

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

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| PG&E Data Request No.: | OEIS_007-Q18 | | |
| PG&E File Name: | WMP-Discovery2022_DR_OEIS_007-Q18 | | |
| Request Date: | March 28, 2022 | Requester DR No.: | Data Request OEIS-PG&E-22-007 |
| Date Sent: | March 30, 2022 | Requesting Party: | Office of Energy Infrastructure Safety |
| PG&E Witness: | | Requester: | Kevin Miller |

SUBJECT: UTILITY DEFENSIBLE SPACE (UDS) PROGRAM

QUESTION 18

In Section 7.3.5.20, PG&E details its Utility Defensible Space (UDS) program and sets a target of 7,000 distribution poles in the HFTD.

- a. To what standard does PG&E clear these poles? (i.e., to what radius and height?)
 - i. Explain the rationale behind choosing this standard, including any scientific or wildfire safety rationales behind the extent of clearance.
 - ii. Has PG&E considered the environmental impacts of this clearance radius? If so, what are environmental impacts, both positive and negative? (e.g., erosion, removal of invasive species, habitat fragmentation, water quality, etc.)
- b. Is PG&E considering alternative mitigation measures (i.e., ones that would negate the need for some or all of the UDS program)?
 - i. If so, what are those mitigation measures?
 - ii. If not, why not?
- c. Provide the procedural document for the UDS program (or a link to it).

ANSWER 18

- a. PG&E clears poles to a 50' horizontal radial distance around poles, and a minimum vertical clearance of understory vegetation 6' from the ground.
 - i. The rationale for these distances is grounded on benchmarking with other California utilities, as well as basic principles of defensible space and fuel management guidelines set forth on California Public Resources Code (PRC) Section 4291 for improved structures. Given the variability of site specific factors and other maintenance that can limit or compliment UDS work, the target of 50' is a reasonable and obtainable clearance to set a baseline for the program. PG&E will continue to calibrate UDS based on the experience and feedback we gain through initial years of program execution.
 - ii. PG&E incorporated environmental impact considerations into the overall program scope including:

- UDS is purposefully not a bare-ground program to reduce ground disturbance and potential for erosion
- UDS targets mitigation of ladder fuels surrounding overhead assets rather than removal of trees. This helps the program align with forest practice rules while achieving the goal of modifying the vertical and horizontal continuity of fuels
- Environmental pre-screening is incorporated into work planning. All proposed work locations go through an initial environmental screening determining their Environmental release to construction steps. Work locations that fall within areas of Environmental constraints have additional steps taken including but not limited to biological reviews, and cultural oversight.

b. Yes.

- The UDS program will continue to be calibrated in coordination with PG&E's other wildfire mitigation programs. This coordination will vary based on site specific factors. Certain mitigations such as EVM, system hardening, retardant applications, and EPSS can be complemented by UDS treatments or render the treatments less beneficial without modification or avoidance altogether. These calibrations are expected as an on-going process planning improvements.

Undergrounding will eliminate the need for UDS. As undergrounding efficiencies and limitations are further documented in the HFTD, the UDS program and targeted areas will be calibrated to avoid work in areas that will not realize longer term UDS benefits.

- Not applicable.

- Please see attached, "WMP-Discovery2022_DR_OEIS_007-Q18Atch01.pdf" UDS Standard TD-7109S.