

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

PG&E Data Request No.:	WilliamBAbrams_002-Q30		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q30		
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. 266 (lines 4-14)

“A. At the time, I don't remember the period of time it was, but PG&E was injecting iron into the cooling water system. And in our meetings with the Geysers folks in Santa Rosa here, I asked them to make sure they notify me prior to injecting iron. Obviously iron and electricity, you don't really want them palling around. So they agreed that they would let me know. Sometimes they did and sometimes they didn't. But when the iron was injected, the steam coming off, it was a higher level of contamination than we were used to seeing.”

**QUESTION 30**

- a. Is PG&E still injecting iron into cooling systems?
- b. If so, how is PG&E mitigating these “higher level” contamination risks and wildfire risks?
- c. How is this reflected within their WMP given that is a cause or a contributor of catastrophic wildfires?

**ANSWER 30**

There is no allegation, nor is there evidence, that “injecting iron into cooling systems” or any resulting contamination in any way caused the Kincade Fire. In the cited testimony, the witness is describing conduct that occurred “back in the 90s.” (Tr. 265:16-17.) In 1999, PG&E sold its Geysers power plants—including the Geysers Units 9/10 plant—to Calpine. Following this sale, PG&E had no responsibility for maintaining, or injecting anything into, the cooling towers associated with the Geysers power plants.