

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

PG&E Data Request No.:	WilliamBAbrams_002-Q22		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q22		
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. 183 (lines 22-25)

“So what did you actually tell them on that day regarding your findings, your opinions regarding the cause of the Sawmill Fire? A. That we made sure that those wires are secured.”

QUESTION 22

- a. When outside oversight agencies provide direction like “make sure those wires are secured” how does PG&E now make sure those instructions are documented and addressed?
- b. Where are these issues addressed in the PG&E WMP given that staff repeatedly did not heed these instructions?

ANSWER 22

There was no testimony or suggestion that PG&E personnel ever ignored instructions from Cal Fire, or that they ignored any instruction to “make sure those wires are secured” following the Sawmill Fire. And there was no testimony, and no evidence, that PG&E personnel “repeatedly did not heed” the instructions. To the contrary, the witness testified that when he described the condition of the wire – having come unstapled and broken free of the pole – to PG&E personnel, they said “that was something we could have fixed.” (Tr. 183:17.) The witness was also shown a photograph of the pole “after it

had been repaired by PG&E,” which showed that the “horseshoe nails or staples” had in fact been reinserted over the bond wire, and the bond wire was thus securely fixed to the pole. (Tr: 226:21-227:2.) PG&E repairs and makes safe its equipment after a failure or other incident as a matter of course; and PG&E coordinates such repairs with Cal Fire and other agencies responding to the fire.