

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

PG&E Data Request No.:	OEIS_012-Q01		
PG&E File Name:	WMP-Discovery2022_DR_OEIS_012-Q01		
Request Date:	May 29, 2022	Requester DR No.:	OEIS-P&GE-22-012
Date Sent:	May 4, 2022	Requesting Party:	Office of Energy Infrastructure Safety
PG&E Witness:		Requester:	Kevin Miller

SUBJECT: PG&E's THIRD ERRATA

QUESTION 01

Regarding information in PG&E's Third Errata to its 2022 WMP Update, provided April 25, 2022:

- a. PG&E has modified its pole clearing program target to inspect and clear (where clearance is needed) all poles identified in PG&E's VM Database, as of October 1, 2021, in HTFD areas or HFRA, not required by PRC 4292. How many poles meet these criteria?
- b. How many assets have been discovered since October 1, 2021?
- c. Does PG&E have an estimate for the number of assets it will discover from now to August 31, 2022?
 - i. If so, provide the estimate and an explanation of how that estimate was calculated.
- d. Why is PG&E extending its target date from April 30, 2022, to October 1, 2022?
- e. How does a "target due date" differ from the 45-day timeline?
- f. How many assets discovered since October 1, 2021, have exceeded the 45-day timeline for inspection and clearance?
- g. How often (percentagewise) has PG&E missed the 45-day deadline due to "External Factors?"
- h. What is PG&E's plan for discovering assets for inspection and clearance?
 - i. How far along is PG&E in completing this plan?

ANSWER 01

- a. Based on our current review, there were approximately 7,000 poles within the High Fire Risk Area (HFRA) and High Fire Threat District (HFTD) areas where clearance is not required by California Public Resources Code (PRC) Section 4292 that were in PG&E's Vegetation Management (VM) Database as of October 1, 2021.

- b. PG&E understands that the assets discovered refers to poles in HFTD and HFRA areas. Based on this understanding, approximately 1,480 poles have been added to PG&E's VM Database as of May 3, 2022. However, not all of these poles are within HFTD and HFRA areas. During the inspection process, approximately 800 of these pole records have been archived because they no longer have non-exempt equipment.
- c. Since inspections and initial clearing for 2022 have largely been completed, the discovery of any additional assets is anticipated to be relatively low. However, we do not have a specific estimate of the number of poles that will be identified.
- d. The pole clearing program is not a new program, but it is a new target within the WMP. The technology currently used for this program has limitations in its ability to look at any backward period in time. It provides daily snap shots on totals for inventory, completed, and pending work. Therefore, there are process and documentation improvements that need to be developed and implemented to support these limitations and provide the necessary documented evidence for Quality Assurance oversight. To accommodate the necessary improvements, we revised the target date from April 31, 2022 to October 1, 2022.
- e. The October 1, 2022 "target due date" is the date by which we will have all the work completed and/or work prescribed for clearance where clearance is required for assets added to our VM Database by August 31, 2022, barring External Factors.

The 45 day commitment only applies to assets discovered after August 31, 2022, which will be inspected and cleared (if clearance is needed) within 45 days for poles identified after August 31, 2022, barring External Factors.

- f. For clarification, the 45 day inspection and clearance requirement only applies to poles identified after August 31, 2022. Thus, it is not applicable to poles identified after October 1, 2021.
- g. See the response to subpart (f).
- h. The discovery plan includes having inspectors on foot patrol inspecting all line mileage within HFTD and HFRA areas and inventorying poles in our system of record with non-exempt equipment. At the time of inspection, work is prescribed and many instances completed. In those instances where it cannot be completed, work is prescribed to determine the appropriate clearing. As of May 3, we have 22 locations the have pending clearance work to perform.