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VIA ELECTRONIC FILING

Patrick Doherty, Program Manager
Office of Energy Infrastructure Safety
Compliance Assurance Division
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: 2020-2022 Surge Arrestor Removals (Docket #s: 2020-EC ARC, 2021-EC ARC, and 2022-EC ARC)

Dear Program Manager Doherty:

In our recent submission of our 2023 Annual Report on Compliance, filed on April 2, 2024, we provided updated annual performance values for Wildfire Mitigation Plan (WMP) target GH-08 – Surge Arrestor Removals.¹ We also included a narrative explaining discrepancies in previously reported numbers for the years 2020 to 2022. We are providing further details here to correct the record in our previous ARC submissions for 2020 to 2022.²

In our 2023-2025 Base WMP, we stated that we expected to complete this program by the end of 2023.³ While validating the total population of our surge arrestor installations for this program, we discovered that 612 surge arrestors thought to be completed prior to 2023 were incorrectly identified as completed, as well as a population of 145 additional surge arrestors that need to be verified for completion in the field but are currently inaccessible due to external factors.⁴ Together, this population of 757 surge arrestors represents 2.5% of the 30,803 total number replaced to date as part of our WMP commitments. The table below provides the annual WMP targets for this work, along with the previously reported and updated numbers. Accordingly, PG&E is correcting here the previously reported numbers in the 2020, 2021 and 2022 ARCs.

¹ PG&E 2023 ARC R1, pp. 28-30.

² The target language is as follows: “Remove 663 non-exempt surge arrestors (based on the known population as of 01/12/2023) where known grounding issues exist. If no non-exempt surge arrestor is identified at a location during pre-field work, the unit will be resolved, and the notification will be canceled. Canceled notifications will count towards this target.” PG&E 2023-2025 WMP R5, p. 334.

³ PG&E 2023-2025 WMP R5, p. 464 (“PG&E expects to complete the program by 2023, barring external factors such as access issues.”).

⁴ These external factors include, among other things, access issues and customer refusals.

HISTORICAL WMP TARGETS AND CORRECTED PERFORMANCE				
YEAR	TARGET (# of arrestors replaced)	INITIALLY REPORTED PERFORMANCE (# of arrestors replaced)	CONFIRMED PERFORMANCE	Requiring Remediation (Jobs)
2020 (C.6)	8,850	10,263	10,221	42
2021 (C.12)	15,000	15,465	15,366	99
2022 (C.13)	4,590	4,621	4,595	26
2023 (GH-08)	663	663	663	0
TOTAL	29,103	31,012	30,845	167

Following the identification of documentation issues with our Surge Arrestor Program, PG&E implemented a remediation process and put preventive measures in place. As part of our remediation plan, PG&E is actively remediating these surge arrestors for 2024 and working to remediate the remaining surge arrestors by December 2024.

We appreciate Energy Safety’s consideration of this letter. Please do not hesitate to reach out should you need any clarifications or additional materials.

Sincerely,
 _____/S/_____

Jay Leyno
 Director, Wildfire Mitigation PMO