

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans
Rulemaking 18-10-007
Data Response

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|------------------------|---|-------------------|-----------------------------|
| PG&E Data Request No.: | CalAdvocates_056-Q02 | | |
| PG&E File Name: | WildfireMitigationPlans_DR_CalAdvocates_056-Q02 | | |
| Request Date: | June 4, 2021 | Requester DR No.: | CalAdvocates-PGE-2021WMP-22 |
| Date Sent: | June 9, 2021 | Requesting Party: | Public Advocates Office |
| PG&E Witness: | | Requester: | Alan Wehrman |

The following questions relate to PG&E's 2021 Wildfire Mitigation Plan – Revised, submitted June 3, 2021.

QUESTION 02

PG&E provided Attachment 2021 WMP_Revision_PGE-06_Atch01, which disaggregates the forecast vegetation management expenditure using 2021 financial assumptions. As a result, it is apparent that the forecast expenditures for individual vegetation management initiatives in PG&E's 2020 WMP, when recalculated using 2021 financial assumptions, are relatively close to the actual 2020 expenditures provided in Table 12. This is demonstrated in the below table. This table includes the original 2020 WMP forecasts as provided to the WSD in response to Data Request WSD_10 Question 19 on March 28, 2021, referenced in the WSD's Revision Notice in support of Critical Issue PGE-06.¹

¹ WSD Revision Notice, pp. 18-24, May 4, 2021.

| | Total 2020 Actual Expenditures (sum of CAPEX and OPEX from Table 12) | Forecast 2020 expenditure from PG&E's response to WSD_10 Q19 | Forecast 2020 expenditure recalculated with 2021 assumptions, from Attachment 2021 WMP_Revision_PGE- 06_Atch01 |
|---|--|--|--|
| Initiative activity | | | |
| 7.3.5.1 Additional efforts to manage community and environmental impacts | \$22,278 | \$16,690 | \$23,598 |
| 7.3.5.2 Detailed inspections of vegetation around distribution electric lines and equipment | \$1,097,665 | \$187,787 | \$999,465 |
| 7.3.5.3 Detailed inspections of vegetation around transmission electric lines and equipment | \$130,878 | \$41,533 | \$104,507 |
| 7.3.5.4 Emergency response vegetation management due to red flag warning or other urgent conditions | \$5,970 | \$6,195 | \$5,514 |
| 7.3.5.5 Fuel management and reduction of "slash" from vegetation management activities | \$23,666 | \$25,000 | \$25,744 |
| 7.3.5.6 Improvement of inspections | \$1,299 | \$7,244 | \$1,074 |
| 7.3.5.7 LiDAR inspections of vegetation around distribution electric lines and equipment | \$2,590 | \$7,155 | \$2,818 |
| 7.3.5.8 LiDAR inspections of vegetation around transmission electric lines and equipment | \$25,222 | \$17,812 | \$30,918 |
| 7.3.5.9 Other discretionary inspections of vegetation around distribution electric lines and equipment | \$517 | \$5,804 | \$756 |
| 7.3.5.10 Other discretionary inspections of vegetation around transmission electric lines and equipment | \$0 | \$285 | \$0 |
| 7.3.5.11 Patrol inspections of vegetation around distribution electric lines and equipment | \$0 | \$150,826 | \$0 |
| 7.3.5.12 Patrol inspections of vegetation around transmission electric lines and equipment | \$0 | \$47,773 | \$0 |
| 7.3.5.13 Quality assurance / quality control of vegetation inspections | \$11,695 | \$13,452 | \$9,663 |
| 7.3.5.14 Recruiting and training of vegetation management personnel | \$14 | \$5,877 | \$11 |
| 7.3.5.15 Remediation of at-risk species | \$115,877 | \$98,545 | \$126,050 |
| 7.3.5.16 Removal and remediation of trees with strike potential to electric lines and equipment | \$0 | | |
| 7.3.5.17.1 Substation inspection , Distribution substation | \$294 | | |
| 7.3.5.17.2 Substation inspection , Transmission substation | \$159 | | |
| 7.3.5.18.1 Substation vegetation management, Maintenance substation distribution | \$3,020 | | |
| 7.3.5.18.2 Substation vegetation management, Maintenance substation transmission | \$2,774 | | |
| 7.3.5.19 Vegetation inventory system | \$7,392 | \$7,947 | \$7,292 |
| 7.3.5.20 Vegetation management to achieve clearances around electric lines and equipment | \$0 | \$697,516 | \$0 |

PG&E's response does not appear to explain why PG&E's actual 2020 expenditures did not align with its 2020 forecasts. For the following initiatives, please state the basis for why PG&E's actual expenditures were significantly lower than the forecast 2020 expenditures in PG&E's 2020 WMP.

- a) 7.3.5.6 Improvement of inspections: 2020 forecast was \$7,244 K, 2020 actual was \$1,299 K.
- b) 7.3.5.13 Quality assurance / quality control of vegetation inspections: 2020 forecast was \$13,452 K, 2020 actual was \$11,695 K.
- c) 7.3.5.14 Recruiting and training of vegetation management personnel: 2020 forecast was \$5,877 K, 2020 actual was \$14 K.

ANSWER 02

Responses for subparts a, b, and c:

- Differences in initiative alignment in the 2020 WMP vs the 2021 WMP:

- In the 2020 WMP, PG&E disaggregated the high-level vegetation forecasts (Routine Transmission and Distribution, Enhanced, Tree Mortality, Right of Way Clearing) to each WSD defined initiative.
 - In the 2021 WMP, based upon feedback from subject matter experts, PG&E consolidated the number of initiatives in which PG&E provided financial figures.
- The WSD 10_Q19 data listed shows the 2020 WMP assumptions which are now outdated based upon the above updates that took place in the 2021 WMP. This realignment of how costs were mapped out inherently drives cost differences (i.e. when an initiative is closed out from having a financial figure, this will cause a variance in amounts being displayed in the 2020 WMP vs 2021 WMP). Examples of this are 7.3.5.10, 7.3.5.11, and 7.3.5.12 showing amounts in the 2020 WMP alignment and zero in the 2021 WMP alignment.
- Please refer to the response in Question 1A of this Data Request for information regarding the difference in assumptions used between the 2020 WMP and the 2021 WMP to disaggregate the vegetation spend into the WSD-defined initiatives.
- Please refer to PG&E's 2021 WMP Revision Notice response to Critical Issue No. 6, Remedy 1, for PG&E's latest cost breakdown highlighting the 2020 WMP initiative splits using the 2021 WMP assumptions providing an apples-to-apples view between the 2020 WMP and the 2021 WMP. The Revision notice response also explains the changes that occurred between the two filings regarding the initiative mapping.