

**PACIFIC GAS AND ELECTRIC COMPANY**  
**PG&E Ref. DRU14469-Case-EUP-SB 884**  
**Data Request CPUC Safety Policy Division**  
**Requester DR No. PG&E Mini-RO Model (SPD-PGE-SB884-012)**

**Requester: Schmitt, Edwin; Hanes, Fred**

**Request Date: October 03, 2024**

**Response Date: October 10, 2024**

**Question No. 002:**

In Question 12 of SPD-PGE-SB884-011, PG&E was asked to provide SPD with testimony, workpapers and data request responses related to the mini-RO model and Pole Replacement Program. In Question 12.viii. SPD also asked PG&E to provide a table that lists the name of each document, where in the document the mini-RO model or Pole Replacement Program is discussed, and a summary of each document. The table PG&E provided, EUP\_DR\_SPD\_011\_Q012Atch14.xlsx, was completed correctly for the testimony and workpapers, but PG&E did not complete the table for data requests. For the individual data requests, the table does not include the document name, where in the document we could find the information discussed or a summary of the document. PG&E must complete this table and include as an attachment to its response to this data request.

**Response to Question No. 002 Response No. 001:**

In response to SPD's request, we have provided updated attachment "*EUP\_DR\_SPD\_012\_Q02Atch01.xlsx*" which includes lists of data request responses with individual document summaries for each request, as set forth below:

- Worksheet "WGSC DRs" – data request responses relating to mini-RO model or Pole Replacement for A.23-06-008
- Worksheet "2020 GRC DRs" – data request responses relating to mini-RO model or Pole Replacement for A.18-12-009

**Response to Question No. 002 Response No. 002:**

In response to SPD's request, we have provided updated attachment "*EUP\_DR\_SPD\_012\_Q02Atch01\_Delivery 2.xlsx*". Ten additional data responses have been identified during our review of A.18-12-009 discovery and have been added to the '2020 GRC DRs' worksheet of this attachment.

**Question No. 003:**

PG&E was asked to provide any responses to data requests from A.23-06-008 and A.18-12-009 that discuss PG&E's Pole Replacement Program. PG&E provided SPD with the compressed file SPD-PGE-SB884-011\_Q12b-ix.zip.

- a) For every data request response sent to TURN, CalAdvocates or CUE that was included in the DR Response folder of SPD-PGE-SB884-011\_Q12b-ix.zip, provide SPD with the entire data request including all attachments.
- b) PG&E must follow the same folder structure found within the DR Response folder of SPD-PGE-SB884-011\_Q12b-ix.zip. These folders should be repackaged as a new .zip file to be included in its response to this data request.
- c) To comply with Question 2 above, PG&E must provide the document name, where in the document the Pole Replacement Program is discussed and write a summary for every document included in its response to 3a. that does discuss the Pole Replacement Program.

**Response to Question No. 003 Response No. 001:**

- a-b) Please see attachment "*EUP\_DR\_SPD\_012\_Q03Atch01.xlsx*" which includes a list of the requested A.23-06-008 documents and links to the files, which is hosted on PG&E's discovery website, <https://pgera.azurewebsites.net>. Users can establish a free account to download linked documents.

PG&E is also providing the requested data request responses for both A.23-06-008 and A.18-12-009 in a zip folder directly to SPD staff: "*EUP\_DR\_SPD\_012\_Q03Atch02.zip*". Note, PG&E has also included the responses and attachments that were previously provided in the DR Response folder of SPD-PGE-SB884-011\_Q12b-ix.zip. Please also note that some of the data response attachment documents contain confidential information as noted on the confidentiality declarations which were included with the responses to the original data requests and are also included with this response.

- c) The data request responses that pertain to pole replacements have been identified, described, and provided in attachment "*EUP\_DR\_SPD\_012\_Q02Atch01\_Delivery 2.xlsx*", in compliance with Q2 above. The other responses and their attachments provided do not contain content related to pole replacements and therefore are not included in the document summary.