

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

PG&E Data Request No.:	WilliamBAbrams_002-Q25		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q25		
Request Date:	April 13, 2022	Requester DR No.:	Email Transmittal – 2022WMP DR-02
Date Sent:	April 25, 2022	Requesting Party:	William B. Abrams
PG&E Witness:		Requester:	Will Abrams

**SUBJECT: PG&E WMP GAP ANALYSIS GIVEN KINCADE FIRE TESTIMONY AND
SAFETY IMPLICATIONS**

Expert Testimony: Mr. Gary Uboldi, Fire Captain Specialist Peace Officer with the California Department of Forestry and Fire Protection who has investigated over 400 wildfires across his 20+ year career

Expert Testimony: Mr. Joseph Hemstock, 38 Year as PG&E as Supervisory Inspector, Crew Foreman, Electrical Transmission Supervisor and other lead roles plus 10 years as PG&E consultant

Testimony Date: February 9, 2022 (See Attachment B: Pre-Trial Transcript)

BACKGROUND TESTIMONY/EVIDENCE:

Pg. 238 (lines 17-24)

“Now, on this page, page 5 towards the top, does it have -- does it include -- the inspection form, does it include a code for what certain numbers represent? A. Yes, it does have a condition code. Q. Is there also a condition code that says N/A? A. Yes. Q. And what does this form say N/A means? A. Not present.

QUESTION 25

- a. Given the ambiguity of “N/A” meaning ‘not present’ has PG&E revised their inspection forms to have less ambiguous and more accurate infrastructure evaluation and risk scoring?
- b. Are any changes reflected within their WMP?

ANSWER 25

PG&E forms are routinely modified to improve accuracy and evaluation. Prior to the Kincade Fire, PG&E required high-resolution photographs to be collected with the inspection form in question, and the photographs show there were no visible issues with the jumper cables at the time of the inspections. The drone images in question were re-reviewed by a second team of drone inspectors, who also reviewed the high-resolution photographs and confirmed there were no visible issues at the time of the inspections.

Any alleged “ambiguity” in “N/A” does not detract from the clarity – and the reviewability – of the photos.

Following the Kincade Fire, PG&E modified its inspection forms so that there were two possible answers to the question, “Is there a jumper(s) present?": Yes or No. PG&E added a follow-up question, “Is there an open jumper(s) present?” That question also has two possible answers: Yes or No. Though PG&E’s inspection program is aimed, in part, at mitigating the risk of wildfire ignition, the specifics of individual inspection forms are not typically included in the WMP.