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**VIA ELECTRONIC 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: **Pacific Gas and Electric Company’s Comments on the Office of Energy Infrastructure Safety’s November 19, 2024, Draft Data Guidelines v4.0**  
*Docket: Data Guidelines*

Dear Mr. Mohammed:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the Draft Data Guidelines v4.0 from the Office of Energy Infrastructure Safety (Energy Safety). PG&E offers the following comments on version 4.0 of the Draft Data Guidelines.

**Wildfire Mitigation Data Reports**

**Effective date of January 1, 2025:** PG&E requests Energy Safety to clarify the first submission for which is to reflect the new v4.0 Data Guidelines is the Q1 2025 submission due May 1, 2025. Previously, in v3.2, Energy Safety specified that the reporting period adoption date was to be the start of the quarter following the finalization of the Guidelines for both Tabular and GIS data. As the guidelines go into effect on January 1, 2025, PG&E requests Energy Safety please carry over this guidance, as it currently exists, into v4.0. With over 150 data element changes in the GIS report and net new templates for our tabular outputs, moving from v3.2 to v4.0 requires updating all existing automation logic for data extractions and transformations into Energy Safety’s newly revised schemas, which would not be feasible in January as PG&E will be in preparing the Q4 2024 submission data due February 1, 2024. Furthermore, all Q4 data collected has been collected under the v3.2 templates and v3.2 Data Guidelines as v4.0 is not yet final. Since v4.0 will be finalized after the quarter end, PG&E will adopt it for the Q1 report.

**Geographic Information Systems (GIS) Data**

**Key Deliverable Templates Not Provided:** To conduct a complete assessment of the proposed spatial report changes within the draft version 4.0 Data Guidelines, PG&E requires the revised Status Report and GDB templates, which were not provided. These templates allow PG&E to review the domain values, fields, character limits, data type, layout, and instructions to ensure

changes are consistent with those outlined in Draft Data Guidelines. Without these templates, PG&E is unable to complete a full assessment of the impacts of the Draft Data Guidelines.

For future Draft Guidelines releases, PG&E requests Energy Safety provide these revised files so a complete and comprehensive review of all changes and impacts can be performed and any inconsistencies and concerns, should any exist, be shared to Energy Safety. This could also help prevent potential unidentified issues from carrying over into future versions of the Draft Data Guidelines.

**Revisions to Previously Submitted Data:** Energy Safety recently updated Section 2.4 of the *Revisions to Previously Submitted Data* guidelines to state that “The electrical corporation must provide revisions (e.g., to correct an error or update risk event reporting) to any previously submitted data by the next quarterly submission date once the need for the revision becomes known to the electrical corporation.”

Under the Draft Data Guidelines, electrical corporations would need to resubmit revised Risk Event feature datasets for all previous submissions with every new quarterly submission as there are certainly updated data and the only way to be certain there are updated data changes would be to reproduce historical reporting. This process would require recreating and resubmitting data repeatedly, even for historical reports, which is neither practical nor feasible within the timeframe allocated to produce Quarterly Data Reports. PG&E request a cumulative, quarterly reporting approach be taken instead as later detailed below.

PG&E, like our peer electrical corporations, operates a dynamic and evolving grid. Consequently, the data included in our quarterly reports represents a snapshot in time and is subject to change as part of the normal course of operations. These changes may occur for several reasons, including:

- Ongoing mapping or data being added into systems of record;
- Incidents still under investigation receiving more up-to-date data inputs;
- Additional reviews, quality control checks, or field verification for newly completed work; and
- Continuous changes to our grid, such as the addition or removal of customers and assets.

For example, in the *Unplanned Outages* dataset, the field *Customer Count* seeks the total number of customers impacted by an outage. This figure is derived dynamically from the customers tied to the assets involved in the outage. If, later in the year, new customers are added to the affected assets, recreating a historical report would yield a higher customer count for that outage. Thus, the quarterly snapshots PG&E produces and shares with Energy Safety represent an accurate reflection of outages at the time of the report’s preparation. Recreating and resubmitting these reports due to ongoing data evolution would result in an endless cycle of revisions, with no practical way to meet reporting deadlines.

Each quarterly submission typically includes over 10,000 records in the Risk Event feature datasets. Reviewing every single record to determine the specific cause of any change is infeasible within the time allotted to produce these reports. Based on our analysis, approximately 20% of the *Unplanned Outage* data in each recreated quarterly submission reflects updated information due to evolving data inputs.

Since the inception of quarterly WMP reporting, there have been 18 submissions, and this number will continue to grow. Recreating and resubmitting such a volume of data each quarter would be unmanageable and would likely lead to diminished utility for Energy Safety, which would be inundated with cumulative submissions.

To address this challenge while providing Energy Safety with the most accurate and up-to-date information, PG&E proposes that Energy Safety revise its guidelines to adopt cumulative reporting for Risk Event data. Under this approach:

- The Q1 submission would cover data from January to March.
- The Q2 submission would include data from January to June.
- The Q3 submission would cover January to September.
- The Q4 submission would encompass the entire calendar year (January to December).
- In the following year, the Q1 submission would span October through March, and this cycle would repeat annually.

This approach would ensure that Energy Safety receives a single, comprehensive GDB file each quarter with the most current information while eliminating the need for multiple resubmissions. Such a streamlined process would improve efficiency for both electrical corporations and Energy Safety while maintaining the accuracy and integrity of the data.

### **Tabular Wildfire Mitigation Data**

#### **Year-to-Date and End of Year data:**

PG&E requests clarification on the submission schedule for the Annual WMP Data. Section 2.1, Table 3 states that the submission date for the Annual WMP Data is “3 days prior to Base WMP or WMP Update submission.”<sup>1</sup> However, the statement directly below Table 3 states that “The electrical corporation must submit the annual-WMP data 30 days prior to the submission of the corresponding base WMP or a WMP Update.”<sup>2</sup> PG&E notes that it intends to submit the annual-WMP data three days prior to the submission of the corresponding Base WMP or a WMP Update. PG&E strongly believes that submission of this data 30 days prior to the WMP submission is not feasible because this would require all targets be finalized 30 days prior to the WMP submission, essentially accelerating the due date for the WMP itself by 30 days. PG&E also interprets ‘Base WMP’ or ‘WMP Update’ to refer to the final WMP submission and not the pre-WMP submission.

PG&E requests clarification on the submission schedule for the Annual-End of Year (EOY) Data. Section 2.1, Table 2 states that the submission date for EOY Data is “February 1” which was first stated to refer to February 1, 2025, during the December 16, 2024, Energy Safety Public Workshop on the Draft Data Guidelines. However, towards the end of the Workshop, Energy Safety representatives clarified that the requirements start for the Q1 2025 submission. Based on

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<sup>1</sup> Draft Data Guidelines at 4.

<sup>2</sup> Draft Data Guidelines at 5.

this last and most recent clarification, PG&E intends to submit the Q4 2024 QDR with the approved template v3.2, and to submit the Annual-End of Year Data with the Q1 2025 QDR submission.

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PG&E greatly appreciates the opportunity to provide feedback on these Draft Data Guidelines and look forward to continuing to work with Energy Safety to promote wildfire safety.

Sincerely,

/s/ Jay Leyno

Jay Leyno