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

PG&E Data Request No.:	CalAdvocates_011-Q04		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_011-Q04		
Request Date:	February 24, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-11
Date Sent:	March 3, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

The following questions relate to your 2022 WMP Update submission.

If a full response to a given question will be included in your 2022 WMP submission, your response to that question of this data request may consist of a citation to the specific page(s) or table(s) of the WMP where the information may be found, a written response to the question, or both.

QUESTION 04

In PG&E's 2021 Q4 Quarterly Initiative Update, PG&E stated that, as of 2021 Q4, PG&E had hardened 210.5 distribution line miles under initiative "C.13 – System Hardening (Distribution)."

As stated in PG&E's response to Data Request CalAdvocates-PGE-2022WMP-03, February 15, 2022, attachment "WMP-Discovery2022_DR_CalAdvocates_003-Q02Supp01Atch01CONF.xlsx," PG&E installed 153.1 miles of covered conductor in HFTD in 2021, and 108.8 miles of underground conductor in HFTD in 2021, which totals 261.9 miles.

Please explain the apparent discrepancy in number of miles between the above documents.

ANSWER 04

The data provided in PG&E's response to Data Request CalAdvocates-PGE-2022WMP-03, which showed 153.1 miles of covered conductor and 108.8 miles of underground circuit miles installed in HFTD areas in 2021, reflected a download from PG&E's Geographic Information System (GIS) on February 1, 2022. That data included all covered conductor and underground circuit-miles installed in 2021 and mapped at the time that data was pulled. The 210.5 miles of system hardening completed in 2021, reported through PG&E's Q4 QIU was tracked in a separate, project-based system and the data in those two systems can vary in several ways, the primary reasons for variation being:

Reason for Variation	Details	Impact
Mapping entry lag	There is a delay from the time a project is constructed in the field and recorded as complete in the system hardening, project-based data, to when it has been fully mapped in PG&E's GIS system.	The GIS data for 2021 installed mileage may not be fully complete for several months into 2022, whereas the system hardening project-based data has already been validated as complete.
Projects are mapped together in GIS	The GIS system assigns a single project completion date to all the miles within a project when that project is completed. Because system hardening projects can be large in terms of mileage and long in terms of construction duration the system hardening project-based data captures the completion of portions of projects.	In the example of a 5-mile system hardening, covered conductor project where 2 miles were constructed and energized in 2020 and the remaining 3 miles were completed in 2021: the GIS system would record all 5 miles as having a 2021 date (because that is when the project completed) but the system hardening project-based data would record 2 miles in 2020 and 3 miles in 2021.
Mileage from other Programs	The GIS data set includes several categories of installed assets that are not considered part of system hardening including: (a) new assets installed as part of new business jobs, (b) replacement of old underground circuits with new underground assets or replacement of existing covered conductor with new covered conductor, and/or (c) other projects that may not have resulted in the removal or replacement of existing, non-hardened overhead assets.	This is likely the largest driver of the difference between these two numbers, since the GIS data includes mileage where new covered conductor or underground assets were installed by other programs whereas the system hardening, project-based data only includes mileage for projects where existing non-hardened facilities were replaced or removed in 2021.