

PACIFIC GAS AND ELECTRIC COMPANY
PG&E Ref. DRU15219-Case-EUP-SB 884
Data Request CPUC Safety Policy Division
Requester DR No. Follow-up to Previous Data Requests (SPD-PGE-SB884-015)

Requester: Schmitt, Edwin
Request Date: February 27, 2025
Response Date: March 11, 2025

Question No. 001:

In PG&E's response to SPD-PGE-SB884-013 Question 8, PG&E informed SPD that the As Built Package for order numbers 35299631, 35329009, 35329010, and 3532901 was not yet complete because they were "in construction as of the date of the response". Provide the As Built Package for any order number where this document is now available.

- a. If the document is not available as of the date of the response, provide a date when the document is expected to be made available.
- b. Provide a written explanation why each of these four order numbers were listed in PG&E's 2023 Annual System Hardening Accountability Report (SHAR) as "Complete" under the Project Completion Status field.¹ Explain why an As Built Package would not be prepared for a project listed as Complete in the SHAR.

Response to Question No. 001 Response No. 001:

- a. The As Built Packages for these orders are not yet finalized as they are currently in the post-construction process. We expect the final As Built Packages to be produced in a few months. An exact date cannot be provided because documentation needs to be collected and reviewed for quality and completeness, including redlines to reflect any changes between the initial plan and completed construction. PG&E will send the files to SPD when they are available.
- b. The **Project Status** field of the SHAR indicates that an order's miles are considered complete and contribute to the annual total mitigated miles achieved. A project, or a portion of a project, is "Complete" in the Project Status field when the new assets are energized, the old assets are de-energized, and the work passes the Fire Risk Safety Audit.

The **Status** field in the SHAR designates the current phase of the project for that order, which is derived from more granular tasks in SAP. The reason these orders are "In-Construction" in the Status field is because there are still field/construction activities remaining that take place after it is considered "Complete" in the Project Status field. These activities include removal of de-energized assets, initial restoration, etc. In the case of these orders, the new infrastructure and associated miles are considered complete, but there are still tasks and activities that have yet to be completed before the order is closed.

¹ See PG&E Advice Letter 7312-E Attachment B – PG&E SHAR 2023_CONF.xlsx

The documents that make up an As Built Package are collected, reviewed, and approved in the post-construction phase of a project (which occurs after it is “Complete” in Project Status).

PG&E recognizes that the format of our response to SPD-PGE-SB884-013 Question 8 may be a cause for misunderstanding because of the ordering of the list of documents we provided in the original response. Below, we updated Table 2 (Key Document Descriptions) and Table 3 (Document Inventory) from that response to properly reflect the sequence that the documents are created, which shows the As-Built Package as the last set of documents produced.

Table 2 (Updated): Key Document Descriptions

Document		Description
1	Business Case	<i>Previously referred to as Advanced Authorization (AA).</i> Describes high level scope of work and approves initial funding for planning/pre-construction activities (Scoping, Estimating/Design, Dependencies).
2	Design Basis Memorandum (DBM)	Contains detail scope documents including basemap
3	Project Charter	<i>Previously referred to as Business Case.</i> Formal request for project costs through completion including key milestone dates on the project schedule.
4	Construction Package	Aggregated set of final pre-construction documents: <ul style="list-style-type: none"> • Circuit Map Change Sheet (CMCS) • Construction Drawings • Crew Instructions • Estimate of Labor and Materials • Signed Land/Environmental/Permit documents approving the work • Any other relevant project documents
5	Fire Risk Safety Audit	Program-specific audit to inspect completed and energized projects for all fire risk safety items. Project must pass this audit for miles to be considered complete for the program and for the Project Status field to be updated to “Complete” in the SHAR. Re-work may be required to pass audit.
6	Standards Audit	General audit for standard adherence and workmanship, and document completion. Re-work may be required to pass audit.
7	As-Built Package	Redline of Construction Package including field changes to design including signature of construction foreman.

Table 3 (Updated): Document Inventory

Order	1. Business Case	2. Design Basis Memorandum (DBM)	3. Project Charter	4. Business Case	5. Fire Safety Audit	6. Standards Audit	7. As Built Package*
35299631	X	X	X	X	X	X	Not Yet Complete
35329009	Included in 35299631	Included in 35299631	X	X	X	X	Not Yet Complete
35329010	Included in 35299631	Included in 35299631	X	X	X	X	Not Yet Complete
35329011	Included in 35299631	Included in 35299631	X	X	X	X	Not Yet Complete

*As-Built Packages are recorded after an order's construction is completed; the orders in this table are still in construction as of the date of the response.

As shown above, As-Built Packages are currently being prepared for these four orders. All other documentation for these projects has been completed.

Question No. 002:

In PG&E's response to SPD-PGE-SB884-006, the FAQ file Ref_No_104_AFUDC 1 - Operative Month_CONF.pdf references the document FIN-3804S Allowance for Funds Used During Construction (AFUDC). Provide a copy of FIN-3804S.

Response to Question No. 002 Response No. 001:

Please see attachment "*DRU15219_EUP_DR_SPD_015_Q002_Atch01_FIN-3804SCONF.pdf*" for the Utility Standard: FIN-3804S – Allowance for Funds Used During Construction (AFUDC).

Please note that this attachment contains confidential information.