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

PG&E Data Request No.:	WSD_010-Q12		
PG&E File Name:	WildfireMitigationPlans_DR_WSD_010-Q12		
Request Date:	March 15, 2021	Requester DR No.:	WSD to PGE – Data Request – 20210315
Date Sent:	March 18, 2021	Requesting Party:	Wildfire Safety Division
PG&E Witness:		Requester:	Ryan Arba

QUESTION 12

PG&E's 2021 WMP states:

> "Covered conductor maintenance will be performed anywhere covered conductor is installed and found to have conditions requiring maintenance." (p. 479)

a. What conditions would require maintenance?

b. How does PG&E determine the spend projections for covered conductor maintenance?

c. Why is PG&E's projected spend for covered conductor maintenance more in 2021 than in 2022 when the projected line miles to be treated remains the same? (Table 12, line 40) Spend for covered conductor maintenance was cut in half from 2021 – 2022.

ANSWER 12

a. As described on page 479 if the 2021 WMP, covered conductor maintenance is performed as part of routine overhead maintenance conducted through our asset inspection program. Any condition requiring repair identified through this program is addressed by our Electric Distribution Preventive Maintenance Manual (available in our supporting documents[1]). Conditions, for example, could include contact by vegetation or animal or third-party.

The 2021 plan was developed based off a review of open existing electric corrective tags (ECs) (known work) and an anticipation of a volume of "find and fix" ECs that will need to be added to the plan as they are identified throughout the upcoming year. PG&E used the detailed forecast model data that was used to build the 2021 plan by assigning the WSD-defined initiative to the units and dollars based off the facility type on the tag, in this case notifications with the object code of "conductor" were assigned to this initiative. Note, however, that the PG&E does not have the

[1] https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/Documents-Referenced-in-2020-WMP.pdf

detailed asset level data available to delineate covered conductor from other types of conductor; thus, the forecast for this initiative includes repair work that covers all conductor types (i.e. bare and covered). For 2022, there was no detailed plan available at the time of the 2021 WMP submission. In the absence of a detailed plan like the one described for the 2021 plan, the 2022 work plan was scaled based upon the year over year growth or decline in overall forecast of the key asset repair categories (MAT codes KAA and 2AA), which encompasses the majority of repair and replacement spend in the maintenance program – see table below for year over year comparison.

	2021	2022	YoY Growth
2AA	$232,990,043	$201,904,811	-13%
KAA	$49,612,461	$22,276,706	-55%

b. See comments above regarding the 2022 plan and how the covered conductor forecast was developed. As noted in the table above, there is a decline in total asset repair spend targets in 2020 as compared to the 2021 forecast. This is driven by PG&E's 2022 targets being refined to align with our Plan of Reorganization (Bankruptcy Exiting Financing) financial budgetary targets. PG&E continues to drive to crate efficiencies in our repair work (and other work categories) through strong operational performance and favorable contracts through the RFP (Request for Proposal) processes to ensure we execute the necessary work plan, while staying within our financial budgets. As always, please note that the 2022 projection is a forecast available at the time of the 2021 WMP filing, it may change before we begin 2022 and actual costs will always vary from such forecasts.