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

PG&E Data Request No.:	WilliamBAbrams_002-Q13		
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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

Testimony Date: February 8, 2022 (See Attachment A: Pre-Trial Transcript)

BACKGROUND TESTIMONY/EVIDENCE:

Pg. 111 (lines 5-14)

> "But then at 1/9, you saw another line break off, and that's the SMUD tap line that you described? A. Yes. Q. Did you follow it all the way to what you called, I believe, the Sonoma power plant? A. Yes. Q. Did you see it actually physically connected there? A. Yes."

QUESTION 13

a. What risk mitigation has PG&E done to ensure decommissioned or moth balled lines are not energized and connected to power plants?

b. How have inspection practices changed to ensure these failures are not repeated?

ANSWER 13

This testimony pertains to the line serving the Sonoma power plant (owned by Calpine), often referred to as the SMUD plant, in the Geysers. There was no "failure" to recognize that the Sonoma plant or the line running to it was mothballed or decommissioned. To the contrary, as the witness acknowledged, the referenced Sonoma power plant "was still active" at the time of the Kincade Fire. (Tr. 215:19-24.) Accordingly, the line spans and tap lines described in the cited testimony were not "decommissioned" or "mothballed," but were instead active and needed to serve an active power plant.

More generally, PG&E's revised practices for identifying idle facilities are set out at a high level in PG&E's 2022 WMP at page 548. Subsequent to the Kincade Fire, PG&E

reviewed its transmission lines to determine if other energized spans not serving customer load remained. In the High Fire Threat Districts, PG&E found one such span and de-energized it. In addition, PG&E revised its inspection forms so that inspectors are required to report facilities not serving customer load.