

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023
Data Response**

PG&E Data Request No.:	OEIS_003-Q001		
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Date Sent:	April 26, 2023	Requesting Party:	Office of Energy Infrastructure Safety
DRU Index #:		Requester:	Colin Lang

SUBJECT: REGARDING ACTIVITIES THAT EXCEED GO 166

QUESTION 001

On page 624, PG&E states it

“is currently working with internal and external stakeholders, including CalOES, to develop and implement activities that exceed compliance requirements in CPUC General Order (GO) 166, Standards for Operation, Reliability, and Safety During Emergencies and Disasters.”

- a. List and describe the referenced activities.
- b. Explain how each listed activity exceeds GO 166.

ANSWER 001

CPUC General Order 166 Standard 1A, Internal Coordination, requires California electric utilities to provide as part of their emergency plans a description of internal coordination functions how they gather, process, and disseminate information within their service areas, set priorities, allocate resources, and coordinate activities to restore service. GO 166 Standard 1D, External and Government Coordination, requires California electric utilities to address as part of their emergency planning coordination with Essential Customers and state and local government agencies.

- a) The additional items referenced above that are not required by GO 166 are listed below:
 - i. We have drafted a Threat Hazard Identification Risk Assessment (THIRA) and will be sharing the results with external agency partners.
 - ii. We participate in quarterly MARAC meetings.
 - iii. We hold quarterly Operational Area calls with our PG&E Public Safety Specialists.
 - iv. We conduct more than the minimum one single exercise and include public partners in integrated exercise play; this includes inviting them to be part of the planning exercises.

Internal and External Coordination

Additionally, although not required as part of GO 166, Standard 1A compliance, a key element of PG&E's internal and external coordination strategy is the alignment of PG&E's functional areas to the frameworks provided by the California Standardized Emergency Management System (SEMS) and SEMS component Incident Command System (ICS). The adoption of these frameworks aligns PG&E with public partners to execute a coordinated response that supports safe restoration of service and whole community recovery. Specifically, PG&E has adopted the following SEMS/ICS consistent operational components:

- Use of the same framework as the SEMS Operational Area concept in the context of emergency organizational structure and levels, with emergencies beginning at the local level (Level 1) which is PG&E's base emergency posture.
- Whole community engagement through PG&E's presence in County Emergency Operations Centers and the State Operations Center, and actions of PG&E's Liaison Officer and team leveraging coordination calls and collaboration of community and customer support.

SEMS Operational Area coordination framework details can be found in CERP subsection 9.4, Local Government, Operational Areas. Whole community engagement, including PG&E Liaison Officer actions are described in CERP sections 4 and 9, Coordination and Communication, and External Relationships.

PG&E Coworker Training

General Order 166, Standard 3C, requires California utilities to annually train designated personnel in preparation for emergencies and major outages. Per Standard 3C, the training shall be designed to overcome problems identified in the evaluations of responses to a major outage or exercise and shall reflect relevant changes to the plan.

Although not required as part of GO Standard 3C compliance, PG&E has continued to train its EOC staff using a SEMS/ICS Baseline, Expanded, Advanced and Position Specific approach, as follows:

- **ICS Baseline:** Foundational SEMS and NIMS courses required of all EOC personnel and pre-requisites to any advanced training.
- **Expanded:** California Specialized Training Institute training request, including:
 - G-191 (EOC/ICS Interface);
 - G-626 (EOC Action Planning);
 - G-775 (EOC Management and Operations);
 - IS-368 (Including People with Disabilities & Others with Access & Functional Needs in Disaster Operations).
- **Advanced:** ICS-300 and ICS-400.
- **Position Specific:** Training focused on EOC specific roles.

SEMS/ICS training details can be found in PG&E's CERP subsection 5.8.1, Training.

- b) The listed activities described in subpart (a) exceed GO 166 as they are not activities that PG&E are required to undertake.