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November 1, 2024

**BY ENERGY SAFETY E-FILING**

Shafi Mohammed  
Chief Data Officer, Data Analytics Division  
Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Re: **Spatial and Non-Spatial Data Submission Revision of Q2 2024 Filing**  
***Docket: 2024-QDR***

Dear Mr. Mohammed:

Pacific Gas and Electric Company is writing to notify you of three feature class revisions that were identified in its Q2 2024 QDR and SQDR submissions.

Pursuant to the Data Guidelines, v3.2, Section 2.4 – Revisions to Previously Submitted Data, Energy Safety instructs that, when an electrical corporation becomes aware of a need for revisions to previously submitted data, the electrical corporation provide the revisions by the next quarterly submission date.<sup>1</sup>

- Pacific Gas & Electric (PG&E) recently identified an error in our Q2 inspection data for the WMP initiative AI-07, now Detailed Ground and Aerial Inspections – Distribution under the approved R6 WMP dated July 6, 2024, where ‘Aerial: drone inspections’ were incorrectly labelled as ‘Ground Inspections.’ As a result, PG&E created this revised submission for the Asset Inspections Point Feature Class.
- PG&E’s 3.6.6.3 Unplanned Outage and 3.6.6.4 Wire Down Event feature classes are subject to ongoing, updated record information.

## **Description**

### **Revision 1**

PG&E identified a misalignment between our WMP R6 and QDR program for (AI-07) Detailed Ground and Aerial Inspections – Distribution program. The QDR had the following field values:

- InspectionProgramName = ‘Ground Inspections’ (now correctly labelled as ‘Detailed Ground and Aerial Inspections – Distribution’ under approved WMP Revision 6 dated July 6, 2024);
- InspectionMethod = ‘Ground Inspection’ (changed to ‘Aerial: drone’ for aerial inspections); and

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<sup>1</sup> See Energy Safety Data Guidelines Version 3.2 (Jan. 30, 2024) page 7 (“Revisions to Previously Submitted Data.”).

- DataCaptureSensorType = 'None' (changed to 'Aerial imagery (visible)' for aerial inspections).

### Revision 2 and 3

PG&E's Q2 2024 unplanned outage and wire down datasets have changed since the previous submission. The record count for the unplanned outages dataset was 10,500 when generated in Q2 for Q2's reporting. When the Q2 report was generated again in Q3 to look for changes, the record count is now 10,477. The record count for the wires down dataset was 605 when generated in Q2 for Q2's reporting. When the Q2 report was generated again in Q3 to look for changes, the record count is now 761. Additional changes have also taken place for the fields involved in each dataset. Overall, comparing each dataset to generate a count of differences reveals there are approximately 2,400 changes between datasets.

### **Explanation for Each Revision**

Revision 1: PG&E leverages Palantir Foundry to transform data into the required schema from Energy Safety. Logic incorrectly assigned static values like ProgramName, InspectionMethod, DataCaptureSensorType under Revision 5 WMP (program name 'Ground Inspections') where the nature of the work was strictly Ground Inspections. PG&E's WMP Revision 6, released July 6, 2024, was in effect before Q2 submission date, and should have delineated Aerial and Ground Inspections under AI-07, hence, PG&E is resubmitting this data to provide the corrected data values.

Revision 2 and 3: PG&E's unplanned outage and wire down data is consistently evolving as additional details emerge regarding said outages. PG&E has and will continue to recreate the previous quarter's risk event feature classes every subsequent quarter, so Energy Safety receives the most up-to-date feature classes. Please note that the Q2 Risk event datasets were regenerated during Q3 on October 28, 2024, to help ensure that the most up to date data was submitted. PG&E is unable to review all 10,477 unplanned outage and 761 wire down records individually given the time constraints driven by quarterly reporting cadence and the need to ensure data submitted represents recent version available.

PG&E, SDG&E, and SCE have expressed to Energy Safety during our quarterly joint Data Guideline check-ins, that all risk event data is subject to daily changes. Data changes will not always be captured in the subsequent quarter as investigations and system outage reviews expand throughout the year. As such, even with a quarterly resubmittal of the last quarter's submission every quarter, Energy Safety will not receive the most up to date data as the reviews can expand beyond a single quarterly refresh. Alternatively, PG&E proposes that Energy Safety consider adoption of reporting that represents year-to-date data to help ensure each submission contains the most accurate data available as further described in the Conclusion section below.

### **Related Change Order Request**

Revision 1:

PG&E's 2024 Change Order for the 2023-2025 Wildfire Mitigation Plan (WMP) (Docket #2023-2025 WMPs). Original request dated January 8<sup>th</sup>, 2024.

**Related Feature or Table Name**

Revision 1:

Spatial Quarterly Data Report: 3.7.3.1.3 Asset Inspections Point

Revision 2 and 3:

Spatial Quarterly Data Report: 3.6.6.3 Unplanned Outage and 3.6.6.4 Wire Down Event feature classes.

Quarterly Data Report: Table 2: Performance Metrics (Metric type: 1. Risk Event) and Table 5: Risk event drivers.

**Record IDs**

Revision 1: There are 69,215 records impacted. PG&E is resubmitting the entire 3.7.3.1.3 Asset Inspections Point feature class again, however the records impacted only relate to the AI-07 Detailed Ground and Aerial Inspections – Distribution program.

Revision 2 and 3: All record IDs subject to ongoing changes. Analyses reveals over 2,400 changes, but individual record review not feasible in time allocated by Energy Safety to produce a revision.

**Conclusion**

Given that data produced each quarter represents a snapshot in time, the only way to ensure all changes are known and communicated under the current Data Guidelines would be to recreate and compare the entire previous submission for the Initiatives, Risk Event, PSPS Event and Other feature datasets. Even then, the resubmission will still only represent data generated as a snapshot but at a later point in time. Additional data changes will continue throughout the year that Energy Safety will remain unaware of given the revision guidelines are only for the previous quarter's reporting. Similarly, since PG&E needs time to package this refreshed data into its own GDB for the resubmittal, additional changes may also be unaccounted beyond the snapshot date of October 28, 2024, through November 1, 2024, as the source systems change daily. The time constraints needed to reproduce the previous quarter's submission on top of the current quarter's submission, also doesn't support having the ability to have a proper QC of the data shared.

PG&E would like to again reiterate our suggestion, that other electrical corporations support, that Energy Safety should revise their Data Guidelines to allow the quarterly submissions to reflect cumulative, year-to-date reporting for the Risk Event, PSPS Event, and Initiative feature datasets. This will prevent the need to resubmit last quarter's submission every quarter, allow electrical corporations to focus efforts on the current report only which supports better QC of the data provided to Energy Safety, and will be the only way to get Energy Safety the most accurate

data for the year quarter over quarter. Another option will be to have an annual true up report of the for the Risk Event, PSPS Event, and Initiative feature datasets.

Very truly yours,

*/s/ Jay Leyno*

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