

May 1, 2025

**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 2024 Filings**  
**Docket: 2024-QDR**

Dear Mr. Mohammed:

Pacific Gas and Electric Company is notifying you of the resubmission of PG&E's 2024 Quarterly Data Reports (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>

### **Description**

#### **Revision 1:**

PG&E's Q3 2024 3.6.5.3 Vegetation Management Project Point feature class.

#### **Revision 2:**

PG&E's Q1-Q4 2024 3.6.3.3.3 Initiative Audit Point feature class.

#### **Revision 3:**

PG&E's Q4 2024 3.6.6.3 Unplanned Outage and 3.6.6.4 Wire Down Event SQDR feature classes along with PG&E 2024 Q4 QDR, Tables 2 and 5, are subject to ongoing, updated record information.

### **Explanation for Each Revision**

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

#### Revision 1:

In the “Description of Work” field, where PG&E’s System of Record had “NULL” values, data was labelled as “Inspection only, no work required” to provide additional optional detail regarding VM-02 activity as outlined in PG&E’s WMP R6. However, this change was inadvertently and incorrectly applied to additional initiatives in the Feature Class: VM-04 and VM-18. PG&E provided resubmission will address this error.

#### Revision 2:

PG&E became aware of the need for submission of Initiative Audits feature class during end of year internal audit Closure Validation. Vegetation Q1/Q2 2024 evidence was revised after recognizing 2023 work plan locations were included. The revised dataset removes those locations and ensures only 2024 work locations were reported. In system inspection QC/QA datasets, record count of audits decreased for 1 of 2 reasons: either due to reporting-week definition logic change or due to being considered a duplicate (i.e. two types of inspections were performed on the assets; however, only one quality audit can be counted per asset). In all cases, removal of audit records did not impact the pass rate. PG&E is resubmitting to ensure Energy Safety is provided with the updated data.

#### Revision 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. PG&E is unable to review all unplanned outages and 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.

### **Related Feature or Table Name**

#### Revision 1:

3.6.3.6.3 Vegetation Management Project Point data.

Revision 2:

3.6.3.3 Initiative Audit Point feature class.

Revision 3:

3.6.6.3 Unplanned Outage and 3.6.6.4 Wire Down Event. Tabular QDR, Tables 2 and 5.

**Record IDs**

PG&E is resubmitting impacted tabular and GIS data feature classes and tables in its entirety.

**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 April 18, 2025, through April 30, 2025, 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,

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Jay Leyno

Director, Wildfire Mitigation PMO