

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2022
Data Response

PG&E Data Request No.:	CalAdvocates_006-Q02		
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Request Date:	December 23, 2021	Requester DR No.:	CalAdvocates-PGE-2022WMP-06
Date Sent:	January 14, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to the *PG&E Independent Monitor Report of November 19, 2021*, Kirkland & Ellis LLP, filed on November 23, 2021 (the Monitor's 2021 report).²

QUESTION 02

The Monitor's 2021 report states:

The cross arm was first identified in connection with an August 19, 2019 patrol. The tag had a due date of February 19, 2020 (a 6-month Priority E tag). The repair was permitted and ready for construction in April 2020 (which was already late), but was never completed. On September 10, 2020, the notification was reassessed and the crew lead requested that the work be expedited before the 2021 fire season (that is, August 30, 2021).⁴

- a) In reference to the above, why was the work scheduled for April 2020 not completed?
- b) Please explain what is meant above by "the crew lead requested that the work be expedited before the 2021 fire season." For example, did the crew open a new tag, or increase the priority of the existing tag?
- c) In reference to the above, why was the expedited work that was requested on September 10, 2020 not completed?
- d) As of June 16, 2021, what was the priority of the tag on this crossarm discussed above?

ANSWER 02

- a) Construction on this job was originally scheduled to begin in March of 2020, with completion expected the following month. Before construction could begin in March, the State of California issued Covid-19 Shelter in Place orders, curtailing all non-essential construction including this repair. Re-scheduling was further impacted by subsequent major emergency events occurring in 2020 which focused construction

² Kirkland & Ellis LLP, *PG&E Independent Monitor Report of November 19, 2021* (Case No. 14-CR-00175-WHA Doc. No. 1524-1), November 23, 2021.

⁴ Monitor's 2021 Report, p. 36.

resources on higher priority emergency work. The tag was evaluated in a Field Safety Reassessment performed on August 11, 2020, which recommended completion of the tag prior to the beginning of the 2021 fire season.

- b) The note the Monitor is referring to is system generated on Field Safety Reassessments performed in HFTD Tier 3 areas. The inspector did not change the priority status of the tag or open a new tag.
- c) The work was scheduled for completion prior to the start of the 2021 fire season when the incident occurred on June 16th.
- d) Tag 117777611, the tag on the crossarm discussed above, was priority E.