

February 3, 2025

**BY ENERGY SAFETY E-FILING**

Shafi Mohammed  
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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 2024 Filings**  
**Docket: 2024-QDR**

Dear Mr. Mohammed:

Pacific Gas and Electric Company is writing to notify you of five feature class revisions that were identified in its Q3 2024 Quarterly Data Report (QDR) and Spatial QDR (SQDR) submissions. PG&E is also revising one feature class for its Q1 and Q2 2024 SQDR submission, Q1 through Q3 2024 QDR, and Q4 2023 QDR.

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> Thus, the following items were revised:

- PG&E's Q3 2024 3.6.5.3 PSPS Event Damage Point and 3.6.5.6.2 PSPS Event Damage Photo Log SQDR feature classes;
- PG&E's Q3 2024 3.6.6.3 Unplanned Outage and 3.6.6.4 Wire Down Event SQDR feature classes along with PG&E 2024 Q3 QDR, Tables 2 and 5, are subject to ongoing, updated record information;
- PG&E's Q1-Q3 2024 3.7.3.1.3 Asset Inspection Point SQDR Feature class reporting of AI-07 Detailed Asset Inspections – Distribution;
- PG&E's Q1 through Q3 2024 QDR, Table 11; and
- PG&E's Q4 2023 QDR, Table 11.

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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.").

## **Description**

### Revision 1

When preparing the Q4 2024 SQDR submission for PSPS events, PG&E noted the CPUC 10-Day report included a single hazard not reported in PG&E's Q3 2024 SQDR submission. Therefore, PG&E is providing a revision to account for the missing record.

### Revision 2 and 3

PG&E's Q3 2024 unplanned outage and wire down datasets have changed since the previous submission. The record count for the unplanned outages dataset was 10,167 when generated in Q3 for Q3's reporting. When the Q3 report was generated again in Q4 to look for changes, the record count is now 10,136. The record count for the wires down dataset was 574 when generated in Q3 for Q3's reporting. When the Q3 report was generated again in Q4 to look for changes, the record count is now 570. Additional changes have also taken place for the fields involved in each dataset.

### Revision 4:

For target AI-07, we are updating our Q1, Q2, and Q3 spatial data based on late submitted data. The need for resubmittal and true-up of attainment values became known when validating end-of-year outputs and we are resubmitting our spatial data on AI-07 to provide Energy Safety with accurate and verifiable inspection locations and totals against our commitment.

### Revision 5:

Please note that we made multiple revisions to the financial data presented in Table 11 to improve its accuracy. Certain costs have been re-categorized among WMP Activities, including the addition and removal of certain costs from this reporting. As a result, our 2023 actual costs have been updated relative to prior submissions. We are providing a revision to Table 11 of our Q4 2023 QDR. The 2023 actual costs provided in this submission reflect the re-categorization. Specifically, costs have been updated for the following WMP Activities:

- Asset Inspections
- Best practice sharing with other utilities
- Collaboration on local wildfire mitigation planning
- Customer support in wildfire and PSPS emergencies
- Distribution pole replacements and reinforcements
- Emergency preparedness plan
- Emergency response vegetation management
- Emerging grid hardening technology installations and pilots
- Engagement with access and functional needs populations
- Environmental monitoring systems

- Equipment maintenance and repair
- Equipment Settings to Reduce Wildfire Risk (Grid Ops)
- External collaboration and coordination
- Fall-in mitigation
- Fire-resilient rights-of-ways
- Quality assurance / quality control
- Grid monitoring systems
- Ignition detection systems
- Line removals (in HFTD)
- Microgrids
- Open work orders
- Other - PSPS
- Other - Wildfire
- Other technologies and systems not listed above
- Personnel Work Procedures and Training in Conditions of Elevated Fire Risk (Grid Ops)
- Pole clearing
- Preparedness and planning for service restoration
- Public emergency communication strategy
- Public outreach and education awareness program
- Risk Methodology and Assessment
- Substation defensible space
- Transmission pole/tower replacements and reinforcements
- Undergrounding of electric lines and/or equipment
- Vegetation Inspections - Distribution
- Vegetation Inspections - Substation
- Vegetation Inspections - Transmission
- Vegetation management enterprise system
- Quality assurance / quality control
- Weather forecasting
- Wildfire Mitigation Strategy Development
- Wood and slash management

Please also note that we corrected typographical errors for certain specific UtilityInitiativeTrackingIDs in Column D of the Q4 2023, Q2 2024 & Q3 2024 Table 11. The tracking IDs had inadvertently been placed in the wrong row.

Please also note that we corrected typographical errors for Q1 2024 QDR, Table 11 which includes:

- Certain specific UtilityInitiativeTrackingIDs in Column D as mentioned above; and
- Removal of the 2024 Actuals, as per the guidance provided by Energy Safety for 2024 data.

## **Explanation for Each Revision**

Revision 1: PG&E is reporting a PSPS Conductor Damage Detail from the July 20, 2024, PSPS event not included in the Q3 submission. This record was reported in the CPUC 10-Day report and classified as a Hazard event. To align the CPUC 10-Day report with QDR reporting requirements we are providing this data to ensure full disclosure and transparency.

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 Q3 Risk event datasets were regenerated during Q4 on January 8, 2025, to help ensure that the most up to date data was submitted. PG&E is unable to review all 10,136 unplanned outages and 570 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 which will better align with the CPUC year to date reporting and help ensure each submission contains the most accurate data available as further described in the Conclusion section below.

### Revision 4:

Since quarterly attainment reporting was not timely gathered for inspections of structures in our spatial data, PG&E is providing a resubmission for Q1, Q2 and Q3. PG&E is working with the functional team to ensure timely reporting of quarterly progress against its commitment for future submissions.

### Revision 5:

The data in Table 11 of the QDR was updated to more accurately align with the categories of WMP finances. We are working with our functional areas to ensure all financial data is appropriately categorized in future submissions.

We also cleaned up several typographical/inadvertent errors.

## **Related Feature or Table Name**

### Revision 1:

PG&Es 3.6.5.3 PSPS Event Damage Point and 3.6.5.6.2 PSPS Event Damage Photo Log

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.

Revision 4:

Spatial Quarterly Data Report: 3.7.3.1.3 Asset Inspection Point Feature class for each quarter in 2024.

Revision 5:

Quarterly Data Report: Table 11: Mitigation initiative financials

## **Record IDs**

Revision 1:

PSPS Conductor Damage Detail record 103776869 added with accompanying log and photos record.

Revision 2 and 3:

All record IDs subject to ongoing changes. Individual record review is not feasible in time allocated by Energy Safety to produce a revision.

Revision 4:

All record IDs with InitiativeTrackingID = AI-07 have been updated.

Revision 5:

Please see the bullet point list in Description section for Revision 5 of the impacted metrics.

## **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 January 14, 2025, through February 3rd, 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*

Jay Leyno