HFTD, barring external factors.	Holly Walman	8/19/2023	8/19/2023	8/19/2023	<a href="https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study">https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study</a>	0	NA	8.1.6	Quality Assurance and Quality Control	NA
423	CAIPA	Sat WMP-28	CAIPA_Sat WMP-28	2	CAIPA_Sat WMP-28_02	<p>RN-PG&amp;E-23-02 Page 35 of PG&amp;E's response states, "PG&amp;E is currently working to integrate OC with our execution processes to drive quality during initial work execution." a) How will PG&amp;E track the quality of asset inspection work under the integrated OC process (which was previously tracked as a OC pass rate)? b) What metrics or measures will PG&amp;E use to identify a possible downward trend in the quality of asset inspection work?</p>	a) The quality of asset inspection work is being tracked by using data on OC failures to inform dashboard and plans, which give visibility into opportunities for improvement in initial work execution, during quality of the source. Where applicable, PG&E will also continue to track OC pass rates as we have done previously. b) PG&E will track pass rates, among other data, to track the finding types which are reviewed with stakeholders to formulate data-driven plans of action. Where applicable, PG&E will also continue to review OC pass rates.	Holly Walman	8/19/2023	8/19/2023	8/19/2023	<a href="https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study">https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study</a>	0	NA	8.1.6	Quality Assurance and Quality Control	NA
424	CAIPA	Sat WMP-28	CAIPA_Sat WMP-28	3	CAIPA_Sat WMP-28_03	<p>RN-PG&amp;E-23-02 Table 8-7.1 (Revised) on page 36 of PG&amp;E's response states that PG&amp;E will perform field QA audits on 500 inspection locations and 1500 distribution locations. a) Provide a breakdown of the 500 transmission locations by inspection type. For example, how many of these locations will each detailed ground inspections, how many will audit aerial inspections, etc. b) Provide a breakdown of the 1500 distribution locations by inspection type. For example, how many of these locations will each detailed ground inspections, how many will audit aerial inspections, how many will audit panel inspections, etc.</p>	a) All QA audit locations are sourced from completed OC ground or desktop audit locations. Both ground and desktop OC locations have an equal but random likelihood of appearing in the QA sample. Due to the random nature of sampling, it is not possible to determine in advance the quantities of each inspection type which may appear in the QA sample. b) Please see the responses to subpart (a) for an explanation of how distribution locations are sourced. The process is the same for distribution locations as it is for transmission locations. c) Type: Type A/B/C 2022 Pass Rate Results 2023 YTD Pass Rate Results (Data as of 7/25/2023) OC Complete Diversity as of 7/25/2023 OC Complete of System Inspections Total as of 7/25/2023 Transmission Field 80.1% 98.4% 61.240 51.05% Desktop 92.1% 98.7% 22.300 76.49% Distribution Field 79.3% 87% 22.430 56.07% Desktop 95.7% 94.2% 61.000 41.5% WMP-Discovery2023_DR_California-028-0004 Page 2 d) Our improved pass rates are the result of the continuous improvements our teams have made since Energy Safety issued the 2022 Revision Notice and which we described in both our 2022 and 2023 WMPs. In particular, the system inspectors and OC organizations have weekly collaboration sessions to explore improvement opportunities, identify gaps in our processes, address challenges and review trends. Furthermore, in addition to the internal improvements we have made, as of July 15, 2023, we have created 74 additional PG&E compliance inspector positions across our service territory, as well as an supervisor position.	Holly Walman	8/19/2023	8/19/2023	8/19/2023	<a href="https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study">https://www.pge.com/eng/about-us/press-releases/2023/08/19/pg-e-announces-2023-annual-abatement-effectiveness-study</a>	0	NA	8.1.6	Quality Assurance and Quality Control	NA



437	CAIPA	Sat WMP-26	CAIPA_Sat WMP-26	16	CAIPA_Sat WMP-26_C16	<p>RN-PCAE-23-05 Page 6 of PCAE's response states, "There are 79 circuit segments that are not included in an underground plan and have not been hardened. In place of these circuit segments, PCAE chose to add different circuit segments to the portfolio that could be undergrounded more efficiently. PCAE manages wildfire risk on these 79 circuit segments through a portfolio of Comprehensive Monitoring and Data Collection and Operational Mitigations described above." a) Has PCAE considered overhead hardening on the 79 circuit segments described in this section? b) If the answer to part (a) is yes, why did PCAE not add overhead hardening as a mitigation for these 79 circuit segments? c) If the answer to part (a) is no, explain why not.</p>	Holly Walman	8/10/2023	8/15/2023	8/15/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of electric lines and/or equipment
438	CAIPA	Sat WMP-26	CAIPA_Sat WMP-26	17	CAIPA_Sat WMP-26_C17	<p>RN-PCAE-23-06 Table RN-PCAE-23-06-2 on page 72 of PCAE's response compares the mileage in the top 20% of WYE, the top 20% of WDM, and the top 20% of WDM-0. a) Is our understanding from PCAE's response to ACQ PGE-23-04 and its 2023-2025 WMP that the list of circuit segments ranked by WYE is based on the risk scores from WDM-0 and the feasibility scores of undergrounding in other words, in the formula above, the WDM-0 risk score appears in the numerator and the feasibility of undergrounding appears in the denominator? b) Please confirm or correct the understanding stated in (a). c) Does the list of circuit segments ranked by WYE incorporate risk scores from WDM-0? If yes, describe how.</p>	Holly Walman	8/10/2023	8/15/2023	8/15/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of electric lines and/or equipment
439	CAIPA	Sat WMP-26	CAIPA_Sat WMP-26	18	CAIPA_Sat WMP-26_C18	<p>RN-PCAE-23-05 Page 73 of PCAE's response states, "Based on our further evaluation, the preliminary updated mitigation effectiveness for undergrounding, considering the residual risk from secondary and service lines, is approximately 97.7 percent compared to the 99 percent." a) Describe how PCAE calculated the effectiveness of 97.7 percent? b) Provide supporting data and worksheets for your response to part (a).</p>	Holly Walman	8/10/2023	8/15/2023	8/15/2023	1	NA	8.2.2	Vegetation Management and Inspections	Vegetation Management Inspections
440	CAIPA	Sat WMP-26	CAIPA_Sat WMP-26	19	CAIPA_Sat WMP-26_C19	<p>RN-PCAE-23-07 Page 103 of PCAE's response states, "The TAT was developed to be the scope of the EVM program. With the conclusion of EVM, PCAE has decided to discontinue the use of the TAT and will be moving forward with industry standard assessment called the TRAO form starting in 2024. The scope of FTI is similar to the scope of EVM (approximately 1,800 miles), which applies to TAT but not TRAO form for the scope of FTI." a) Describe the ways in which the TAT and TRAO form are similar. b) Describe the ways in which the TAT and TRAO form are different.</p>	Holly Walman	8/10/2023	8/15/2023	8/15/2023	2	NA	8.2.2	Vegetation Management and Inspections	Vegetation Management Inspections
441	CAIPA	Sat WMP-26	CAIPA_Sat WMP-26	20	CAIPA_Sat WMP-26_C20	<p>RN-PCAE-23-07 Page 104 of PCAE's response states, "Given that we began working with the ISA TRAO in 2023, data does not lend to objectively compare effectiveness differences between ISA TRAO and the TAT." a) Does PCAE plan to perform a study or analysis to compare the effectiveness of the TAT and the ISA TRAO? This may include, for example, performing a subset of FTI work using both tools. b) If the answer to part (a) is no, please describe the only PCAE plans to perform, and the data PCAE plans to conduct the study. c) If the answer to part (a) is no, please explain why not.</p>	Holly Walman	8/10/2023	8/15/2023	8/15/2023	0	NA	8.2.2	Vegetation Management and Inspections	Vegetation Management Inspections
442	011	OES_011	OES_011	1	OES_011_C01	<p>Regarding distribution detailed ground inspections a. On page 444 of its revised WMP, PCAE states that it will shift from inspecting all HTD Tier 3 distribution assets annually and Tier 2 assets every three years, to inspecting severe and extreme consequence plant maps annually and other consequence plant maps every three years. b. Please provide the number of assets/structures (using the same asset/structure definition as WMP R2 table 1.1.3, page 465) located in HTD Tier 3. c. Please provide the number of assets/structures (using the same asset/structure definition as WMP R2 table 1.1.3, page 465) located in HTD Tier 2. d. Describe any performance metrics PCAE has developed related to this approach and any metrics for OES.</p>	Dakota Smith	8/16/2023	8/23/2023	8/23/2023	0	NA	8.1.3.2.1	Asset Inspections	Detailed Ground Inspection
443	011	OES_011	OES_011	2	OES_011_C02	<p>Regarding PCAE's Grid Design and Maintenance Quality Control a. In its Revision Notice Response, PCAE states that it is "working to integrate OC with [the] execution processes... this approach will create real-time feedback to coach and guide workers... and that minimum sample sizes and pass rate larger "would" under PCAE's feasibility" (Page 30). b. Describe this approach, including the similarities and differences from the current and previous approach to OC. c. Provide the timeline for integrating this approach. d. Describe the estimated sample sizes for this approach. These sample sizes may either represent physical assets PCAE will inspect per year (e.g., PCAE will inspect 3,000 circuit miles in each year of the WMP cycle), or how PCAE determines the sample sizes for OC (i.e., the criteria for when and where PCAE performs OC). e. Describe any performance metrics PCAE has developed related to this approach and any metrics for OES.</p>	Dakota Smith	8/16/2023	8/23/2023	8/23/2023	0	NA	8.1.6	Quality Assurance and Quality Control	NA
444	011	OES_011	OES_011	3	OES_011_C03	<p>Regarding PCAE's Vegetation Management Quality Control a. In its Revision Notice Response, PCAE states that it is "working to integrate OC with [the] execution processes... this approach will create real-time feedback to coach and guide workers... and that minimum sample sizes and pass rate larger "would" under PCAE's feasibility" (Page 30). b. Describe this approach, including the similarities and differences from the current and previous approach to OC. c. Provide the timeline for integrating this approach. d. Describe the estimated sample sizes for this approach. These sample sizes may either represent physical assets PCAE will inspect per year (e.g., PCAE will inspect 3,000 circuit miles in each year of the WMP cycle), or how PCAE determines the sample sizes for OC (i.e., the criteria for when and where PCAE performs OC). e. Describe any performance metrics PCAE has developed related to this approach and any metrics for OES.</p>	Dakota Smith	8/16/2023	8/23/2023	8/23/2023	0	NA	8.1.6	Quality Assurance and Quality Control	NA
445	CPUC - SPD (Safety Policy Division)	010	CPUC - SPD (Safety Policy Division)	010	CPUC - SPD (Safety Policy Division)	<p>Provide the attached spreadsheet with information summarized from Table 11 of PCAE's most recently submitted DOR (01 2023 submitted Aug 1).</p>	Kevin Mlar	8/24/2023	9/1/2023	8/31/2023	1	NA	QDR	NA	NA
446	012	OES_012	OES_012	1	OES_012_C01	<p>001. Regarding PCAE's Response to RN-PCAE-23-07 a. Considering that there are no fields in OEWIM to collect Level 2 inspection data, the TRAO form will not be updated and the Focused Tree Inspection procedure will require inspectors to take a photo of completed TRAO forms, what data and information do PCAE plan to use to perform field-based quality control on Level 2 inspections performed under Focused Tree Inspections? b. Describe the quality control procedure for Focused Tree Inspections. c. How are the paper TRAO forms generated through Focused Tree Inspections collected and stored by PCAE? d. For Focused Tree Inspections, Routine, and Second Patrol e. How and where does the inspector document report factors that contributed to an inspector's designation of a tree as a hazard, or not a hazard, and any resulting statement prescription? f. If PCAE does not record the information, justify why it does not record the information. g. In response to remedy 1, PCAE states that it plans to only inspect part of its Areas of Concern through the Focused Tree Inspections. What PCAE's process in determining the Areas of Concern that will be inspected? h. In PCAE's response to Data Request WMP-2023-PGAE-01, Question 2, PCAE describes a tool called its Asset Assessment Tool (TAT) in 2022. i. Was this tool used operationally? j. If so, when was it operational? (i.e., used by all inspectors in the field to perform tree risk assessment under EVM) k. If not, why was it not operational? l. Provide the most recent version of updated TAT, even if that version was not operationalized. m. Provide any reports regarding the 2022 update of the TAT, including, but not limited, documentation of methodology, application, internal review, and external feedback. n. In response to remedy 1, PCAE states that the current residual risk due to the Tier 2 Remedial Inventory is 7% of vegetation risk in the HTD-4 Area PCAE's analysis regarding the "percent of vegetation risk" assumes that 100% of the vegetation risk in the HTD can be mitigated? o. If so, justify this assumption. p. If not, what percentage of vegetation risk does PCAE estimate it can mitigate in the HTD? q. In response to remedy 1, PCAE states that it expects to update Distribution Inspection Procedures to achieve improved risk reduction of approximately 3 percent over the legacy Distribution Inspection Procedures to follow the entry rules of the following table: Scenario Risk Rating Backup</p>	Dakota Smith	8/30/2023	9/27/2023	9/27/2023	4	NA	8.2.2.2.5	Vegetation Management and Inspections	Focused Tree Inspections
447	012	OES_012	OES_012	2	OES_012_C02	<p>002. Regarding PCAE's Response to RN-PCAE-23-03 a. In its response regarding to EPSS, PCAE states that it "has not detailed mitigation effectiveness analysis at this time. These analyses are being developed based on subject matter expertise while empirical data is being collected." b. Explain what is meant by this statement, particularly given PCAE has provided effectiveness estimates for EPSS in its 2023-2025 WMP. PCAE provides an estimated effectiveness of 68% for EPSS in 2022. Is this still an accurate effectiveness estimate? If not, why? c. How does PCAE plan on calculating a more updated effectiveness estimate? What factors is PCAE including in its calculation?</p>	Dakota Smith	8/30/2023	9/25/2023	9/25/2023	0	NA	8.1.2.10	Grid Design and System Hardening	Downed Conductor Detection Devices



456	CAIPA	Sat WMP-20	CAIPA_Sat_WMP-20	7	CAIPA_Sat_WMP-20_07	<p>a) To address EPSC's system reduction benefit, EPSC protection settings are designed to provide (1) faster fault detection and clearing within 100ms, (2) reduced loss-of-single-phase operation, and (3) higher impedance fault detection. Accordingly, by definition our EPSC device protection settings must restrain sensitive isolation zones on our circuits (such as fused taps) and detect faults beyond fuses and de-energize all three phases within 100ms when a fault is detected, such as a line or branch coming into contact with our lines.</p> <p>With EPSC active, outages that would otherwise occur but normally be isolated on smaller zones within our system (e.g., such as fused tap outages) may result in larger zones or circuit-level outages impacting a greater number of customers across a larger geographic area but not necessarily resulting in an increase in the number of outages. Accordingly, the number of outages may increase under certain operating conditions but be electrically isolated to smaller portions of our system. In a small number of cases, we have experienced outages that were not related to switching activities associated with planned work. In those instances, we have worked to place weather on existing point and restoration procedures to expedite the restoration of those outages.</p> <p>The number of outages in the HFRA from May to October increased significantly from 2021 to 2022. Additionally, the number of outages in the HFRA during the same time period was only slightly higher in 2022 (8,140 outage events) than in 2021 (6,138 outage events) before EPSC was enabled.</p> <p>b) Please see the graphic below showing an example fused tap that, when EPSC settings are enabled and a fault occurs downstream of either of the fuses, the system would de-energize to LRE level as opposed to being the restoration to the distribution bus.</p>	Holly Welham	9/7/2023	9/27/2023	9/27/2023	<p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p>	0	NA	8.1.1.1	Grid Operations and Procedures	Protective Equipment and Device Settings
457	CAIPA	Sat WMP-20	CAIPA_Sat_WMP-20	8	CAIPA_Sat_WMP-20_08	<p>Page 2 of PG&amp;E's reply comments filed on September 1, 2023, states, "The number of outages in the HFRA from May to October decreased significantly from 2021 to 2022. Additionally, the number of outages in the HFRA during the same time period was only slightly higher in 2022 (8,140 outage events) than in 2021 (6,138 outage events) before EPSC was enabled. Per PG&amp;E's quarterly data reports, PG&amp;E generally experienced fewer RFW circuit mile days in 2022 than in 2020."</p> <p>02000 20206 C1 C2 C3 C4 C1 C2 C3 C4 Rtd Flag Warning overhead circuit mile days - HFTD tier 2 1,708 65,320 105,120 0.00 38.182 272.0 Rtd Flag Warning overhead circuit mile days - HFTD tier 3 0 1,346 25,214 95,324 0.02 839 749.0</p> <p>a) No. PG&amp;E performed a study to compare the weather-normalized number of outages in 2020, 2021, and 2022 to determine changes in the weather-normalized outage count across the three years? This may include, for example, normalizing the number of outages by RFW days, high wind days, high temperature days, or some other metric or set of metrics.</p> <p>b) If the answer to part (a) is yes, please explain how PG&amp;E normalized the outage counts by weather.</p> <p>c) If the answer to part (a) is yes, please provide the results of any such study or analysis.</p> <p>d) If the answer to part (a) is no, please explain why not.</p>	Holly Welham	9/7/2023	9/27/2023	9/27/2023	<p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p>	0	NA	7.2.1	Wildfire Mitigation Strategy Development	Overview of Mitigation Initiatives and Activities
458	OES	013	OES_013	1	OES_013_01	<p>It is unclear from statements in its revised 2023-2025 WMP (printed 8/7) whether PG&amp;E uses probability distributions or maximum values in its risk score calculations—(a) based on (b) multiplied by consequences (C/E) On page 173-174 (section 8) PG&amp;E discusses how a classifier system is used to calculate mean (average) MAIVs by asset which are then aggregated to a risk score.</p> <p>These extrapolations of how consequences are calculated in section 8 appears inconsistent with Table 9.2.2.1 on page 868 (section 9), the table states maximum population impact from Technovision simulation is used to calculate safety consequences and that maximum tailing impact from Technovision simulation is used to calculate safety consequences.</p> <p>To address this data request:</p> <p>1. Please indicate whether the consequence component of PG&amp;E's risk score calculations (C/E) uses averages or maximum values.</p> <p>2. If PG&amp;E uses maximum values in the consequence component of its risk score calculations, please indicate which maximum values it uses and explain why maximum values are used instead of averages.</p>	Dakota Smith	9/8/2023	9/13/2023	9/13/2023	<p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p>	0	NA	6.1.1.1	Risk Score Calculations	NA
459	TURN	014	TURN_014	1	TURN_014_01	<p>On September 11, 2023, PG&amp;E submitted a request to supplement its 2023-2025 WMP submission, to which OES responded on September 13, 2023. PG&amp;E's request indicated that PG&amp;E wishes to update confidential information responsive to items raised in the 2023-2025 Revision Notice.</p> <p>Please provide all documents (and the redactions) associated with responding to OES' comments in PG&amp;E's response to the Revision Notice that were created on or after August 2, 2023 (the date of PG&amp;E's response to the Revision Notice) that reflect communication between an employee or other representative of PG&amp;E and an employee or other representative of OES related to PG&amp;E's 2023-2025 WMP. Please exclude from the response documents that are publicly available through the OES website, such as data requests from OES and PG&amp;E's responses to such data requests.</p>	Tom Long	9/15/2023	9/20/2023	9/20/2023	<p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p>	1	NA	NA	NA	NA
460	OES	014	OES_014	1	OES_014_01	<p>D01. Regarding Wildfire Benefit Cost Analysis</p> <p>a. In PG&amp;E's Supplemental Revision Notice Response, PG&amp;E states that it "will be moving away from the WFE to a Wildfire Benefit Cost Analysis (WBCA) at the circuit segment level" (p. 78) to how does PG&amp;E WBCA factor in feasibility?</p> <p>b. How does PG&amp;E determine which initiatives are used in combination when evaluating asset effectiveness (e.g., the examples in Table RWPC&amp;E-23-01-3 shows overhead conductor work EPSC and DCO)? Please provide the calculations used for the monetized risk values shown in Table RWPC&amp;E-23-01-3, p. 84.</p> <p>c. How is PG&amp;E calculating the monetized risk avoidance risk avoidance on 820?</p> <p>d. PG&amp;E also states that it plans to present the benefit-cost model and mitigation selection results using this model in our Service Risk (SR) Risk plan that we intend to file with Energy Safety" (p. 82)</p> <p>1. What is PG&amp;E's timeline for the development and implementation of WBCA? This should include (but not be limited to) when PG&amp;E is planning on presenting from WFE to WBCA, as well as when WBCA's underlying and supporting plans will begin to be informed by WBCA opposed to WFE.</p> <p>2. Has PG&amp;E analyzed the prioritization or mitigation selection difference between implementing WFE vs. WBCA? If so, provide all such supporting analysis.</p>	Dakota Smith	10/6/2023	10/11/2023	10/11/2023	<p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p>	0	NA	8.1.2.2	Grid Design and System Hardening	Underpinning of electric bus and/or equipment
461	OES	014	OES_014	2	OES_014_02	<p>D02. Regarding backlog risk reduction</p> <p>a. Provide PG&amp;E's calculations for risk reduction percentages broken down annually for both the initial open tag reduction targets in PG&amp;E's Table PG&amp;E-8.1.7.2 (PG&amp;E's original 2023-2025 Wildfire Mitigation Plan, p. 455) compared to the revised Table PG&amp;E-8.1.7.2 (PG&amp;E's latest 2023-2025 WMP as filed with its Supplemental Revision Notice Response, p. 555). This should include a discussion of how PG&amp;E's calculations for risk reductions, as well as both risk impact and overall risk impact.</p> <p>b. Provide PG&amp;E's overall calculations for risk reduction percentages for the original 2023-2025 WMP plan for addressing backlog compared to PG&amp;E's new plan for addressing backlog as outlined in its Supplemental Revision Notice Response. This should also account for any new risks introduced from delays in responding to Priority E and F tags that may fall under OES requirements due to backlog. This should include a discussion of how PG&amp;E's calculations for risk reductions, as well as both a reduction in risk units and overall risk impact.</p> <p>c. Explain the difference between percent risk units and the % risk impact as shown in Table RWPC&amp;E-23-04-2 (p. 85) (for instance, 2023 has a 48 percent risk unit reduction, but only a 2.4 percent risk impact reduction).</p>	Dakota Smith	10/6/2023	10/11/2023	10/11/2023	<p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p> <p><a href="https://www.pge.com/wa/epsc/epsc-mitigation-plan">https://www.pge.com/wa/epsc/epsc-mitigation-plan</a></p>	0	NA	8.1.7	Open Work Orders	NA



462	MGRA	Data Request No. 7	MGRA_Data_Requsrt No. 7	1	MGRA_Data_Requsrt No. 7_G1	<p>PG&amp;E has 30 Public Safety Specialists (PSS) at the expert and senior levels. Below, we describe the general roles, levels, responsibilities, and qualifications of the PSS team. After the narrative, we provide a table that lists the minimum and desired qualifications for PSS experts and seniors.</p> <p>Generally, a PSS is responsible for serving as the point of contact for county office of emergency services (CES), fire and law enforcement agencies. The PSS also facilitates conversations with and works with public works departments, contractors, excavators, fire insurers, utilities and other specialized groups within PG&amp;E's service territory and provides on-site support to PG&amp;E and agency responders during emergencies. Additionally, the position supports gas and electric regulatory compliance matters, the delivery of the Community Wildfire Safety Program and the Public Safety Power Shutoff Program, wildfire readiness efforts, and emergency planning efforts across all Functional Areas.</p> <p>PSS teams are structured regionally. Collectively, the teams are a diverse group of specialists with varying degrees of experience in the spread modeling, traffic control and evacuation, and wildfire firefighting and suppression. Experience in these areas is generally based on their previous emergency management experience.</p> <p>PSS team members who previously worked in law enforcement or fire agencies have extensive experience in traffic control and evacuation modeling because that task generally falls to law enforcement agencies during a wildfire fire or other disaster. Team members who had previous careers in law enforcement generally held executive level positions within their respective agencies.</p> <p>PSS staff who previously worked for wildfire fire agencies, such as CAL FIRE, USDA Forest Service, National Park Service, and the Bureau of Land Management have extensive experience in wildfire firefighting and suppression, with some limited to fire spread modeling using Technosoft or other simulation tools. These team members often are very knowledgeable about traffic control and evacuation modeling. Most of our team members who had previous careers in firefighting held the position of Chief Officer and above.</p> <p>PSS staff who came from firefighting within local government agencies such as counties, cities, and special districts have varying degrees of experience in the spread modeling, traffic control and evacuation, and wildfire firefighting and suppression based on the size and jurisdiction of the department in which they worked.</p> <p>Ingress and egress concerns are not determined solely by the potential for falling poles. The PSS considers many factors when evaluating ingress and egress concerns in a complex or rapidly expanding wildfire fire including:</p> <ul style="list-style-type: none"> <li>- Population density</li> <li>- Time of day (there are differences between evacuating communities at night when most people are at home compared to during the day when fewer people are at home).</li> <li>- Amount of time the public would need to evacuate or shelter in place</li> <li>- Notifications and information made available to the public</li> <li>- Road infrastructure (e.g., road size, number of lanes, type of surface, direction)</li> <li>- Fuel types along an evacuation corridor (e.g., grass vs. brush vs. timber)</li> <li>- Weather (Weather conditions (e.g., wet fuel days including high temperatures, high winds, low relative humidity)</li> <li>- Topography (steep slope evacuation routes place evacuees in danger due to steep slopes, drainage, and chimneys along a corridor which are often associated with extreme fire behavior)</li> <li>- Human factors (e.g., ability, social needs, evacuating large and small pets, knowledge or experience of citizens living in high fire hazard areas)</li> <li>- Location of overhead electrical assets (e.g., poles proximately to the roads shoulder and conductor crossing over those ingress/egress thoroughfares should they become impacted by fire and fall onto the evacuation corridor)</li> <li>- Fuelbeds (grass (e.g., corridor, base, side of easement, stream areas, etc.)</li> </ul>	Joseph Mitchell	10/9/2023	10/12/2023	10/12/2023	0	NA	8.4.4.1	Emergency Preparedness	Protocols for Emergency Communication
463	MGRA	Data Request No. 7	MGRA_Data_Requsrt No. 7	2	MGRA_Data_Requsrt No. 7_G2	<p>See ingress and egress concerns determined solely by the potential for falling poles or does the PSS team also analyze the potential for entrapment by fast moving wildfires and/or re-entrant outcrops?</p>	Joseph Mitchell	10/9/2023	10/12/2023	10/12/2023	0	NA	8.1.3	Asset Inspectors	NA
464	MGRA	Data Request No. 7	MGRA_Data_Requsrt No. 7	3	MGRA_Data_Requsrt No. 7_G3	<p>How representative is the prior PSS score of the entire circuit? Specifically:</p> <ol style="list-style-type: none"> <li>How many hardening projects are there per circuit? Provide a distribution if possible.</li> <li>What fraction does the hardening project typically take of the circuit? Provide a distribution if possible.</li> <li>Show how EPS scores are determined and how these compare against WDRM v3.</li> <li>Are PSS mitigations being used as an assumed incorporation of the risk model or is it used as an independent decision tree branch point?</li> <li>What fraction of underground projects is used as the primary assessment and make the determination to underground?</li> <li>Provide the fraction for cases where PSS mitigations was only one of many factors used in the determination to underground.</li> </ol>	Joseph Mitchell	10/9/2023	10/12/2023	10/12/2023	1	NA	8.1.3	Asset Inspectors	NA
465	CAIPA	Set WMP-30	CAIPA_Set WMP-30	1	CAIPA_Set WMP-30_G1	<p>The data requested relates to PG&amp;E's Wildfire Distribution Risk Model version 4 (hereinforth referred to as "WDRM v4"). If any of the requested documents or information is not yet complete and available, please state in your response when you expect the documents or information to be complete and available.</p> <ol style="list-style-type: none"> <li>Please list all distinct risk scores generated by PG&amp;E's WDRM v4. For example, WDRM v3 generated 17 different risk scores.4</li> <li>For each risk score in part (a), please provide a category or brief description of the type of risk the score represents.</li> <li>For each risk score in part (a), please provide a brief explanation of how PG&amp;E intends to use that risk score.</li> <li>For each risk score in part (a), please state the most granular level available for that risk score. For example, in WDRM v3, the most granular level available would be the risk scores associated with individual 100m x 100m cells.</li> <li>For each risk score in part (a), please state the granularity at which the risk score is used to inform wildfire mitigation initiatives (e.g. circuit segment, circuit, individual asset, etc.)</li> </ol>	Holly Walman	10/11/2023	10/25/2023	10/23/2023	0	NA	2022 WMP Section 4.5	Model Metrics and Calculation Methodologies	NA
466	CAIPA	Set WMP-30	CAIPA_Set WMP-30	2	CAIPA_Set WMP-30_G2	<p>The data requested relates to PG&amp;E's Wildfire Distribution Risk Model version 4 (hereinforth referred to as "WDRM v4"). If any of the requested documents or information is not yet complete and available, please state in your response when you expect the documents or information to be complete and available.</p> <ol style="list-style-type: none"> <li>Please list all composite (or aggregate) risk scores generated by PG&amp;E's WDRM v4. For example, WDRM v3 generated five composite risk scores.</li> <li>For each risk score in part (a), please provide a category or brief description of the type of risk the score represents.</li> <li>For each risk score in part (a), please provide a brief explanation of how PG&amp;E intends to use that risk score.</li> <li>For each risk score in part (a), please list all PG&amp;E wildfire mitigation initiatives that are informed by that risk score.</li> <li>For each risk score in part (a), please state the most granular level available for that risk score.</li> <li>For each risk score in part (a), please state the granularity at which the risk score is used to inform wildfire mitigation initiatives (e.g. circuit segment, circuit, individual asset, etc.)</li> </ol>	Holly Walman	10/11/2023	10/25/2023	10/23/2023	0	NA	2022 WMP Section 4.5	Model Metrics and Calculation Methodologies	NA
467	CAIPA	Set WMP-30	CAIPA_Set WMP-30	3	CAIPA_Set WMP-30_G3	<p>The following questions refer to the risk scores generated from WDRM v4. This should be understood to refer to PG&amp;E's responses to questions 1 and 2 above.</p> <p>Please provide a GIS file that details the most granular level (as discussed in questions 1(a) and 2(a)) available for each risk score identified in questions 1(a) and 2(a). This file should contain the following:</p> <ol style="list-style-type: none"> <li>Geometric features detailing the most granular level available for each risk score. This may be polygons that depict "lines," lines that depict circuit segments, points that depict assets, or other geometry that best suits the relevant risk scores. If multiple risk scores share geometry (e.g., multiple risk scores that are calculated at the "line" level), there is no need to include multiple layers that depict the same physical geometry.</li> <li>For each geometric feature, please include all relevant risk scores from questions 1(a) and 2(a) as attributes.</li> <li>For each geometric feature, include the circuit segment name as an attribute.</li> <li>As needed, include unique identification for each geometric feature (e.g., asset ID, substation name, etc.)</li> </ol>	Holly Walman	10/11/2023	10/25/2023	10/23/2023	0	NA	2022 WMP Section 4.5	Model Metrics and Calculation Methodologies	NA
468	CAIPA	Set WMP-30	CAIPA_Set WMP-30	4	CAIPA_Set WMP-30_G4	<p>The following questions refer to the risk scores generated from WDRM v4. This should be understood to refer to PG&amp;E's responses to questions 1 and 2 above.</p> <p>Please provide a GIS file that details the risk scores at the same granularity that is currently used to inform wildfire mitigation measures (as discussed in questions 1(a) and 2(a)). This file should contain the following:</p> <ol style="list-style-type: none"> <li>Geometric features detailing the relevant geometry for each risk score. This may be polygons that depict "lines," lines that depict circuit segments, points that depict assets, or other geometry that best suits the relevant risk scores. If multiple risk scores share geometry (e.g., multiple risk scores that are calculated at the "line" level), there is no need to include multiple layers that depict the same physical geometry.</li> <li>For each geometric feature, please include all relevant risk scores from questions 1(a) and 2(a) as attributes.</li> <li>For each geometric feature, include the circuit identification number as an attribute.</li> <li>For each geometric feature, include the circuit name as an attribute.</li> <li>For each geometric feature, include the circuit segment name as an attribute.</li> <li>As needed, include unique identification for each geometric feature (e.g., asset ID, substation name, etc.)</li> </ol>	Holly Walman	10/11/2023	10/25/2023	10/23/2023	0	NA	2022 WMP Section 4.5	Model Metrics and Calculation Methodologies	NA

469	CAIPA	Sat WMP-30	CAIPA_Sat WMP-30	5	CAIPA_Sat WMP-30_05	<p>The following questions refer to the risk scores generated from WDRM v4. This should be understood to refer to PG&amp;E's responses to questions 1 and 2 above.</p> <p>Please provide a spreadsheet that lists (in rows) each circuit-segment that is included in the Wildlife Distribution Risk Model v4. This spreadsheet should include, at minimum, the following columns:</p> <ol style="list-style-type: none"> <li>Name or ID number of each circuit-segment.</li> <li>Circuit name for the circuit that each segment is part of.</li> <li>Circuit ID for the circuit that each segment is part of.</li> <li>Natural voltage.</li> <li>The peak current of the circuit-segment (CAI Advocates understands this to be the number of 100m x 100m pixels analyzed by the WDRM v4 along the length of the circuit-segment).</li> <li>The average risk value associated with each pixel along the circuit-segment. (In previous versions of the risk model, this was referred to as the "mean MAVF core risk" or "mean risk").</li> <li>Total overhead circuit-miles on the circuit-segment.</li> <li>Total overhead circuit-miles on the circuit-segment.</li> <li>Total Tier 2 overhead circuit-miles on the circuit-segment.</li> <li>Total Tier 3 overhead circuit-miles on the circuit-segment.</li> <li>Total underground circuit-miles on the circuit-segment.</li> <li>Total non-HFTD underground circuit-miles on the circuit-segment.</li> <li>Total Tier 2 underground circuit-miles on the circuit-segment.</li> <li>Total Tier 3 underground circuit-miles on the circuit-segment.</li> <li>Each risk score (each in a separate and labeled column) identified in question 1(a) that is used at the circuit-segment level to inform wildlife mitigation initiatives. (May require multiple columns.)</li> <li>Each composite risk score (each in a separate and labeled column) identified in question 2(a) that is used at the circuit-segment level to inform wildlife mitigation initiatives. (May require multiple columns.)</li> </ol>	<p>a) - c) As stated in the Responses to Questions 001 - 004, the WDRM v4 is not currently available. PG&amp;E plans to make the model information available with the 2025 WMP Update.</p>	Holly Waltem	10/12/2023	10/25/2023	10/23/2023	0	NA	2022 WMP Section 4.5	Model Metrics and Calculation Methodologies	NA
470	CAIPA	Sat WMP-30	CAIPA_Sat WMP-30	6	CAIPA_Sat WMP-30_06	<p>The following questions refer to the risk scores generated from WDRM v4. This should be understood to refer to PG&amp;E's responses to questions 1 and 2 above.</p> <p>a) Has E3 or another entity performed an independent review of the WDRM v4?</p> <p>b) If the answer to part (a) is yes, please provide a copy of any report and output from the independent review of the WDRM v4?</p> <p>c) If the answer to part (a) is no, does PG&amp;E plan to have E3 or a similar entity perform an independent review of the WDRM v4?</p> <p>d) If the answer to part (c) is no, please explain why not.</p> <p>e) If the answer to part (c) is yes, when does PG&amp;E expect the review to be completed?</p>	<p>a) - e) The WDRM v4 is currently under review by E3. PG&amp;E expects that the E3 review will be completed and available with the 2025 WMP Update.</p>	Holly Waltem	10/12/2023	10/25/2023	10/23/2023	0	NA	2022 WMP Section 4.5	Model Metrics and Calculation Methodologies	NA
471	CAIPA	Sat WMP-30	CAIPA_Sat WMP-30	7	CAIPA_Sat WMP-30_07	<p>The following questions refer to the risk scores generated from WDRM v4. This should be understood to refer to PG&amp;E's responses to questions 1 and 2 above.</p> <p>a) Has PG&amp;E created a detailed overview document that details the WDRM v4, similar to the "2021 Wildlife Distribution Risk Model Overview" that PG&amp;E submitted following the public workshop held on October 5 and 6, 2021?</p> <p>b) If the answer to part (a) is yes, please provide a copy of the document.</p> <p>c) If the answer to part (a) is no, does PG&amp;E plan to create such a document?</p> <p>d) If the answer to part (c) is no, please explain why not.</p> <p>e) If the answer to part (c) is yes, when does PG&amp;E expect the document to be completed?</p>	<p>a) - e) As stated in the response to Questions 001 - 005, the WDRM v4 is not currently available. PG&amp;E plans to make the model information available with the 2025 WMP Update. Along with the model information, PG&amp;E anticipates preparing a similar document as part of the 2025 WMP Update.</p>	Holly Waltem	10/12/2023	10/25/2023	10/23/2023	0	NA	2022 WMP Section 4.5	Model Metrics and Calculation Methodologies	NA
472	CAIPA	Sat WMP-30	CAIPA_Sat WMP-30	8	CAIPA_Sat WMP-30_08	<p>The following questions refer to the risk scores generated from WDRM v4. This should be understood to refer to PG&amp;E's responses to questions 1 and 2 above.</p> <p>Page 76 of PG&amp;E's 2023-2025 Wildlife Mitigation Plan Supplemental Response to Revision Notice, September 27, 2023 states: "When we begin using the WDRM v4 and incorporating it with the WBCA (Wildlife Benefits Cost Analysis), our existing and future projects will include wildlife risk reduction, reliability benefits, public safety, project costs, long-term savings and other factors that present a more fulsome view into the costs and benefits of our proposed projects."</p> <p>a) Does the WDRM v4 include an estimation of reliability benefits, as discussed in the above quote? Please explain if yes.</p> <p>b) Does the WDRM v4 include an estimation of public safety, as discussed in the above quote? Please explain if yes.</p> <p>c) Does the WDRM v4 include an estimation of project costs, as discussed in the above quote? Please explain if yes.</p>	<p>a) - c) The WDRM v4 scope does not include the estimated benefits requested in parts a, b, and c. Reliability benefits, public safety, and project costs will be considered as part of the WBCA and are not part of the WDRM v4.</p>	Holly Waltem	10/12/2023	10/25/2023	10/23/2023	0	NA	2022 WMP Section 4.5	Model Metrics and Calculation Methodologies	NA
473	CAIPA	Sat WMP-31	CAIPA_Sat WMP-31	1	CAIPA_Sat WMP-31_01	<p>The following questions pertain to PG&amp;E's 2023 - 2025 WMP Revision 3, submitted on September 27, 2023, Section 8.1.7 - Open Work Orders.</p> <p>On page 530 of year 2023 - 2025 WMP R3, PG&amp;E provided a table (Table 8-8-1) showing the total number of past due transmission asset work orders by age and HFTD tier. Please provide an updated version of Table 8-8-1 as of September 30, 2023.</p> <p>Number of Past Due Transmission Asset Work Orders Categorized by Age (through September 30, 2023)</p> <p>HFTD Area 1 - 30 Days 31 - 60 Days 61 - 90 Days 91 - 180 Days 181+ Days</p> <p>Non - HFTD 30 Days 31 - 60 Days 61 - 90 Days 91 - 180 Days 181+ Days</p> <p>HFTD Tier 1 HFTD Tier 2 HFTD Tier 3</p>	<p>Please see the table below for the requested information.</p> <p>Number of Past Due Transmission Asset Work Orders Categorized by Age (through September 30, 2023)</p> <p>HFTD Area 1 - 30 Days 31 - 60 Days 61 - 90 Days 91 - 180 Days 181+ Days</p> <p>Non - HFTD 30 Days 31 - 60 Days 61 - 90 Days 91 - 180 Days 181+ Days</p> <p>HFTD Tier 1 158,566 1765 1148</p> <p>HFTD Tier 2 3 62 54 98 836</p>	Holly Waltem	10/12/2023	10/26/2023	10/26/2023	0	NA	8.1.7	Open Work Orders	NA
474	CAIPA	Sat WMP-31	CAIPA_Sat WMP-31	2	CAIPA_Sat WMP-31_02	<p>The following questions pertain to PG&amp;E's 2023 - 2025 WMP Revision 3, submitted on September 27, 2023, Section 8.1.7 - Open Work Orders.</p> <p>On page 530 of year 2023 - 2025 WMP R3, PG&amp;E provided a table (Table 8-8-1) showing the total number of past due transmission asset work orders by age and HFTD tier. Please provide a similar table for past due distribution asset work orders by age and HFTD tier. Please provide a similar table for past due distribution asset work orders by age and HFTD tier.</p> <p>Number of Past Due Distribution Asset Work Orders Categorized by Age (through September 30, 2023)</p> <p>HFTD Area 1 - 30 Days 31 - 60 Days 61 - 90 Days 91 - 180 Days 181+ Days</p> <p>Non - HFTD 30 Days 31 - 60 Days 61 - 90 Days 91 - 180 Days 181+ Days</p> <p>HFTD Tier 1 HFTD Tier 2 HFTD Tier 3</p>	<p>Please see the table below for the requested information.</p> <p>Number of Past Due Distribution Asset Work Orders Categorized by Age (through September 30, 2023)</p> <p>HFTD Area 1 - 30 Days 31 - 60 Days 61 - 90 Days 91 - 180 Days 181+ Days</p> <p>Non - HFTD 18,454 38,327 41,357 200,643</p> <p>HFTD Tier 1 1,183 15,617 25,168 60,981</p> <p>HFTD Tier 2 220,268 847 60,907</p>	Holly Waltem	10/12/2023	10/26/2023	10/26/2023	0	NA	8.1.7	Open Work Orders	NA
475	CAIPA	Sat WMP-31	CAIPA_Sat WMP-31	3	CAIPA_Sat WMP-31_03	<p>The following questions pertain to PG&amp;E's 2023 - 2025 WMP Revision 3, submitted on September 27, 2023, Section 8.1.7 - Open Work Orders.</p> <p>On page 557 of year 2023 - 2025 WMP R3, PG&amp;E stated with regard to distribution asset work orders, "PG&amp;E is unable to provide the number of past due asset work orders, categorized by age, in the HFTD, as stated above."</p> <p>a) Please list the reasons why PG&amp;E was unable to provide the number of past due asset work orders, categorized by age, in the HFTD, as stated above.</p> <p>b) Please list any steps PG&amp;E has taken to improve its ability to provide the number of past due asset work orders, categorized by age, in the HFTD.</p>	<p>a) At the time of filing the 2023 - 2025 WMP, PG&amp;E did not have the capability to extract the data at the granularity requested. Therefore, PG&amp;E was unable to provide the number of past due asset work orders and, therefore, submit the Quarterly Data Report, Table 2, metric 7 as a proxy to generate the number of past due asset work orders.</p> <p>b) Throughout 2023, PG&amp;E has improved its "data" extraction capabilities and is now able to provide the data at the requested granularity. This capability has improved by employing additional data scientists and creating automated scripting possibilities. The same automated process will now allow us to pull data more quickly and at the granularity desired.</p>	Holly Waltem	10/12/2023	10/26/2023	10/26/2023	0	NA	8.1.7	Open Work Orders	NA
476	CAIPA	Sat WMP-31	CAIPA_Sat WMP-31	4	CAIPA_Sat WMP-31_04	<p>The following questions pertain to PG&amp;E's 2023 - 2025 WMP Revision 3, submitted on September 27, 2023, Section 8.1.7 - Open Work Orders - Distribution Tags in PG&amp;E's 2023 - 2025 WMP R3 discuss a subset of open work orders referred to as "ignition-risk" tags. Please provide a table similar to Table 8-8-1 for all past due, ignition-risk, distribution asset work orders by age and HFTD tier, as of September 30, 2023.</p> <p>Number of Ignition Risk "Past Due Distribution Asset Work Orders Categorized by Age (through September 30, 2023)</p> <p>HFTD Area 1 - 30 Days 31 - 60 Days 61 - 90 Days 91 - 180 Days 181+ Days</p> <p>Non - HFTD 30 Days 31 - 60 Days 61 - 90 Days 91 - 180 Days 181+ Days</p> <p>HFTD Tier 1 HFTD Tier 2 HFTD Tier 3</p>	<p>Please see the table below for the requested information.</p> <p>Number of Ignition Risk "Past Due Distribution Asset Work Orders Categorized by Age (through September 30, 2023)</p> <p>HFTD Area 1 - 30 Days 31 - 60 Days 61 - 90 Days 91 - 180 Days 181+ Days</p> <p>Non - HFTD 33,205 454 2,077</p> <p>HFTD Tier 1 1,911 1,408 23,626 60,512</p> <p>HFTD Tier 2 146 120 753 55,157</p>	Holly Waltem	10/12/2023	10/26/2023	10/26/2023	0	NA	8.1.7	Open Work Orders	NA
477	CPUC - SPD (Safety Policy Division)	011	CPUC - SPD (Safety Policy Division)_011	1	CPUC - SPD (Safety Policy Division)_011	<p>Provide calculations that justify Table RN-PG&amp;E-23-05-3. Explain specifically how Risk Avoidance over Lifetime Benefits is calculated from Total Risk. (page 85 of PG&amp;E's 2023-2025 Wildlife Mitigation Plan (WMP) - Supplemental Revision Notice Response)</p>	<p>In Critical Issue RN-PG&amp;E-23-05, PG&amp;E explained that in response to the Commission's decision in the Risk-Based Decision-Making Framework (RBDMF), 1 we are in the process of constructing a benefit-cost model. The model will incorporate benefit elements of the mitigation selection decision-making process into an analytical model. PG&amp;E calls this the Wildlife Benefits Cost Analysis (WBCA) tool.</p> <p>In RN-PG&amp;E-23-05 PG&amp;E provided an example of the output from the WBCA model for two mitigation alternatives at two circuit segments (Table RN-PG&amp;E-23-05-3). PG&amp;E explained that the WBCA model is currently under development and is not yet fully developed, approved, or implemented within PG&amp;E.</p> <p>We also explained that the workbooks submitted in the 2023-2025 WMP is based on PG&amp;E's Wildlife Distribution Risk Model (WDRM) and uses the 2023-2025 projects included in the WMP workbooks were selected using the WBCA.</p> <p>The WBCA is being developed to support PG&amp;E's 10-year (2023-2033) underground plan and we anticipate finalizing the WBCA for that submission in 2024. We anticipate eventually using the WBCA to inform project selection for PG&amp;E's long-term underground plan and future WMPs.</p> <p>Because the WBCA is still in development, PG&amp;E is not in a position to respond to either of the questions in this data request.</p>	Henry Sweet	10/12/2023	10/12/2023	10/17/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of electric lines and/or equipment
477	CPUC - SPD (Safety Policy Division)	012	CPUC - SPD (Safety Policy Division)_012	1	CPUC - SPD (Safety Policy Division)_012	<p>Provide calculations that justify Table RN-PG&amp;E-23-05-3. Explain specifically how Risk Avoidance over Lifetime Benefits is calculated from Total Risk. (page 85 of PG&amp;E's 2023-2025 Wildlife Mitigation Plan (WMP) - Supplemental Revision Notice Response)</p>	<p>Please see "WMP-December2023_OR_SPD_012-0001A001.xlsx" for the visual and underlying data. The chart has not been updated. PG&amp;E expects to update the chart in Q2 of 2024 as part of the Risk Assessment and Mitigation Phase (RAMMP) filing. Please note there are non-monetary components to the visual data below. Both the dataset and the chart are not available for public review.</p>	Henry Sweet	11/13/2023	11/15/2023	11/14/2023	1	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of electric lines and/or equipment
478	CPUC - SPD (Safety Policy Division)	011	CPUC - SPD (Safety Policy Division)_011	2	CPUC - SPD (Safety Policy Division)_011	<p>Provide a numerical justification that shows the risk from outages or other sources for EPSS compares to benefits of EPSS lines and/or equipment, when 1) SPD would prefer the analysis performed only cost benefit ratios to that shown in Table RN-PG&amp;E-23-05-3.</p>	<p>Please see PG&amp;E's response to Question 1 of this data request.</p>	Henry Sweet	10/12/2023	10/12/2023	10/17/2023	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of electric lines and/or equipment

479	CAIPA	Sat WMP-32	CAIPA_Sat WMP-32	1	CAIPA_Sat WMP-32_01	<p>Please provide the following data for the years 2020, 2021, 2022, and 2023:</p> <p>a) Number of miles of overhead distribution that POSE installed as part of overhead-to-undergrounding conversion projects for the purpose of wildfire risk reduction.</p> <p>b) Number of miles of overhead distribution POSE removed as part of the same projects in part (a).</p>	Holly Welman	10/31/2023	1/14/2023	1/14/2023	<a href="https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_01.pdf">https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_01.pdf</a>	0	NA	7.2.2.1	Wildfire Mitigation Strategy Development	Projected Overall Risk Reduction
480	CAIPA	Sat WMP-32	CAIPA_Sat WMP-32	2	CAIPA_Sat WMP-32_02	<p>Please provide the same information as requested in Question 1 for undergrounding projects that fall into each of the following categories:</p> <p>a) Rule 20 undergrounding</p> <p>b) Wildfire related undergrounding</p> <p>c) Any other undergrounding not included in Question 1 or parts a and b of this question.</p>	Holly Welman	10/31/2023	1/14/2023	1/14/2023	<a href="https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_02.pdf">https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_02.pdf</a>	0	NA	8.1.2.2	Grid Design and System Hardening	Undergrounding of Electric Lines and/or Equipment – Distribution
481	CAIPA	Sat WMP-32	CAIPA_Sat WMP-32	3	CAIPA_Sat WMP-32_03	<p>Please provide copies of all current, sole-source contracts POSE has executed with other entities with regard to any of the following:</p> <p>a) Suppliers of materials related to distribution undergrounding projects.</p> <p>b) Entities who assist POSE with planning, permitting, environmental review, and other similar non-construction tasks related to distribution undergrounding projects.</p> <p>c) Any other entities who provide goods or services to POSE in relation to distribution undergrounding projects.</p>	Holly Welman	10/31/2023	12/1/2023	12/1/2023	<a href="https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_03.pdf">https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_03.pdf</a>	5	NA	8.1.2	Grid Design, Operations, and Maintenance	Grid Design and System Hardening
482	CAIPA	Sat WMP-32	CAIPA_Sat WMP-32	4	CAIPA_Sat WMP-32_04	<p>Describe all vegetation management activities that POSE typically performs around the following line types. In your responses to parts (b) through (f), please describe if, and in what ways, POSE's vegetation management activities for that category meaningfully differ compared to your response to part (a):</p> <p>a) Aboveground distribution mains located in HFTD/HFRA.</p> <p>b) Aboveground distribution secondaries located in HFTD/HFRA.</p> <p>c) Aboveground distribution services located in HFTD/HFRA.</p> <p>d) Right-of-way for underground distribution located in HFTD/HFRA.</p>	Holly Welman	10/31/2023	1/14/2023	1/14/2023	<a href="https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_04.pdf">https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_04.pdf</a>	0	NA	8.2	Vegetation Management and Inspections	NA
483	CAIPA	Sat WMP-32	CAIPA_Sat WMP-32	5	CAIPA_Sat WMP-32_05	<p>Please estimate the typical, annual cost per mile of vegetation management activities that POSE performs around the following line types:</p> <p>a) Aboveground distribution mains located in HFTD/HFRA.</p> <p>b) Aboveground distribution secondaries located in HFTD/HFRA.</p> <p>c) Aboveground distribution services located in HFTD/HFRA.</p> <p>d) Right-of-way for underground distribution located in HFTD/HFRA.</p>	Holly Welman	10/31/2023	1/14/2023	1/14/2023	<a href="https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_05.pdf">https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_05.pdf</a>	9	NA	8.2	Vegetation Management and Inspections	NA
484	CAIPA	Sat WMP-32	CAIPA_Sat WMP-32	6	CAIPA_Sat WMP-32_06	<p>CAI Associates understands that, in every project to replace overhead bare distribution with covered conductor, POSE performs pole loading calculations for every pole in the project.</p> <p>a) Do the above calculations concern? Please elaborate if correct.</p> <p>b) Does POSE have a threshold safety factor (or other result from a pole loading calculation) at which it will replace poles in a project?</p> <p>c) If the answer to part (b) is yes, please describe POSE's threshold(s).</p> <p>d) If the answer to part (b) is no, please explain how POSE determines which poles to replace in a project.</p>	Holly Welman	10/31/2023	1/14/2023	1/14/2023	<a href="https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_06.pdf">https://www.pge.com/content/dam/pge/customer_service/CAIPA/CAIPA_Sat_WMP-32_06.pdf</a>	1	NA	7.2	Wildfire Mitigation Strategy	Wildfire Mitigation Strategy



494	CAIPA	Sat WMP-34	CAIPA_Sat WMP-34	4	CAIPA_Sat WMP-34_04	<p>PG&amp;E's 2023 WMP R5, p. 1045, states "Name changes including the absorption of CPZs into others resulting in the original CPZ no longer existing. Additionally, in 415 in Table 9-2 of the 2023 WMP (Underpinning Workflows) states, "(a) PG&amp;E often changes circuit segment names when additional segmenting devices are placed on the grid or other design changes result in switching nodes." (b) Describe PG&amp;E's circuit segment naming convention when a segmenting device is installed or other grid change occurs (e.g., is a segmenting device placed on the CPZ into and the line placed after which the name change) would go into effect (e.g., immediately after grid change, end of month, end of fiscal year, etc.). (c) Have any of the EPSS with EPSS enabled had a change of name from month to month in the EPSS Monthly Report to SED, since the first EPSS report was submitted? (d) If the answer to part (b) is yes, provide a list with previous names), current name, date the name change occurred, and the reason for the name change, description of the state of the CPZ (e.g., active or inactive). NOTE: This should include immediate name changes to CPZ A that then becomes CPZ A and CPZ B in March 2022, but then in March 2023 CPZ B becomes CPZ C such that CPZ B no longer exists.</p>	Justin Hegler	12/12/2023	1/22/2024	1/22/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	0	NA	8.1.8.1.1	Grid Operations and Procedures	Protective Equipment and Device Settings
495	CAIPA	Sat WMP-34	CAIPA_Sat WMP-34	5	CAIPA_Sat WMP-34_05	<p>Provide an Excel spreadsheet of all distribution circuits in HTDs or High Fire Risk Areas (HFRAs), or crossing HTD and HFA boundaries, existing as of January 1, 2023 (see rows that include the following information in separate columns:  a) Circuit Name  b) Circuit ID  c) City  d) County  e) Division (e.g., Los Padres District #)  f) Date PG&amp;E first activated EPSS settings on any part of the circuit?  g) Total Customers  h) Number of CPZs contained on the circuit  i) Circuit SAIDI for 2017  j) Circuit SAIDI for 2018  k) Circuit SAIFI for 2017  l) Circuit SAIFI for 2018  m) Circuit SAIFI for 2019  n) Circuit SAIFI for 2020  o) Circuit SAIFI for 2021</p>	Justin Hegler	12/12/2023	1/22/2024	1/22/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	1	NA	8.1.8.1.1	Grid Operations and Procedures	Protective Equipment and Device Settings
496	CAIPA	Sat WMP-34	CAIPA_Sat WMP-34	6	CAIPA_Sat WMP-34_06	<p>Please divide the data presented in question 5 into performance quartiles based on SAIDI and SAIFI. (An example table is included below the question options.)  a) Of the distribution circuits listed in response to Question 5, identify in an Excel spreadsheet format, the best performing (i.e., circuits experiencing the least number of sustained outages) 25% circuits by average combined SAIFI for years 2017 to 2019 in each of your divisions.  b) Of the distribution circuits listed in response to Question 5, identify in an Excel spreadsheet format the worst performing (i.e., circuits experiencing the most sustained outages) 25% circuits by average combined SAIFI for years 2017 to 2019 in each of your divisions.  c) Of the distribution circuits listed in response to Question 5, identify in an Excel spreadsheet format the best performing SAIDI (i.e., circuits experiencing the shortest duration of sustained outages) 25% circuits by average combined SAIDI for years 2017 to 2019 in each of your divisions.  d) Of the distribution circuits listed in response to Question 5, identify in an Excel spreadsheet format the worst performing SAIDI (i.e., circuits experiencing the longest duration of sustained outages) 25% circuits by average combined SAIDI for years 2017 to 2019 in each of your divisions.</p> <p>Example Table: Question 6, Part a)  Division:  Circuit Name:  Average SAIFI 2017-2019:  Los Padres:  San Francisco 1101  1.08  Los Padres:  Los Angeles 1102  1.01  North Valley:  Sacramento 1103  1.06</p>	Justin Hegler	12/12/2023	1/22/2024	1/22/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	0	NA	8.1.8.1.1	Grid Operations and Procedures	Protective Equipment and Device Settings
497	CAIPA	Sat WMP-34	CAIPA_Sat WMP-34	7	CAIPA_Sat WMP-34_07	<p>Provide an Excel table that lists (see rows) each sustained outage that occurred from January 1, 2017 through December 31, 2022 on any of the circuits identified in your response to Question 6. For each outage, the Excel table should include the following information in separate columns:  a) Outage ID  b) Circuit Name  c) Circuit ID  d) Division  e) Was EPSS enabled on this circuit at the time of the outage?  f) What was this circuit made EPSS-capable?  g) P/N (Firm Name)  h) Outage End Day &amp; Time  i) CEO (Count of Customers Experiencing Sustained Outage)  j) Customer Minutes  k) Cause (if known)  l) Was the circuit identified in response to the nomenclature outages?</p>	Justin Hegler	12/12/2023	1/22/2024	1/22/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	2	NA	8.1.8.1.1	Grid Operations and Procedures	Protective Equipment and Device Settings
498	CAIPA	Sat WMP-34	CAIPA_Sat WMP-34	8	CAIPA_Sat WMP-34_08	<p>Provide an Excel table that lists (see rows) each momentary outage that occurred from January 1, 2017 through December 31, 2022 on any of the circuits identified in your response to Question 6. For each outage, the Excel table should include the following information in separate columns:  a) Outage ID  b) Circuit Name  c) Circuit ID  d) Division  e) Was EPSS enabled on this circuit at the time of the outage?  f) What was this circuit made EPSS-capable?  g) P/N (Firm Name)  h) Outage End Day &amp; Time  i) CEO (Count of Customers Experiencing Sustained Outage)  j) Customer Minutes  k) Cause (if known)  l) Was the circuit identified in response to the nomenclature outages?</p>	Justin Hegler	12/12/2023	1/22/2024	1/22/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	1	NA	8.1.8.1.1	Grid Operations and Procedures	Protective Equipment and Device Settings
499	CAIPA	Sat WMP-34	CAIPA_Sat WMP-34	9	CAIPA_Sat WMP-34_09	<p>Regarding PG&amp;E's 2021 Reliability Report, PG&amp;E stated "Basic reliability projects have been initiated on Carlsbadville 1101 circuit to enhance the impacts of EPSS, and taking a more surgical approach in applying EPSS settings when the circuit is most at risk." However, PG&amp;E did not report an EPSS outage for Carlsbadville 1101 in 2021. PG&amp;E's first reported outage on Carlsbadville 1101 was on July 24, 2022, 10 months after the 2021 Reliability Report was published. Please explain this discrepancy.</p>	Justin Hegler	12/12/2023	1/19/2024	1/19/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	0	NA	8.1.8.1.1	Grid Operations and Procedures	Protective Equipment and Device Settings
500	CAIPA	Sat WMP-34	CAIPA_Sat WMP-34	10	CAIPA_Sat WMP-34_10	<p>Regarding PG&amp;E's 2021 Reliability Report, PG&amp;E stated "Basic reliability project has been initiated on Otter 1102 circuit to enhance the impacts of EPSS, and taking a more surgical approach in applying EPSS settings when the circuit is most at risk." However, PG&amp;E did not report an EPSS outage for Otter 1102 in 2021. PG&amp;E's first reported outage on Otter 1102 was on August 15, 2022, 13 months after the 2021 Reliability Report was published. Please explain this discrepancy.</p>	Justin Hegler	12/12/2023	1/19/2024	1/19/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	0	NA	8.1.8.1.1	Grid Operations and Procedures	Protective Equipment and Device Settings
501	CAIPA	Sat WMP-34	CAIPA_Sat WMP-34	11	CAIPA_Sat WMP-34_11	<p>In PG&amp;E's November 2023 EPSS Monthly report, PG&amp;E reported that there have been 20 outages on EPSS-enabled Transmission lines (T-EPSS) outages in the year to date.  a) Are there downstream outages (e.g., distribution outages) that may be caused from a saturation that may be fed by the transmission line that result from outages that occur on EPSS-enabled transmission line?  b) Did any of the 20 reported T-EPSS outages in 2023 cause downstream impacts to other transmission or distribution customers?  c) If the answer to part (b) is yes, please describe the extent of the downstream impacts.  d) If the answer to part (b) is yes, are those downstream outages reported as EPSS outages in PG&amp;E's monthly EPSS reports or in any other reporting method?  e) If the answer to part (b) is yes, why did PG&amp;E not have a backup or contingency transmission circuit(s) in place to avoid downstream distribution outages?</p>	Justin Hegler	12/12/2023	1/19/2024	1/19/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	0	NA	8.1.8.1.1	Grid Operations and Procedures	Protective Equipment and Device Settings
502	CAIPA	Sat WMP-35	CAIPA_Sat WMP-35	1	CAIPA_Sat WMP-35_01	<p>In Table 9-2 of PG&amp;E's 2023-2025 WMP R4 submitted January 8th, 2024, PG&amp;E indicates that system hardening is being carried out for certain frequently de-energized circuits. Please update Table 9-2 by providing the estimated completion year and quarter for each of the mitigation actions listed in the right-most column (Measures taken or planned to be taken to reduce the need for and impact of future "PSPF" of circuit), if the timetable for completion is unknown or undetermined, please so state.</p>	Franky Luo	2/7/2024	2/23/2024	2/23/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	1	NA	9.1.2	Identification of Frequently De-Energized Devices	NA
503	CAIPA	Sat WMP-35	CAIPA_Sat WMP-35	1	CAIPA_Sat WMP-35_01	<p>PG&amp;E provided the following table in the response to CallAdvocates-POE 2023WMP-06 question 5. Please provide an updated table showing actual values for 2023 and forecast values for 2024 with the DTM transitional programs disaggregated into the three initiatives described in PG&amp;E's response to CallAdvocates-POE 2023WMP-06 Q5.</p> <p>1. Tree Removal Inventory  2. Focused Tree Inspections  3. VM for Operational Mitigations.</p>	Franky Luo	3/8/2024	3/28/2024	3/28/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	0	NA	NA	Vegetation Management	NA
504	CAIPA	Sat WMP-35	CAIPA_Sat WMP-35	2	CAIPA_Sat WMP-35_02	<p>PG&amp;E provided the following table in the response to CallAdvocates-POE 2023WMP-06 question 5. Please provide an updated table showing actual values for 2023 and forecast values for 2024 with the DTM transitional programs disaggregated into the three initiatives described in PG&amp;E's response to CallAdvocates-POE 2023WMP-06 Q5.</p> <p>1. Tree Removal Inventory  2. Focused Tree Inspections  3. VM for Operational Mitigations.</p>	Franky Luo	3/8/2024	3/28/2024	3/28/2024	<a href="https://www.pge.com/customer-service/energy-safety/epss-reports">https://www.pge.com/customer-service/energy-safety/epss-reports</a>	0	NA	QDR	NA	NA

504	CA/PA	Sat WMP-36	CA/PA_Sat WMP-36	2REV	CA/PA_Sat WMP-36_Q2REV	Please disaggregate the data in Table 11 of PG&E's 2023 Q4 ODR such that there is only one Utility Initiative Tracking ID for each row. If this is not possible, please explain why and clarify the methodology for grouping certain tracking IDs.	Please reference "WMP-Discovery/2023-2025_OPR_California/036-000/2023/04/04" for the 2023 WMP Annual Review Compliance (ARC) and please reference "WMP-Discovery/2023-2025_OPR_California/036-000/2023/04/04" for the 2023 WMP Annual Review (AR).	Franky Luo	3/8/2024	4/9/2024	4/9/2024	<a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	2	NA	GDR	NA	NA
505	CA/PA	Sat WMP-36	CA/PA_Sat WMP-36	3	CA/PA_Sat WMP-36_Q3	Table 7 of PG&E's 2023 Q4 ODR does not reflect the planned or actual net addition or removal values reported in (a) Please explain this discrepancy. (b) Is Table 7 or Table 8 accurate?	Table 7 provides a summary of projected and actual additions or removals of equipment in the 2023 WMP. The "Net Change" column in Table 7 breaks down equipment additions and removals across multiple service area designations. The "Net Change" column in Table 8 provides a summary of the net change in system year-over-year. For example, the net change for CA 2023's month uses the difference between CA 2023 and Q4 2022 to obtain the value. (a) Table 7 and Table 8 are both accurate, and Table 8 is formatistically derived from Table 7.	Franky Luo	3/8/2024	3/29/2024	3/29/2024	<a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	0	NA	OR	NA	NA
506	CA/PA	Sat WMP-36	CA/PA_Sat WMP-36	4	CA/PA_Sat WMP-36_Q4	Table 9 of PG&E's 2023 Q4 ODR reports on the utility infrastructure upgrades. (a) Please provide clarification on how PG&E interprets and uses the term "utility infrastructure upgrades." (b) Per data guidelines version 3.2, below values should be "Numeric 0, or blank". Please explain the negative values reported for metric number 1.3.3.1 in Q3 2023 and Q4 2023.	(a) For the 2023 ODR submissions, the term "utility infrastructure upgrades" encompasses all work performed under GH101, specifically overhead conductor hardening, undergrounding, and line removal. Additional details about this work can be found in WMP commitment GH47, System Hardening, in Section 8.2.1.2 of the 2023-2025 WMP (pages 158-165). (b) The negative values reported were a mathematical error. Upon review of the data and associated method used to report the data reported in Table 9, we corrected the quarterly data reported as Metric Type 1 Number of Overhead Circuit Miles Planned to Upgrade.	Franky Luo	3/8/2024	3/29/2024	3/29/2024	<a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	0	NA	GDR	NA	NA
507	CA/PA	Sat WMP-40	CA/PA_Sat WMP-40	1	CA/PA_Sat WMP-40_Q1	PG&E states on page 23 of its 2025 WMP Update regarding its workplan for undergrounding and covered conductor projects. PG&E is currently refining our workplans for both overhead hardening and undergrounding projects through the end of the GRC period (2026) to account for the direction provided in D.23-11-069. As we update the workplan, we continue the approach described in the Base 2023-2025 WMP of including additional projects such as property access, weather, permitting, land rights acquisition, materials, or other constraints. This same set of projects included in this workplan may not be completed in the 2023-2025 timeframe. Generally, PG&E will continue working on these projects until they can be completed. Finally, additional projects may be identified and added to the workplan going forward for potential completion between 2022 and 2026. (a) Please identify PG&E's intended cost recovery view for the above-mentioned undergrounding projects not completed in the 2023-25 timeframe. (b) Please identify PG&E's intended cost recovery view for the above-mentioned additional projects that may be identified and added to the workplan.	a. The cost recovery view for undergrounding projects depends on the year in which the project becomes operational (i.e. a specific). Any undergrounding project made operational in 2023-2026 will be recovered through PG&E's 2023 General Rate Case (GRC) via the WMP Migration Balancing Account (WMPBA). PG&E plans to submit its SB 884 10-Year Undergrounding Plan with a currently anticipated program start date of January 1, 2027 and proposes that any undergrounding project that is operational on or after January 1, 2027 would be recovered through PG&E's SB 884 10-Year Undergrounding Plan. While PG&E's intent is to launch the SB 884 undergrounding program in 2027, PG&E is currently evaluating the SB 884 10-Year Plan guidelines from Energy 2027. Based on the review findings of the regulation (i.e., new month-to-month by Energy 2027) and the electric utility's intent to launch the CRPC, and the review by CRPC, if final guidelines are issued mid-year 2024, the earliest we could reasonably begin approval for the SB 884 Plan would be late 2024. Thus, PG&E anticipates our Plan period would begin January 1, 2027. PG&E anticipates that the SB 884 Plan would begin to be identified in 2027. The Plan launch in January 2027 assumes Energy Safety and the CRPC approval of a cost recovery without requiring a separate change in rate plan period. Furthermore, given the typical undergrounding project lifecycle of approximately two or more years, identifying projects in 2027 will require project readiness work in 2025 and 2026. Thus, PG&E would begin recovery for projects that will become used and useful in the SB 884 Plan period of 2027 and beyond. PG&E's net recovery application includes these costs for readiness work for projects that become operational during the SB 884 Plan period. b. For overhead hardening projects not fully completed in the 2023-2026 GRC timeframe will continue to be recovered through PG&E's next GRC period via the WMPBA.	Missa Gordon	4/5/2024	4/10/2024	4/10/2024	<a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	0	NA	8.1.2	Grid Design and System	8.1.2.2 Undergrounding of electric lines and/or equipment
508	CA/PA	Sat WMP-40	CA/PA_Sat WMP-40	2	CA/PA_Sat WMP-40_Q2	PG&E states on page 23 of its 2025 WMP Update regarding its workplan for undergrounding projects. PG&E is currently refining our workplans for both overhead hardening and undergrounding projects through the end of the GRC period (2026) to account for the direction provided in D.23-11-069. As we update the workplan, we continue the approach described in the Base 2023-2025 WMP of including additional projects such as property access, weather, permitting, land rights acquisition, materials, or other constraints. This same set of projects included in this workplan may not be completed in the 2023-2025 timeframe. Generally, PG&E will continue working on these projects until they can be completed. Finally, additional projects may be identified and added to the workplan going forward for potential completion between 2022 and 2026. (a) Please identify PG&E's intended cost recovery view for the above-mentioned additional projects that may be identified and added to the workplan. (b) How does your answer to part (a) compare to the risk reduction target established in D.23-11-069? (c) According to PG&E's current workplan, what is the amount of risk reduction that PG&E expects to achieve in 2024 due to undergrounding projects? (d) How does your answer to part (b) compare to the risk reduction target established in D.23-11-069? (e) How does your answer to part (c) compare to the risk reduction target established in D.23-11-069? (f) How does your answer to part (d) compare to the risk reduction target established in D.23-11-069? (g) If yes, please state the number of miles and PG&E's intended cost recovery view for said miles.	a. PG&E intends to meet the cumulative system hardening risk reduction requirement of 18% by 2026, using the risk reduction methodology described in Advice Letter 7150-E-A. b. Based on the workplan as of February 22, 2024, and using the GRC risk reduction methodology described in Advice Letter 7150-E-A, the 2024 target informed risk reduction for undergrounding projects is currently forecasted to be approximately 1.6%. c. Using the WMP risk reduction method (risk reduction based on WDRM v3 only), the target-informed anticipated risk reduction for undergrounding projects currently forecasted for completion in 2024 is approximately 1.5%. Note: these values only include projects in Maintenance Activity Type (MAT) codes BW and 3UG. d. Annual risk reduction forecasts established in D.23-11-069 are cumulative for the GRC period (2023-2026). Risk reduction forecasts for specific mitigation types were not established. The response to subpart (b) includes the undergrounding contribution to the GRC System Hardening cumulative risk reduction target (to be achieved by 2026). System Hardening Cumulative Risk Reduction Targets (per D.23-11-069, OP 23) Date: 12/31/2023 12/31/2024 12/31/2025 12/31/2026 Overall Target: 2023-2026 Cumulative Risk Reduction Target: 2% 5% 10% 16% 18%. For all system hardening work, including overhead covered conductor, underground and line removal, the 2024 cumulative risk reduction target established in D.23-11-069 is 5% for 2023-2024. Based on the system hardening workplan as of February 22, 2024 and using the GRC risk reduction methodology described in Advice Letter 7150-E-A, PG&E's current forecasted cumulative risk reduction for system hardening in 2023-2024 is 4.7% (MAT codes 3UG and BW only). The actual risk reduction values of completed system hardening work are expected to meet the overall cumulative target of 18% by 2026. <a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	Missa Gordon	4/5/2024	4/10/2024	4/10/2024	<a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	0	NA	8	Section 8.1.2 - Grid Design and System	8.1.2.2 Undergrounding of electric lines and/or equipment
509	CA/PA	Sat WMP-40	CA/PA_Sat WMP-40	3	CA/PA_Sat WMP-40_Q3	PG&E states on page 23 of its 2025 WMP Update regarding its workplan for covered conductor projects. PG&E is currently refining our workplans for both overhead hardening and undergrounding projects through the end of the GRC period (2026) to account for the direction provided in D.23-11-069. As we update the workplan, we continue the approach described in the Base 2023-2025 WMP of including additional projects such as property access, weather, permitting, land rights acquisition, materials, or other constraints. This same set of projects included in this workplan may not be completed in the 2023-2025 timeframe. Generally, PG&E will continue working on these projects until they can be completed. Finally, additional projects may be identified and added to the workplan going forward for potential completion between 2022 and 2026. (a) Please identify PG&E's intended cost recovery view for the above-mentioned additional projects that may be identified and added to the workplan. (b) How does your answer to part (a) compare to the risk reduction target established in D.23-11-069? (c) According to PG&E's current workplan, what is the amount of risk reduction that PG&E expects to achieve in 2024 due to covered conductor projects? (d) How does your answer to part (b) compare to the risk reduction target established in D.23-11-069? (e) How does your answer to part (c) compare to the risk reduction target established in D.23-11-069? (f) How does your answer to part (d) compare to the risk reduction target established in D.23-11-069? (g) If yes, please state the number of miles and PG&E's intended cost recovery view for said miles.	a. PG&E intends to meet the cumulative system hardening risk reduction requirement of 18% by 2026, using the risk reduction methodology described in Advice Letter 7150-E-A. b. Based on the workplan as of February 22, 2024, and referencing the GRC risk reduction methodology described in Advice Letter 7150-E-A, the 2024 target informed risk reduction for overhead hardening projects is currently forecasted to be approximately 0.8%. c. Annual risk reduction forecasts established in D.23-11-069 are cumulative for the GRC period (2023-2026). Risk reduction forecasts for specific mitigation types were not established. The response to subpart (b) includes the undergrounding contribution to the GRC System Hardening cumulative risk reduction target (to be achieved by 2026). System Hardening Cumulative Risk Reduction Targets (per D.23-11-069, OP 23) Date: 12/31/2023 12/31/2024 12/31/2025 12/31/2026 Overall Target: 2023-2026 Cumulative Risk Reduction Target: 2% 5% 10% 16% 18%. For all system hardening work, including overhead covered conductor, underground and line removal, the 2024 cumulative risk reduction target established in D.23-11-069 is 5% for 2023-2024. Based on the system hardening workplan as of February 22, 2024 and using the GRC risk reduction methodology described in Advice Letter 7150-E-A, PG&E's current forecasted cumulative risk reduction for system hardening in 2023-2024 is 4.7% (MAT codes 3UG and BW only). The actual risk reduction values of completed system hardening work are expected to meet the overall cumulative target of 18% by 2026. <a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	Missa Gordon	4/5/2024	4/10/2024	4/10/2024	<a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	0	NA	8	Section 8.1.2 - Grid Design and System	8.1.2.1 Covered Conductor Installation - Distribution
510	CA/PA	Sat WMP-40	CA/PA_Sat WMP-40	4	CA/PA_Sat WMP-40_Q4	PG&E states on page 25 of its 2025 WMP Update: "PG&E proposes to add a 2025 target (System Hardening - Transmission Conductor Segment Replacement (GH11)) to perform conductor segment replacement on two - transmission lines." (a) Was the above-mentioned work requested and authorized in PG&E's "Year 2023 GRC?" (b) If yes, please provide the exhibit and page number in PG&E's "Year 2023 GRC" testimony that discusses this work, as well as the relevant Major Activity Type (MAT) code or codes. (c) If no, please provide the total authorized funding amount for this program as set forth in D.23-11-069, with a citation to the relevant nodes of that document.	(a) No. System Hardening - Transmission Conductor Segment Replacement was not forecasted or authorized in the 2023 General Rate Case (GRC). (b) The applicable response is as follows: (i) If not applicable, please see the response to subpart (c).	Missa Gordon	4/5/2024	4/10/2024	4/10/2024	<a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	0	NA	8	Section 8.1.2 - Grid Design and System	8.1.2.5.1 Traditional Overhead Hardening - Transmission
511	CA/PA	Sat WMP-40	CA/PA_Sat WMP-40	5	CA/PA_Sat WMP-40_Q5	PG&E states on page 3 of its 2025 WMP Update that it is introducing a new evolution of its Wildfire Distribution Risk Model (WDRM), called WDRM v4. (a) Please identify each WMP initiative for which WDRM v4 is expected to inform risk prioritized short-cycle work in 2025. (b) Please identify each WMP initiative for which WDRM v4 is expected to inform risk prioritized long-cycle work in 2025 and beyond. (c) When will WDRM v4 begin to inform the scoping and execution of covered conductor projects? (d) When will WDRM v4 begin to inform the scoping and execution of undergrounding projects? (e) When will WDRM v4 begin to inform the scoping and execution of covered conductor projects? (f) How does PG&E expect to begin continuing covered conductor projects that are expected using WDRM v4?	a. At this time, 2025 workplans are still being developed. PG&E cannot say with certainty which WMP initiatives for which WDRM v4 are expected to "inform risk prioritized short-cycle work in 2025." PG&E's 2025-2026 WMP will provide details on workplan drawing on the WDRM v4 for insights. b. PG&E cannot say with certainty which long-cycle work it is expected to inform risk prioritized long-cycle work in 2025 and beyond. PG&E's 2025-2026 WMP will provide details on workplan drawing on the WDRM v4 for insights. c. WDRM v4 will begin to inform scoping of undergrounding projects as well as the second half of 2024 for undergrounding projects expected for completion in 2027 and beyond. d. For undergrounding projects using WDRM v4, PG&E anticipates that some planning activities in 2025 and preparatory work for civil construction may begin in 2026 for projects to be completed in 2027. e. WDRM v4 will begin to inform scoping of overhead hardening (covered conductor) projects as early as the second half of 2024 for projects expected to be completed in 2027 and beyond. f. For overhead hardening (covered conductor) projects stopped using WDRM v4, PG&E anticipates that some planning activities in 2025 and preparatory work for civil construction may begin in 2026 for projects to be completed in 2027 and beyond. g. As a noted in response to Request 501 of this data request, WDRM v4 may begin to inform scoping of undergrounding projects as early as the second half of 2024 for undergrounding projects planned for completion in 2027 and beyond. h. The scope of the SHAR System Hardening work completed in the GRC period (2023-2026), during this time period and not currently anticipated to be performed in WDRM v4, in the next projects selected by WDRM v4 and not being performed for completion during this time period, WDRM v4 information would be included in the SHAR in the next project selected by WDRM v4 (Risk Model Maturity, Risk Reduction, etc.). i. As noted in response to Request 501 of this data request, WDRM v4 may begin to inform scoping of overhead hardening (covered conductor) projects as early as the second half of 2024 for projects planned for completion in 2027 and beyond. j. Please see the response to subpart (b) above for how PG&E reports this risk reduction to the GRC.	Missa Gordon	4/5/2024	4/16/2024	4/12/2024	<a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	0	NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models
512	CA/PA	Sat WMP-40	CA/PA_Sat WMP-40	6	CA/PA_Sat WMP-40_Q6	PG&E states on page 3 of its 2025 WMP Update that it is introducing a new evolution of its Wildfire Distribution Risk Model (WDRM), called WDRM v4. (a) Please identify each WMP initiative for which WDRM v4 is expected to inform risk prioritized long-cycle work in 2025 and beyond. (b) Please identify each WMP initiative for which WDRM v4 is expected to inform risk prioritized long-cycle work in 2025 and beyond. (c) When will WDRM v4 begin to inform the scoping and execution of covered conductor projects? (d) When will WDRM v4 begin to inform the scoping and execution of undergrounding projects? (e) When will WDRM v4 begin to inform the scoping and execution of covered conductor projects? (f) How does PG&E expect to begin continuing covered conductor projects that are expected using WDRM v4?	(a) As noted in response to Request 501 of this data request, WDRM v4 may begin to inform scoping of undergrounding projects as early as the second half of 2024 for undergrounding projects planned for completion in 2027 and beyond. (b) The scope of the SHAR System Hardening work completed in the GRC period (2023-2026), during this time period and not currently anticipated to be performed in WDRM v4, in the next projects selected by WDRM v4 and not being performed for completion during this time period, WDRM v4 information would be included in the SHAR in the next project selected by WDRM v4 (Risk Model Maturity, Risk Reduction, etc.). (c) As noted in response to Request 501 of this data request, WDRM v4 may begin to inform scoping of overhead hardening (covered conductor) projects as early as the second half of 2024 for projects planned for completion in 2027 and beyond. (d) Please see the response to subpart (b) above for how PG&E reports this risk reduction to the GRC.	Missa Gordon	4/5/2024	4/16/2024	4/12/2024	<a href="https://www.pge.com/resources/energy/undergrounding.html">https://www.pge.com/resources/energy/undergrounding.html</a>	0	NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models

513	CaPA	Sat WMP-40	CaPA_Sat WMP-40	7	CaPA_Sat WMP-40_07	<p>PG&amp;E states on page 31 of its 2025 WMP Update that, in response to AD PG&amp;E-25-05 – Labeling Grid Hardening Decision Making: “PG&amp;E is conducting a WDRM (Wildfire Decision Risk Model) and to incorporate cost effectiveness components, reliability considerations, and location-specific mitigation effectiveness calculations.” PG&amp;E further states that underlying projects scoped with the WDRM in 2024 and 2025 will likely have a completion date in 2027 or later.”</p> <p>1) Was the WDRM not used to scope any projects that will be tracked in the System Hardening Accountability Report required by D 23-11-069 ?</p> <p>2) If the answer to part (a) is yes, please explain how this will be identified in the SHAR.</p> <p>3) If the answer to part (a) is no, please identify any changes to the SHAR template (e.g. adding fields) that would need to be made to include the necessary information to track such projects.</p> <p>4) Does PG&amp;E expect to request any changes to the SHAR to facilitate tracking projects scoped using the WDRM? Please explain your response.</p>	Miles Gordon	4/5/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf">https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-25-05 – Labeling Grid Hardening Decision Making
514	CaPA	Sat WMP-41	CaPA_Sat WMP-41	1	CaPA_Sat WMP-41_01	<p>1) Please list all distinct risk scores generated by PG&amp;E's WDRM v4. For example, WDRM v3 generated 17 distinct risk scores.</p> <p>2) For each risk score in part (a), please provide a category or brief description of the type of risk the score represents.</p> <p>3) For each risk score in part (a), please provide a brief explanation of how PG&amp;E intends to use that risk score.</p> <p>4) For each risk score in part (a), please list all PG&amp;E wildfire mitigation initiatives that are informed by that risk score (if PG&amp;E expects to utilize a risk score to inform a mitigation initiative in the future, please so note).</p> <p>5) For each risk score in part (a), please state the most granular level available for that risk score. For example, in WDRM v4, the most granular level available would be the risk scores associated with individual 100m x 100m cells.</p> <p>6) For each risk score in part (a), please state the granularity at which the risk score is used to inform wildfire mitigation initiatives (e.g. circuit segment, circuit, individual asset, individual miles, etc.).</p>	Holly Walman	4/5/2024	4/11/2024	4/11/2024	<a href="https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf">https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf</a>	0	NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models
515	CaPA	Sat WMP-41	CaPA_Sat WMP-41	2	CaPA_Sat WMP-41_02	<p>1) Please list all composite (or aggregate) risk scores generated by PG&amp;E's WDRM v4. For example, WDRM v3 generated five composite risk scores.</p> <p>2) For each risk score in part (a), please provide a category or brief description of the type of risk the score represents.</p> <p>3) For each risk score in part (a), please provide a brief explanation of how PG&amp;E intends to use that risk score.</p> <p>4) For each risk score in part (a), please list all PG&amp;E wildfire mitigation initiatives that are informed by that risk score (if PG&amp;E expects to utilize a risk score to inform a mitigation initiative in the future, please so note).</p> <p>5) For each risk score in part (a), please state the most granular level available for that risk score. For example, in WDRM v4, the most granular level available would be the risk scores associated with individual 100m x 100m cells.</p> <p>6) For each risk score in part (a), please state the granularity at which the risk score is used to inform wildfire mitigation initiatives (e.g. circuit segment, circuit, individual asset, individual miles, etc.).</p>	Holly Walman	4/5/2024	4/11/2024	4/11/2024	<a href="https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf">https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf</a>	0	NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models
516	CaPA	Sat WMP-41	CaPA_Sat WMP-41	3	CaPA_Sat WMP-41_03	<p>Questions 3 and 4 refer to the risk scores generated from WDRM v4. This should be understood to refer to PG&amp;E's responses to questions 1 and 2 above. If PG&amp;E possesses geospatial data that is not in the specific format requested in questions 3 and 4, but that PG&amp;E believes substantially contains the information requested in questions 3 and 4, please contact the originators to discuss the format of your responses.</p> <p>Question 3</p> <p>Please provide a GIS file that details the most granular level (as discussed in questions 1(a) and 2(a)) available for each risk score identified in questions 1(a) and 2(a). This file should contain the following:</p> <p>a) Geometric features detailing the most granular level available for each risk score. This may be polygons that depict "lines" that depict circuit segments, points that depict assets, or other geometry that best suits the relevant risk scores. If multiple risk scores share geometry (e.g., multiple risk scores that are calculated at the "circuit" level), there is no need to include multiple layers that depict the same physical geometry.</p> <p>b) For each geometric feature, please include all relevant risk scores from questions 1(a) and 2(a) as attributes.</p>	Holly Walman	4/5/2024	4/29/2024		NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models		
517	CaPA	Sat WMP-41	CaPA_Sat WMP-41	4	CaPA_Sat WMP-41_04	<p>Please provide a GIS file that details the risk scores at the same granularity that is currently used to inform wildfire mitigation measures (as discussed in questions 1(b) and 2(b)). This file should contain the following:</p> <p>a) Geometric features detailing the relevant geometry for each risk score. This may be polygons that depict "lines" that depict circuit segments, points that depict assets, or other geometry that best suits the relevant risk scores. If multiple risk scores share geometry (e.g., multiple risk scores that are used to inform mitigation measures at the circuit segment level), there is no need to include multiple layers that depict the same physical geometry.</p> <p>b) For each geometric feature, please include all relevant risk scores from questions 1(a) and 2(a) as attributes.</p> <p>c) For each geometric feature, include the circuit identification number as an attribute.</p> <p>d) For each geometric feature, include the circuit name as an attribute.</p> <p>e) As needed, include unique identification for each geometric feature (e.g., asset ID, subsection name, etc.).</p>	Holly Walman	4/5/2024	4/29/2024		NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models		
518	CaPA	Sat WMP-41	CaPA_Sat WMP-41	5	CaPA_Sat WMP-41_05	<p>Question 5 refers to the risk scores generated from WDRM v4. This should be understood to refer to PG&amp;E's responses to questions 1 and 2 above.</p> <p>Please provide a spreadsheet that lists (see rows) each circuit segment that is included in the Wildfire Distribution Risk Model v4. This spreadsheet should include, at minimum, the following columns:</p> <p>a) Name or ID number of each circuit segment.</p> <p>b) Circuit name for the circuit that each segment is part of.</p> <p>c) Circuit ID for the circuit that each segment is part of.</p> <p>d) Nominal voltage.</p> <p>e) The pole count of the circuit segment (as applicable, e.g., for pole-banded sub-models).</p> <p>f) The average risk value(s) associated with each pole along the circuit segment (as applicable, e.g., for pole-banded sub-models).</p> <p>g) The asset count of the circuit segment (as applicable, e.g., for asset-banded sub-models).</p> <p>h) The risk values associated with each asset along the circuit segment (as applicable, e.g., for asset-banded sub-models).</p> <p>i) The risk per mile of the circuit segment (as applicable).</p> <p>j) Total overhead circuit-miles on the circuit segment.</p> <p>k) Total non-HTD overhead circuit-miles on the circuit segment.</p> <p>l) Total Tar 2 overhead circuit-miles on the circuit segment.</p> <p>m) Total Tar 2 underground circuit-miles on the circuit segment.</p> <p>n) Total non-HTD underground circuit-miles on the circuit segment.</p> <p>o) Total Tar 2 underground circuit-miles on the circuit segment.</p> <p>p) Total Tar 3 underground circuit-miles on the circuit segment.</p> <p>q) A separate, labeled column for each risk score identified in question 1(a) that is used at the circuit-segment level to inform wildfire mitigation initiatives. (May require multiple columns.)</p> <p>r) A separate, labeled column for each composite risk score identified in question 2(a) that is used at the circuit-segment level to inform wildfire mitigation initiatives. (May require multiple columns.)</p>	Holly Walman	4/5/2024	4/11/2024	4/11/2024	<a href="https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf">https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf</a>	1	NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models
519	CaPA	Sat WMP-41	CaPA_Sat WMP-41	6	CaPA_Sat WMP-41_06	<p>Pages 11-13 of PG&amp;E's 2025 WMP Update discuss version 4 of PG&amp;E's Wildfire Consequence Model. Please provide a GIS file that details the most granular level available for the Wildfire Consequence Model, version 4. This file should contain the following:</p> <p>a) Geometric features detailing the most granular level available for consequence (i.e. Cal Acres) attributable to the consequence model "asset".</p> <p>b) For each geometric feature, please include all relevant consequence values (if there are multiple) as attributes.</p>	Holly Walman	4/5/2024	4/29/2024		NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models		
520	CaPA	Sat WMP-41	CaPA_Sat WMP-41	7	CaPA_Sat WMP-41_07	<p>Please provide a GIS file that details the most granular level available for the Wildfire Consequence Model version used in the WDRM v4. This file should contain the following:</p> <p>a) Geometric features detailing the most granular level available for consequence (i.e. Cal Acres) attributable to the consequence model "asset".</p> <p>b) For each geometric feature, please include all relevant consequence values (if there are multiple) as attributes.</p>	Holly Walman	4/5/2024	4/29/2024		NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models		
521	CaPA	Sat WMP-41	CaPA_Sat WMP-41	8	CaPA_Sat WMP-41_08	<p>a) Has E3 or another entity completed an independent review of the WDRM v4?</p> <p>b) If the answer to part (a) is yes, please provide a copy of the independent review.</p> <p>c) If the answer to part (a) is no, when does PG&amp;E expect the review to be completed?</p>	Holly Walman	4/5/2024	4/11/2024	4/11/2024	<a href="https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf">https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf</a>	0	NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models
522	CaPA	Sat WMP-41	CaPA_Sat WMP-41	9	CaPA_Sat WMP-41_09	<p>a) Has PG&amp;E created a detailed overview document that details the WDRM v4, similar to the 2021 Wildfire Distribution Risk Model Overview? That PG&amp;E submitted following the public workshop held on October 6 and 7, 2021?</p> <p>b) If the answer to part (a) is yes, please provide a copy of the document.</p> <p>c) If the answer to part (a) is no, does PG&amp;E plan to create such a document?</p> <p>d) If the answer to part (c) is no, please explain why not.</p> <p>e) If the answer to part (c) is yes, when does PG&amp;E expect the document to be completed?</p>	Holly Walman	4/5/2024	4/11/2024	4/11/2024	<a href="https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf">https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf</a>	0	NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models
523	MOIRA	Data Request No. 9	MOIRA_Data Request No. 9	1	MOIRA_Data Request No. 9_01	<p>Table PG&amp;E-25-1-1.2 Asset Probability Based Production Performance in the table, predictive ability for drivers of ignitions from Primary Conductor Other (PCCO) have relatively strong compared to regular attributes. Explain why this is so.</p>	Joseph Michal	4/8/2024	4/11/2024	4/11/2024	<a href="https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf">https://www.pge.com/assets/pge-ca/wdrms-and-wdrm-calculation-templates-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-25-26 Fire Potential Index (FPI) and Ignition Probability Weather (IPW) Enhancements

524	MORA	Data Request No. 9	MORA_Data Request No. 9	2	MORA_Data Request No. 9_C2	Please provide information available on the introduction of an assessment of dry wind conditions for predicting areas of consequences?	As indicated on page 10 of the 2025 PG&E WMP Update, one of the key updates to the 4-Wireline Consequence (WFL) model is the addition of an analysis for Red Flag conditions. Red Flag conditions are combined with fire outcomes. However, due to inconsistencies with the way Red Flag conditions are forecast and reported, a group for Red Flag conditions has been developed that is consistent across the territory. The WFL model uses one of the definitions for Red Flag conditions found in Southern California and administers the so-called "dry wind" conditions from PG&E's historical meteorological data. Dry wind conditions enter as a partition in the baseline consequence model, similar to the way the risk levels enter Red Flag warnings. Like Red Flag warnings, dry wind warnings combined with various outcomes. However, the additional explanatory power of dry wind over the predicted destructive condition has proven to be more modest.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-25 Fire Potential Index (FPI) and Ignition Probability Weather (IPW) Enhancements
525	MORA	Data Request No. 9	MORA_Data Request No. 9	3	MORA_Data Request No. 9_C3	Will the "dry wind" consequence assessment also be coupled to driver weather days also characterized by high-wind?	PG&E responds that the question is regarding whether the dry wind definition corresponds to days with their weather and higher winds. In this case, the dry wind definition is based on wind speed history being reported as a Red Flag condition. PG&E responds that the question is whether the dry wind days are used in the development of the WFL model. PG&E responds that the dry wind definition is used in the development of the WFL model. PG&E responds that the dry wind definition is used in the development of the WFL model.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-25 Fire Potential Index (FPI) and Ignition Probability Weather (IPW) Enhancements
526	MORA	Data Request No. 9	MORA_Data Request No. 9	4	MORA_Data Request No. 9_C4	Will the "dry wind" weather days be associated with a probability driver also correlated with "dry wind" weather days and if how so?	PG&E responds that the question is regarding whether the dry wind definition corresponds to days with their weather and higher winds. In this case, the dry wind definition is based on wind speed history being reported as a Red Flag condition. PG&E responds that the question is whether the dry wind days are used in the development of the WFL model. PG&E responds that the dry wind definition is used in the development of the WFL model. PG&E responds that the dry wind definition is used in the development of the WFL model.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-25 Fire Potential Index (FPI) and Ignition Probability Weather (IPW) Enhancements
527	MORA	Data Request No. 9	MORA_Data Request No. 9	5	MORA_Data Request No. 9_C5	PS-07: Reduce PSPS Impacts to Customers (Section 9.1.5) For the 22k to 13k reduction customers exposed to PSPS events, how much of the reduction is due to 1) undergrounding? 2) Motorized Switch Operations (MSO), and 3) other factors?	All of the reduction from 22k to 13k is attributed to undergrounding. As mentioned in section 9.1.1.3 of the 2025 WMP, the number of undergrounding miles for 2025 was updated from 500 miles to 130 miles. Therefore the reduction in customer mitigated correspondingly proportionally to the increase in undergrounding miles completed. No customer energy relocation from Motorized Switch Operations (MSO) replacements are expected in 2025 as the program is expected to be completed in 2024.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	9.1.5	9.0 Public Safety Power Shutoff	9.1.5 Performance Metrics Identified by the Electrical Corporation
528	MORA	Data Request No. 9	MORA_Data Request No. 9	6	MORA_Data Request No. 9_C6	Explain how MSO reduces PSPS incidence.	For clarification, Motorized Switch Operator (MSO) devices do not reduce "PSPS incidence," but rather the scope of customer impact during a PSPS event. While MSO devices were intended to serve as a sectorizing device, PG&E identified MSO devices as an ignition risk when operated while energized due to the chance of arc flashes. As a result, MSO devices are not operated while energized, but must first be de-energized before they can be operated. If an MSO device is selected for a PSPS event, the next upstream non-MSO device must first be used to temporarily de-energize the MSO device so that the MSO device can be operated while de-energized. The non-MSO device is closed to energize up to the next non-MSO device. The procedure eliminates the ignition risk from the MSO device and in a short duration PSPS outage for the customer located between the MSO device and the next upstream device. If the MSO device is replaced with a non-MSO device such as a recloser, substation equipment, and other related equipment approved for current usage, these short duration outage customers will no longer experience any outage during the PSPS event because the replacement device can be opened directly without attention to the de-energization step.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	9.1.5	9.0 Public Safety Power Shutoff	9.1.5 Performance Metrics Identified by the Electrical Corporation
529	MORA	Data Request No. 9	MORA_Data Request No. 9	7	MORA_Data Request No. 9_C7	Does MSO also allow for EPSS to be enabled as a function of weather conditions?	Motor Switch Operator (MSO) devices are not capable of fault protection and therefore are not part of EPSS. As part of the MSO initiative in the WMP, these units are being replaced with either the recloser or the motorized switch, or a recloser with a fault recloser option is selected, those replaced devices will have EPSS capability and be enabled during EPSS weather events.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	8.1.8.1.1	8.1.8 Grid Operations and Procedures	8.1.8.1.1 Protective Equipment and Device Settings
530	MORA	Data Request No. 9	MORA_Data Request No. 9	8	MORA_Data Request No. 9_C8	If not, is EPSS enabled based on weather conditions and if so how?	Yes, EPSS is enabled and disabled based on forecasted weather conditions. EPSS settings are enabled or disabled based on weather approval by the Western Risk Governance Steering Committee. This criteria is based on 2km-by-2km model outputs from our Fire Potential Index (FPI) model. The model outputs are used to identify localized wildfire risk based on a variety of key risk indicators derived from fire science as well as lessons learned from operational wildfire events. The reported detailed average effectiveness for all 9 areas based on a study focused on a specific subset of circuits where REFL is critical. This study is ongoing and cannot be performed assuming all circuits are REFL enabled. The REFL analysis was applied to substations that had the following requirements: - Single voltage with 12 or 24 kV substation. - Located in the Western Risk Governance (WRG) area. - Less than 50% of circuit LSC, and - Less than 20% of circuit peak subloads. The effectiveness of the other mitigation types (CC Overhead, EPSS, DCC) on the all 9 areas is less in comparison to that of the full portfolio of PG&E's study. Mitigation effectiveness can be predetermined (i.e., 85% overall wildfire ignition reduction effectiveness is not in question). Rather, the average effectiveness of all 9 areas is the result of assessing the aggregated mitigation effectiveness against more than 2,000 miles of failure, such as all effectiveness ranges from 0% to 100%. Much of the benefits of covered conductor outweigh the benefits of the operational mitigations, such as EPSS. Because of this, we chose a more granular analysis of outage causes to assign effectiveness to differentiate the multiple combined mitigations by an end-to-end outage benefit.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	8.1.8.1.1	8.1.8 Grid Operations and Procedures	8.1.8.1.1 Protective Equipment and Device Settings
531	MORA	Data Request No. 9	MORA_Data Request No. 9	9	MORA_Data Request No. 9_C9	Table ACI-PG&E-23-05-3: Ignition mitigation effectiveness for Area 4 - Covered conductor + EPSS effectiveness is rated at 78.2%, all 9 included CC + EPSS, but also REFL, and DCC and shows an effectiveness of 65%. How is it possible that adding additional mitigations reduces the effectiveness? If the calculation is correct please provide the formula as a circuit analysis, not a substitution analysis, assuming all circuits are REFL enabled.	The reported detailed average effectiveness for all 9 areas based on a study focused on a specific subset of circuits where REFL is critical. This study is ongoing and cannot be performed assuming all circuits are REFL enabled. The REFL analysis was applied to substations that had the following requirements: - Single voltage with 12 or 24 kV substation. - Located in the Western Risk Governance (WRG) area. - Less than 50% of circuit LSC, and - Less than 20% of circuit peak subloads. The effectiveness of the other mitigation types (CC Overhead, EPSS, DCC) on the all 9 areas is less in comparison to that of the full portfolio of PG&E's study. Mitigation effectiveness can be predetermined (i.e., 85% overall wildfire ignition reduction effectiveness is not in question). Rather, the average effectiveness of all 9 areas is the result of assessing the aggregated mitigation effectiveness against more than 2,000 miles of failure, such as all effectiveness ranges from 0% to 100%. Much of the benefits of covered conductor outweigh the benefits of the operational mitigations, such as EPSS. Because of this, we chose a more granular analysis of outage causes to assign effectiveness to differentiate the multiple combined mitigations by an end-to-end outage benefit.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-25 Fire Potential Index (FPI) and Ignition Probability Weather (IPW) Enhancements
532	MORA	Data Request No. 9	MORA_Data Request No. 9	10	MORA_Data Request No. 9_C10	Please provide the above table ACI-PG&E-23-05-3 under the assumption that Covered Conductor wildfire ignition reduction effectiveness is 85.0%, not 66.4%.	This is not feasible to provide based on the methodology of PG&E's study. Mitigation effectiveness can be predetermined (i.e., 85% overall wildfire ignition reduction effectiveness is not in question). Rather, the average effectiveness of all 9 areas is the result of assessing the aggregated mitigation effectiveness against more than 2,000 miles of failure, such as all effectiveness ranges from 0% to 100%. Much of the benefits of covered conductor outweigh the benefits of the operational mitigations, such as EPSS. Because of this, we chose a more granular analysis of outage causes to assign effectiveness to differentiate the multiple combined mitigations by an end-to-end outage benefit.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-25 Fire Potential Index (FPI) and Ignition Probability Weather (IPW) Enhancements
533	MORA	Data Request No. 9	MORA_Data Request No. 9	11	MORA_Data Request No. 9_C11	5.57 - Non-Undergrounded Mitigation This consideration of location-specific benefits and risks is consistent with the prior decision-tree approach we used to select projects and mitigations for completion in 2023 to 2025. In what ways does the new calculation differ from the previous decision-tree based analysis and in what ways does it differ?	PG&E objects to the question on the grounds that it is vague and ambiguous, including that the repetition of the statement "we have not been fully articulated." Nevertheless, PG&E responds to the question by asking for clarity on the difference between the Western Benefit Cost Analysis (WBCA), which we interpret to be the "new calculation" referenced in the question, and the tool used to select system hardening projects prior to the WBCA tool. We have, therefore, answered based on that understanding of the question. PG&E's system hardening programs start by using a model to determine where (which circuit segments) we should complete wildfire system hardening work. Once a circuit segment is selected, PG&E's Civil Design engineers use a decision tree to evaluate the sections of that circuit segment to determine the right mitigation approach across the circuit segment. The primary element that has changed over the last few years is the "model" used to select the majority of circuit segments to then be selected for hardening for example. The model selected using PG&E's Wildfire Distribution Risk Model (WDRM) v2 identified work located in the top 20% of circuit segments, selected solely based on wildfire risk scores to create a Wildfire Feasibility Effectiveness (WFE) score. Going forward, the WBCA is an analytical framework that will compare the total lifetime costs and total lifetime benefits of different mitigations, and combinations of mitigations, at the circuit segment level. As discussed in our 2025 WMP update, the WBCA tool incorporates wildfire risk, as well as reliability, public safety, and cost efficiency in accordance with the requirements of SB 884. Reliability and public safety are new inputs to the selection process that is used in the WBCA which informs the selection of hardening projects from these additional data inputs. The cost efficiency data incorporated into WBCA is more comprehensive than the feasibility score used in WFE. Cost efficiency accounts for benefits associated with wildfire, public safety, and reliability risk reduction, as well as costs associated with mitigation management. WBCA maintenance cost accounting expenses of various mitigations. Cost efficiency also includes the other capital installation costs which were previously incorporated into the WFE score.	Joseph Mitchell	4/8/2024	4/11/2024	4/12/2024	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-25 Fire Potential Index (FPI) and Ignition Probability Weather (IPW) Enhancements
534	MORA	Data Request No. 9	MORA_Data Request No. 9	12	MORA_Data Request No. 9_C12	Table ACI PG&E-23-06-01 Please provide the table presented at these workshops, redacted for any confidential material.	Please reference the table below for presentation materials for the workshops identified. Workshop Title Attachment Name Kickoff and Consensus Testing Date: May 3, 2023 WMP-Discovery2023-2025_DR_MGRA_009-Q0124x01.pdf Aging Susceptibility Date: June 12, 2023 WMP-Discovery2023-2025_DR_MGRA_009-Q0124x02.pdf New Technologies Date: July 17, 2023 WMP-Discovery2023-2025_DR_MGRA_009-Q0124x03.pdf Maintenance and Inspections Date: July 24, 2023 WMP-Discovery2023-2025_DR_MGRA_009-Q0124x04.pdf Efficacy Testing Date: August 7, 2023 WMP-Discovery2023-2025_DR_MGRA_009-Q0124x05.pdf Workshop Title Attachment Name New Technologies - ETO Date: September 20, 2023 WMP-Discovery2023-2025_DR_MGRA_009-Q0124x06.pdf New Technologies Date: November 8, 2023 WMP-Discovery2023-2025_DR_MGRA_009-Q0124x07.pdf	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	7	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-06 - Continuation of Grid Resiliency Joint Studies
535	MORA	Data Request No. 9	MORA_Data Request No. 9	13	MORA_Data Request No. 9_C13	Early Fault Detection/Distribution Fault Mitigation Are EFD circuits being deployed on circuits that are being selected for undergrounding?	PG&E has evaluated existing operational assignments with known undergrounding schedules for Early Fault Detection (EFD) circuit.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-07 - Deployment of New Technologies
536	MORA	Data Request No. 9	MORA_Data Request No. 9	14	MORA_Data Request No. 9_C14	What would be the final year that a circuit will be undergrounded that might potentially be implemented with an EFD?	Not applicable, please see the response to Question No. 13 for an explanation.	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-07 - Deployment of New Technologies
537	MORA	Data Request No. 9	MORA_Data Request No. 9	15	MORA_Data Request No. 9_C15	Please provide a list of repeatable options for the last two years including the following additional attributes: a) rating system at the time of the ignition (R0, R1, R2, etc.) b) whether circuit was implemented with active DCC c) whether circuit was implemented with active EPSS d) whether PSPS was activated/announced on the system.	Please see attachment "WMP-Discovery2023-2025_DR_MGRA_009-Q015A01.xlsx" for the requested information. Please note that for subject (a), PG&E produces Fire Potential Index (FPI) ratings only for circuits with a Fire Index Area (FIA).	Joseph Mitchell	4/8/2024	4/11/2024	4/11/2024	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-25 Fire Potential Index (FPI) and Ignition Probability Weather (IPW) Enhancements
538	MORA	Data Request No. 9	MORA_Data Request No. 9	16	MORA_Data Request No. 9_C16	Please provide a list of outages for the last two years including the following additional attributes: a) rating system at the time of the outage (R0, R1, R2, etc.) b) whether circuit was implemented with active DCC c) whether circuit was implemented with active EPSS	Please see attachment "WMP-Discovery2023-2025_DR_MGRA_009-Q016A01.xlsx" for the requested information.	Joseph Mitchell	4/8/2024	4/17/2024	4/17/2024	1	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-25 Fire Potential Index (FPI) and Ignition Probability Weather (IPW) Enhancements
539	CAIPA	Set WMP-42	CAIPA_Set WMP-42	1	CAIPA_Set WMP-42-01	Page 10 of PG&E's 2025 WMP Update states that, for version 4 of PG&E's Wildfire Consequence Model, PG&E increased the fire simulation time from eight to 24 hours. a) List the reasons why PG&E chose to increase the simulation time to 24 hours. b) Is PG&E aware of any potential detrimental effects associated with increasing the fire simulation time from eight to 24 hours? c) If the answer to part (b) is yes, list any such potential detrimental effects. d) What has PG&E done so far to validate the accuracy of 24-hour fire simulations?	a) There were two main drivers for evaluating and eventually utilizing longer for simulations: 1. Expert consensus: Interim and the E3 model validation for the WDRM v3 model recommended moving to longer simulation times to capture fire impacts. 2. As outlined in more detail in the response to Request No. 002, there is a slightly more robust relationship between simulation acreage and actual acreage burned in historic fires. b) No. c) Not applicable, please see the response to subject (b) above. d) As outlined in the response to Request No. 002, there is a slightly more robust relationship between simulation acreage and actual acreage burned in historic fires.	Holly Waltemin	4/9/2024	4/17/2024	4/17/2024	0	NA	6.2.2.2	6.0 Risk Methodology and Assessment	6.2.2.2 Consequence



540	CaPA	Sat WMP-42	CaPA_Sat WMP-42	2	CaPA_Sat WMP-42_02	<p>Page 1021 of PG&amp;E's 2025 WMP R4 states, in response to ACI PG&amp;E-23-05, "In general, 24-hour simulations result in higher impacts as simulated time are more likely to reach highly populated areas despite decreasing reliability on the weather forecasts as time progresses, and customer expectation effectiveness over time. Sensitivity analysis is continuing, and PG&amp;E will be able to provide results in 2023 that quantify the effectiveness of shorter versus longer simulation durations."</p> <p>1) Describe the result of the sensitivity analysis discussed above.</p> <p>2) Provide any written records, reports, or other output of the sensitivity analysis discussed above.</p>	Holly Walther	4/9/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf">https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf</a>	0	NA	6.2.2.2	6.0 Risk Methodology and Assessment	6.2.2.2 Consequence
541	CaPA	Sat WMP-42	CaPA_Sat WMP-42	3	CaPA_Sat WMP-42_03	<p>Page 7 of PG&amp;E's 2025 WMP Update states, with regard to PG&amp;E's distribution event probability models, "Significant efforts were made to improve asset, ignition, and outage data quality." List and explain the significant efforts discussed above.</p>	Holly Walther	4/9/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf">https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf</a>	0	NA	6.2.2.2	6.0 Risk Methodology and Assessment	6.2.2.2 Consequence
542	CaPA	Sat WMP-42	CaPA_Sat WMP-42	4	CaPA_Sat WMP-42_04	<p>Table PG&amp;E-8.1.1-1 on page 8 of PG&amp;E's 2025 WMP Update indicates that WDRM includes wind direction in its vegetation models.</p> <p>1) Describe how wind direction is incorporated in the vegetation models in WDRM v4.</p> <p>2) List the data sources that PG&amp;E uses to incorporate wind direction into its risk model.</p> <p>3) Describe the benefits of incorporating wind direction into the risk model.</p>	Holly Walther	4/9/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf">https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf</a>	0	NA	6.2.1	6.0 Risk Methodology and Assessment	6.2.1 Risk and Risk Component Identification
543	CaPA	Sat WMP-42	CaPA_Sat WMP-42	5	CaPA_Sat WMP-42_05	<p>Page 16 of PG&amp;E's 2025 WMP Update states, "In the WTRM v4 update, we corrected this overly conservative estimate by applying a remaining strength of 32% (consistent to Condition Code 2) to reinforced poles, in order to state the basis for applying a remaining strength of 32% to reinforced poles."</p>	Holly Walther	4/9/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf">https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf</a>	0	NA	6.2.2.2	6.0 Risk Methodology and Assessment	6.2.2.2 Consequence
544	CaPA	Sat WMP-42	CaPA_Sat WMP-42	6	CaPA_Sat WMP-42_06	<p>Page 17 of PG&amp;E's 2025 WMP Update states, "When viewed on a line weighted basis, the relative average risk of each transmission line can be viewed for nights. It should be noted that these mile weighted values will tend to highlight short lines such as SPS."</p> <p>1) Does PG&amp;E plan to correct for the fact that mile weighted values tend to highlight shorter lines?</p> <p>2) If the answer to part (a) is yes, explain the method PG&amp;E uses to do so.</p> <p>3) If the answer to part (a) is no, explain why not.</p>	Holly Walther	4/9/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf">https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf</a>	0	NA	6.2.2.2	6.0 Risk Methodology and Assessment	6.2.2.2 Consequence
545	CaPA	Sat WMP-42	CaPA_Sat WMP-42	7	CaPA_Sat WMP-42_07	<p>Page 24 of PG&amp;E's 2025 WMP Update states that PG&amp;E is adjusting target PS-07 (Reduce RUPP Impacts to Customers) in 2025 downward by 40% to account for a 40% increase in underground utility miles.</p> <p>Does PG&amp;E expect a similar reduction in the number of EPSS customer services impacted in 2025? Explain your answer.</p>	Holly Walther	4/9/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf">https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-14 EPSS Initiatives Analysis for EPSS Implementing Implementation of DCO
546	CaPA	Sat WMP-42	CaPA_Sat WMP-42	8	CaPA_Sat WMP-42_08	<p>Page 29 of PG&amp;E's 2025 WMP Update states that PG&amp;E's 2025 forecast capital expenditure associated with overhead conductor installation will increase by a factor of 5.8, from \$1.4 billion to \$8.1 billion. The updated Table PG&amp;E-8.1.1-1 on page 452 of PG&amp;E's 2025 WMP R4 reflects indicators that, in 2025, the release associated with overhead conductor installation will increase by a factor of 4.4, from 50 miles to 220 miles. Please explain why PG&amp;E's capital forecast for 2025 will increase by a factor of 5.8 while the mileage will increase by a factor of 4.4.</p>	Holly Walther	4/9/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf">https://www.pge.com/assets/pge/cpa/wmp/wmp-2025-wmp-r4-2024-04-09.pdf</a>	0	NA	4.3	4.0 Overview of WMP	4.3 Proposed Expenditures

547	CAIPA	Sat WMP-42	CAIPA_Sat WMP-42	9	CAIPA_Sat WMP-42_09	<p>In comparison to PG&amp;E's WDRM v3, does WDRM v4:</p> <ol style="list-style-type: none"> <li>Move 10 percent or more of ignition risk into or out of the top ignition risk circuits, segments, or spans? If yes, please provide the data in the format of Table 1-1 in section 1.1.1 of the 2025 Wildlife Mitigation Plan Update. Guidelines for both WDRM v3 and v4.</li> <li>Move 10 percent or more of PSPS risk into or out of the top PSPS risk circuits, segments, or spans? If yes, please provide the data in the format of Table 1-2 in section 1.1.1 of the 2025 Wildlife Mitigation Plan Update. Guidelines for both WDRM v3 and v4.</li> </ol>	Holly Walman	4/9/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-42_09.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-42_09.pdf</a>	1	NA	6.2.1	6.0 Risk Methodology and Assessment	6.2.1 Risk and Risk Component Identification
548	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	1	CAIPA_Sat WMP-43_01	<p>Does not appear to be an option of covered conductor with both EPSS and DCC.</p> <p>Is the PG&amp;E covered conductor alternative that consists of covered conductor with EPSS and DCC?</p> <p>Is the answer to part (a) or (b) no, why? If the answer to part (a) is no, why not?</p>	Holly Walman	4/12/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_01.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_01.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Updating Grid Hardening Decision Making
549	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	2	CAIPA_Sat WMP-43_02	<p>The identified average effectiveness for alternative 9 (REFCL with covered conductor, EPSS, and DCC) is lower than alternative 4 (covered conductor with EPSS).</p> <p>Why does the effectiveness for alternative 9 appear lower than alternative 4, although alternative 9 appears to include more mitigation techniques?</p>	Holly Walman	4/12/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_02.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_02.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Updating Grid Hardening Decision Making
550	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	3	CAIPA_Sat WMP-43_03	<p>List the assumptions unique to each of the ten alternatives.</p>	Holly Walman	4/12/2024	4/26/2024			0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Updating Grid Hardening Decision Making
551	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	4	CAIPA_Sat WMP-43_04	<p>Explain the difference in "substation effectiveness score" and "intended average effectiveness at the circuit segment level."</p> <p>Does alternative 9a assume that, for circuits where REFCL cannot be applied to the substation, there are no mitigations applied?</p> <p>If the answer to part (b) is no, what are the basins for this assumption?</p> <p>Describe how PG&amp;E would implement alternative 9 on circuits served by substations where REFCL could be applied.</p> <p>Describe how PG&amp;E would implement alternative 9 on circuits served by substations where REFCL could not be applied.</p>	Holly Walman	4/12/2024	4/26/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_04.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_04.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Updating Grid Hardening Decision Making
552	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	5	CAIPA_Sat WMP-43_05	<p>Alternative 1 is the only alternative that appears to include PSPS.</p> <p>Is PSPS considered in any of the other alternatives?</p> <p>How many of the substations in your response to part (b) are not capable of having REFCL applied?</p> <p>If the answer to part (a) is no, why not?</p>	Holly Walman	4/12/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_05.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_05.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Updating Grid Hardening Decision Making
553	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	6	CAIPA_Sat WMP-43_06	<p>The table notes, "Not all substations are capable of having REFCL applied, and it cannot be isolated to a circuit segment only."</p> <p>How many substations does PG&amp;E have that serve circuit segments within its HTDFHRA?</p> <p>How many of the substations in your response to part (b) are not capable of having REFCL applied?</p> <p>Provide a list of the substations in part (b). For each substation, state the reasons why REFCL cannot be applied.</p> <p>If PG&amp;E has not conducted the analysis necessary to respond to parts (b) and (c) in full, please explain why not.</p>	Holly Walman	4/12/2024	4/26/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_06.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_06.pdf</a>	1	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Updating Grid Hardening Decision Making
554	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	7	CAIPA_Sat WMP-43_07	<p>The table lists the assumption, "Mitigation effectiveness for other Environmental caused outages: None for Overhead and All for Underground."</p> <p>State the basis for this assumption.</p>	Holly Walman	4/12/2024	4/26/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_07.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_07.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Updating Grid Hardening Decision Making
555	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	8	CAIPA_Sat WMP-43_08	<p>The table lists the assumption, "Analysis assumes no Overhead degradation for life of the asset."</p> <p>State the basis for this assumption.</p> <p>Does PG&amp;E have plans to include overhead degradation of assets in its mitigation efficacy analysis in the future?</p> <p>How does the WBCA consider benefits and costs over the lifetime of the asset if the analysis assumes no overhead degradation?</p>	Holly Walman	4/12/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_08.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_08.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Updating Grid Hardening Decision Making
556	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	9	CAIPA_Sat WMP-43_09	<p>The table lists the assumption, "EPSS and DCC are only active when conditions are greater than R1."</p> <p>State the basis for this assumption.</p> <p>Are weather events an applicable attribute in the outage combination used in PG&amp;E's mitigation effectiveness analysis?</p> <p>Please provide a list of all applicable attributes to be used in outage combinations.</p>	Holly Walman	4/12/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_09.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_09.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Updating Grid Hardening Decision Making
557	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	10	CAIPA_Sat WMP-43_10	<p>Page 66 of PG&amp;E's 2025 WMP Update states, "The Joint ILMs have met monthly in 2023 to discuss the results of recorded and estimated effectiveness for covered conductor."</p> <p>Provide the results of estimated effectiveness for covered conductor that were discussed in 2023 for each of the Joint ILMs.</p> <p>Provide the results of estimated effectiveness for covered conductor that were discussed in 2023 for each of the Joint ILMs.</p> <p>List one other finding from the monthly meetings in 2023, and describe it.</p>	Holly Walman	4/12/2024	4/12/2024	4/12/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_10.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_10.pdf</a>	1	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Continuation of Grid Hardening Joint Studies
557	CAIPA	Sat WMP-43	CAIPA_Sat WMP-43	100/PPP	CAIPA_Sat WMP-43_100/PPP	<p>CAI Associates requested results of meetings held in 2023 regarding the effectiveness for covered conductor. PG&amp;E's responses appear to be identical to the Joint IOU OCC report from its 2023-2025 Base WMP 2023-03-27_PSE_2023_WMP_PD_Appendix A ACI PG&amp;E-23-11_Ar011.pdf, provided to OESB March 2023, and does not include results of meetings held in 2023.</p> <p>Please verify whether PG&amp;E possesses documents responsive to the request to include the results of recorded and estimated effectiveness for covered conductor based on meetings held in 2023.</p> <p>If yes, please provide them in a format that includes the identified findings and associated mitigation measures.</p> <p>PG&amp;E included findings from the covered conductor working group in the 2023-2025 WMP Update located on pages 64-67 of the PDF PG&amp;E does not possess materials in addition to what was provided in the 2023 WMP Update.</p> <p>If PG&amp;E has attached WMP-Discovery-2023-0205_DCR_California043-D01AR01.pdf for the Joint IOU Covered Conductor Working Group Report, which includes the results of recorded and estimated effectiveness for covered conductor discussed during 2023 monthly Joint ILM meetings.</p> <p>Please see the response to subject (a) for the requested information.</p> <p>PG&amp;E is not aware of additional findings outside of those in the Joint IOU Covered Conductor Working Group Report, identified in subject (a).</p>	Holly Walman	4/19/2024	4/24/2024	4/24/2024	<a href="https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_100/PPP.pdf">https://www.pge.com/assets/pge/external/efms/efms_data/2025/WMP-43_100/PPP.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-08 - Continuation of Grid Hardening Joint Studies

558	CAIPA	Sat WMP-43	CAIPA_Sat_WMP-43	11	CAIPA_Sat_WMP-43_011	<p>Pages 66-67 of PG&amp;E's 2025 WMP Update list three workshops the Joint Utilities held with Energy Safety. June 2023 Distribution Fault Anticipation (DFA) WMP-Discovery025-2025_DR_CalAdvocates_043-D011A201.pdf</p> <p>July 2023 Early Fault Detection (EFD) WMP-Discovery025-2025_DR_CalAdvocates_043-D011A203.pdf</p> <p>August 2023 Rapid Earth Fault Current Limiter (REFCL) WMP-Discovery025-2025_DR_CalAdvocates_043-D011A204.pdf</p> <p>(a) Provide a copy of any materials prepared by PG&amp;E for each of the three workshops. (b) Provide a copy of any reports, minutes, recordings, or other output of the three workshops. (c) List any findings from each of the three workshops. (d) List any action items PG&amp;E took on from each of the three workshops.</p>	Holly Walman	4/12/2024	4/17/2024	4/17/2024	<a href="https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf">https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf</a>	4	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-06 - Continuation of Grid Hardening Joint Studies
559	CAIPA	Sat WMP-43	CAIPA_Sat_WMP-43	119JPP	CAIPA_Sat_WMP-43_0119JPP	<p>In response to part (b), PG&amp;E stated, "No reports, minutes, recordings were taken or prepared at the referenced workshops." However, Slide 8 of attachment 2 lists "meeting minutes" under "next steps."</p> <p>* If yes, please provide those in response to this data request.</p>	Holly Walman	4/19/2024	4/24/2024	4/24/2024	<a href="https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf">https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-06 - Continuation of Grid Hardening Joint Studies
560	CAIPA	Sat WMP-43	CAIPA_Sat_WMP-43	12	CAIPA_Sat_WMP-43_012	<p>Page 67 of PG&amp;E's 2025 WMP Update states, "In 2023, the utilities discussed the unit costs of EFD and underpinning and compared, at a high level, the different cost drivers."</p> <p>(a) Provide the unit costs of covered conductor that were discussed in 2023 for each of the Joint Utilities. (b) Provide the unit costs of underpinning that were discussed in 2023 for each of the Joint Utilities. (c) Describe the cost drivers that were discussed in 2023 for each of the Joint Utilities. (d) List any other findings from the monthly meetings in 2023 noted above.</p>	Holly Walman	4/12/2024	4/17/2024	4/17/2024	<a href="https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf">https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-06 - Continuation of Grid Hardening Joint Studies
561	CAIPA	Sat WMP-43	CAIPA_Sat_WMP-43	129JPP	CAIPA_Sat_WMP-43_0129JPP	<p>Cal Advocates requested results of meetings held in 2023 regarding the unit costs and cost drivers of covered conductor and underpinning. PG&amp;E's response refers to the attachment to Question 10 which, as noted above, does not discuss results from 2023 meetings.</p> <p>* Please verify whether PG&amp;E possesses any meeting minutes associated with the workshops discussed in question 11. If yes, please provide those in response to this data request.</p>	Holly Walman	4/19/2024	4/24/2024	4/24/2024	<a href="https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf">https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-06 - Continuation of Grid Hardening Joint Studies
562	CAIPA	Sat WMP-43	CAIPA_Sat_WMP-43	13	CAIPA_Sat_WMP-43_013	<p>Page 68 of PG&amp;E's 2025 WMP Update states, with regard to the REFCL pilot at the Caltelega substation, "Although we are committed to continuing this demonstration project, several factors have caused delays in commissioning the program, including equipment failure, extended lead time of equipment, and the need to procure additional equipment to further stabilize the system."</p> <p>(a) List and describe each equipment failure that occurred during 2021, 2022, or 2023 and delayed the commissioning of the program. (b) List and describe each instance of extended lead time that occurred during 2021, 2022, or 2023 and delayed the commissioning of the program. (c) List and describe PG&amp;E's current needs to procure additional equipment to further stabilize the system. (d) When does PG&amp;E currently anticipate receiving satisfactory results from the REFCL pilot at the Caltelega substation? (e) List each of the efforts PG&amp;E made in 2023 to accelerate the REFCL pilot at the Caltelega substation. (f) List each of the efforts PG&amp;E plans to make in 2025 to accelerate the REFCL pilot at the Caltelega substation.</p>	Holly Walman	4/12/2024	4/17/2024	4/17/2024	<a href="https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf">https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-07 - Deployment of New Technologies
561	CAIPA	Sat WMP-43	CAIPA_Sat_WMP-43	14	CAIPA_Sat_WMP-43_014	<p>Page 69 of PG&amp;E's 2025 WMP Update states, "As of December 2023, PG&amp;E moved beyond pilot and into production of these technologies, being deployed EFD technology on 103 locations over 5 distribution circuits and DFA technology at 79 substations."</p> <p>(a) State the approximate number of circuit miles on which DFA is currently active. (b) Describe PG&amp;E's standards and criteria for determining when to install EFD technology. (c) Describe PG&amp;E's standards and criteria for determining when to install DFA technology. (d) Provide a description of the pilot program mentioned in the quote above, which prompted PG&amp;E to move into production and deployment of these technologies in December 2023. (e) Provide any reports, analysis, or other documentation of the results of the pilot program.</p>	Holly Walman	4/12/2024	4/17/2024	4/17/2024	<a href="https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf">https://www.pge.com/assets/pge/docs/advocates-and-supporters/caladvocates_043.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-07 - Deployment of New Technologies

562	CA/PA	Set WMP-43	CA/PA_Set WMP-43	15	CA/PA_Set WMP-43_015	<p>Table ACI-PG&amp;E-23-09-1 on page 75 of PG&amp;E's 2025 WMP Update lists the number of HFTD structures in each consequence level from E&amp;S to Medium.</p> <p>1) Provide an updated version of this table with additional rows to show the structures with a consequence rank level from E&amp;S to Medium.</p> <p>2) Please provide an updated version of this table (including the additional rows from part (a)) that lists structures in the HFTD HFRA, not only the HFTD.</p> <p>3) Explain the methodology PG&amp;E used to segregate its pit maps by consequence rank.</p> <p>4) Provide any procedures, reports, analyses, or other documentation to support your response to part (3).</p>	Holly Walman	4/12/2024	4/17/2024	4/17/2024	<p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p>	1	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-09 - Decrease in Detailed Distribution Inspections
563	CA/PA	Set WMP-43	CA/PA_Set WMP-43	16	CA/PA_Set WMP-43_016	<p>Table ACI-PG&amp;E-23-09-1 on page 75 of PG&amp;E's 2025 WMP Update lists the number of HFTD structures in each consequence level from E&amp;S to Medium.</p> <p>1) Has PG&amp;E used the WORM v4 to re-rank its structures and pit maps? If no, explain why not.</p> <p>2) If the answer to part (a) is no, does PG&amp;E plan to use the WORM v4 to re-rank its structures and pit maps? If so, explain why not.</p> <p>3) If the answer to either part (a) or (b) is yes, does PG&amp;E plan to adjust its detailed inspection program to use the updated pit map marking? If no, explain why not.</p> <p>4) If the answer to part (c) is yes, will PG&amp;E use the same inspection frequencies for the updated pit map marking? If no, explain why not.</p> <p>5) If the answer to part (d) is yes, when does PG&amp;E plan to adjust its detailed inspection program to use the updated pit map marking in 2025?</p>	Holly Walman	4/12/2024	4/17/2024	4/17/2024	<p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-09 - Decrease in Detailed Distribution Inspections
564	CA/PA	Set WMP-43	CA/PA_Set WMP-43	17	CA/PA_Set WMP-43_017	<p>Page 10 of PG&amp;E's 2025 WMP Update states:</p> <p>Inspecting high consequence assets annually by ground would increase both the eyes-on-risk and the cost of the inspection plan relative to inspecting these assets every other year. PG&amp;E calculates that approximately 37,000 additional inspections would need to be performed annually at a cost of roughly \$4.3 million. Similarly, inspecting medium consequence structures every other year would result in 15,000 more inspections at an additional annual cost of \$1.7 million.</p> <p>1) What would be the annual cost of performing approximately 37,000 additional detailed aerial inspections of high consequence assets?</p> <p>2) What would be the annual cost of performing approximately 15,000 additional detailed aerial inspections of medium consequence assets?</p> <p>3) What would be the estimated benefit, in dollars, of inspecting high consequence assets annually?</p> <p>4) What would be the estimated benefit, in dollars, of inspecting medium consequence assets annually?</p>	Holly Walman	4/12/2024	4/17/2024	4/17/2024	<p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-09 - Decrease in Detailed Distribution Inspections
565	MGRA	Data Request No. 10	MGRA_Data Request No. 10	1	MGRA_Data Request No. 10_Q1	<p>Please provide a spreadsheet listing (in rows) of every undergrounding project completed during the period of January 1, 2023, through December 31, 2023, including non-WMP projects. For each project, please provide the following information (in columns):</p> <p>1) Project ID number or other identifier</p> <p>2) ID of each circuit segment that was entirely undergrounded in the project</p> <p>3) ID of each circuit segment that was partially undergrounded in the project</p> <p>4) Total overhead circuit-miles removed</p> <p>5) Total miles of underground conductor installed</p> <p>6) Total miles of trenching required</p> <p>7) Total electric costs of the project (i.e., costs attributed to your electric facilities), including costs for planning, design, permitting, and construction</p> <p>8) Total number of customers served by the project</p> <p>9) Total number of minutes of PSPS experienced by the project circuit segments since 2019.</p>	Joseph Michol	4/12/2024	4/17/2024	4/17/2024	<p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p>	1	NA	8	Section 8.1.2 - Grid Design and System Hardening	8.1.2.2 Undergrounding of electric lines and/or equipment
566	MGRA	Data Request No. 10	MGRA_Data Request No. 10	2	MGRA_Data Request No. 10_Q2	<p>Please provide a spreadsheet listing (in rows) of every planned undergrounding completed to be fully or partially completed by the end of 2024. This includes work currently underway, completed in 2024, or to be performed in 2024.</p> <p>1) Other number</p> <p>2) Circuit ID number</p> <p>3) Circuit segment name or ID number (if the project affects more than one circuit segment, please identify each one)</p> <p>4) Relevant wildfire risk scenario(s) from the wildfire risk model that you are using to estimate distribution loss in your 2025 WMP Update filing</p> <p>5) The expected or actual start date of the project</p> <p>6) The expected completion date of the project</p> <p>7) Length (in circuit miles) of overhead conductor to be installed prior to the end of 2025</p> <p>8) Length (in circuit miles) of overhead conductor to be permanently removed prior to the end of 2025 and replaced by underground conductor (note that this may differ slightly from the previous section due to differing overhead and underground losses)</p> <p>9) Length (in circuit miles) of overhead conductor to be permanently removed in 2025 and not replaced with covered conductor or undergrounding</p> <p>10) Total number of customers served by the project</p> <p>11) Total number of minutes of PSPS experienced by the project circuit segments since 2019.</p>	Joseph Michol	4/12/2024	4/17/2024	4/17/2024	<p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p>	1	NA	8	Section 8.1.2 - Grid Design and System Hardening	8.1.2.2 Undergrounding of electric lines and/or equipment
567	MGRA	Data Request No. 10	MGRA_Data Request No. 10	3	MGRA_Data Request No. 10_Q3	<p>Has DCD algorithms based on prevailing weather conditions? If so, please describe how weather is adjusted according to weather.</p>	Joseph Michol	4/12/2024	4/17/2024	4/17/2024	<p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-14 Effectiveness Analysis for EPSS Including Implementation of DCD
568	MGRA	Data Request No. 10	MGRA_Data Request No. 10	4	MGRA_Data Request No. 10_Q4	<p>During today's April 8th meet and confer, the ADM's technology was mentioned that could allow much faster switching of fast tap configurations. Please describe the ADM's and/or what information it could be used, and how much it might help to remove the table title page.</p>	Joseph Michol	4/12/2024	4/17/2024	4/17/2024	<p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-14 Effectiveness Analysis for EPSS Including Implementation of DCD
569	MGRA	Data Request No. 10	MGRA_Data Request No. 10	5	MGRA_Data Request No. 10_Q5	<p>Please provide the 2022 and 2023 EPSS reliability studies referred to on p. 8 and p. 12 of T110363-2024042112596_20240421_POE_2025_WMPUpdate_3d1_A022316_A0201.pdf.</p>	Joseph Michol	4/12/2024	4/17/2024	4/17/2024	<p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p>	3	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-14 Effectiveness Analysis for EPSS Including Implementation of DCD
570	MGRA	Data Request No. 10	MGRA_Data Request No. 10	6	MGRA_Data Request No. 10_Q6	<p>As per discussions in the April 8th meet and confer, please provide distribution loss data for each circuit segment in any format required to remove suspension (data or any other confidential information). This can be converted to the format required by the Smart Analytics Data Report.</p>	Joseph Michol	4/12/2024	4/17/2024	4/17/2024	<p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p>	1	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-14 Effectiveness Analysis for EPSS Including Implementation of DCD
571	CA/PA	Set WMP-44	CA/PA_Set WMP-44	1	CA/PA_Set WMP-44_01	<p>Page 52 of PG&amp;E's 2025 WMP Update states:</p> <p>We assessed the effectiveness of each of the mitigation alternatives against more than 2,200 outage combinations that have occurred in PG&amp;E's HFTD during wildfire season. PG&amp;E SMEs reviewed each of the outage combinations, and assigned a rating for each mitigation at preventing each outage combination.</p> <p>1) How many SMEs were involved in reviewing outage combinations and assigning effectiveness ratings?</p> <p>2) Please describe the methods used by PG&amp;E SMEs to review outage combinations and assign effectiveness ratings.</p> <p>3) Do the 2,200 outage combinations represent a specific time period? Please explain your answer.</p> <p>4) Do the 2,200 outage combinations include outage combinations that occurred in PG&amp;E's HFRA but not in the HFTD? Please explain your answer.</p>	Holly Walman	4/15/2024	4/18/2024	4/18/2024	<p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p> <p><a href="https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update">https://www.pge.com/customer-service/updates-and-alerts/2025-wmp-update</a></p>	1	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E-23-05 - Updating Grid Hardening Decision Making

572	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	2	CAIPA_Sat WMP-44_02	<p>Page 54 of POGE's 2025 WMP Update states: "To determine circuit segment-level mitigation effectiveness, the WBCA will adjust for the outage combinations likely to occur on a given circuit segment, that estimated frequency, and their contribution to overall risk on the circuit segment."</p> <p>6) Please describe the methods used in the WBCA to adjust for the outage combinations likely to occur on a given circuit segment.</p> <p>7) Please describe the methods used in the WBCA to adjust for the contribution of outage combinations to overall risk on a given circuit segment.</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI POGE-23-05 - Updating Grid Hardening Decision Making
573	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	3	CAIPA_Sat WMP-44_03	<p>Page 54 of POGE's 2025 WMP Update states: "To determine circuit segment-level mitigation effectiveness, the WBCA will adjust for the outage combinations likely to occur on a given circuit segment, that estimated frequency, and their contribution to overall risk on the circuit segment."</p> <p>8) Please describe the methods used in the WBCA to adjust for the contribution of outage combinations to overall risk on a given circuit segment.</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI POGE-23-05 - Updating Grid Hardening Decision Making
574	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	4	CAIPA_Sat WMP-44_04	<p>Page 56 of POGE's 2025 WMP Update discusses Underpinning versus Overhead Hardening. Underpinning is stated to have greater total permanent risk reduction, but it takes longer and costs more to install.</p> <p>9) Has POGE conducted an analysis of its transmission and distribution system to determine the estimated remaining useful life of its assets?</p> <p>10) If the answer to part (9) is yes, does POGE consider the remaining life of assets when evaluating benefits of overhead hardening, which is faster to deploy?</p> <p>11) If the answer to part (9) is yes, please provide any applicable analysis relevant to the condition of POGE's transmission and distribution system assets.</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI POGE-23-05 - Updating Grid Hardening Decision Making
575	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	5	CAIPA_Sat WMP-44_05	<p>Page 67 of POGE's 2025 WMP Update states: "Regarding cost effectiveness scores, the undergrounding projects in POGE's current workplan were previously selected using a methodology (WDRM v2 and V3) that did not incorporate cost effectiveness scores for individual projects. Therefore, cost effectiveness scores are not available."</p> <p>12) Define the term "undergrounding project" in the above statement.</p> <p>13) Has POGE used the outputs from WDRM v1 to calculate the cost effectiveness scores for the undergrounding projects in POGE's current workplan?</p> <p>14) If the answer to part (13) is yes, please provide the cost effectiveness scores for all projects in POGE's current undergrounding workplan.</p> <p>15) If the answer to part (13) is no, explain why not.</p> <p>16) Does POGE plan to use the outputs from WDRM v1 to calculate the cost effectiveness scores for the undergrounding projects in POGE's current workplan?</p> <p>17) If the answer to part (16) is yes, when does POGE anticipate completing this analysis?</p> <p>18) If the answer to part (16) is no, explain why not.</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI POGE-23-05 - Updating Grid Hardening Decision Making
576	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	6	CAIPA_Sat WMP-44_06	<p>Figure ACI-POGE-23-02-1 on page 40 of POGE's 2025 WMP Update states: "After considering the overall wildfire risk with EPSS and PPS, this is a 68% - 3x of Distribution Outage."</p> <p>19) Please state the significance of the "3x" risk of overall wildfire risk with EPSS and PPS compared to Distribution Outage.</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI POGE-23-02 - PPS and Wildfire Risk Take-Out Transparency
577	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	7	CAIPA_Sat WMP-44_07	<p>Figure ACI-POGE-23-02-1 on page 40 of POGE's 2025 WMP Update indicates that wildfire risk is approximately \$20.688 million, and PPS and EPSS combined reduce the wildfire risk by approximately \$16.359 million.</p> <p>20) Are the \$20.688 million wildfire risk and the \$16.359 million risk reduction estimates annual values? Please explain if no.</p> <p>21) Do the \$20.688 million wildfire risk and the \$16.359 million risk reduction estimates apply to POGE's entire service territory? Please explain if no.</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI POGE-23-02 - PPS and Wildfire Risk Take-Out Transparency
578	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	8	CAIPA_Sat WMP-44_08	<p>Figure ACI-POGE-23-02-1 on page 40 of POGE's 2025 WMP Update indicates that wildfire risk is approximately \$20.688 million, and PPS and EPSS combined reduce the wildfire risk by approximately \$16.359 million.</p> <p>22) Has POGE estimated the incremental wildfire risk reduction (in dollars) attributed to wildfire risk reduction of REFLC?</p> <p>23) This study has not been conducted because REFLC cannot be deployed independently in the EPSS monthly reports provided to the public.</p> <p>24) Has POGE conducted this analysis?</p> <p>25) If the answer to part (23) is no, why has POGE not conducted this analysis?</p> <p>26) Has POGE estimated the incremental risk increase attributed to widespread deployment of REFLC? Please provide this estimate if yes.</p> <p>27) If the answer to part (26) is no, why has POGE not conducted this analysis?</p> <p>28) Has POGE estimated the incremental lifetime expenditure attributed to widespread deployment of REFLC? Please provide this estimate if yes.</p> <p>29) If the answer to part (29) is no, why has POGE not conducted this analysis?</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI POGE-23-02 - PPS and Wildfire Risk Take-Out Transparency
579	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	9	CAIPA_Sat WMP-44_09	<p>Page 88 of POGE's 2025 WMP Update states: "CPUC-replaceable igniters on EPSS enabled circuits were replaced by approximately 720 igniters in the three-year program."</p> <p>30) Please provide copies of any reports, analysis, or other documentation to support POGE's statement quoted above.</p> <p>31) Are EPSS outages with DCC-embedded devices in the EPSS monthly reports served by POGE?</p> <p>32) If the answer to part (31) is yes, please state how such outages are distinguishable.</p> <p>33) If the answer to part (31) is no, does POGE plan to make such outages distinguishable in future EPSS monthly reports?</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI POGE-23-14 - Effectiveness Analysis for EPSS Including Implementation of DCC
580	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	10	CAIPA_Sat WMP-44_010	<p>The following table is from POGE's 2022 Annual Electric Reliability Report, page 12:</p> <p>34) Please provide an updated version of this table with an additional row for 2023.</p> <p>35) If POGE is unable to provide any of the requested data from part (34), please provide a reason for each data item.</p> <p>36) If POGE is unable to provide any of the requested data from part (34), please provide an estimate of when this data will be available.</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	NA	NA	NA
581	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	11	CAIPA_Sat WMP-44_011	<p>Page 70 of POGE's 2025 WMP Update states: "The 2023 FTI focused on new inspection program enhanced enhanced inspection practices and evaluated improvements to situational awareness to further inform on-gate clearance recommendations. Based on results of the 2023 FTI, POGE is working forward with necessary 1,500 miles of work in 2024."</p> <p>37) Please describe the results of the program in which POGE is basing the decision to move forward with necessary 1,500 miles of work in 2024.</p> <p>38) Provide any available reports, analysis, or other documentation of the results of the program.</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI POGE-23-19 - Continued Progression of Vegetation Management Maturity
582	CAIPA	Sat WMP-44	CAIPA_Sat WMP-44	12	CAIPA_Sat WMP-44_012	<p>Table ACI-POGE-23-23-1 on page 113 of POGE's 2025 WMP Update includes the following entry:</p> <p>4) Explain why the last calibration date of this weather station was recorded as 1/1/2022, over three months after the station was installed.</p> <p>5) Provide any records of the calibration on 9/1/2022.</p> <p>6) When does POGE become aware that the site had been destroyed?</p> <p>7) When does POGE plan to replace the destroyed asset?</p>	Holly Walther	4/15/2024	4/19/2024	4/19/2024	<a href="https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf">https://www.pge.com/content/dam/pge/pge-us/en/energy/operations/2025-wmp/2025-wmp-update-04-19-2024.pdf</a>	0	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI POGE-23-23 - Weather Station Maintenance and Calibration

583	CAIPA	See WMP-44	CAIPA_Sat_WMP-44	13	CAIPA_Sat_WMP-44_L013	<p>Table ACP-PCGE-23-21-1 on page 113 of PCGE's 2025 WMP Update includes the following entry:      14. Explain why the last calibration date of this weather station was recorded as 11/1/2022, over one month after the station was removed on September 07, 2022.      15. Provide any records of the calibration on 11/1/2022.      16. When did PCGE receive an email that the station had been removed?      17. When does PCGE plan to relocate the station?</p>	Holly Walman	4/15/2024	4/15/2024	4/15/2024	<a href="https://www.pge.com/assets/geba/communications-and-safety/2025-wmp-update-20240402-001-002-003-004-005-006-007-008-009-010-011-012-013-014-015-016-017-018-019-020-021-022-023-024-025-026-027-028-029-030-031-032-033-034-035-036-037-038-039-040-041-042-043-044-045-046-047-048-049-050-051-052-053-054-055-056-057-058-059-060-061-062-063-064-065-066-067-068-069-070-071-072-073-074-075-076-077-078-079-080-081-082-083-084-085-086-087-088-089-090-091-092-093-094-095-096-097-098-099-100-101-102-103-104-105-106-107-108-109-110-111-112-113-114-115-116-117-118-119-120-121-122-123-124-125-126-127-128-129-130-131-132-133-134-135-136-137-138-139-140-141-142-143-144-145-146-147-148-149-150-151-152-153-154-155-156-157-158-159-160-161-162-163-164-165-166-167-168-169-170-171-172-173-174-175-176-177-178-179-180-181-182-183-184-185-186-187-188-189-190-191-192-193-194-195-196-197-198-199-200-201-202-203-204-205-206-207-208-209-210-211-212-213-214-215-216-217-218-219-220-221-222-223-224-225-226-227-228-229-230-231-232-233-234-235-236-237-238-239-240-241-242-243-244-245-246-247-248-249-250-251-252-253-254-255-256-257-258-259-260-261-262-263-264-265-266-267-268-269-270-271-272-273-274-275-276-277-278-279-280-281-282-283-284-285-286-287-288-289-290-291-292-293-294-295-296-297-298-299-300-301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-991-992-993-994-995-996-997-998-999-1000">https://www.pge.com/assets/geba/communications-and-safety/2025-wmp-update-20240402-001-002-003-004-005-006-007-008-009-010-011-012-013-014-015-016-017-018-019-020-021-022-023-024-025-026-027-028-029-030-031-032-033-034-035-036-037-038-039-040-041-042-043-044-045-046-047-048-049-050-051-052-053-054-055-056-057-058-059-060-061-062-063-064-065-066-067-068-069-070-071-072-073-074-075-076-077-078-079-080-081-082-083-084-085-086-087-088-089-090-091-092-093-094-095-096-097-098-099-100-101-102-103-104-105-106-107-108-109-110-111-112-113-114-115-116-117-118-119-120-121-122-123-124-125-126-127-128-129-130-131-132-133-134-135-136-137-138-139-140-141-142-143-144-145-146-147-148-149-150-151-152-153-154-155-156-157-158-159-160-161-162-163-164-165-166-167-168-169-170-171-172-173-174-175-176-177-178-179-180-181-182-183-184-185-186-187-188-189-190-191-192-193-194-195-196-197-198-199-200-201-202-203-204-205-206-207-208-209-210-211-212-213-214-215-216-217-218-219-220-221-222-223-224-225-226-227-228-229-230-231-232-233-234-235-236-237-238-239-240-241-242-243-244-245-246-247-248-249-250-251-252-253-254-255-256-257-258-259-260-261-262-263-264-265-266-267-268-269-270-271-272-273-274-275-276-277-278-279-280-281-282-283-284-285-286-287-288-289-290-291-292-293-294-295-296-297-298-299-300-301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-991-992-993-994-995-996-997-998-999-1000</a>	0	NA	11.4	Appendix D - Areas for Contract Improvement	11.4 ACI PCGE-03-20 - Weather Station Maintenance and Calibration
584	CAIPA	See WMP-45	CAIPA_Sat_WMP-45	1	CAIPA_Sat_WMP-45_01	<p>Regarding its usage of Wildlife Distribution Risk Model (WDRM) v4 in scoping cover conductor and underground projects, and the reflection of such in its System Planning Accountability Report required by D.23-11-004 (PCGE issues the following in response to Question 6 of data request CAIAdvocates-PCGE-2025WMP-04):      The scope of the SHAR (System Planning Accountability Report) includes System Planning completed in the CRC period (2022-2026). Projects in the time period we've not currently anticipated to be informed by WDRM v4. In the event projects selected by WDRM v4 do not get being planned for completion during this time period, WDRM v4 information would be included in the SHAR in the eventing non-related fields (i.e., Applicable Risk Model, Risk Reduction %, etc.).      How do you show that it is meaning the risk reduction targets outlined in D.23-11-007?      (a) If the event projects selected with WDRM v4 do not get being planned for completion in the CRC period, will PCGE file a Petition for Modification (PFM) of D.23-11-009 to reflect usage of WDRM v4? Please explain your answer.      (b) In the event projects selected with WDRM v4 do not get being planned for completion in the CRC period, will PCGE adjust an advice letter to modify the SHAR template to reflect usage of WDRM v4? Please explain your answer.      (c) In the event projects selected with WDRM v4 do not get being planned for completion in the CRC period, will PCGE use different means (other than a PFM of D.23-11-009 to an advice letter) to modify the SHAR reporting requirements or SHAR template content? Please explain your answer.</p>	Holly Walman	4/15/2024	4/15/2024	4/15/2024						

593	CaPA	Sat WMP-46	CaPA_Sat WMP-46	6	CaPA_Sat WMP-46_C6	In response to data request Call/Conducts-PGE-2023WMP-03, question 1, PGE provided attachment "WMP-Discovery2023-2025_C6_Cal/Conducts (03-2023)0602.xlsx". The following questions refer to the tab "Transmission": a) Please define "OC Data" (column D). b) Please define "OV Data" (column G). c) Does PGE have a standard for the maximum amount of time that is allowable between an inspection and the OC data? d) If the answer to part (c) is yes, what is the maximum amount of time that is allowable between an inspection and the OC data? e) If the answer to part (c) is no, why not? f) Does PGE have a standard for the maximum amount of time that is allowable between an inspection and the OV data? g) If the answer to part (g) is yes, what is the maximum amount of time that is allowable between an inspection and the OV data? h) If the answer to part (g) is no, why not? i) Please provide any relevant procedures, specifications, job aids, bulletins, or other documentation to support your answer.	Holly Welman	4172024	4252024	NA	8.1.6	Section 8.1.6 - Quality Assurance and Quality Control	8.1.6.1 Quality Assurance (QA)
594	CaPA	Sat WMP-46	CaPA_Sat WMP-46	7	CaPA_Sat WMP-46_C7	In response to data request Call/Conducts-PGE-2023WMP-03, question 1, PGE provided attachment "WMP-Discovery2023-2025_C7_Cal/Conducts (03-2023)0703.xlsx". The following questions refer to the tab "Pole Clearing": a) Please define "OC Data" (column P). b) Please define "OV Data" (column N). c) Does PGE have a standard for the maximum amount of time that is allowable between an inspection and the OC data? d) If the answer to part (c) is yes, what is the maximum amount of time that is allowable between an inspection and the OC data? e) If the answer to part (c) is no, why not? f) Does PGE have a standard for the maximum amount of time that is allowable between an inspection and the OV data? g) If the answer to part (g) is yes, what is the maximum amount of time that is allowable between an inspection and the OV data? h) If the answer to part (g) is no, why not? i) Please provide any relevant procedures, specifications, job aids, bulletins, or other documentation to support your answer.	Holly Welman	4172024	4252024	NA	8.1.6	Section 8.1.6 - Quality Assurance and Quality Control	8.1.6.1 Quality Assurance (QA)
595	CaPA	Sat WMP-46	CaPA_Sat WMP-46	8	CaPA_Sat WMP-46_C8	In response to data request Call/Conducts-PGE-2023WMP-03, question 1, PGE provided attachment "WMP-Discovery2023-2025_C8_Cal/Conducts (03-2023)0803.xlsx". The following questions refer to the tab "2023 BI Transmission Desktop OC": a) Please explain what an entry of "Photos are not adequate per compliance training" in Discrepancy Code Description (column I) means. b) If photos are not adequate per compliance training, is it possible to complete OC for that inspection? Explain why or why not. c) Please provide any relevant procedures, specifications, job aids, bulletins, or other documentation to support your answer to part (b). d) If photos are not adequate per compliance training, what actions do OC personnel take to complete OC? e) Please provide any relevant procedures, specifications, job aids, bulletins, or other documentation to support your answer to part (d).	Holly Welman	4172024	4252024	NA	8.1.6	Section 8.1.6 - Quality Assurance and Quality Control	8.1.6.1 Quality Assurance (QA)
596	CaPA	Sat WMP-46	CaPA_Sat WMP-46	9	CaPA_Sat WMP-46_C9	In response to data request Call/Conducts-PGE-2023WMP-03, question 1, PGE provided attachment "WMP-Discovery2023-2025_C9_Cal/Conducts (03-2023)0903.xlsx", which relates to asset inspections in 2023. Line 8 indicates that, out of 133 transmission intrusive pole inspections reviewed by desktop OC, 108 failed OC review. Line 9 indicates that, out of 148 transmission intrusive pole inspections reviewed by field OC, 134 failed OC review. Has PGE made any changes to its intrusive inspection practices for transmission pole inspections as a result of the high OC failure rates? a) If the answer to part (a) is yes, describe the changes PGE has made. b) Provide any relevant procedures, specifications, job aids, bulletins, or other documentation to support your answer to part (a). c) If the answer to part (a) is no, state why not. d) Has PGE made any changes to its OC review process for intrusive inspections of transmission poles as a result of the high OC failure rates? e) If the answer to part (d) is yes, describe the changes PGE has made. f) Provide any relevant procedures, specifications, job aids, bulletins, or other documentation to support your answer to part (d). g) If the answer to part (d) is no, state why not. h) Please describe any other actions PGE took as a result of the high OC failure rates in 2023 related above. i) What were the primary reasons for transmission intrusive pole inspections to fail desktop OC review in 2023? j) What were the primary reasons for transmission intrusive pole inspections to fail field OC review in 2023?	Holly Welman	4172024	4252024	NA	8.1.6	Section 8.1.6 - Quality Assurance and Quality Control	8.1.6.1 Quality Assurance (QA)
597	CaPA	Sat WMP-46	CaPA_Sat WMP-46	10	CaPA_Sat WMP-46_C10	In response to data request Call/Conducts-PGE-2023WMP-03, question 1, PGE provided attachment "WMP-Discovery2023-2025_C10_Cal/Conducts (03-2023)1003.xlsx", which relates to asset inspections in 2023. Line 16 indicates that, out of 2820 distribution intrusive pole inspections reviewed by desktop OC, 1672 failed OC review. Line 17 indicates that, out of 1491 distribution intrusive pole inspections reviewed by field OC, 1021 failed OC review. Has PGE made any changes to its intrusive inspection practices for distribution pole inspections as a result of the high OC failure rates? a) If the answer to part (a) is yes, describe the changes PGE has made. b) Provide any relevant procedures, specifications, job aids, bulletins, or other documentation to support your answer to part (a). c) If the answer to part (a) is no, state why not. d) Has PGE made any changes to its OC review process for intrusive inspections of distribution poles as a result of the high OC failure rates? e) If the answer to part (d) is yes, describe the changes PGE has made. f) Provide any relevant procedures, specifications, job aids, bulletins, or other documentation to support your answer to part (d). g) If the answer to part (d) is no, state why not. h) Please describe any other actions PGE took as a result of the high OC failure rates in 2023 related above. i) What were the primary reasons for distribution intrusive pole inspections to fail desktop OC review in 2023? j) What were the primary reasons for distribution intrusive pole inspections to fail field OC review in 2023?	Holly Welman	4172024	4252024	NA	8.1.6	Section 8.1.6 - Quality Assurance and Quality Control	8.1.6.1 Quality Assurance (QA)
598	OES	016	OES_016	1	OES_016_C1	D01: Regarding PGE's Response to PG&E-23-15, I says that "the following information will be digitally recorded for trees prescreened for removal." - Did PGE enhance the One VM application for Routine and Second Patrol to include capability to capture factors for prescreening trees for removal" by target completion date of 1/31/2024? - If not, explain the reason for the delay and provide an updated target completion date for inclusion of this capability in One VM. - Provide the One VM form that "captures" factors for prescreening trees for removal." - Is PGE on track to "Enhance the application for the Vegetation Management for Operational Mitigation (VOM) - NMRP - Tree Removal Inventory (TRI) - Field Prep - program to include capability to capture factors for prescreening trees for removal" by target completion date of 1/15/2024? - If not, explain the reason for the delay and provide an updated target completion date for this planned enhancement. - In PGE's response to PG&E-23-15, it says that "PGE will be making digital record enhancements to FTI potential strike trees." - Did PGE enhance record keeping practices for the Focused Tree Inspection program (FTI) by creating records of all potential strike trees inspected using a digitized Tree Risk Assessment form" by target completion date of 3/31/2024? - If not, explain the reason for the delay and provide an updated timeline for inclusion of this capability in One VM. Provide PGE's digitized Tree Risk Assessment form.	Brad Hill	4222024	4252024	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E 23-15 Implementation of Focused Tree Inspections and Addressing the Risk from Hazard Trees
599	OES	016	OES_016	2	OES_016_C2	D02: Regarding PGE's Quarterly Targets for Routine Patrol In PGE's 2025 WMP Update, PGE sets quarterly targets for Routine Patrol - Distribution (VM-16); 2023 and 2024 targets are included for reference. PGE's Routine Patrol Targets by Year in Circuit Mileage Year End of Q2 End of Q3 End of Year 2023 41,761 43,800 79,000 2024 38,325 39,989 78,650 2025 31,280 33,850 78,200 % vs. 2023-2025 28.7% 19.5% 17% Note: PGE's end of year target has remained relatively constant from 2023 to 2025, the end of Q2 and end of Q3 targets have decreased year-over-year. a. Why have PGE's end of Q2 and end of Q3 targets for routine patrol decreased year-over-year since 2023? b. What percentage of PGE's end of Q2 and end of Q3 2025 targets will be completed within the HFT?7 c. How will PGE ensure that the HFT7 and other high risk areas are inspected in a timely manner to mitigate wildfire risk before and during wildfire season?	Brad Hill	4222024	4252024	NA	11.4	Appendix D - Areas for Continued Improvement	11.4 ACI PG&E 23-09 Decrease in Detailed Distribution Inspections
600	OES	016	OES_016	3	OES_016_C3	D03: Regarding PGE's Assessments to its WFRM In its 2025 WMP Update, PGE discusses the changes made between its Wildfire Distribution Risk Model (WDRM) Version 3 (V3) to Version 4 (V4). Based on these changes, provide: a. An updated version of Table 6.5 from its 2023-2025 WMP based on any changes made to the top risk circuit segments between V3 and V4. b. An updated version of Table 7.2 from its 2023-2025 WMP based on any changes made to the top risk circuit segments between V3 and V4. c. An updated version of Table 6.6 from its 2023-2025 WMP based on any changes made to the top risk circuit segments between V3 and V4. d. An updated version of Table 7.1 from its 2023-2025 WMP based on any changes made to the top risk circuit segments between V3 and V4. e. An updated version of Table 7.4 from its 2023-2025 WMP based on any changes made to the top risk circuit segments between V3 and V4. f. A graph demonstrating the overlaid risk scores between V3 and V4, similar to the graph provided in Data Request OES-PG&E-23-09 Question 17 showing the difference in color between V3 and V4.	Brad Hill	4222024	4252024	NA	6	Section 6 - Risk Methodology and Assessment	6.1.2 Summary of Risk Models

Pre-Discovery 01	CAIPA	Set WMP-01	CAIPA_Set_WMP-01	1	CAIPA_Set_WMP-01_01	<p>This data request pertains to your 2023-2025 Wildfire Mitigation Plan (WMP) and all related documents and submissions (including but not limited to data submissions, tables, GIS data, attachments, and appendices).</p> <p>This data request covers the entirety of calendar year 2023.</p> <p>Please provide a copy of each WMP-related document, submission, or report you submit to the Office of Energy Infrastructure Safety (Energy Safety) in 2023 that is related to your WMP. From the California Public Information Act, all documents submitted to Energy Safety. If you have submitted the document to Energy Safety in 2023 to this date request, please provide a copy as soon as possible and no later than 10 business days from the issuance of this date request. If you have submitted a final final version of documents that: (1) are related to safety plans, initiative reports, risk models, risk response efficiency (RSE) calculations, or WMP change orders; and (2) are provided to Energy Safety to provide additional details or correct concerning information or statements in your WMP and any subsequent revisions or change orders affecting your WMP.</p>	<p><b>GENERAL OBJECTIONS TO THIS SET OF DATA REQUESTS</b></p> <p>PG&amp;E objects to the instructions or direction of this set of data requests entire. California's PGE 2023-2025 WMP is the only document of this type that is subject to the applicable rules and decisions of the Commission or any other agency, orders, rules, or laws limiting the regulatory authority and jurisdiction of the Commission. In particular, PG&amp;E objects to the instruction that purports to place a burden on the responding party to search out and identify relevant information. PG&amp;E objects to the instruction that purports to require the responding party to provide and well written instructions, definitions, and requests for the party seeking the information and cannot be applied to the responding party. Additionally, PG&amp;E objects to the instruction that PG&amp;E need "beyond the name and title of the responding individual" as burdensome and not reasonably calculated to lead to the discovery of admissible information. Our responses to data requests are not the product of a single individual but rather the product of numerous individuals working together from different departments of the company. If the requesting party wishes to contact PG&amp;E with questions or concerns about a data request, it may do so by contacting the appropriate individuals in the Regulatory Relations or Law Department upon whom the request was served.</p> <p>PG&amp;E also objects to the following definitions:</p> <ul style="list-style-type: none"> <li>"The definition of "Dates of" or "records" which are overbroad and burdensome to the extent they request materials "relevant" or be connected with in any way" the subject of the data request.</li> <li>"The definition of "Records" to include "documents," "records," and "materials" which include "nonrecords" and "communications," making these terms overbroad, vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible information as provided in this proceeding.</li> <li>"The definition of the phrase "like the basic," which is overbroad and burdensome to the extent it requests "every fact, statistic, reference, suggestion, estimate, consideration, conclusion, study, report, and analysis..."</li> </ul> <p>AND/VER 001 In addition to all general objections, PG&amp;E specifically objects to this request on the grounds that it is overly burdensome. PG&amp;E further objects to this request as the information requested is vague, ambiguous, and overbroad. Lastly, PG&amp;E objects to this request on the grounds that it seeks to impose a continuing response obligation on the responding party. Continuing discovery obligations are not permitted under California law. Bill's v. Exxon Mobil Corp., 124 Cal App 4th 1315, 1328 (2004); Code Civ. Proc. § 2030.08(b). Notwithstanding and without waiving these objections, PG&amp;E accedes as follows. We do our best to provide the requested information sought within the requested timeframe, or as soon as possible thereafter. However, please note that due to the timing and voluminous nature of our submissions to Energy Safety, it may not always be possible to provide the information sought within the requested timeframe. In these instances, we will provide the requested information as soon as it is reasonably possible. Additionally, with the exception of confidential and spatial data, please note that we post our WMP-related submissions on our website, www.pge.com/infrastructureprotection, on the same business day that the documents are provided to Energy Safety. Furthermore, all submissions to Energy Safety are also posted to the request docket on the Energy Safety website, https://info.energysafety.ca.gov/, and are nearly always publicly available within one business day of submission. Public email notifications of the availability of these documents are sent to all parties who subscribe to the service lists for these docket.</p> <p>We will do our best to provide the requested information within the requested timeframe, or as soon as possible thereafter. However, please note that due to the timing and voluminous nature of our submissions to Energy Safety, it may not always be possible to provide the information sought within the requested timeframe. In these instances, we will provide the requested information as soon as it is reasonably possible.</p>	Huly Wehman	2/7/2023	2/14/2023	2/14/2023	0	NA	NA	NA	NA	NA						
Pre-Discovery 02	CAIPA	Set WMP-01	CAIPA_Set_WMP-01	2	CAIPA_Set_WMP-01_02	<p>Please provide a copy of your WMP pre-submission within two business days of its submission to Energy Safety.</p>	<p>PG&amp;E understands the question to refer to reports from our internal Quality Control, Quality Assurance, and Quality Verification programs as set forth below:</p> <p>System Inspections Department</p> <p>Please see the attachment below for the System Inspections QC Department's daily and weekly dashboards communicating Key Performance Indicators (KPIs) and analysis.</p> <ul style="list-style-type: none"> <li>*WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.pdf</li> <li>*WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.pdf</li> </ul> <p>Please note the above attachment contain confidential information.</p> <p>Electric Compliance Quality Management</p> <ul style="list-style-type: none"> <li>• Q0 165 Inspections</li> </ul> <p>Please see attachment listed below for the Electric Compliance Quality Management Department's audits of Q0 165 Inspections. On Distribution and one Transmission system inspections audits were conducted in 2022. Please see attachments: *WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.pdf and *WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.pdf.</p> <p>Please note the above attachment contain confidential information.</p> <p>*Vegetation Quality Verification (QV)</p> <p>The 2022 WMP submission for Vegetation O/A broken down to the following components: Distribution Reviews, Transmission Reviews, Vegetation Control Reviews, Enhanced Vegetation Management (EVM), and Break in Aunts. Please see the following reports for each of these components:</p> <ul style="list-style-type: none"> <li>• DVM Work Log (attached as "tbl") is a comprehensive log for all QV reviews completed in 2022 including a summary of findings for each review as well as a detailed report of those findings.</li> <li>• 2022 EVM Report, attached as *WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.pdf</li> <li>• Vegetation Quality Assurance (QA)</li> </ul> <p>The 2022 WMP submission for Vegetation QA is broken down by "bundles". Final reports are available for bundles that have been completed to date. Please see the attached zip file for a total of 37 DA Report Packages: *WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.zip</p> <p>Please see the above attachments on this table for additional confidential information.</p>	Huly Wehman	2/7/2023	2/15/2023	2/15/2023	1	NA	NA	NA	NA	NA						
Pre-Discovery 03	CAIPA	Set WMP-01	CAIPA_Set_WMP-01	3	CAIPA_Set_WMP-01_03	<p>Please provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reports and submitted to Energy Safety (including but not limited to all PDF, spatial data files, non-spatial data files, and confidential attachments) on the same business day that the document is submitted to Energy Safety.</p>	<p>We will do our best to provide the requested information within the requested timeframe, or as soon as possible thereafter. However, please note that due to the timing and voluminous nature of our submissions to Energy Safety, it may not always be possible to provide the information sought within the requested timeframe. In these instances, we will provide the requested information as soon as it is reasonably possible.</p> <p>Additionally, with the exception of confidential and spatial data, please note that we post our WMP-related submissions on our website, www.pge.com/infrastructureprotection, on the same business day that the documents are provided to Energy Safety. Furthermore, all submissions to Energy Safety are also posted to the request docket on the Energy Safety website, https://info.energysafety.ca.gov/, and are nearly always publicly available within one business day of submission. Public email notifications of the availability of these documents are sent to all parties who subscribe to the service lists for these docket.</p> <p>We will do our best to provide the requested information within the requested timeframe, or as soon as possible thereafter. However, please note that due to the timing and voluminous nature of our submissions to Energy Safety, it may not always be possible to provide the information sought within the requested timeframe. In these instances, we will provide the requested information as soon as it is reasonably possible.</p>	Huly Wehman	2/7/2023	2/14/2023	2/14/2023	0	NA	NA	NA	NA	NA						
Pre-Discovery 04	CAIPA	Set WMP-01	CAIPA_Set_WMP-01	4	CAIPA_Set_WMP-01_04	<p>Provide a copy to Cal Associates of all your confidential responses to WMP discovery requests, on the same business day that you send the documents to the base of the discovery request. This includes: a) Confidential responses to WMP discovery requests issued by Energy Safety. b) Confidential responses to WMP discovery requests issued by other entities.</p>	<p>We will do our best to provide the requested information within the requested timeframe, or as soon as possible thereafter. However, please note that due to the timing and voluminous nature of our submissions to Energy Safety, it may not always be possible to provide the information sought within the requested timeframe. In these instances, we will provide the requested information as soon as it is reasonably possible.</p> <p>PG&amp;E understands the question to refer to reports from our internal Quality Control, Quality Assurance, and Quality Verification programs as set forth below:</p> <p>System Inspections Department</p> <p>Please see the attachment below for the System Inspections QC Department's daily and weekly dashboards communicating Key Performance Indicators (KPIs) and analysis.</p> <ul style="list-style-type: none"> <li>*WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.pdf</li> <li>*WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.pdf</li> </ul> <p>Please note the above attachment contain confidential information.</p> <p>Electric Compliance Quality Management</p> <ul style="list-style-type: none"> <li>• Q0 165 Inspections</li> </ul> <p>Please see attachment listed below for the Electric Compliance Quality Management Department's audits of Q0 165 Inspections. On Distribution and one Transmission system inspections audits were conducted in 2022. Please see attachments: *WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.pdf and *WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.pdf.</p> <p>Please note the above attachment contain confidential information.</p> <p>*Vegetation Quality Verification (QV)</p> <p>The 2022 WMP submission for Vegetation O/A broken down to the following components: Distribution Reviews, Transmission Reviews, Vegetation Control Reviews, Enhanced Vegetation Management (EVM), and Break in Aunts. Please see the following reports for each of these components:</p> <ul style="list-style-type: none"> <li>• DVM Work Log (attached as "tbl") is a comprehensive log for all QV reviews completed in 2022 including a summary of findings for each review as well as a detailed report of those findings.</li> <li>• 2022 EVM Report, attached as *WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.pdf</li> <li>• Vegetation Quality Assurance (QA)</li> </ul> <p>The 2022 WMP submission for Vegetation QA is broken down by "bundles". Final reports are available for bundles that have been completed to date. Please see the attached zip file for a total of 37 DA Report Packages: *WMP-Discovery02_02_CaliforniaElectric_002-000184830CNCF.zip</p> <p>Please see the above attachments on this table for additional confidential information.</p>	Huly Wehman	2/7/2023	2/14/2023	2/14/2023	0	NA	NA	NA	NA	NA						
Pre-Discovery 05	CAIPA	Set WMP-02	CAIPA_Set_WMP-02	1	CAIPA_Set_WMP-02_01	<p>Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by internal entities that were completed since January 1, 2022 and that examined any programs, initiatives, or strategies described in your 2022 WMP Update. External entities included, but are not limited to, consultants, contractors, vendors, and third-party providers and independent auditors.</p>	<p>The PG&amp;E independent Safety Monitor Status Update Report, dated October 4, 2022, discusses programs and initiatives described in our 2022 WMP. Please find the document here: https://info.energysafety.ca.gov/monitor-status-update-report-as-of-10-2022.pdf</p> <p>Please see the above attachment on this table for additional confidential information.</p>	Huly Wehman	2/7/2023	3/7/2023	3/7/2023	6	NA	NA	NA	NA	NA						
Pre-Discovery 06	CAIPA	Set WMP-02	CAIPA_Set_WMP-02	2	CAIPA_Set_WMP-02_02	<p>Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by internal entities that were completed since January 1, 2022 and that examined any programs, initiatives, or strategies described in your 2022 WMP Update. External entities included, but are not limited to, consultants, contractors, vendors, and third-party providers and independent auditors.</p>	<p>The PG&amp;E independent Safety Monitor Status Update Report, dated October 4, 2022, discusses programs and initiatives described in our 2022 WMP. Please find the document here: https://info.energysafety.ca.gov/monitor-status-update-report-as-of-10-2022.pdf</p> <p>Please see the above attachment on this table for additional confidential information.</p>	Huly Wehman	2/7/2023	3/7/2023	3/7/2023	1	NA	NA	NA	NA	NA						
Pre-Discovery 07	CAIPA	Set WMP-02	CAIPA_Set_WMP-02	3	CAIPA_Set_WMP-02_03	<p>Provide an Excel table of all defects in the year 2022 found by Energy Safety's Compliance Branch (as rows) that include the following information in separate columns: a) Associated circuit name b) Defect type c) Description of defect d) WMP initiative (from your 2022 WMP update) associated with defect e) Date that the defect was identified f) Date that the defect was corrected g) If the defect has not yet been corrected as of the issuance date of this data request, a brief explanation h) Priority level of corresponding circuit tag i) Geographic latitude of defect in decimal degrees, truncated to seven decimal places j) Geographic longitude of defect in decimal degrees, truncated to seven decimal places</p>	<p>Please see attachment: *WMP-Discovery02_03_CaliforniaElectric_002-000184830CNCF.pdf for a list of all alleged defects identified in December 2021 by the Office of Energy Infrastructure Safety ("Energy Safety"). Please note these defects were based on notification of defects in March 2022.</p> <p>Please note the following: -The data provided for "Defect type," "Description of defect," and "Date that the defect was identified" are all based on Energy Safety's inspection reports. -Not all corrective actions required Electric Current (EC) notifications ("EC tags"). For example, while reviewing the alleged defects from Energy Safety, some work was addressed directly in the field (e.g., trimming of vegetation), and no EC tag was created. -This attachment contains confidential information.</p>	Huly Wehman	2/7/2023	2/22/2023	2/22/2023	1	NA	8.13	Asset Inspectors	NA							
Pre-Discovery 08	CAIPA	Set WMP-03	CAIPA_Set_WMP-03	1	CAIPA_Set_WMP-03_01	<p>Provide an Excel table of all distribution circuits existing as of January 1, 2023 (as rows) that includes the following information in separate columns: a. Circuit name b. Circuit ID number c. Total circuit miles d. Circuit miles in Non-HTD Areas e. Circuit miles in HTD Tier 1 f. Circuit miles in HTD Tier 2 g. Circuit miles in HTD Tier 3 h. Circuit voltage i. Circuit SAIDI (System Average Interruption Duration Index) for 2021 j. Circuit SAIDI (System Average Interruption Duration Index) for 2022 k. Circuit SAIFI (System Average Interruption Frequency Index) for 2021 l. Circuit SAIFI (System Average Interruption Frequency Index) for 2022 m. Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2021 n. Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2022 o. Total customer-minutes of de-energization on the circuit due to PSPS events in 2021 (sum of customer-minutes across all PSPS events) p. Total customer-minutes of de-energization on the circuit due to PSPS events in 2022 (sum of customer-minutes across all PSPS events) q. Total customer-minutes of de-energization on the circuit due to fast-rip settings in 2021 r. Total customer-minutes of de-energization on the circuit due to fast-rip settings in 2022 s. Number of trees that were worked on for EVM in Non-HTD in 2021 t. Number of trees that were worked on for EVM in Non-HTD in 2022 u. Number of trees that were worked on for EVM in Other HTD in 2021 v. Number of trees that were worked on for EVM in Other HTD in 2022 w. Number of trees that were worked on for EVM in HTD Tier 1 in 2021 x. Number of trees that were worked on for EVM in HTD Tier 1 in 2022 y. Number of trees that were worked on for EVM in HTD Tier 2 in 2021 z. Number of trees that were worked on for EVM in HTD Tier 2 in 2022 aa. Miles of covered conductor installed in Non-HTD in 2021 bb. Miles of covered conductor installed in Non-HTD in 2022 cc. Miles of covered conductor installed in Other HTD in 2021</p>	<p>PG&amp;E is providing the requested distribution information at the circuit level in attachment *WMP-Discovery02_03_CaliforniaElectric_002-000184830CNCF.pdf. Included in the table below are notes that document assumptions in the methodology for data collection. Where we have not included any notes, the data provided did not require adaptations or assumptions in answering the request. For purposes of this request, "Other HTD" refers to Zone 1 areas.</p> <p>Asset data provided in response to this request was generated from PG&amp;E's Geographic Information Systems (GIS) and presented in a spreadsheet format. PG&amp;E's Electric Transmission GIS and Electric Distribution GIS reporting systems receive assets associated with construction work when that work has been reviewed and mapped by Electric GIS mapping technicians. Construction jobs that are partially completed or fully complete may be reported in the GIS systems once construction "as built" information has been submitted and accepted by the GIS Mapping Department. Prior to being received by the GIS Mapping Department, completed job packages must undergo several processing steps including circuit review, processing, and paperwork screening. Sometimes completed job packages require additional information from the field for post-processing work. The processing steps take time to complete, and a project is completed and reported, detailed information remains in the design systems and paper job packages. Therefore, completed field work is not always reflected in the current GIS systems.</p> <p>Once data is mapped in PG&amp;E's GIS systems, it can be formatted to meet the requirements of the Office of Energy Infrastructure Safety (Energy Safety) Field Geospatial Data Exchange (GDE) File Geodatabase schema and included in our GIS Data Standard submissions. Data Citation Notes: Circuit Information on Some circuits can have multiple voltages. Where this occurs, the Circuit Voltage in column g reflects the voltage of the majority of the circuit (based on circuit miles). Please note, Circuit IDs and Circuit Names regarding HTD circuits were not included in this response. SAIDI/MAIFI/MAIFI are not instantaneous, instantaneous, and distribution level outputs as of February 29, 2023 were used to quantify the metrics reported as measured at the individual distribution circuit level and include Major Event Days (as defined in IEEE 388 Standard). The denominator used for such calculations is based on the number of circuits served by each circuit (based on the system configuration at the end of 2022 and may not represent the same circuit configuration at the time of each reporting output). De-energization - As previously stated in our PSPS Final Event On Enlargement reports submitted to the CPUC, "The information, times, and figures released in this report are based on the best available information available at the time of the report's submission. The information, times and figures herein are subject to revision based on further analysis and validation." As such, we note that there are some minor updated versions in the data included in this submission, as expected in the data that may have been requested to provide additional submissions periodically following the</p>	Huly Wehman	2/7/2023	3/10/2023	3/10/2023	2	NA	8.13	Asset Inspectors	Distribution							



File Discovery 09	CuPA	Sat WMP-03	CuPA_Sat_WMP-03	2	CuPA_Sat_WMP-03_02	<p>Provide an Excel table of all transmission circuits existing as of January 1, 2023 (see rows) that includes the following information in separate columns:</p> <ol style="list-style-type: none"> <li>Circuit name</li> <li>Circuit ID number</li> <li>Total circuit miles</li> <li>Circuit miles in Non-HFTD Areas</li> <li>Circuit miles in Other HFTD</li> <li>Circuit miles in HFTD Tier 1</li> <li>Circuit miles in HFTD Tier 2</li> <li>Circuit miles in HFTD Tier 3</li> <li>Circuit voltage</li> <li>Total customer minutes of de-energization on the circuit due to PSCP events in 2021 (sum of customer-minutes across all PSCP events)</li> <li>Total customer minutes of de-energization on the circuit due to PSCP events in 2022 (sum of customer-minutes across all PSCP events)</li> <li>Total customer minutes of de-energization on the circuit due to fast-slip settings in 2021.</li> <li>Total customer minutes of de-energization on the circuit due to fast-slip settings in 2022.</li> <li>Number of support structures replaced in Non-HFTD in 2021</li> <li>Number of support structures replaced in Non-HFTD in 2022</li> <li>Number of support structures replaced in Other HFTD in 2021</li> <li>Number of support structures replaced in Other HFTD in 2022</li> <li>Number of support structures replaced in HFTD Tier 1 in 2021</li> <li>Number of support structures replaced in HFTD Tier 1 in 2022</li> <li>Number of support structures replaced in HFTD Tier 2 in 2021</li> <li>Number of support structures replaced in HFTD Tier 2 in 2022</li> <li>Number of support structures replaced in HFTD Tier 3 in 2021</li> <li>Number of support structures replaced in HFTD Tier 3 in 2022</li> <li>Miles of LIDAR inspection in Non-HFTD in 2021</li> <li>Miles of LIDAR inspection in Non-HFTD in 2022</li> <li>Miles of LIDAR inspection in Other HFTD in 2021</li> <li>Miles of LIDAR inspection in Other HFTD in 2022</li> <li>Miles of LIDAR inspection in HFTD Tier 1 in 2021</li> <li>Miles of LIDAR inspection in HFTD Tier 1 in 2022</li> <li>Miles of LIDAR inspection in HFTD Tier 2 in 2021</li> <li>Miles of LIDAR inspection in HFTD Tier 2 in 2022</li> <li>Miles of LIDAR inspection in HFTD Tier 3 in 2021</li> <li>Miles of LIDAR inspection in HFTD Tier 3 in 2022</li> </ol> <p>20. Number of avoided record violations in Non-HFTD in 2021</p>	Holy Wellman	2/7/2023	3/10/2023	3/10/2023	<a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a>	0	NA	8.1.3	Asset Inspections	Transmission
File Discovery 10	CuPA	Sat WMP-03	CuPA_Sat_WMP-03	3	CuPA_Sat_WMP-03_03	<p>Provide an Excel table of all distribution circuits existing as of January 1, 2022 (see rows) that were removed or decommissioned in 2022, either partially or entirely. This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Includes the following information in separate columns:</p> <ol style="list-style-type: none"> <li>Circuit name</li> <li>Circuit ID number</li> <li>Circuit miles removed or decommissioned in Non-HFTD Areas</li> <li>Circuit miles removed or decommissioned in Other HFTD</li> <li>Circuit miles removed or decommissioned in HFTD Tier 1</li> <li>Circuit miles removed or decommissioned in HFTD Tier 2</li> <li>Circuit miles removed or decommissioned in HFTD Tier 3</li> <li>Reason(s) for removal or decommissioning</li> </ol>	Holy Wellman	2/7/2023	3/10/2023	3/10/2023	<a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a>	1	NA	8.1.2	Grid Design and System Hardening	Work Performed in 2022
File Discovery 11	CuPA	Sat WMP-03	CuPA_Sat_WMP-03	4	CuPA_Sat_WMP-03_04	<p>Provide an Excel table of all transmission circuits existing as of January 1, 2022 (see rows) that were removed or decommissioned in 2022, either partially or entirely. This includes permanent removal, removal of overhead lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Includes the following information in separate columns:</p> <ol style="list-style-type: none"> <li>Circuit name</li> <li>Circuit ID number</li> <li>Circuit miles removed or decommissioned in Non-HFTD Areas</li> <li>Circuit miles removed or decommissioned in Other HFTD</li> <li>Circuit miles removed or decommissioned in HFTD Tier 1</li> <li>Circuit miles removed or decommissioned in HFTD Tier 2</li> <li>Circuit miles removed or decommissioned in HFTD Tier 3</li> <li>Reason(s) for removal or decommissioning</li> </ol>	Holy Wellman	2/7/2023	3/10/2023	3/10/2023	<a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a>	1	NA	Grid Design and System Hardening	System Hardening Work Performed in 2022	
File Discovery 12	CuPA	Sat WMP-03	CuPA_Sat_WMP-03	5	CuPA_Sat_WMP-03_05	<p>For each WMP initiative listed below, please state how the modeled Wildlife Risk Scores for each circuit or circuit-segment influenced when you plan to perform work in 2023.</p> <ol style="list-style-type: none"> <li>ERM</li> <li>Covered conductor installation</li> <li>Undergrounding</li> <li>Distribution pole replacement</li> <li>Grid reconfiguration</li> <li>Detailed inspections of distribution assets</li> <li>Detailed inspections of transmission assets</li> <li>Aerial inspections of distribution assets</li> <li>Aerial inspections of transmission assets</li> <li>LIDAR inspections of distribution assets</li> <li>LIDAR inspections of transmission assets</li> </ol>	Holy Wellman	2/7/2023	3/10/2023	3/10/2023	<a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a>	0	NA	2022 WMP Section 7.1	Wildlife Mitigation Strategy Development	NA
File Discovery 13	CuPA	Sat WMP-03	CuPA_Sat_WMP-03	6	CuPA_Sat_WMP-03_06	<p>For each WMP initiative listed below, please state how the modeled Wildlife Risk Scores for each circuit or circuit-segment influenced how you plan to perform work in 2023.</p> <ol style="list-style-type: none"> <li>ERM</li> <li>Covered conductor installation</li> <li>Undergrounding</li> <li>Distribution pole replacement</li> <li>Grid reconfiguration</li> <li>Detailed inspections of distribution assets</li> <li>Detailed inspections of transmission assets</li> <li>Aerial inspections of distribution assets</li> <li>Aerial inspections of transmission assets</li> <li>LIDAR inspections of distribution assets</li> <li>LIDAR inspections of transmission assets</li> </ol>	Holy Wellman	2/7/2023	3/10/2023	3/10/2023	<a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a>	0	NA	2022 WMP Section 7.1	Wildlife Mitigation Strategy Development	NA
File Discovery 14	CuPA	Sat WMP-03	CuPA_Sat_WMP-03	7	CuPA_Sat_WMP-03_07	<p>For each WMP initiative listed below, please state how the modeled Wildlife Risk Scores for each circuit or circuit-segment influenced when you plan to perform work in 2023.</p> <ol style="list-style-type: none"> <li>ERM</li> <li>Covered conductor installation</li> <li>Undergrounding</li> <li>Distribution pole replacement</li> <li>Grid reconfiguration</li> <li>Detailed inspections of distribution assets</li> <li>Detailed inspections of transmission assets</li> <li>Aerial inspections of distribution assets</li> <li>Aerial inspections of transmission assets</li> <li>LIDAR inspections of distribution assets</li> <li>LIDAR inspections of transmission assets</li> </ol>	Holy Wellman	2/7/2023	3/10/2023	3/10/2023	<a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a> <a href="http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx">http://www.psc.ny.gov/pscweb/pscweb.nsf/openervlet?open=2023-03-CALCULATIONS_2023-0204040101.xlsx</a>	0	NA	7.2	Wildlife Mitigation Strategy Development	Wildlife Mitigation Strategy

Pre-Discovery 15	CAIPA	Sat WMP-03	CAIPA_Sat_WMP-03	8	CAIPA_Sat_WMP-03_08	<p>For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit segment influence how work in 2023 will be sequenced.</p> <p>a. EVM b. Covered conductor installation c. Undergrounding d. Distribution pole replacement e. Grid sectionalization f. Detailed inspections of distribution assets g. Detailed inspections of transmission assets h. Aerial inspections of distribution assets i. Aerial inspections of transmission assets j. LDMR inspections of distribution assets k. LDMR inspections of transmission assets</p>	Holly Walther	2/7/2023	3/10/2023	3/10/2023	<a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a>	0	NA	7.2	Wildfire Mitigation Strategy Development	Wildfire Mitigation Strategy
Pre-Discovery 16	CAIPA	Sat WMP-03	CAIPA_Sat_WMP-03	9	CAIPA_Sat_WMP-03_09	<p>For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit segment influence where you plan to perform work in 2024.</p> <p>a. EVM b. Covered conductor installation c. Undergrounding d. Distribution pole replacement e. Grid sectionalization f. Detailed inspections of distribution assets g. Detailed inspections of transmission assets h. Aerial inspections of distribution assets i. Aerial inspections of transmission assets j. LDMR inspections of distribution assets k. LDMR inspections of transmission assets</p>	Holly Walther	2/7/2023	3/10/2023	3/10/2023	<a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a>	0	NA	7.2	Wildfire Mitigation Strategy Development	Wildfire Mitigation Strategy
Pre-Discovery 17	CAIPA	Sat WMP-03	CAIPA_Sat_WMP-03	10	CAIPA_Sat_WMP-03_010	<p>For each WMP initiative listed below, please state how the modeled Wildfire Risk Scores for each circuit or circuit segment influence how work in 2024 will be sequenced.</p> <p>a. EVM b. Covered conductor installation c. Undergrounding d. Distribution pole replacement e. Grid sectionalization f. Detailed inspections of distribution assets g. Detailed inspections of transmission assets h. Aerial inspections of distribution assets i. Aerial inspections of transmission assets j. LDMR inspections of distribution assets k. LDMR inspections of transmission assets</p>	Holly Walther	2/7/2023	3/10/2023	3/10/2023	<a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a>	0	NA	7.2	Wildfire Mitigation Strategy Development	Wildfire Mitigation Strategy
Pre-Discovery 18	CAIPA	Sat WMP-04	CAIPA_Sat_WMP-04	1	CAIPA_Sat_WMP-04_01	<p>For each WMP initiative for which you forecast capital expenditures in 2023 to be at least two times actual capital expenditures in 2022, please provide:</p> <p>i) The name of the initiative as it is identified in your 2023-2025 WMP ii) The WMP initiative number in Table 11 of your 2023-2025 WMP iii) The WMP initiative number in Table 12 of your 2022 WMP Update iv) An explanation for the projected increase.</p>	Holly Walther	2/7/2023	3/7/2023	3/7/2023	<a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a>	0	NA	4.3	Proposed Expenditures	NA
Pre-Discovery 19	CAIPA	Sat WMP-04	CAIPA_Sat_WMP-04	2	CAIPA_Sat_WMP-04_02	<p>For each WMP initiative for which you forecast capital expenditures in 2024 to be at least two times actual capital expenditures in 2023, please provide:</p> <p>i) The name of the initiative as it is identified in your 2023-2025 WMP ii) The WMP initiative number in Table 11 of your 2023-2025 WMP iii) The WMP initiative number in Table 12 of your 2022 WMP Update iv) An explanation for the projected increase.</p>	Holly Walther	2/7/2023	3/7/2023	3/7/2023	<a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a>	0	NA	4.3	Proposed Expenditures	NA
Pre-Discovery 20	CAIPA	Sat WMP-04	CAIPA_Sat_WMP-04	3	CAIPA_Sat_WMP-04_03	<p>For each WMP initiative for which you forecast operating expenditures in 2023 to be at least two times actual operating expenditures in 2022, please provide:</p> <p>i) The name of the initiative as it is identified in your 2023-2025 WMP ii) The WMP initiative number in Table 11 of your 2023-2025 WMP iii) The WMP initiative number in Table 12 of your 2022 WMP Update iv) An explanation for the projected increase.</p>	Holly Walther	2/7/2023	3/7/2023	3/7/2023	<a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a> <a href="https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp">https://www.gdp.commerce.ca.gov/energy/energy-projects/energy-projects-2023-2025-wmp</a>	0	NA	4.3	Proposed Expenditures	NA

Pri-Discovery 21	CAIPA	Sat WMP-04	CAIPA_Sat_WMP-04	4	CAIPA_Sat_WMP-04_04	<p>For each WMP initiative for which you forecast operating expenditures in 2024 to be at least two times actual operating expenditures in 2022, please provide:</p> <p>a) The name of the initiative as it is identified in your 2022-2023 WMP</p> <p>b) The WMP initiative number in Table 11 of your 2022-2023 WMP</p> <p>c) The name of the initiative as it is identified in your 2022 WMP Update</p> <p>d) The WMP initiative number in Table 11 of your 2022 WMP Update</p> <p>e) An explanation for the projected increase.</p>	<p>a) 2023 WMP forecasts are prepared per WMP Initiative Activities as laid out in Table 11 from Energy Safety. As the 2023 WMP is a new cycle with new mapping of forecasts by activity that align with the 2022 forecasts, there is not an apples-to-apples re-mapping of costs back to the 2022 WMP view. Thus, the comparison can only be made using the 2023 WMP view. Below are the 2023 WMP activities and section numbers where 2024 operating expense forecasts are at least two times the 2022 recorded costs.</p> <ul style="list-style-type: none"> <li>Other technologies and systems not listed above – section 8.1.2.1.2</li> <li>Microgrids – section 8.1.2.7</li> <li>Environmental monitoring systems – 8.3.2</li> <li>FA in mitigation 8.2.3.4</li> </ul> <p>b) See the response to part a)</p> <p>c) NA. As explained in part a), there is not an apples-to-apples re-mapping of costs back to the 2022 WMP view. Thus, the comparison can only be made using the 2023 WMP view.</p> <p>d) NA. Please refer to the response to part c)</p> <p>e) Explanations for the projected increase below:</p> <ul style="list-style-type: none"> <li>Other technologies and systems not listed above – The 2022 recorded costs are too low by anticipated weather</li> <li>Other maintenance work such as vegetation – The 2022 recorded costs are too low by anticipated weather</li> <li>FA in mitigation – The forecast increase is due to implementing three new VM programs that support fall in mitigation (VM for Operational Mitigation, Tree Removal Inventory, Focused Tree Inspections). Please refer to the narrative in section 8.2.3.4 of the 2023 WMP for more details due to missing some costs. The 2022 recorded costs need to be adjusted to put in recorded costs for Substation animal abatement. We will correct this item in Table 11 pursuant to the 2023-2025 WMP Guidelines from Energy Safety.</li> <li>Microgrids – The projected increase is based on forecast and anticipated projects put forward to the CPUC in PG&amp;E's Microgrids Program Implementation Plan.</li> <li>Environmental monitoring systems – The forecast increase in 2023/2024 is mainly driven:</li> </ul> <p>The plan is currently awaiting a CPUC Decision.</p>	Holly Waltherm	2/7/2023	3/7/2023	3/7/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/04/04">https://www.pge.com/pge_dsl#/wmp/2023/04/04</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/04/04">https://www.pge.com/pge_dsl#/wmp/2023/04/04</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/04/04">https://www.pge.com/pge_dsl#/wmp/2023/04/04</a>	0	NA	4.3	Proposed Expenditures	NA
Pri-Discovery 22	CAIPA	Sat WMP-05	CAIPA_Sat_WMP-05	1	CAIPA_Sat_WMP-05_01	<p>In response to Data Request CallActionCase-PGE-2022WMP-31 on September 8, 2022, PG&amp;E provided information regarding the Western Distribution Risk Model version 3 (WDRM v3). Please provide an updated response to questions 1-7 of the above referenced data request, including any new or changed information since PG&amp;E's initial response. If the response to a question has not changed, please so denote.</p>	No changes have been made to WDRM v3 since the September 8, 2022 response.	Holly Waltherm	3/10/2023	3/10/2023	3/10/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/05/01">https://www.pge.com/pge_dsl#/wmp/2023/05/01</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/05/01">https://www.pge.com/pge_dsl#/wmp/2023/05/01</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/05/01">https://www.pge.com/pge_dsl#/wmp/2023/05/01</a>	0	NA	2022 WMP Section 4.5	Model Metrics and Calculation Methodologies	WDRM v3
Pri-Discovery 23	CAIPA	Sat WMP-05	CAIPA_Sat_WMP-05	2	CAIPA_Sat_WMP-05_02	<p>a) Have you identified transportation corridors within your service territory where falling or falling trees or poles could currently limit egress and/or ingress during an emergency?</p> <p>b) If the answer to part (a) is yes, please describe how you identify such transportation corridors.</p> <p>c) If available, please provide a geospatial data file that contains all current identified transportation corridors with ingress and egress hazards.</p>	<p>a) The potential of falling or falling trees or poles near identified transportation corridors is not currently reflected in our site recording. PG&amp;E Risk Safety Operations with experience in career inhibited firefighters have reviewed general egress and/or ingress concerns when evaluating circuits or circuit segments for potential system hardening work.</p> <p>b) Not applicable.</p> <p>c) Not applicable.</p>	Holly Waltherm	3/10/2023	3/10/2023	3/10/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/05/02">https://www.pge.com/pge_dsl#/wmp/2023/05/02</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/05/02">https://www.pge.com/pge_dsl#/wmp/2023/05/02</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/05/02">https://www.pge.com/pge_dsl#/wmp/2023/05/02</a>	0	NA	8.1.3	Asset Inspections	NA
Pri-Discovery 24	CAIPA	Sat WMP-05	CAIPA_Sat_WMP-05	3	CAIPA_Sat_WMP-05_03	<p>Please fill out the attached spreadsheet, CallActionCase-PGE-2022WMP-06 Attachment 1, requesting information regarding your asset inspections in 2022.</p>	Please see attachment "WMP-Discovery2022_DR_CallActionCase_005-0003A0101.xlsx" for the requested information regarding your asset inspections in 2022.	Holly Waltherm	3/10/2023	3/10/2023	3/10/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/05/03">https://www.pge.com/pge_dsl#/wmp/2023/05/03</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/05/03">https://www.pge.com/pge_dsl#/wmp/2023/05/03</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/05/03">https://www.pge.com/pge_dsl#/wmp/2023/05/03</a>	1	NA	8.1.3	Asset Inspections	Inspections completed in 2022
Pri-Discovery 25	CAIPA	Sat WMP-05	CAIPA_Sat_WMP-05	4	CAIPA_Sat_WMP-05_04	<p>Please submit Table 13 of the non-potential data tables in your WMP Quarterly Data Report for Q4 of 2022, which reports issue-related corrective notifications on electric circuits that were open at the end of the quarter, as follows:</p> <ol style="list-style-type: none"> <li>Add the following information in separate columns: <ol style="list-style-type: none"> <li>Name of the associated circuit</li> <li>ID number of the associated circuit</li> <li>Geographic latitude in decimal degrees, truncated to seven decimal places</li> <li>Geographic longitude in decimal degrees, truncated to seven decimal places</li> <li>Priority of the original notification, using PG&amp;E's internal priority level codes</li> <li>Geographic codes or other internal codes</li> </ol> </li> <li>Please complete column 5 ("Equipment type") of Table 13.</li> <li>Please complete or explain why each of the below columns is not applicable: <ol style="list-style-type: none"> <li>Column 1</li> <li>Column 3</li> <li>Column 4</li> <li>Column 5</li> <li>Column 6</li> </ol> </li> </ol>	<p>a) Please see attachments "WMP-Discovery2022_DR_CallActionCase_005-0004A0101.xlsx" for the requested Distribution Information and "WMP-Discovery2022_DR_CallActionCase_005-0004A0201.xlsx" for the requested Geospatial Information. Please note that columns 1, 3, and 5 will not be available for Distribution and Transmission circuits until the 2023 Q1 Quarterly Data Report (QDR) is ready, and data to report changes in the standard that resulted in a substantial reassessment of our notification data.</p>	Holly Waltherm	3/10/2023	3/10/2023	3/10/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/05/04">https://www.pge.com/pge_dsl#/wmp/2023/05/04</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/05/04">https://www.pge.com/pge_dsl#/wmp/2023/05/04</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/05/04">https://www.pge.com/pge_dsl#/wmp/2023/05/04</a>	2	NA	QDR	NA	NA
Pri-Discovery 26	CAIPA	Sat WMP-06	CAIPA_Sat_WMP-06	1	CAIPA_Sat_WMP-06_01	<p>Provide your workplan that describes where you will undertake EVM projects in 2023. This workplan should be in an Excel format, with circuit-segments as rows. Please include the following information in separate columns in the Excel spreadsheet at a minimum:</p> <ol style="list-style-type: none"> <li>Circuit name</li> <li>Circuit ID number</li> <li>Circuit-segment name</li> <li>Circuit-segment ID number</li> <li>EVM miles to be completed in 2023</li> <li>Risk categories for the circuit segment</li> </ol>	The EVM program concluded at the end of 2022. There is no EVM workplan for 2023.	Holly Waltherm	3/10/2023	3/29/2023	3/29/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/06/01">https://www.pge.com/pge_dsl#/wmp/2023/06/01</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/01">https://www.pge.com/pge_dsl#/wmp/2023/06/01</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/01">https://www.pge.com/pge_dsl#/wmp/2023/06/01</a>	0	NA	8.2.3	Vegetation Management	EVM
Pri-Discovery 27	CAIPA	Sat WMP-06	CAIPA_Sat_WMP-06	2	CAIPA_Sat_WMP-06_02	<p>Provide your workplan that describes where you will undertake EVM projects in 2024. This workplan should be in an Excel format, with circuit-segments as rows. Please include the following information in separate columns in the Excel spreadsheet at a minimum:</p> <ol style="list-style-type: none"> <li>Circuit name</li> <li>Circuit ID number</li> <li>Circuit-segment name</li> <li>Circuit-segment ID number</li> <li>EVM miles to be completed in 2024</li> <li>Risk categories for the circuit segment</li> </ol>	The EVM program concluded at the end of 2022. There is no EVM workplan for 2024.	Holly Waltherm	3/10/2023	3/29/2023	3/29/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/06/02">https://www.pge.com/pge_dsl#/wmp/2023/06/02</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/02">https://www.pge.com/pge_dsl#/wmp/2023/06/02</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/02">https://www.pge.com/pge_dsl#/wmp/2023/06/02</a>	0	NA	8.2.3	Vegetation Management	EVM
Pri-Discovery 28	CAIPA	Sat WMP-06	CAIPA_Sat_WMP-06	3	CAIPA_Sat_WMP-06_03	<p>In response to Data Request CallActionCase-PGE-2022WMP-11, Question 2, March 3, 2022, PG&amp;E provided its 2022 EVM workplan. Please provide an updated version of this workplan that lists the actual EVM mileage completed in 2022 as a new column. Rows should be added as needed to cover all circuit-segments where you performed EVM work in 2022 (even if those circuit-segments were not included in the original workplan).</p>	<p>Please see "WMP-Discovery2022_DR_CallActionCase_006-0003A0101.xlsx" for actual 2022 EVM mileage data broken down by circuit segment.</p> <p>Column C on tab "2022 EVM Mile Planned" contains the number of miles planned for EVM work in 2022.</p> <p>Column C on tab "2022 EVM Mile Completed" contains the number of miles that were completed and work verified in 2022.</p>	Holly Waltherm	3/10/2023	3/29/2023	3/29/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/06/03">https://www.pge.com/pge_dsl#/wmp/2023/06/03</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/03">https://www.pge.com/pge_dsl#/wmp/2023/06/03</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/03">https://www.pge.com/pge_dsl#/wmp/2023/06/03</a>	1	NA	2022 WMP 7.3.5.2	Vegetation Management and Inspections	Enhanced Vegetation Management
Pri-Discovery 29	CAIPA	Sat WMP-06	CAIPA_Sat_WMP-06	4	CAIPA_Sat_WMP-06_04	<p>In response to Data Request CallActionCase-PGE-2022WMP-16, Question 11, March 23, 2022, PG&amp;E stated the following: "Through 2022, the EVM program includes strike tree evaluation and hazard tree mitigation, overhead clearing and radial clearance. Starting in 2023, Enhanced VM includes overhead clearing."</p> <p>a) Is the statement above still accurate as of the date of this request?</p> <p>b) If the answer to part (a) is no, please update the above statement to reflect PG&amp;E's vegetation management strategy for 2023.</p> <p>c) If the answer to part (a) is no, please update the above statement to reflect PG&amp;E's vegetation management strategy for 2024.</p>	<p>a) Yes. In response to feedback of wildfire risk effectively and efficiently, the Enhanced Vegetation Management (EVM) program concluded at the end of 2022.</p> <p>b) These new VM programs will be incorporated into the 2023 workplan. These programs for VM are Focused Tree Inspections, VM for Operational Mitigation, and Tree Removal Inventory.</p> <p>c) Focused Tree Inspections: We developed specific areas of focus (referred to as Areas of Concern (AOC)), primarily in the FPA, where we will concentrate our efforts to inspect and address high-risk locations, such as those that have experienced higher volumes of vegetation damage during PSPS events, cables, and/or splines.</p> <p>-VM for Operational Mitigation: This program is intended to help reduce outages and potential ignition with a risk focused, targeted plan to mitigate vegetation concerns based on historic vegetation caused damage on EPSS enabled circuits. We will really focus on mitigating potential vegetation risks in critical protection zones that have experienced vegetation-caused damage. Scope of work will be developed by using EPSS and historical outages data and vegetation data from the WDRM v3 risk model. EPSS-enabled devices vegetation outages status of location inspections may generate additional tree work.</p> <p>-Tree Removal Inventory: This is a long-term program intended to systematically work down trees that were previously identified through EVM inspections. We will develop annual risk-ranked work plans and mitigate the highest risk ranked areas first and will continue monitor the condition of these trees through our established inspection programs.</p> <p>d) The three programs identified above will continue in 2024. These combined three programs are also referred to as EVM Transformation programs.</p>	Holly Waltherm	3/10/2023	3/29/2023	3/29/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/06/04">https://www.pge.com/pge_dsl#/wmp/2023/06/04</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/04">https://www.pge.com/pge_dsl#/wmp/2023/06/04</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/04">https://www.pge.com/pge_dsl#/wmp/2023/06/04</a>	0	NA	2022 WMP 7.3.5	Vegetation Management and Inspections	Program Costs
Pri-Discovery 30	CAIPA	Sat WMP-06	CAIPA_Sat_WMP-06	5	CAIPA_Sat_WMP-06_05	<p>In response to Data Request CallActionCase-PGE-2022WMP-19, Question 16, March 18, 2022, PG&amp;E provided the following table, which shows spending on vegetation management programs in thousands of dollars (actual figures for 2019-2021 and forecasted figures for 2022-2023).</p> <p>Please update this table as follows:</p> <ol style="list-style-type: none"> <li>Update the 2022 column to state actual spending in 2022.</li> <li>Update the 2023 column to show PG&amp;E's current forecasts for 2023.</li> <li>Add a column that shows PG&amp;E's current forecasts for 2024.</li> <li>Please add one as necessary. Any changes in PG&amp;E's vegetation management strategy since created are tabular or categorical in nature.</li> </ol>	Please see updated table below with 2022 Actuals, and our current forecasts for 2023 and 2024.	Holly Waltherm	3/10/2023	3/29/2023	3/29/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/06/05">https://www.pge.com/pge_dsl#/wmp/2023/06/05</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/05">https://www.pge.com/pge_dsl#/wmp/2023/06/05</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/05">https://www.pge.com/pge_dsl#/wmp/2023/06/05</a>	0	NA	Vegetation Management	NA	NA
Pri-Discovery 31	CAIPA	Sat WMP-06	CAIPA_Sat_WMP-06	6	CAIPA_Sat_WMP-06_06	<p>Please provide a list of any incidents in 2022 where the actions of a VM contractor posed a safety risk to workers or the public. "Safety risk" here is defined as any occurred on a workable where the contractor's actions created a safety hazard for other workers or the general public.</p> <p>For each incident, please provide:</p> <ol style="list-style-type: none"> <li>The date you were informed of the safety issue</li> <li>The date that the original work that created the safety issue was performed</li> <li>Whether the safety issue concerned a transmission or distribution circuit</li> <li>A brief description of the safety issue involved in the original work</li> <li>A brief description of the safety issue involved in 2022.</li> </ol>	<p>Please refer to Attachment "WMP-Discovery2022_DR_CallActionCase_009-0004A011CONF.xlsx" for a list of all contractor involved safety incidents that took place in 2022. This data includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>Contractor Name/Pretext: The contractor/player a company involved in the incident.</li> <li>Incident: The date of the incident.</li> <li>Date ER: The date the incident was formally reported and logged.</li> <li>Division: The division where the incident took place.</li> <li>Incident Type: The incident type (ie the strike).</li> <li>Incident Description: A brief description of the incident.</li> <li>Program: Description on which relative a contractor was working on, on the date of incident.</li> <li>Corrective Action: A description of the action(s) PG&amp;E took to prevent recurrence.</li> </ul> <p>Please note, both Distribution and Transmission contractor incidents are included in the attachment. These records are pulled from the Enterprise Contractor Incident Reports Tool (ECIRT) database. The ECIRT database incident handling process does not have a space for reporting Distribution or Transmission circuit information, therefore we are unable to provide that information on the spreadsheet because our system does not track the incidents that way.</p>	Holly Waltherm	3/10/2023	3/29/2023	3/29/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/06/06">https://www.pge.com/pge_dsl#/wmp/2023/06/06</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/06">https://www.pge.com/pge_dsl#/wmp/2023/06/06</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/06">https://www.pge.com/pge_dsl#/wmp/2023/06/06</a>	1	NA	Vegetation Management	NA	NA
Pri-Discovery 32	CAIPA	Sat WMP-06	CAIPA_Sat_WMP-06	7	CAIPA_Sat_WMP-06_07	<p>In response to Data Request CallActionCase-PGE-2022WMP-14, Question 13, March 15, 2022, PG&amp;E provided its 2022 system hardening workplan by the categories relating to parts (a)-(d) below. Please provide an updated version of this workplan with additional columns to show the actual system hardening work performed in each circuit segment in 2022 for each of these categories. Rows should be added as needed to cover all circuit-segments where PG&amp;E performed system hardening work in 2022 (even if those circuit-segments were not included in the original workplan).</p> <ol style="list-style-type: none"> <li>Installation of covered conductor</li> <li>Removal of underground conductor</li> <li>Removal of overhead conductor</li> <li>Removal of overhead conductor associated with remote grid work</li> </ol>	<p>Note, for CallActionCase-PGE-2022WMP-14, Question 13, the projects listed in the 2022 columns were only for projects that overlapped with 2021 completed miles. It did not represent a comprehensive list of 2022 projects. Similarly, the 2020 columns were only for projects that overlapped with 2021 completed miles. It did not represent a comprehensive list of 2020 projects.</p> <p>See "WMP-Discovery2022_DR_CallActionCase_006-0004A011CONF.xlsx" This file includes the 2022 system hardening completed work in the below columns:</p> <ol style="list-style-type: none"> <li>Installation of covered conductor: See column D.</li> <li>Installation of underground conductor: See column E.</li> <li>Removal of overhead conductor: See column O. Note, this removal work is not associated with the lines removed from overhead for installation of underground projects. It is strictly overhead conductor completely de-energized and removed.</li> <li>Removal of overhead conductor associated with remote grid work: NA. There are no removals from remote grid work in 2022. Since the installation of remote grid generating units work occurred late in 2022, the associated line removal of de-energized conductors will take place in 2023.</li> </ol> <p>Similar to the response to CallActionCase-PGE-2022WMP-14, Question 13, the data includes project information from 2021 and 2023 only where projects overlap with those years. Thus, the 2021 and 2023 data is not comprehensive. Additionally, because this question is associated with the System Hardening workplan only, this data does not include interconnecting mileage associated with the Bata Relays.</p>	Holly Waltherm	3/10/2023	3/29/2023	3/29/2023	<a href="https://www.pge.com/pge_dsl#/wmp/2023/06/07">https://www.pge.com/pge_dsl#/wmp/2023/06/07</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/07">https://www.pge.com/pge_dsl#/wmp/2023/06/07</a> <a href="https://www.pge.com/pge_dsl#/wmp/2023/06/07">https://www.pge.com/pge_dsl#/wmp/2023/06/07</a>	1	NA	2022 WMP Section 7.3.1.7	Grid Design and System Hardening	System Hardening



Pre-Discovery 41	CAIPA	Sat WMP-06	CAIPA_Sat WMP-06	16	CAIPA_Sat WMP-06_016	Regarding your PSPS circuit modeling capabilities: a) Please describe your present circuit modeling capabilities with regard to PSPS decision making ("PSPS circuit modeling capabilities"), including with what level of granularity you are able to determine how circuit hardening efforts or other changes to a line segment will affect PSPS events. b) Please describe any improvements to the present PSPS circuit modeling capabilities that you expect to implement in 2022. c) Please describe any improvements to the present PSPS circuit modeling capabilities that you report to implement in 2023. d) Please describe the expected state of your PSPS circuit modeling capabilities at the conclusion of the 2022-2023 WMP cycle.	At all times, PG&E understands circuit modeling to mean the level of granularity at which a utility can model the operation of its electrical assets and through length line assets. PG&E models and de-energizes circuits utilizing all switching devices on the system that do not pose ignition risk. The level of hardening and other changes to a line segment will be accounted for by our WMP model which uses metrics relating to primary past outages and ignitions and uses those as a basis for ignitions and outage potential going forward which is used for PSPS modeling. Thus, we do not provide a breakdown of changes used to incorporate changes to their historical performance changes. As mentioned, PG&E models circuits at the most granular level for de-energization taking into account all devices on the system that do not pose an ignition risk. As mentioned, PG&E models circuits at the most granular level for de-energization taking into account all devices on the system that do not pose an ignition risk. As mentioned, PG&E models circuits at the most granular level for de-energization taking into account all devices on the system that do not pose an ignition risk.	Holly Wehman	3/10/2023	3/29/2023	3/29/2023	0	NA	PSPS	NA	NA
Pre-Discovery 42	CAIPA	Sat WMP-06	CAIPA_Sat WMP-06	17	CAIPA_Sat WMP-06_017	a) Have you developed Public Safety Power Shutoff (PSPS) risk scores at the circuit segment level? b) Have you developed Enhanced Powerline Safety Settings (EPSS) risk scores at the circuit segment level? c) If the answer to either part (a) or (b) is no, please provide a spreadsheet that lists (a) each circuit segment, the most recent specific data for all circuit segments for which you have modeled PSPS or EPSS risk scores. Include the following attributes for each circuit segment: 1. Circuit Identification Number 2. Circuit Name 3. Circuit Segment Identification Number 4. Circuit segment-level PSPS Risk Score (if applicable) 5. Circuit segment-level EPSS Risk Score (if applicable) d) If the answer to part (a) or (b) is yes, please provide a spreadsheet that lists (a) each circuit segment for which you have modeled PSPS or EPSS risk scores. Include the following attributes for each circuit segment: 1. Circuit Identification Number 2. Circuit Name 3. Circuit Segment Identification Number 4. Circuit segment-level PSPS Risk Score (if applicable) 5. Circuit segment-level EPSS Risk Score (if applicable) e) If the answer to part (a) is no, does PG&E intend to develop PSPS risk scores for circuit segments? f) If the answer to part (a) is no, does PG&E intend to develop EPSS risk scores for circuit segments?	a) Yes. This is cited in Section 6.2.1, Figure 6.2.1.3. b) No. c) Please see "WMP-Discovery2023_DCR_California_006-0017A501CONF.pdf" which is a geodatabase file containing the circuit segments along with PSPS risk values and Circuit Segment names. Due to the different circuit segment lengths approximately 400 of the circuit segments are not modeled. d) Yes. Please see "WMP-Discovery2023_DCR_California_006-0017A501CONF.xlsx" which provides the circuit segment PSPS risk values. e) Not applicable. f) PG&E produces an annual reliability study of EPSS outage activity, which informs reliability mitigation actions. Furthermore, PG&E is exploring incorporating this data into "EPSS reliability risk" score for circuit segments.	Holly Wehman	3/10/2023	3/29/2023	3/29/2023	2	NA	PSPS/EPSS	NA	NA
Pre-Discovery 43	CPUC - SPD (Safety Policy Division)	001	CPUC - SPD (Safety Policy Division)_001	1	CPUC - SPD (Safety Policy Division)_001_01	REFCL Inquiries: REFCL file at California Grid Segment ID 110311031 Objective versus active settings profiles Objective versus planned settings profiles Identify how REFCL differs from monetary faults & when REFCL deenergizes line for permanent faults. Identify how REFCL differs from monetary faults & when REFCL deenergizes line for permanent faults. Availability of REFCL - Describe any known barriers to increasing deployment to deploy REFCL to all circuits per Public Safety Act 711 REFCL mitigates: Explain why REFCL is not preferred mitigation for distributed generation and confirm PG&E no longer plans to install REFCL at 2 substations per year per GNC trip.	a. The REFCL equipment installed in the substations protects all the primary lines on both Colianga circuits. These settings profiles allow for changing load sensitivity and tripping behavior on the fly based on field conditions. Setting 1 is for low risk with a three second delay before switching the neutral to solid grounding for the protection to the fault. Setting 2 is for medium risk with a three second fault ride through before directly tripping the faulted feeder circuit breaker for a sustained fault. Setting 3 is for high risk with no time delay and greatest fault sensitivity and tripping the faulted feeder circuit breaker. b. Staged fault testing was performed in 2022 with preliminary data collected. A medium high voltage motor bank is incrementally connected to stage a fault on the circuit. Normally the system rides through the neutral with no service outage from the bus. Due to greater line to ground voltages during the testing, the possibility of unplanned outage of the equipment taking is slightly increased. c. All service transformers w/REFCL circuits are connected two line to one, so service voltage is maintained during the faulted. If setting 1 or 2 is chosen, once a ground fault is detected, a three second delay enables before the fault confirmation is performed in the fault confirmation mechanism that the fault varied (momentary) fault, then the fault voltage is returned to normal with service interruption. If setting 3 is chosen, the fault confirmation mechanism is sustained fault. Then the tripping is handled based on the active setting group described in 1a. d. REFCL is used to protect against the risk of a fault on the circuit. REFCL is used to protect against the risk of a fault on the circuit. REFCL is used to protect against the risk of a fault on the circuit. e. Substation voltage regulators: Regulate voltage-ground connections with in-line connected regulators f. Substation feeder breakers: High accuracy current transformers w/switches g. Substation secondary neutral: clearance of substation transformer bank and installation of grounding switch and cable connections to arc suppression coil h. Substation physical space: Enough room within the substation for an 18 x 28 ft footprint per Ground Fault Neutralizer (GFN). Some substations may require GFN right away for deploying REFCL. i. Distribution circuits: 3-wire up-grounded neutral only j. Distribution circuits: Minimum of approximately 50' circuit miles of underground cable per transformer bank k. Distribution circuits: Primary connected customers - requires large isolation transformer depending on complexity of customer-owned equipment l. Distribution circuits: Long single phase underground cable causes increased neutral current and requires capacitive balancing units (CBUs) m. Each distribution circuit in California is unique. REFCL deployment needs to be evaluated on a circuit-by-circuit basis. Projected next steps to continue research of substation environment to support REFCL: mechanical research (next 6-18 months) n. The following incidents are listed on-going and planned to mitigate EPSS reliability impacts: Enhanced Outage Review Team (EORT) process that includes additional review of circuit/Outage Protection Zone (OPZ) performance that when multiple outages occur triggers a Multiple Outage Review (MOR) to drive additional actions if needed to reduce repeated outage going forward. o. Continuing Proactive Vegetation Trimming on the Top 12 circuit segments that were identified last year based on further of outages experienced and a projected enhancement of over 60% for the first season. For 2023 we looked at CBM (customer experiencing multiple outages) impacted customers and evaluated vegetation outages and identified if additional circuit protection needs be added to this approach. p. Continuing EORT of Condition assessment and trimming. When a vegetation-related EPSS outage occurs the incident location and 5 miles in all directions is inspected by our vegetation management team to identify trimming opportunities to prevent an outage from occurring near the previous location reducing risk and improving reliability. q. EPSS CBM for "Tagged" customers r. Vegetation clearing for OPZ with multiple veg caused outages is covered above. s. Developing additional strategies for animal intrusion reduction due to high animal-caused outages when EPSS is enabled. t. Fault resistor installations Proactively installing 1800 Fault Indicators on EPSS Circuits to expedite outage restoration and assist in finding the location of faults. In general, customer support programs for EPSS are limited to those in place for PSPS implementation. In most cases with PG&E's Battery Storage Program (BSP), Disability and Battery Reserve Access and Resource Program (DBAR) and Generator and Battery Reserve Program (GBRP), the programs are the same. PG&E simply expanded eligibility criteria such that programs initially targeting PSPS customer outages now also include the most impacted EPSS customers. One notable exception is the new residential Fuel Power Stations offering, which the Residential Storage Incentive or RSI, which was launched in late 2022. As a new offering, RSI was targeted at EPSS-impacted customers, which happens to overlap with areas historically impacted by PSPS events. u. The Sensitive Circuit Fault (SCF) protective elements, which was expanded to systemwide use in 2021 and 2022 on 3-wire circuits as a part of EPSS, is a set of non-directional ground overcurrent elements typically set at 15A with a 15-20 second delay. Prior to 2021, SCF was in use in limited usage throughout the system. SCF is enabled year-round given the public safety benefit of detecting and isolating wire on ground faults. SCF is often implemented on feeders and circuit breakers protecting 3-wire or phase-to-phase fault connected downstream line sections. v. Down Conductor Detection (DCD) technology is an industry term used to describe different protective relay algorithms that are focused on detection and isolation of high impedance ground faults. The specific algorithm currently in development is SCF+D, incorporates the manufacturing and value added by a hybrid transformer bus. w. In general, EPSS and REFCL are two very different approaches that share a common goal of attempting to reduce risk associated with ignitions on primary electric distribution systems. x. EPSS - advantages: - Can be implemented on existing existing equipment and relays - Reduces incident fault energy across all types of faults (Three-phase, line-to-line, line-to-ground, etc.) - Reduces incident fault energy through fault clearing time reduction - Help to reduce backfeed issues associated with 3-wire distribution system by prioritizing gang trip behavior versus single phase fault operation - Incorporates various techniques for high impedance fault detection (Sensitive Ground Fault (SGF), Downed Conductor Detection (DCD), etc.) - Does not require changes to system grounding configuration or fault conditions to implement REFCL - advantages: - Preferred for OPZ, ignition probability reduction for single line to ground faults (Vegetation ignition testing). Considering all fault types, an overall ignition probability reduction can be calculated to approximately a 50% reduction. - Fault current limited to 1 Amp for line to ground faults to reduce fault clearing time. - Greater sensitivity to high impedance faults > 3k ohm fault resistance - Lower overall circuit losses for the equipment on ground faults EPSS - disadvantages: - Less capability to reactivate the system during fault events as compared to traditional protective settings due to the minimal coordination time provided in which can result in lower reliability performance - Fault current is not limited, fault energy is reduced by faster clearing time, since user remains a function of existing system configuration. Re-energization after a fault event requires disabling of EPSS to avoid switch trips - Susceptible to trips associated with customer load inrush, CT error, capacitor bank switching, and other non-fault grid disturbances REFCL - disadvantages: - No risk reduction for line-to-line or three-phase ground faults - Complicated to install and operate - Limits operational flexibility / flexibility for the distribution circuit - Fault location is more difficult - Increased line-ground voltage surge on equipment during fault - Backfeed from faults and line-to-ground fault location - Backfeed from faults and line-to-ground fault location For locations that will not be underground, we will continue to deploy the suite of Operational Mitigations and other System Resilience Mitigations. Operational Mitigations include programs such as EPSS equipment maintenance, distribution and repair, vegetation management for operational reliability, and System Resilience Mitigations include programs such as conductor material replacement, transmission conductor replacement, bus, network, and distribution and transmission FTD and HFRA open span relays. We will also engage system staff through our California Monitoring and Data Collection program, include detailed distribution and transmission asset inspection programs, vegetation inspection programs, and monitoring programs and weather stations. As mentioned in the table, we will continue to deploy Section 7.1.1 of the WMP Table 7.1 in PG&E's WMP shows how we have different mitigation programs at the circuit segment level to provide system protection and reduce risk. When Table 7.1 shows only PG&E's top risk circuit segments, we apply the mitigation across all the circuits in the FTD and HFRA.	Wendy Al-Malabat	2/23/2023	3/5/2023	3/5/2023	0	NA	8.1.1.3	GND Operations and Procedures	Setting of Other Emerging Technologies (e.g., Rapid Earth Fault Current Limiters)
Pre-Discovery 44	CPUC - SPD (Safety Policy Division)	001	CPUC - SPD (Safety Policy Division)_001	2	CPUC - SPD (Safety Policy Division)_001_02	EPSS & Supporting Technologies (DCC & Partial Voltage Detectors) Inquiries: Explain all activities planned to mitigate EPSS reliability risks. Are customer support programs (e.g., battery backup) distinct from or in addition to those in place for PSPS implementation? Explain Detailed Circuit Fault Settings for EPSS enabled circuit segments. Explain Downed Conductor Detection (DCD) technology and how it isolates high impedance faults with EPSS. Explain DCC 2023-2025 Tables 7.1 & 7.2. Are 7.1 and 7.2 protective devices consistent or varying and whether they will cover all DED and buffer EPSS circuits. Explain why says "To Be Improved." Explain how many DCC are currently installed including on top 2% risk circuit segments. Explain Partial Voltage Detection using SmartMeters and how supplements DCC and EPSS.	1. Vegetation clearing for OPZ with multiple veg caused outages is covered above. 2. Developing additional strategies for animal intrusion reduction due to high animal-caused outages when EPSS is enabled. 3. Fault resistor installations Proactively installing 1800 Fault Indicators on EPSS Circuits to expedite outage restoration and assist in finding the location of faults. In general, customer support programs for EPSS are limited to those in place for PSPS implementation. In most cases with PG&E's Battery Storage Program (BSP), Disability and Battery Reserve Access and Resource Program (DBAR) and Generator and Battery Reserve Program (GBRP), the programs are the same. PG&E simply expanded eligibility criteria such that programs initially targeting PSPS customer outages now also include the most impacted EPSS customers. One notable exception is the new residential Fuel Power Stations offering, which the Residential Storage Incentive or RSI, which was launched in late 2022. As a new offering, RSI was targeted at EPSS-impacted customers, which happens to overlap with areas historically impacted by PSPS events. 4. The Sensitive Circuit Fault (SCF) protective elements, which was expanded to systemwide use in 2021 and 2022 on 3-wire circuits as a part of EPSS, is a set of non-directional ground overcurrent elements typically set at 15A with a 15-20 second delay. Prior to 2021, SCF was in use in limited usage throughout the system. SCF is enabled year-round given the public safety benefit of detecting and isolating wire on ground faults. SCF is often implemented on feeders and circuit breakers protecting 3-wire or phase-to-phase fault connected downstream line sections. 5. Down Conductor Detection (DCD) technology is an industry term used to describe different protective relay algorithms that are focused on detection and isolation of high impedance ground faults. The specific algorithm currently in development is SCF+D, incorporates the manufacturing and value added by a hybrid transformer bus. 6. In general, EPSS and REFCL are two very different approaches that share a common goal of attempting to reduce risk associated with ignitions on primary electric distribution systems. 7. EPSS - advantages: - Can be implemented on existing existing equipment and relays - Reduces incident fault energy across all types of faults (Three-phase, line-to-line, line-to-ground, etc.) - Reduces incident fault energy through fault clearing time reduction - Help to reduce backfeed issues associated with 3-wire distribution system by prioritizing gang trip behavior versus single phase fault operation - Incorporates various techniques for high impedance fault detection (Sensitive Ground Fault (SGF), Downed Conductor Detection (DCD), etc.) - Does not require changes to system grounding configuration or fault conditions to implement REFCL - advantages: - Preferred for OPZ, ignition probability reduction for single line to ground faults (Vegetation ignition testing). Considering all fault types, an overall ignition probability reduction can be calculated to approximately a 50% reduction. - Fault current limited to 1 Amp for line to ground faults to reduce fault clearing time. - Greater sensitivity to high impedance faults > 3k ohm fault resistance - Lower overall circuit losses for the equipment on ground faults EPSS - disadvantages: - Less capability to reactivate the system during fault events as compared to traditional protective settings due to the minimal coordination time provided in which can result in lower reliability performance - Fault current is not limited, fault energy is reduced by faster clearing time, since user remains a function of existing system configuration. 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Wendy Al-Malabat	2/23/2023	3/5/2023	3/5/2023	0	NA	8.1.1.1	GND Operations and Procedures	Protective Equipment and Device Settings
Pre-Discovery 45	CPUC - SPD (Safety Policy Division)	001	CPUC - SPD (Safety Policy Division)_001	3	CPUC - SPD (Safety Policy Division)_001_03	EPSS vs REFCL Inquiries: EPSS vs REFCL - Describe the major similarities and differences. What are advantages and disadvantages? In terms of capability, standardization, safety, and reliability? EPSS vs Ground Faults vs Circuit (Multiple) Faults - What is the risk profile of existing ignitions on PG&E's system and how does REFCL & EPSS mitigate these risks? Comparison of REFCL with EPSS & Other Mitigations - Explain how these three could work together, and PG&E has quantified combined fault-reduction benefits. Explain the differences in fault energy for EPSS vs REFCL. Including for low and high impedance faults. Explain why EPSS is preferred if REFCL fault energy is less than 10% of EPSS fault energy for low impedance faults. Explain the effectiveness of DCC vs REFCL on high impedance faults.	REFCL - advantages: - Preferred for OPZ, ignition probability reduction for single line to ground faults (Vegetation ignition testing). Considering all fault types, an overall ignition probability reduction can be calculated to approximately a 50% reduction. - Fault current limited to 1 Amp for line to ground faults to reduce fault clearing time. - Greater sensitivity to high impedance faults > 3k ohm fault resistance - Lower overall circuit losses for the equipment on ground faults EPSS - disadvantages: - Less capability to reactivate the system during fault events as compared to traditional protective settings due to the minimal coordination time provided in which can result in lower reliability performance - Fault current is not limited, fault energy is reduced by faster clearing time, since user remains a function of existing system configuration. Re-energization after a fault event requires disabling of EPSS to avoid switch trips - Susceptible to trips associated with customer load inrush, CT error, capacitor bank switching, and other non-fault grid disturbances REFCL - disadvantages: - No risk reduction for line-to-line or three-phase ground faults - Complicated to install and operate - Limits operational flexibility / flexibility for the distribution circuit - Fault location is more difficult - Increased line-ground voltage surge on equipment during fault - Backfeed from faults and line-to-ground fault location - Backfeed from faults and line-to-ground fault location For locations that will not be underground, we will continue to deploy the suite of Operational Mitigations and other System Resilience Mitigations. Operational Mitigations include programs such as EPSS equipment maintenance, distribution and repair, vegetation management for operational reliability, and System Resilience Mitigations include programs such as conductor material replacement, transmission conductor replacement, bus, network, and distribution and transmission FTD and HFRA open span relays. We will also engage system staff through our California Monitoring and Data Collection program, include detailed distribution and transmission asset inspection programs, vegetation inspection programs, and monitoring programs and weather stations. As mentioned in the table, we will continue to deploy Section 7.1.1 of the WMP Table 7.1 in PG&E's WMP shows how we have different mitigation programs at the circuit segment level to provide system protection and reduce risk. When Table 7.1 shows only PG&E's top risk circuit segments, we apply the mitigation across all the circuits in the FTD and HFRA.	Wendy Al-Malabat	2/23/2023	3/5/2023	3/5/2023	0	NA	8.1.1.1	GND Operations and Procedures	Equipment Settings to Reduce Wildlife Risk
Pre-Discovery 46	CPUC - SPD (Safety Policy Division)	001	CPUC - SPD (Safety Policy Division)_001	4	CPUC - SPD (Safety Policy Division)_001_04	General risk reduction inquiry What's PG&E's goal for long-term risk reduction, particularly reduction of likelihood of ignitions and also reduction of consequences, for circuits in HFDs that are not underground?	REFCL - advantages: - Preferred for OPZ, ignition probability reduction for single line to ground faults (Vegetation ignition testing). Considering all fault types, an overall ignition probability reduction can be calculated to approximately a 50% reduction. - Fault current limited to 1 Amp for line to ground faults to reduce fault clearing time. - Greater sensitivity to high impedance faults > 3k ohm fault resistance - Lower overall circuit losses for the equipment on ground faults EPSS - disadvantages: - Less capability to reactivate the system during fault events as compared to traditional protective settings due to the minimal coordination time provided in which can result in lower reliability performance - Fault current is not limited, fault energy is reduced by faster clearing time, since user remains a function of existing system configuration. Re-energization after a fault event requires disabling of EPSS to avoid switch trips - Susceptible to trips associated with customer load inrush, CT error, capacitor bank switching, and other non-fault grid disturbances REFCL - disadvantages: - No risk reduction for line-to-line or three-phase ground faults - Complicated to install and operate - Limits operational flexibility / flexibility for the distribution circuit - Fault location is more difficult - Increased line-ground voltage surge on equipment during fault - Backfeed from faults and line-to-ground fault location - Backfeed from faults and line-to-ground fault location For locations that will not be underground, we will continue to deploy the suite of Operational Mitigations and other System Resilience Mitigations. Operational Mitigations include programs such as EPSS equipment maintenance, distribution and repair, vegetation management for operational reliability, and System Resilience Mitigations include programs such as conductor material replacement, transmission conductor replacement, bus, network, and distribution and transmission FTD and HFRA open span relays. We will also engage system staff through our California Monitoring and Data Collection program, include detailed distribution and transmission asset inspection programs, vegetation inspection programs, and monitoring programs and weather stations. As mentioned in the table, we will continue to deploy Section 7.1.1 of the WMP Table 7.1 in PG&E's WMP shows how we have different mitigation programs at the circuit segment level to provide system protection and reduce risk. When Table 7.1 shows only PG&E's top risk circuit segments, we apply the mitigation across all the circuits in the FTD and HFRA.	Wendy Al-Malabat	2/23/2023	3/5/2023	3/5/2023	0	NA	7.2.1	Wildlife Mitigation Strategy Development	Overview of Mitigation Initiatives and Activities
Pre-Discovery 47	Green Power Institute (GPI)	001	Green Power Institute (GPI)_001_01	1	Green Power Institute (GPI)_001_01_01	Please provide PG&E's Pre-Submission 2023-2025 WMP Base Plan text for February 11, 2023, with the GCS for the 2023 WMP Guidelines and Schedule documents, including all attachments and associated supporting documents required for the Pre-Submission 2023-2025 WMP Base Plan.	PG&E has designated the write pre-submission to conform to align with the California's pre-submission process and guidelines which require that the pre-submission documents are not to be made public, in addition the pre-submission contains contract. As noted in our correspondence to you on March 8th and March 10th, we can provide you with a copy of the pre-submission documents upon execution of a non-disclosure agreement. Alternatively, we will be submitting our final 2023-2025 Wildlife Mitigation Plan (WMP) for public review on March 27, 2023. You would prefer to wait for a copy of the completed WMP (Wildlife Safety) to complete your check. Please feel free to reach out to us to discuss how we can support your efforts.	Zoe Haroot	3/10/2023	3/14/2023	3/14/2023	0	NA	All	All	All

Ph-Discovery 48	CA/PA	Sat WMP-37	CA/PA_Sat_WMP-37	1	CA/PA_Sat_WMP-37_01	<p>Please provide a copy of each WMP Update-related document, submission, or report you submit to the Office of Energy Infrastructure Safety (Energy Safety) in 2024 or 2025 (WMP Update). Provide the copy to Cal Advocates within one business day of the document's submission to Energy Safety. (If you have submitted a document to Energy Safety prior to this date request, please provide a copy as soon as possible and no later than 10 business days from the issuance of this date request.)</p> <p>This request is limited to materials or documents, including targets, risk models, risk spend efficiency (RSE) calculations, cost-benefit ratio (CBR) calculations, or WMP change orders, and if they are provided to Energy Safety to provide additional data for WMP submission or statements to your WMP (and any subsequent revisions or change orders affecting your WMP).</p>	Holly Walman	3/20/2023	4/3/2024	4/3/2024	<a href="https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-update-submission-and-report-caadvocates-017.pdf">https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-update-submission-and-report-caadvocates-017.pdf</a>	0	NA	NA	NA	NA	NA
Ph-Discovery 49	CA/PA	Sat WMP-37	CA/PA_Sat_WMP-37	2	CA/PA_Sat_WMP-37_02	<p>Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reports and submitted to Energy Safety (including but not limited to all PDF, spatial data files, non-spatial data files, and confidential attachments, within one business day of the document's submission to Energy Safety.</p>	Holly Walman	3/20/2023	4/3/2024	4/3/2024	<a href="https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-quarterly-data-reports-caadvocates-017.pdf">https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-quarterly-data-reports-caadvocates-017.pdf</a>	0	NA	NA	NA	NA	NA
Ph-Discovery 50	CA/PA	Sat WMP-37	CA/PA_Sat_WMP-37	3	CA/PA_Sat_WMP-37_03	<p>Provide a copy to Cal Advocates of all your confidential responses to WMP discovery requests, on the same business day that you send the documents to the Office of Energy Infrastructure Safety. This includes:</p> <ul style="list-style-type: none"> <li>i) Confidential responses to WMP discovery requests issued by Energy Safety.</li> <li>ii) Confidential responses to WMP discovery requests issued by other entities.</li> </ul>	Holly Walman	3/20/2023	4/3/2024	4/3/2024	<a href="https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-discovery-responses-caadvocates-017.pdf">https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-discovery-responses-caadvocates-017.pdf</a>	0	NA	NA	NA	NA	NA
Ph-Discovery 51	CA/PA	Sat WMP-38	CA/PA_Sat_WMP-38	1	CA/PA_Sat_WMP-38_01	<p>Provide an Excel table of all distribution circuit segment settings as of January 1, 2024 (as rows) that includes the following information in separate columns. PGE is unable to provide some or all of the requested information at the circuit segment level, provide such data at the circuit level instead and explain why PGE is unable to provide circuit segment level data.</p> <ul style="list-style-type: none"> <li>i) Circuit segment name</li> <li>ii) Circuit ID number</li> <li>iii) Total circuit miles</li> <li>iv) Circuit miles in Non-HFTD</li> <li>v) Circuit miles in Other HFTD</li> <li>vi) Circuit miles in HFTD Tier 2</li> <li>vii) Circuit miles in HFTD Tier 3</li> <li>viii) Circuit voltage</li> <li>ix) Circuit SAGI (System Average Interruption Duration Index) for 2023</li> <li>x) Circuit SAIFI (System Average Interruption Frequency Index) for 2023</li> <li>xi) Circuit MAIFI (Momentary Average Interruption Frequency Index) for 2023</li> <li>xii) Circuit MAFI (Momentary Average Interruption Frequency Index) for 2023</li> <li>xiii) Total customer minutes of de-energization on the circuit due to PSPS events in 2023 (sum of customer minutes across all PSPS events)</li> <li>xiv) Total customer minutes of de-energization on the circuit due to PSPS events in 2023 (sum of customer minutes across all PSPS events)</li> <li>xv) Miles of covered conductor installed in Non-HFTD in 2023</li> <li>xvi) Miles of covered conductor installed in Other HFTD in 2023</li> <li>xvii) Miles of covered conductor installed in HFTD Tier 2 in 2023</li> <li>xviii) Miles of covered conductor installed in HFTD Tier 3 in 2023</li> <li>xix) Number of poles replaced in Non-HFTD in 2023</li> <li>xx) Number of poles replaced in HFTD Tier 2 in 2023</li> <li>xxi) Number of poles replaced in HFTD Tier 3 in 2023</li> <li>xxii) Miles of underground conductor installation in Non-HFTD in 2023</li> <li>xxiii) Miles of underground conductor installation in Other HFTD in 2023</li> <li>xxiv) Miles of underground conductor installation in HFTD Tier 2 in 2023</li> <li>xxv) Miles of underground conductor installation in HFTD Tier 3 in 2023</li> <li>xxvi) Miles of LDMR inspection in Non-HFTD in 2023</li> <li>xxvii) Miles of LDMR inspection in Other HFTD in 2023</li> <li>xxviii) Miles of LDMR inspection in HFTD Tier 2 in 2023</li> <li>xxix) Miles of LDMR inspection in HFTD Tier 3 in 2023</li> </ul>	Holly Walman	3/20/2023	4/19/2024	4/19/2024	<a href="https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-discovery-responses-caadvocates-018.pdf">https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-discovery-responses-caadvocates-018.pdf</a>	4	NA	8	Section 8.1.3 - Asset Inspection	8.1.3.2 Asset Inspectors - Distribution	
Ph-Discovery 52	CA/PA	Sat WMP-38	CA/PA_Sat_WMP-38	2	CA/PA_Sat_WMP-38_02	<p>Provide an Excel table of all transmission circuit settings as of January 1, 2024 (as rows) that includes the following information in separate columns.</p> <ul style="list-style-type: none"> <li>i) Circuit name</li> <li>ii) Circuit ID number</li> <li>iii) Total circuit miles</li> <li>iv) Circuit miles in Non-HFTD</li> <li>v) Circuit miles in Other HFTD</li> <li>vi) Circuit miles in HFTD Tier 2</li> <li>vii) Circuit miles in HFTD Tier 3</li> <li>viii) Circuit voltage</li> <li>ix) Total customer minutes of de-energization on the circuit due to PSPS events in 2023 (sum of customer minutes across all PSPS events)</li> <li>x) Number of support structures replaced in Non-HFTD in 2023</li> <li>xi) Number of support structures replaced in Other HFTD in 2023</li> <li>xii) Number of support structures replaced in HFTD Tier 2 in 2023</li> <li>xiii) Number of support structures replaced in HFTD Tier 3 in 2023</li> <li>xiv) Miles of LDMR inspection in Non-HFTD in 2023</li> <li>xv) Miles of LDMR inspection in Other HFTD in 2023</li> <li>xvi) Miles of LDMR inspection in HFTD Tier 2 in 2023</li> <li>xvii) Miles of LDMR inspection in HFTD Tier 3 in 2023</li> <li>xviii) Number of miles of detailed aerial inspections in Non-HFTD in 2023 (specify units)</li> <li>xix) Number of miles of detailed aerial inspections in Other HFTD in 2023 (specify units)</li> <li>xx) Number of miles of detailed aerial inspections in HFTD Tier 2 in 2023 (specify units)</li> <li>xxi) Number of miles of detailed aerial inspections in HFTD Tier 3 in 2023 (specify units)</li> <li>xxii) Number of detailed climbing inspections in Non-HFTD in 2023</li> <li>xxiii) Number of detailed climbing inspections in Other HFTD in 2023</li> <li>xxiv) Number of detailed climbing inspections in HFTD Tier 2 in 2023</li> <li>xxv) Number of detailed climbing inspections in HFTD Tier 3 in 2023</li> <li>xxvi) Number of detailed ground-based inspections in Non-HFTD in 2023</li> <li>xxvii) Number of detailed ground-based inspections in Other HFTD in 2023</li> <li>xxviii) Number of detailed ground-based inspections in HFTD Tier 2 in 2023</li> <li>xxix) Number of detailed ground-based inspections in HFTD Tier 3 in 2023</li> </ul>	Holly Walman	3/20/2023	4/19/2024	4/19/2024	<a href="https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-discovery-responses-caadvocates-018.pdf">https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-discovery-responses-caadvocates-018.pdf</a>	0	NA	8	Section 8.1.3 - Asset Inspection	8.1.3.1 Asset Inspectors - Transmission	
Ph-Discovery 53	CA/PA	Sat WMP-38	CA/PA_Sat_WMP-38	3	CA/PA_Sat_WMP-38_03	<p>Provide an Excel table of all distribution circuit settings as of January 1, 2023 (as rows) that were removed or decommissioned in 2023, either partially or entirely. This includes permanent removal, removal of overhead lines, removal of underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns:</p> <ul style="list-style-type: none"> <li>i) Circuit name</li> <li>ii) Circuit ID number</li> <li>iii) Circuit miles removed or decommissioned in Non-HFTD</li> <li>iv) Circuit miles removed or decommissioned in Other HFTD</li> <li>v) Circuit miles removed or decommissioned in HFTD Tier 2</li> <li>vi) Circuit miles removed or decommissioned in HFTD Tier 3</li> <li>vii) Reason(s) for removal or decommissioning</li> </ul>	Holly Walman	3/20/2023	4/19/2024	4/15/2024	<a href="https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-discovery-responses-caadvocates-018.pdf">https://www.pge.com/assets/pge/cba/cba-subpage-and-safir/wmp-discovery-responses-caadvocates-018.pdf</a>	1	NA	8	Section 8.1.3 - Asset Inspection	8.1.3.2 Asset Inspectors - Distribution	

Pre-Discovery 54	CA/PA	See WMP-30	CA/PA_Set WMP-35	4	CA/PA_Set WMP-38_04	Provide an Excel table of all transmission circuits existing as of January 1, 2023 (as rows) that were removed or decommissioned in 2023, either partially or entirely. The included pertinent removal, removal of in-service lines that were moved underground, or overhead lines that were decommissioned but not physically removed. Include the following information in separate columns: A) Circuit name B) Circuit ID number C) Circuit miles removed or decommissioned in Non-FTD D) Circuit miles removed or decommissioned in Other FT D E) Circuit miles removed or decommissioned in FT D Tier 2 F) Circuit miles removed or decommissioned in FT D Tier 3 G) Reason for removal or decommissioning.	Please see attachment "WMP-Discovery2023-2025_DR_California_208-ATTACHMENT 1" for the requested information. WMP-Discovery2023-2025_DR_California_208-000404001.xlsx	Holly Wetman	3/20/2023	4/19/2024	4/15/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-04.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-04.xlsx</a>	1	NA	8	Section 8.1.3 - Asset Inspection	8.1.3.1 Asset Inspection - Transmission
Pre-Discovery 55	MORA	008	MORA_Data Request No. 8	1	MORA_Data Request No. 8_01	GIS Data: Please provide the GIS data set provided to the Office of Energy Infrastructure Safety for Q1-Q4 2023. Please remove any confidential attributes that may have been added to the requested records. Please provide Asset Point data for Camera, Fuse, Support Structure, and Weather Station.	GENERAL STATEMENT REGARDING RESPONSES TO QUESTIONS 1 THROUGH 4 In response to questions 1 through 4 of this set of data requests, PGE is providing non-confidential data from the 2023 Office of Energy Infrastructure and Safety (Energy Safety) Geographic Information System (GIS) Data Standard submission, as instructed by the requesting party. Due to the high volume of records in our submission (approximately 1.5 million records each quarter), individual record review for confidential data is neither feasible nor practical. The feature classes and related tables included in the submission are not static and change each quarter. Additionally, the interconnected aspect of feature class data and the geospatial dependencies of the feature data creates complexities in identifying the confidentiality of individual records and removes additional risk for error. PGE is accepting confidential dependencies at the feature class and field level, dependent on the subject data, to help mitigate against the risk of mislabeling individual records. Search requests used to identify confidential records. PGE respectfully requests that MORA use the data for internal purposes only and restrict access to a needs-to-know basis.  In response to this request, PGE is providing Camera and Weather Station data, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. PGE is also providing non-confidential data from the Support Structure feature class. An exception, WMP-Discovery2023-2025_DR_MORA_008-0001 Page 2, PGE is not providing data for the Fuse feature class as this data is confidential energy infrastructure information (CEI). Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A001.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-01.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-01.xlsx</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 55	MORA	Data Request No. 8	MORA_Data Request No. 8	15/PPP	MORA_Data Request No. 8_Q15/PPP	GIS Data: Please provide the GIS data set provided to the Office of Energy Infrastructure Safety for Q1-Q4 2023. Please remove any confidential attributes that may have been added to the requested records. Please provide Asset Point data for Camera, Fuse, Support Structure, and Weather Station.	Please see "WMP-Discovery2023-2025_DR_MORA_008-0001A001A011.gdb.sp" for the information requested during PGE's discussion with MORA on Friday, April 12, 2024.	Joseph Michal	3/21/2023	4/22/2024	4/22/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-015-PPP.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-015-PPP.xlsx</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 56	MORA	008	MORA_Data Request No. 8	2	MORA_Data Request No. 8_Q2	Provide Asset Line data for Transmission Line (as permitted as non-confidential), Primary Distribution Line, and Secondary Distribution Line.	In response to this request, PGE is providing non-confidential data for the Primary and Secondary Distribution Line Feature Classes, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. As requested, PGE is not providing the Transmission Line Feature Class as it is confidential CEI. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-02.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-02.xlsx</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 56	MORA	Data Request No. 8	MORA_Data Request No. 8	25/PPP	MORA_Data Request No. 8_Q25/PPP	Provide Asset Line data for Transmission Line (as permitted as non-confidential), Primary Distribution Line, and Secondary Distribution Line.	In response to this request, PGE is providing non-confidential data for the Primary and Secondary Distribution Line Feature Classes, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. As requested, PGE is not providing the Transmission Line Feature Class as it is confidential CEI. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/22/2024	4/22/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-025-PPP.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-025-PPP.xlsx</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 57	MORA	008	MORA_Data Request No. 8	3	MORA_Data Request No. 8_Q3	Provide PSPS Event data. Include Event Log, Event Line, Event Polygon data. Please exclude customer meter data. Provide all PSPS Event Asset Damage data including photos.	In response to this request, PGE is unable to provide Public Safety Power Shutoff (PSPS) Event data for the Quarter (Q1, Q2, and Q3) 2023 submissions as no PSPS Events have passed these quarters. As requested, our non-confidential data is included in this response. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-03.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-03.xlsx</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 57	MORA	Data Request No. 8	MORA_Data Request No. 8	35/PPP	MORA_Data Request No. 8_Q35/PPP	Provide PSPS Event data. Include Event Log, Event Line, Event Polygon data. Please exclude customer meter data. Provide all PSPS Event Asset Damage data including photos.	In response to this request, PGE is providing non-confidential data for the Wire Down, Ignition, Unplanned Outage, and Risk Asset Log feature classes, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. Energy Safety changed its schema for version 1.1 of the Data Standard and combined all Damage feature classes into a single feature class. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/22/2024	4/22/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-035-PPP.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-035-PPP.xlsx</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 58	MORA	008	MORA_Data Request No. 8	4	MORA_Data Request No. 8_Q4	Provide Risk Event Point data, including Wire Down, Ignition, Transmission unplanned outage (as classified non-confidential), Distribution Unplanned Outage data, Distribution Unplanned Outage Underlaid Outage, Risk Event Asset Log.	In response to this request, PGE is providing non-confidential data for the Wire Down, Ignition, Unplanned Outage, and Risk Asset Log feature classes, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. Energy Safety changed its schema for version 1.1 of the Data Standard and combined all Damage feature classes into a single feature class. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-04.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-04.xlsx</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 58	MORA	Data Request No. 8	MORA_Data Request No. 8	45/PPP	MORA_Data Request No. 8_Q45/PPP	Provide Risk Event Point data, including Wire Down, Ignition, Transmission unplanned outage (as classified non-confidential), Distribution Unplanned Outage data, Distribution Unplanned Outage Underlaid Outage, Risk Event Asset Log.	In response to this request, PGE is providing non-confidential data for the Wire Down, Ignition, Unplanned Outage, and Risk Asset Log feature classes, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. Energy Safety changed its schema for version 1.1 of the Data Standard and combined all Damage feature classes into a single feature class. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/22/2024	4/22/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-045-PPP.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-045-PPP.xlsx</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 59	MORA	008	MORA_Data Request No. 8	5	MORA_Data Request No. 8_Q5	Under Involves, please provide Grid Hardening data, including Hardening Log, Hardening Point, and Hardening Line data. Inspection data is not requested at this time.	In response to this request, PGE is providing non-confidential data for the Grid Hardening Point and Grid Hardening Line feature classes, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. Energy Safety changed its schema for version 1.1 of the Data Standard and renamed the Grid Hardening Log feature class. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-05.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-05.xlsx</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 59	MORA	Data Request No. 8	MORA_Data Request No. 8	55/PPP	MORA_Data Request No. 8_Q55/PPP	Under Involves, please provide Grid Hardening data, including Hardening Log, Hardening Point, and Hardening Line data. Inspection data is not requested at this time.	In response to this request, PGE is providing non-confidential data for the Grid Hardening Point and Grid Hardening Line feature classes, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. Energy Safety changed its schema for version 1.1 of the Data Standard and renamed the Grid Hardening Log feature class. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/22/2024	4/22/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-055-PPP.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-055-PPP.xlsx</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 60	MORA	008	MORA_Data Request No. 8	6	MORA_Data Request No. 8_Q6	Under Other Required Data, please provide Red Flag Warning Day polygon data.	In response to this request, PGE is providing non-confidential data for the Red Flag Warning Day polygon data for Q2-Q4 2023 feature class, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. PGE is unable to provide the Red Flag Warning Day polygon data for the Q1 2023 submission as there were no Red Flag Warning days to report. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-06.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-06.xlsx</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 60	MORA	Data Request No. 8	MORA_Data Request No. 8	65/PPP	MORA_Data Request No. 8_Q65/PPP	Under Other Required Data, please provide Red Flag Warning Day polygon data.	In response to this request, PGE is providing non-confidential data for the Red Flag Warning Day polygon data for Q2-Q4 2023 feature class, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. PGE is unable to provide the Red Flag Warning Day polygon data for the Q1 2023 submission as there were no Red Flag Warning days to report. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/22/2024	4/22/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-065-PPP.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-065-PPP.xlsx</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Progress on Filing Asset Inventory Data Gaps
Pre-Discovery 61	MORA	008	MORA_Data Request No. 8	7	MORA_Data Request No. 8_Q7	Please provide a layer indicating calculated circuit-level risk, using the methodology presented in the WMP. If independent probability and consequence layers exist, please provide these independently as well.	The requested circuit-level risk model results that correspond with this request for the 2023 Q1-Q4 data are the Wildfire Distribution Risk Model (WDRM) v3 results that were provided pursuant to WMP-Discovery2023-2025_DR_MORA_008-0001 and submitted to the Murray Grade Road Alliance on April 7, 2023. In PGE's 2025 WMP Update, the next iteration of the Wildfire Risk Model (WDRM v4) is outlined. At this time the model has not been internally approved for use in developing future wildfire risk. WDRM v4 enhanced capabilities will be first released in the 2026 WMP.	Joseph Michal	3/21/2023	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-07.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-07.xlsx</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Response Overview for Potential Risk/Outage in Higher Risk Areas
Pre-Discovery 61	MORA	Data Request No. 8	MORA_Data Request No. 8	75/PPP	MORA_Data Request No. 8_Q75/PPP	Please provide a layer indicating calculated circuit-level risk, using the methodology presented in the WMP. If independent probability and consequence layers exist, please provide these independently as well.	In response to this request, PGE is providing non-confidential data for the Wire Down, Ignition, Unplanned Outage, and Risk Asset Log feature classes, as delivered in the 2023 Energy Safety GIS Data Standard Submissions. Energy Safety changed its schema for version 1.1 of the Data Standard and renamed the Grid Hardening Log feature class. Please see attachment "WMP-Discovery2023-2025_DR_MORA_008-0001A00101.sp" for the data provided in response to this request.	Joseph Michal	3/21/2023	4/22/2024	4/22/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-075-PPP.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-075-PPP.xlsx</a>	1	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACI PG&E-23-33 Response Overview for Potential Risk/Outage in Higher Risk Areas
Pre-Discovery 62	CA/PA	See WMP-30	CA/PA_Set WMP-35	1	CA/PA_Set WMP-30_01	Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by internal entities that have been completed since January 1, 2023 and that examined any programs, initiatives, or strategies described in your 2023-2025 Base WMP.	PGE internally has managed Quality Assurance (QA/Quality Control) (QC) within our individual functional areas. In 2023, PGE formalized its independent quality management system in support of the System Inspections and Vegetation Management functional areas. As a result, the response provided for 2023 aligns with data produced by various 2023 commitments. Please see the eight attachments identified below for data/reports of QA/QC performed for the following programs: -Vegetation Management Routine Distribution -Vegetation Management Routine Transmission -System Inspections Distribution and -System Inspections Transmission. ATTACHMENTS WMP-Discovery2023-2025_DR_California_208-0001A00101.xlsx WMP-Discovery2023-2025_DR_California_208-0001A00201.xlsx WMP-Discovery2023-2025_DR_California_208-0001A00301.xlsx WMP-Discovery2023-2025_DR_California_208-0001A00401.xlsx WMP-Discovery2023-2025_DR_California_208-0001A00501.xlsx WMP-Discovery2023-2025_DR_California_208-0001A00601.xlsx WMP-Discovery2023-2025_DR_California_208-0001A00701.xlsx WMP-Discovery2023-2025_DR_California_208-0001A00801.xlsx	Holly Wetman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-01.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-01.xlsx</a>	8	NA	8	Section 8.1.6 - Quality Assurance and Quality Control	8.1.6.1 Quality Assurance (QA)
Pre-Discovery 63	CA/PA	See WMP-30	CA/PA_Set WMP-35	2	CA/PA_Set WMP-30_02	Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports conducted by internal entities that have been completed since January 1, 2023 and that examined any programs, initiatives, or strategies described in your 2023-2025 Base WMP. External entities included, but are not limited to, consultants, contractors, auditors, cost-sapportment numbers, and Independent Evaluation.	The requested circuit-level risk model results that correspond with this request for the 2023 Q1-Q4 data are the Wildfire Distribution Risk Model (WDRM) v3 results that were provided pursuant to WMP-Discovery2023-2025_DR_MORA_008-0001 and submitted to the Murray Grade Road Alliance on April 7, 2023. In PGE's 2025 WMP Update, the next iteration of the Wildfire Risk Model (WDRM v4) is outlined. At this time the model has not been internally approved for use in developing future wildfire risk. WDRM v4 enhanced capabilities will be first released in the 2026 WMP.	Holly Wetman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-02.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-02.xlsx</a>	0	NA	8	Section 8.1.6 - Quality Assurance and Quality Control	8.1.6.1 Quality Assurance (QA)
Pre-Discovery 64	CA/PA	See WMP-30	CA/PA_Set WMP-35	3	CA/PA_Set WMP-30_03	Provide an Excel table of all defects in the year 2023 found by Energy Safety's Compliance Branch (as rows) that includes the following information in separate columns: A) Associated circuit name B) Defect type C) Description of defect D) WMP initiative (from your 2023-2025 WMP) associated with defect E) Date that the defect was identified F) Data that the defect was corrected G) If the defect was not corrected, a brief explanation H) Priority level of corresponding corrective tag I) Geographic latitude of defect in decimal degrees, rounded to seven decimal places J) Geographic longitude of defect in decimal degrees, rounded to seven decimal places	Please see the attachment to this response containing CONFIDENTIAL information provided pursuant to the accompanying confidentiality declaration. Please see attachment "WMP-Discovery2023-2025_DR_California_208-0003A0100NF.xlsx" for the requested information.	Holly Wetman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-03.xlsx">https://www.pge.com/assets/pge/external/asset-safety/asset-safety-incident-response/docs/2023-discovery-wmp-30-35-38-03.xlsx</a>	1	NA	11	Section 11 - Corrective Action Program	11.3 Corrective Action Program - Address Findings from Energy Safety's Compliance Assurance Division (i.e., audits and notices of defect and violation)

Pre-Discovery 65	CAIPA	Sat WMP-39	CAIPA_Sat_WMP-39	4	CAIPA_Sat_WMP-39_04	<p>There are two WMP initiatives that fall in the population requested above, where the forecast operating expenditures in 2025 are at least two times the actual capital expenditures in 2023: (1) customer support in wildfire and PSPS emergencies; and (2) traditional overhead hardening.</p> <p>(1) Customer support in wildfire and PSPS emergencies.</p> <p>(2) Traditional Overhead Hardening</p> <p>a) Name of Initiative: Emergency Preparedness – Customer Support in Wildfire and PSPS Emergencies</p> <p>Grid Design, Operations, and Maintenance – Traditional Overhead Hardening</p> <p>b) POE is providing the name of the activity category in lieu of the initiative number for ease of reference as Table 11 includes activity categories. The WMP activity category for this initiative is "Customer Support in Wildfire and PSPS Emergencies."</p> <p>c) Same as above in part a.</p> <p>d) Same as above in part b.</p> <p>e) This difference is due to POE having fewer than forecasted PSPS activities in 2023 and, therefore, the need to replace capital hardware (for example, phones, laptops, etc.)</p> <p>f) <u>Statewide wildfire risk reduction</u></p>	Holly Waterman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf">https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf</a>	0	NA	4	Section 4 - Overview of WMP	4.3 Proposed Expenditures
Pre-Discovery 66	CAIPA	Sat WMP-39	CAIPA_Sat_WMP-39	5	CAIPA_Sat_WMP-39_05	<p>There are three WMP initiatives that fall in the population requested above, where the forecast operating expenditures in 2025 are at least two times actual operating expenditures in 2023: (1) Fall-in mitigation; (2) microgrids; and (3) the resilient right-of-ways.</p> <p>1. Fall-in Mitigation 2. Microgrid 3. Fire-Resilient Right-of-Ways</p> <p>a) Vegetation Management and Inspection - Fall-In Mitigation</p> <p>Grid Design, Operations, and Maintenance/Microgrids</p> <p>Vegetation Management and Inspection – Fire-Resilient Right-of-Ways</p> <p>1. Fall-in Mitigation 2. Microgrid 3. Fire-Resilient Right-of-Ways</p> <p>b) POE is providing the name of the activity category in lieu of the initiative number for ease of reference as Table 11 includes activity categories. The WMP activity category for this initiative is "Fall-In Mitigation."</p> <p>c) POE is providing the name of the activity category in lieu of the initiative number for ease of reference as Table 11 includes activity categories. The WMP activity category for this initiative is "Microgrids."</p> <p>d) POE is providing the name of the activity category in lieu of the initiative number for ease of reference as Table 11 includes activity categories. The WMP activity category for this initiative is "Microgrids."</p>	Holly Waterman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf">https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf</a>	0	NA	4	Section 4 - Overview of WMP	4.3 Proposed Expenditures
Pre-Discovery 67	CAIPA	Sat WMP-39	CAIPA_Sat_WMP-39	6	CAIPA_Sat_WMP-39_06	<p>Please fill out the attached spreadsheet, CAInfoAccess-PGE-2023WMP-03 Attachment 1, requesting information regarding your asset inspections in 2023.</p>	Holly Waterman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf">https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf</a>	1	NA	8	Section 8.1.3 - Asset Inspections	8.1.3 Asset Inspections
Pre-Discovery 68	CAIPA	Sat WMP-39	CAIPA_Sat_WMP-39	7	CAIPA_Sat_WMP-39_07	<p>Please provide a list of any incidents in 2023 where the actions of a VM contractor posed a safety risk to workers and/or the public. "Safety risk" here is defined as any occurrence on a worksite where the contractor's actions created a safety hazard for other workers or the general public. For each instance, please provide:</p> <p>a) The date you were informed of the safety issue</p> <p>b) The date the original work that created the safety issue was performed</p> <p>c) Whether the safety issue concerned a transmission or distribution circuit</p> <p>d) The vegetation management initiative involved in the original work</p> <p>e) A brief description of the safety issue involved.</p>	Holly Waterman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf">https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf</a>	1	NA	8	Section 8.2 - Vegetation Management and Inspections	8.2 Vegetation Management and Inspections
Pre-Discovery 69	CAIPA	Sat WMP-39	CAIPA_Sat_WMP-39	8	CAIPA_Sat_WMP-39_08	<p>In response to Data Request CAInfoAccess-PGE-2023WMP-08, On March 29, 2023, POE provided its 2023 system hardening workplan by the categories referred to in parts (a)-(d) below. Please provide an updated version of this workplan with additional columns to show the actual system hardening work performed in each circuit segment in 2023 for each of these categories. Please add rows as needed to cover all circuit-segments where POE performed system hardening work in 2023 even if those circuit-segments were not included in the original workplan:</p> <p>a) Installation of covered conductor</p> <p>b) Removal of overhead conductor</p> <p>c) Removal of overhead conductor associated with removal grid work</p>	Holly Waterman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf">https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf</a>	1	NA	8.1.2.5	System Hardening	NA
Pre-Discovery 70	CAIPA	Sat WMP-39	CAIPA_Sat_WMP-39	9	CAIPA_Sat_WMP-39_09	<p>Please see attachment "WMP-Discovery2023-2025_DR_CalInfoAccess_039-00084021" for the requested information.</p> <p>Please provide the information that describes where and when you will perform system hardening or distribution circuits in 2026. For projects that you expect to partially complete in 2025 (i.e., projects that started before 2025 and are expected to continue in 2025, or projects that are expected to be completed after 2023), please include the project and describe the work that you forecast will actually be performed in calendar year 2025.</p> <p>For each project, include the following information in separate columns, as a minimum:</p> <p>a) Order number</p> <p>b) MAT code</p> <p>c) Program</p> <p>d) Circuit ID number</p> <p>e) Circuit segment name or ID number (if the project affects more than one circuit-segment, please identify each one)</p> <p>f) Relevant wildfire risk score(s) from the wildfire risk model that you are using to estimate distribution risk in your 2025 WMP Update filing</p> <p>g) The expected or actual start date of the project</p> <p>h) The expected completion date of the project</p> <p>i) Length (in circuit miles) of overhead conductor to be installed in 2025</p> <p>j) Length (in circuit miles) of underground conductor to be installed in 2025</p> <p>k) Length (in circuit miles) of overhead conductor to be permanently removed in 2025 and replaced by underground conductor (note that this may differ slightly from the previous section due to differing overhead and underground needs)</p> <p>l) Length (in circuit miles) of overhead conductor to be permanently removed in 2025 and not replaced with covered conductor or undergrounded)</p> <p>m) Length (in circuit miles) of any other type of system hardening project to be installed in 2025 (if this is greater than zero, please describe the type of system hardening project)</p> <p>n) Location-specific underground effectiveness</p> <p>o) Location-specific effectiveness of alternate mitigations.</p>	Holly Waterman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf">https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf</a>	0	NA	8.1.2.5	System Hardening	NA
Pre-Discovery 71	CAIPA	Sat WMP-39	CAIPA_Sat_WMP-39	10	CAIPA_Sat_WMP-39_010	<p>Provide your workplan that describes where and when you will perform system hardening or distribution circuits in 2026. For projects that you expect to partially complete in 2025 (i.e., projects that started before 2025 and are expected to continue in 2025, or projects that are expected to be completed after 2023), please include the project and describe the work that you forecast will actually be performed in calendar year 2025.</p> <p>For each project, include the following information in separate columns, as a minimum:</p> <p>a) Order number</p> <p>b) MAT code</p> <p>c) Program</p> <p>d) Circuit ID number</p> <p>e) Circuit segment name or ID number (if the project affects more than one circuit-segment, please identify each one)</p> <p>f) Relevant wildfire risk score(s) from the wildfire risk model that you are using to estimate distribution risk in your 2025 WMP Update filing</p> <p>g) The expected or actual start date of the project</p> <p>h) The expected completion date of the project</p> <p>i) Length (in circuit miles) of overhead conductor to be installed in 2025</p> <p>j) Length (in circuit miles) of underground conductor to be installed in 2025</p> <p>k) Length (in circuit miles) of overhead conductor to be permanently removed in 2025 and replaced by underground conductor (note that this may differ slightly from the previous section due to differing overhead and underground needs)</p> <p>l) Length (in circuit miles) of overhead conductor to be permanently removed in 2025 and not replaced with covered conductor or undergrounded)</p> <p>m) Length (in circuit miles) of any other type of system hardening project to be installed in 2025 (if this is greater than zero, please describe the type of system hardening project)</p> <p>n) Location-specific underground effectiveness</p> <p>o) Location-specific effectiveness of alternate mitigations.</p>	Holly Waterman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf">https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf</a>	0	NA	8.1.2.5	System Hardening	NA
Pre-Discovery 72	CAIPA	Sat WMP-39	CAIPA_Sat_WMP-39	11	CAIPA_Sat_WMP-39_011	<p>There are two WMP initiatives that fall in the population requested above, where the forecast operating expenditures in 2025 are at least two times the actual capital expenditures in 2023: (1) customer support in wildfire and PSPS emergencies; and (2) traditional overhead hardening.</p> <p>(1) Customer support in wildfire and PSPS emergencies.</p> <p>(2) Traditional Overhead Hardening</p> <p>a) Name of Initiative: Emergency Preparedness – Customer Support in Wildfire and PSPS Emergencies</p> <p>Grid Design, Operations, and Maintenance – Traditional Overhead Hardening</p> <p>b) POE is providing the name of the activity category in lieu of the initiative number for ease of reference as Table 11 includes activity categories. The WMP activity category for this initiative is "Customer Support in Wildfire and PSPS Emergencies."</p> <p>c) Same as above in part a.</p> <p>d) Same as above in part b.</p> <p>e) This difference is due to POE having fewer than forecasted PSPS activities in 2023 and, therefore, the need to replace capital hardware (for example, phones, laptops, etc.)</p> <p>f) <u>Statewide wildfire risk reduction</u></p>	Holly Waterman	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf">https://www.pge.com/assets/docs/2023/2023-wmp-report-ca/capex-ca/capex-ca-2023-wmp-report-ca.pdf</a>	0	NA	8.1.2.5	System Hardening	NA



Pre-Discovery 73	CAIPA	Sat WMP-39	CAIPA_Sat WMP-39	12	CAIPA_Sat WMP-39_012	On October 3, 2023, the Wildlife Safety Advisory Board held a meeting. Four documents related to PG&E's ground-level distribution system pilot are listed in the meeting materials (see <a href="https://www.wildlifesafety.ca.gov/governance-and-meetings/wildlifesafetyadvisory-board-meeting-10-2-2023">https://www.wildlifesafety.ca.gov/governance-and-meetings/wildlifesafetyadvisory-board-meeting-10-2-2023</a> ). Please provide confidential (i.e., unredacted) copies of these four documents: a) Experimental Installation Letter b) Project Final Scope c) Project Information d) Pilot Construction Sketch Please note that the GLDS Pilot Construction Sketch includes redlines which reflect updates to the GLDS Project. Attachments - please note that these attachments contain confidential information.	Holly Waltema	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com">https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com</a> <a href="mailto:waltema-holly@pge.com">mailto:waltema-holly@pge.com</a>	4	NA	8.1.2.5	System Hardening	NA
Pre-Discovery 74	CAIPA	Sat WMP-39	CAIPA_Sat WMP-39	13	CAIPA_Sat WMP-39_013	Identify any ignitions in 2023 associated with assets where you had an existing corrective notification at the time of ignition. Please provide a spreadsheet listing each such ignition (as rows) with the following information in the following columns: a) Line#s ignition ID b) Date of ignition c) Cause of ignition d) Whether associated with the ignition e) Asset burned f) Number of ignitions burned, if any g) Number of ignitions associated with ignition, if any h) Asset ID of asset associated with ignition i) Circuit ID number of circuit associated with ignition j) Notification number(s) for the existing correspondence on the asset in question.	Holly Waltema	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com">https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com</a> <a href="mailto:waltema-holly@pge.com">mailto:waltema-holly@pge.com</a>	1	NA	8	Section 8.3 - Situational Awareness and Forecasting	8.3.4.1 Existing Ignition Detection Sensors and Systems
Pre-Discovery 75	CAIPA	Sat WMP-39	CAIPA_Sat WMP-39	14	CAIPA_Sat WMP-39_014	Please note the attachments to this response contain CONFIDENTIAL information provided pursuant to the accompanying confidentiality declaration. a) Yes, PG&E has corrected ignitions that occurred in 2023 to assets with existing asset or vegetation corrective notifications at the time of ignition. b) Please see the table below for links to the requested information. Ignition ID Date Asset Corrective Notification Type and Description Attachment Name 2023/15/31/23 Was it a potential re-heat conductor issue false EC Notification 12148810 (If Priority): Vegetation tampering falling off WMP-Discovery2023-2025_DR_California03-03-02148810CONF.pdf 20231027N91923 Sat party leaving beaching swamp jobs ignited a	Holly Waltema	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com">https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com</a> <a href="mailto:waltema-holly@pge.com">mailto:waltema-holly@pge.com</a>	4	NA	8	Section 8.3 - Situational Awareness and Forecasting	8.3.4.1 Existing Ignition Detection Sensors and Systems
Pre-Discovery 76	CAIPA	Sat WMP-39	CAIPA_Sat WMP-39	15	CAIPA_Sat WMP-39_015	On page 546 of PG&E's 2023-2025 WMP RA, January 8, 2024, PG&E stated that it was revising its field safety assessment procedure (TD 8123P-200) and expected to publish the revised procedure by the end of 2023. Has PG&E published the revised TD 8123P-200 procedure? a) If the answer to part (a) is yes, briefly describe the substance of the changes to the procedure. b) If the answer to part (a) is yes, please provide a copy of the updated version of TD 8123P-200. c) If the answer to part (a) is no, please explain the delay. d) If the answer to part (a) is no, please state when PG&E currently expects to publish the revised TD 8123P-200 procedure.	Holly Waltema	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com">https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com</a> <a href="mailto:waltema-holly@pge.com">mailto:waltema-holly@pge.com</a>	1	NA	8	Section 8.1.7 - Open Work Orders	8.1.7.2 Open Work Orders - Distribution Tags
Pre-Discovery 77	CAIPA	Sat WMP-39	CAIPA_Sat WMP-39	16	CAIPA_Sat WMP-39_016	In response to data request California03-PGE-2023WMP-19 question 15, April 26, 2023, PG&E stated that it was actively analyzing the effectiveness of both covered conductor and bare conductor in combination with EPSS and DCCDF. PG&E stated that it anticipated completing this analysis in 2023. a) Has PG&E completed the analysis mentioned above? b) If the answer to part (a) is yes, please provide a copy of any reports or other output from the analysis. c) If the answer to part (a) is no, please explain the delay. d) If the answer to part (a) is no, please state when PG&E currently expects to complete this analysis.	Holly Waltema	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com">https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com</a> <a href="mailto:waltema-holly@pge.com">mailto:waltema-holly@pge.com</a>	0	NA	8.1.2	Grid Design and System Hardening	Various
Pre-Discovery 78	CAIPA	Sat WMP-39	CAIPA_Sat WMP-39	17	CAIPA_Sat WMP-39_017	In response to data request California03-PGE-2023WMP-27 question 5, August 18, 2023, PG&E stated that it expected to complete its Substation Animal Abatement Effectiveness Study in partnership with Electric Power Research Institute by Q1 of 2024. a) Has PG&E completed the Substation Animal Abatement Effectiveness Study? b) If the answer to part (a) is yes, please provide a copy of any reports or other output from the Substation Animal Abatement Effectiveness Study. c) If the answer to part (a) is no, please explain the delay. d) If the answer to part (a) is no, please state when PG&E currently expects to complete the Substation Animal Abatement Effectiveness Study.	Holly Waltema	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com">https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com</a> <a href="mailto:waltema-holly@pge.com">mailto:waltema-holly@pge.com</a>	0	NA	8.1.2.12.2	Grid Design and System Hardening	Other Technologies and Systems - Substation Animal Abatement
Pre-Discovery 79	CAIPA	Sat WMP-39	CAIPA_Sat WMP-39	18	CAIPA_Sat WMP-39_018	In response to data request California03-PGE-2023WMP-27 question 6, August 18, 2023, PG&E stated that it was finishing a study to assess the recorded reliability improvements at locations that have been undergrounded and/or have been hardened with covered conductor. PG&E stated that it anticipated completing this study in October of 2023. a) Has PG&E completed the study mentioned above? b) If the answer to part (a) is yes, please provide a copy of any reports or other output from the study. c) If the answer to part (a) is no, please explain the delay. d) If the answer to part (a) is no, please state when PG&E currently expects to complete this study.	Holly Waltema	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com">https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com</a> <a href="mailto:waltema-holly@pge.com">mailto:waltema-holly@pge.com</a>	0	NA	Appendix D	Appendix D - Areas for Continued Improvement	Appendix D ACP P&E 22-16 Progress and Updates on Undergrounding and Risk Prioritization
Pre-Discovery 80	CAIPA	Sat WMP-39	CAIPA_Sat WMP-39	19	CAIPA_Sat WMP-39_019	In response to data request California03-PGE-2023WMP-29 question 5, September 27, 2023, PG&E stated that it expected to publish its 2023 Electric Asset Management Plan by the end of 2023. a) Has PG&E completed the 2023 Electric Asset Management Plan? b) If the answer to part (a) is yes, please provide a copy of the 2023 Electric Asset Management Plan. c) If the answer to part (a) is no, please explain the delay. d) If the answer to part (a) is no, please state when PG&E currently expects to publish the 2023 Electric Asset Management Plan.	Holly Waltema	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com">https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com</a> <a href="mailto:waltema-holly@pge.com">mailto:waltema-holly@pge.com</a>	0	NA	NA	NA	NA
Pre-Discovery 80	CAIPA	Sat WMP-39	CAIPA_Sat WMP-39	19REV	CAIPA_Sat WMP-39_019REV	In response to data request California03-PGE-2023WMP-29 question 5, September 27, 2023, PG&E stated that it expected to publish its 2023 Electric Asset Management Plan by the end of 2023. a) Has PG&E completed the 2023 Electric Asset Management Plan? b) If the answer to part (a) is yes, please provide a copy of the 2023 Electric Asset Management Plan. c) If the answer to part (a) is no, please explain the delay. d) If the answer to part (a) is no, please state when PG&E currently expects to publish the 2023 Electric Asset Management Plan.	Holly Waltema	3/22/2024	6/14/2024				NA	NA	NA	NA
Pre-Discovery 81	CAIPA	Sat WMP-39	CAIPA_Sat WMP-39	20	CAIPA_Sat WMP-39_020	In response to data request California03-PGE-2023WMP-29 question 6, September 27, 2023, PG&E stated the following: "We will evaluate the history of response to wire down conditions in the HPA/HPTD, occurring during the traditional peak wildfire season of (between) May 1 and November 1, going back to 2020. We can complete this analysis by December 31, 2023." a) Has PG&E completed the analysis mentioned above? b) If the answer to part (a) is yes, please provide a copy of any reports or other output from the analysis. c) If the answer to part (a) is no, please explain the delay. d) If the answer to part (a) is no, please state when PG&E currently expects to complete this analysis.	Holly Waltema	3/22/2024	4/5/2024	4/5/2024	<a href="https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com">https://www.pge.com/assets/pge/cb/cb/subpage-intel-staff-waltema-holly@pge.com</a> <a href="mailto:waltema-holly@pge.com">mailto:waltema-holly@pge.com</a>	0	NA	8.2.3.4	Vegetation Management and Inspections	Fall in Migration