

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

PG&E Data Request No.:	WilliamBAbrams_002-Q07		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q07		
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. 84 (lines 14-21)

“Additionally, that's also a south-facing slope. So the fuel model on that side, the fuels on that side of the slope are going to have a lower water content or fuel moisture content then the fuels on the back side of that slope because the sun never touches it. So the plants on the back side of the slope are going to have a higher moisture content than the ones on the front side. They have also been preheated all day.”

**QUESTION 07**

Given these findings and the increased fire risk on “south-facing slopes”, has PG&E modified their vegetation management practices to ensure this type of topography is treated differently or more regularly given the lower moisture content?

**ANSWER 07**

PG&E is aware of no practical proposal to set different vegetation management standards in accordance with the various angles at which the sun hits a slope – especially in a highly varied, mountainous environment with slopes inclined in every direction. Like all towers and poles in high fire threat areas, PG&E poles and towers on or near south-facing slopes are subject to numerous mitigations, as set forth in the 2022 WMP. Section 7.3.5 provides an overview of PG&E’s extensive vegetation management program.

PG&E employs a holistic, multi-factor approach when inspecting vegetation within its easements and determining what work, if any, is needed. Slope is a factor that [is](#) considered as part of that approach. Please see the response to Question 6 for additional information. Health of the tree—which can be impacted by topography and moisture content—is another factor considered during vegetation management inspections.