

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans
Rulemaking 18-10-007
Data Response**

PG&E Data Request No.:	CalAdvocates_055-Q02		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_055-Q02		
Request Date:	April 26, 2021	Requester DR No.:	2021WMP-021
Date Sent:	April 29, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

QUESTION 02

Between February 5, 2021 and March 17, 2021, PG&E provided two different versions of Table 4, “Fatalities due to utility wildfire mitigation initiatives” from its 2021 WMP. The table below summarizes the responses provided by PG&E.

	Original 2021 WMP	Errata
	2/5/2021	3/17/2021
2018 Employee	0	0
2018 Contractor	0	0
2018 Public	0	0
2019 Employee	0	0
2019 Contractor	1	0
2019 Public	0	0
2020 Employee	0	0
2020 Contractor	0	1
2020 Public	0	0

In PG&E’s Errata, p. 14, PG&E stated:

Table 4 incorrectly stated that there was 1 contractor fatality that occurred related to utility inspection work performed in 2019. There were no contractor fatalities relating to utility inspection work in 2019. However, the 1 contractor fatality was related to vegetation management work performed in Q1 2020.

- a) The number of fatalities for 2018 and 2019 reported in PG&E’s 2020 WMP matched PG&E’s original 2021 WMP submission on February 5, 2021. PG&E subsequently revised these counts in its Errata on March 17, 2021. Please explain why PG&E took over a year to identify and correct the errors in its fatality counts.
- b) Please explain how the contractor fatality that occurred in 2020 was previously miscategorized, both by incident year and by WMP work category.
- c) What date did this fatality occur?
- d) Please provide a copy of the OSHA report for this contractor fatality.

ANSWER 02

- a) PG&E disagrees with the assertion that we had an error in our WMP fatality count. In our 2021 WMP, we identified one fatality from 2018-2020, and that number remains the same following the March 17, 2021 errata. However, on March 9, 2021, Cal Advocates issued a data request to PG&E asking for detailed information regarding injuries we identified in Table 5 of the 2021 WMP. In response, we reviewed our records and discovered an inadvertent error regarding the contractor fatality identified in Table 4 of the 2021 WMP. Accordingly, we updated Table 4 to correct the year of the fatality and the type of work being performed when it occurred.
- b) As stated previously, PG&E did not track OSHA-recordable contractor injuries prior to the end of 2019 and early 2020. In 2020, PG&E began to improve our internal tracking and categorization of OSHA incidents involving vendors. However, we still have limited information regarding injuries to contractors and members of the public, and any related medical treatment, during wildfire mitigation initiatives because we are not responsible for reporting the injuries to OSHA.

Upon receiving a data request from Cal Advocates on March 9, 2021 asking for detailed information regarding injuries we identified in Table 5 of the 2021 WMP, we reviewed our records and discovered the error regarding the placement of the contractor fatality identified in Table 4 of the 2021 WMP. We have no additional information to provide at this time regarding why this error occurred during drafting.

- c) March 16, 2020
- d) PG&E does not have a copy of the OSHA report for the Q1 2020 fatality. The contractor was responsible to file the report to OSHA on behalf of its employee.