

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

PG&E Data Request No.:	CalAdvocates_032-Q02		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_032-Q02		
Request Date:	August 29, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-32
Date Sent:	September 13, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

The following questions pertain to PG&E's response to data request CalAdvocates-PGE- 2022WMP-29 (DR 29) on August 24, 2022.

QUESTION 02

In response to question 3 of DR 29, PG&E stated, "After further review, we determined that this serious injury was not the result of wildfire mitigation work associated with our WMP. As a result, the WMP tables will be revised to reflect this update."

- a) Please identify the date, time, and location of the incident that led to the injury.
- b) Did the incident that resulted in injury occur on property owned, operated, or maintained by PG&E?
- c) Please state to the best of PG&E's knowledge the circumstances that led to this injury.
- d) Was the injury described in DR 29 the result of activity performed by PG&E?
- e) Was the injury described in DR 29 the result of activity performed the result of activity performed by contractors or agents at PG&E's discretion?
- f) If the answer to part (e) is yes, was the work that resulted in the injury approved by PG&E?
- g) Please state how the injury described in DR 29 was previously misidentified as resulting from wildfire mitigation work.
- h) How did PG&E determine that the injury described in DR 29 was not related to wildfire mitigation work?
- i) Please provide copies of any reports related to this injury that PG&E provided to SED, OSHA, or other regulatory agencies.

ANSWER 02

- a) Date: February 15, 2022.
Time: 08:00 hours.
Location: 2215 Cabrillo Highway, Moss Landing, CA 95039.
- b) No, the accident occurred while a contract crew was on route to a project location.

- c) Based on currently available information, this incident occurred when a contract crew was on the way to a jobsite to perform undergrounding work. On the way to the job, the driver lost control of the truck causing a three-vehicle accident.
- d) No, the contract crew was on their way to a jobsite to perform work for PG&E.
- e) The fatality occurred when the contractor was enroute to a PG&E job. PG&E did not specifically direct the contractor on how to get to the job site.
- f) The work the contractor was enroute to perform was approved by PG&E.
- g) During our initial investigation, out of an abundance of caution, we determined it was best to include the incident since we were unaware whether it was wildfire related.
- h) As our investigation progressed, we were able to determine that the contract crew was not performing wildfire mitigation work at the time of the incident and was, instead, traveling to a jobsite.
- i) Since we were in the process of completing our investigation and determining the facts surrounding the incident, no reports have yet been sent to SED, OSHA, or any other regulatory agencies.