

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



December 9, 2020

Advice Letter 4117-G/5582-E

Erik Jacobson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

SUBJECT: Plan for the Communication of Fire and Weather Data and Modeling Information as Required by Decision 19-05-037, Ordering Paragraph 11

Dear Mr. Jacobson,

This disposition letter approves with modifications Pacific Gas and Electric Company's (PG&E's) Advice Letter (AL) 4117-G/5582-E.

Summary

The Energy Division (ED), in consultation with the Wildfire Safety Division (WSD), has determined that AL 4117-G/5582-E complies with Ordering Paragraph (OP) 11 of Commission Decision (D.) 19-05-037. This disposition requires PG&E to share information generated from its fire danger rating forecasts and System Outage Prediction Project (SOPP) model with any operators of electric utility systems that are directly adjacent to PG&E's service territory. PG&E may condition such sharing on such operators' agreement to non-disclosure agreements (NDAs) that comport with the standard NDA as required by Resolution E-4468,¹ but PG&E shall not delay sharing under emergency situations due to a delay in obtaining an NDA.

Background

On June 4, 2019, the Commission issued D.19-05-037 approving PG&E's 2019 wildfire mitigation plan (WMP) and adopting numerous reporting and AL requirements, including OP 11 of D.19-05-037 that provided the following:

In a Tier 1 Advice Letter filing due no later than 30 days after the Commission issues this decision, Pacific Gas and Electric Company shall articulate a plan for communicating the fire and weather data and modeling information from its Wildfire Safety Operations Center in real time during potential or actual emergency events to affected agencies, governments, and first

¹ The Commission issued Resolution E-4468 on October 2, 2015. The Resolution is available at: <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M154/K641/154641163.PDF>

responders. All such critical service providers shall have a direct contact with Pacific Gas and Electric Company within its Emergency Operations Team structure. The Tier 1 Advice Letter must contain Pacific Gas and Electric Company's situational awareness plans, including information on how it intends to share the information and analysis with first responders and others. As part of this filing, Pacific Gas and Electric Company shall explain fully the Wildfire Safety Operations Center's decision-making criteria, the point(s) at which fire related information will be communicated, and what media Pacific Gas and Electric Company plans to use to communicate this information to first responders and local government agencies and other critical service providers and its timeline for developing the process for disseminating this information.

Pursuant to OP 11 of D.19-05-037, on July 5, 2019, PG&E filed AL 4117-G/5582-E to provide its plan for communicating the fire and weather data and modeling information from its Wildfire Safety Operations Center (WSOC) in real-time during potential or actual emergency events to affected agencies, governments, and first responders. In the filing, PG&E provided the following information: (1) an overview of WSOC tools and information, (2) PG&E's current and future plans for communicating WSOC information, (3) the process for communicating WSOC tools and information, and (4) detail on additional communications and data sharing during emergency events.

In discussing its plans for communicating WSOC tools and information, PG&E identified certain information that it would not share. The information PG&E identified included PG&E's daily fire danger ratings and forecasts and outputs from its SOPP model. PG&E cited the need to avoid confusion with forecasts produced by CAL FIRE, which is the authority on wildfire risk forecasts. Similarly, PG&E indicated information generated from the SOPP model "has little use for non-utility operators" and may cause unnecessary confusion.²

Protests

Protests and responses to the AL were timely filed by: (1) the Northern California Power Agency³ (NCPA), (2) the California Municipal Utilities Association⁴ (CMUA), (3) the Counties of Mendocino, Napa and Sonoma and the City of Santa Rosa (Joint Local Governments), and (4) Sonoma Clean Power, Marin Clean Energy, Pioneer Community Energy, and San Jose Clean Energy (Joint CCAs).

NCPA, CMUA, and Joint Local Governments requested access to the daily fire danger ratings and forecasts, as well as outputs from PG&E's SOPP model. In response to the protests, PG&E reiterated its position that since the requested data and information was utility-specific, providing that information to non-utility entities could cause confusion due to the existence of CAL FIRE ratings and forecasts which may not agree with PG&E's information.

² PG&E AL 4117-G/5582-E at p. 4.

³ NCPA's members include the cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, Shasta Lake and Ukiah, as well as the Bay Area Rapid Transit District, Port of Oakland, the Truckee Donner Public Utility District, and the Plumas-Sierra Rural Electric Cooperative.

⁴ CMUA is a statewide organization of local public agencies providing electricity and water service throughout parts of California. In total, CMUA members provide approximately 25 percent of California's electric load.

The Joint CCA protest notes that simultaneous to D.19-05-037, the Commission issued D.19-05-042 in R.18-12-005 which adopted guidelines for de-energization or Public Safety Power Shutoff (PSPS) events. The Joint CCA protest states that D.19-05-042 identifies the groups with which PG&E must share information in a different manner than the decision that ordered the AL, D.19-05-037.⁵ Those groups are: (1) Public Safety Partners, (2) Critical Facility and Infrastructure Operators, (3) Access and Functional Needs Populations, and (4) Other Customers. The Joint CCA protest expresses concern that PG&E's plan for communicating PSPS-related information, as provided in AL 4117-G/5582-E, does not comport with the requirements adopted in D.19-05-042. The Joint CCAs request PG&E amend AL 4117-G/5582-E to explicitly describe its plan for communication with respect to the four groups identified above and adopted in D.19-05-042. In reply to the protests, PG&E states that it is unwilling to share such information in the form requested. Instead, PG&E states that it is developing a comprehensive weather and PSPS outlook website that will provide much of the PSPS-related information being requested by Joint Local Governments and Joint CCAs.

Several protested issues are now moot. For example, NCPA and CMUA requested to be involved in discussions that PG&E held in the third quarter of 2019 with stakeholders.⁶ These meetings addressed the protests, at least in part.

Discussion

AL 4117-G/5582-E complies with the written requirements of OP 11 in D.19-05-037. However, PG&E has failed to justify its proposal to not share the requested fire, weather, and modeling information generated at the WSOC. While PG&E notes that having potentially conflicting fire danger and weather forecast information could cause confusion, PG&E is free to provide the information with disclaimers that explain the potential for conflict between its own data and that of CAL FIRE. PG&E acknowledges that the specific data and information generated from its fire danger forecasts and SOPP model are informative for utility-specific operations and planning. As such, considerations of safety require that in certain cases PG&E should, upon request, share information generated from its fire danger forecasts and SOPP model with operators of electric utility systems that are directly adjacent to its service territory. Meetings that have occurred since the protests were filed have led to a better understanding of PG&E's responsibilities to share information consistent with Commission decision.

Regarding the matter of inconsistency between terminology used in AL 4117-G/5582-E, as ordered in D.19-05-037, and those adopted in the PSPS guidelines in D.19-05-042, nothing in this disposition or D.19-05-037 relieves PG&E from the obligations ordered in the de-energization/PSPS decision, D.19-05-042. Hence, we need not address the issue here. PG&E shall comply with the notification and communication requirements outlined in Resolution ESRB-8, D.19-05-042, and any other requirements that are adopted in R.18-12-005.

⁵ OP 11 indicates the AL filing shall include plans for communicating information with "first responders and local government agencies and other critical service providers..."

⁶ Statewide stakeholders identified by PG&E include CAL FIRE, California Office of Emergency Services, the United States Forest Service, and this Commission.

Erik Jacobson
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Under General Order 96-B, Commission staff rejects the protests filed on the basis of the technical review and analysis described above.

Disposition

PG&E's AL 4117-G/5582-E, dated July 5, 2019, is approved. Nothing in this letter relieves PG&E from the obligation to comply with all orders entered in D.19-05-042 and R.18-12-005.

PG&E is required to do the following actions:

PG&E shall provide daily fire danger forecasts and outputs from its SOPP model, upon the request of any operator of electric utility system that is directly adjacent to PG&E's service territory. PG&E may condition such data sharing on signing of a non-disclosure agreement (NDA) if that NDA is consistent with the standard NDA adopted by Commission Resolution E-4468. PG&E may not, in an emergency, decline to share data if such sharing would not in itself interfere with PG&E's ability to manage the emergency, based solely on the lack of a signed NDA.

Sincerely,



Caroline Thomas Jacobs
Director, Wildfire Safety Division



Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

cc: Service Lists for R.18-10-007, R.18-12-005
Susie Berlin, Counsel for Northern California Power Agency (NCPA),
berlin@susieberlinlaw.com
Laura Fernandez, Counsel to California Municipal Utilities Association (CMUA),
fernandez@braunlegal.com
Megan Somogyi, Counsel for the Counties of Mendocino, Napa and Sonoma and the City of
Santa Rosa (Joint Local Governments), msomogyi@goodinmacbride.com
David Peffer, Counsel for Sonoma Clean Power, Marin Clean Energy, Pioneer Community
Energy, and San Jose Clean Energy (Joint CCAs), peffer@braunlegal.com

July 5, 2019

Advice 4117-G/5582-E

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Plan for the Communication of Fire and Weather Data And Modeling
Information As Required by Decision 19-05-037, Ordering Paragraph
11**

Pursuant to Ordering Paragraph 11 of Decision (D.) 19-05-037, issued by the California Public Utilities Commission (CPUC or Commission) on June 4, 2019, Pacific Gas and Electric Company (PG&E) submits this Tier 1 Advice Letter (AL) providing its plan for communicating the fire and weather data and modeling information from its Wildfire Safety Operations Center (WSOC) in real-time during potential or actual emergency events to affected agencies, governments, and first responders.

In this AL, PG&E provides the following information: (1) an overview of the WSOC tools and information; (2) PG&E's current and future plans for communicating WSOC information; (3) the process for communicating WSOC tools and information; and (4) additional communications during emergency events.

1. Overview of WSOC Tools and Information

PG&E's WSOC monitors potential fire threats across its service area in real-time and coordinates prevention and response efforts. The WSOC is staffed 24 hours a day, primarily during wildfire season, and operational at other times of the year depending on conditions. The analysts that staff the WSOC are a highly qualified team composed of individuals knowledgeable in fire science, electric and gas operations, meteorology, dispatch services, and other related fields.

The WSOC provides real-time monitoring of conditions leveraging on-the-ground field teams, PG&E weather stations, live camera feeds, satellite data capture, emergency alert systems and social media from agencies such as CAL FIRE, National Weather Service (NWS), National Oceanic and Atmospheric Association (NOAA), California Highway Patrol (CHP) and local public safety authorities.

Weather monitoring and forecasting is one of the most important inputs into the WSOC, including how weather feeds into PG&E's daily Fire Danger Forecast (a Utility-specific

risk index). To further advance forecasting capabilities, PG&E is expanding its network of weather stations to monitor and forecast weather conditions and better assess where extreme weather with potential wildfire danger could occur. This will allow PG&E to respond quickly and appropriately to keep communities, employees, and customers safe. Data collected by the weather stations is streamed in real-time and is available to state and local agencies and the public through online sources such as the National Weather Service and MesoWest (mesowest.utah.edu). With these weather stations, PG&E is able to capture localized data related to temperature, wind speeds and humidity levels to provide improved awareness of current fire danger conditions.

Similarly, PG&E is expanding the number of high-definition (HD) cameras available to improve real-time awareness. PG&E makes these cameras available to the public through the AlertWildfire network. AlertWildfire is a consortium of 3 universities: The University of Nevada, Reno (UNR); University of California San Diego (UCSD); and the University of Oregon (UO). The AlertWildfire network provides access to state-of-the-art Pan-Tilt-Zoom (PTZ) fire cameras and associated tools to help firefighters and first responders: (1) discover/locate/confirm fire ignition, (2) quickly scale fire resources up or down appropriately, (3) monitor fire behavior through containment, (4) during firestorms, help evacuations through enhanced situational awareness, and (5) ensure contained fires are monitored appropriately through their demise. Additional background and access to these cameras is available at <http://www.alertwildfire.org/>.

In addition to these tools, PG&E is actively expanding the resources available to enhance real-time situational awareness regarding active fires, wildfire potential risk and related factors. This includes satellite fire detection technology and a fire spread model. These two technologies have yet to be fully implemented at PG&E, but show significant promise in enhancing our future capabilities in understanding fire risk, conditions and appropriate responses.

2. PG&E's Current and Future Plans for Communicating WSOC Information

As noted above, PG&E's weather station data and HD camera feeds are already publicly available through third party websites. PG&E also has additional data sharing processes in place or currently under development to share WSOC information to affected agencies, governments, and first responders.

- **Full-time California Office of Emergency Services (CalOES) data sharing:** PG&E has a full-time representative from its Emergency Preparedness & Response (EP&R) team embedded with CalOES at the State Warning Center to maintain alignment and situational awareness for all hazards and incidents that may impact either organization. Under normal, non-emergency, conditions this individual, on duty Monday-Friday 0800-1700, is positioned in the "Sitcell" (as labeled by CalOES) and is tasked with communicating PG&E's outlook for the next 5-7 days including potential inclement weather (storms, fire weather, etc.). This outlook leverages PG&E tools to project how the incoming weather can potentially affect PG&E assets and how we are preparing to respond. In addition,

as PG&E incidents occur, this position is responsible to proactively advise the CalOES Warning Center. Through this EP&R representative PG&E shares with CalOES the WSOC forecasting tools including PG&E's Fire Danger Forecasts (Utility Risk Index) and Storm Outage Prediction Project (SOPOP) model.

- **Public Safety Power Shutoff (PSPS) Portal:** To help cities, counties, tribes, agencies, and emergency responders respond to PSPS events, PG&E has established a secure data transfer portal to provide event-specific information in advance of and during an event. The information will include estimated start time of a potential PSPS event, forecasted weather duration, estimated time range to full restoration, number of customers, including volume of medical baseline and critical facilities, in the potentially impacted area, and maps (shapefiles and KMZs) that include boundaries of the area subject to de-energization and affected circuits. Additional event-specific data, including names and addresses of potentially impacted medical baseline customers and critical facilities within a jurisdiction, is available with a signed and fully-executed non-disclosure agreement.
- **Electric Public Safety Specialists (PSSs):** The WSOC coordinates closely with the Public Safety Specialists to share intelligence with local agencies and partners on fires and the potential impacts to PG&E assets. The PSSs are PG&E's liaisons to first responders during emergency response incidents. The PSS team will communicate and share information, for example PG&E operations updates and fire maps overlaid with PG&E assets, locally with the impacted agency(ies). During significant fire responses, the PSSs will serve as PG&E's agency representatives at base camps and share intelligence between PG&E field operations and the authority having jurisdiction (AHJ).
- **Real-time weather monitoring module on pge.com:** PG&E is developing a module that will be embedded with the pge.com webpage to provide increased detail to the weather conditions and forecasts that PG&E is viewing. For example, under development is a red/yellow/green indicator map of the likelihood of a PSPS being called for specific areas within PG&E territory. Combining information from PG&E's weather stations and the National Weather Service this website is anticipated to provide graphical information regarding wind speed & gusts, humidity levels, and temperature for PG&E's service territory. This information will be incorporated into the above-mentioned PSPS "predictor" information regularly refreshed by data from PG&E's Meteorological team.

While PG&E is working to communicate as much fire and weather data and modeling information as possible to affected agencies, governments, and first responders, there is some information which does not appear to be prudent to share, as described in more detail below. PG&E is open to discussing this matter further with the Commission and other parties.

- **PG&E's Fire Danger Ratings and Forecasts:** PG&E has discussed at length with CAL FIRE and other state agencies the pros and cons of sharing geographic wildfire risk forecasts, which are produced daily for internal use to support safe operations in potential wildfire risk areas. PG&E's daily wildfire risk forecasts, while informed by nationwide standards for evaluating wildfire risk, do not necessarily represent the universal wildfire risk forecast and are oriented toward the wildfire risk associated with utility facilities. As a result, PG&E's wildfire risk forecast may not match similar forecasts created and distributed by other authorities that do not have a utility-oriented view. CAL FIRE is the appropriate authority on fire risk forecasts and conditions. In the interest of avoiding confusion and the potential misalignment of forecasts, and in alignment with CAL FIRE being the authority on wildfire risk forecasts for the public, first responders, governmental agencies and others, PG&E does not plan to share wildfire risk forecasting data.
- **PG&E's SOPP model:** Similarly, the SOPP model is utility specific and provides forecasts of the possible damage to PG&E's utility infrastructure from forecasted weather events. This information allows PG&E to make important resource decisions about where to locate crews and appropriately scale our response staffing. However, this information has little use for non-utility operators and may actually confuse or misdirect first responders by highlighting the areas likely to experience utility asset damage, not the most at-risk overall locations for damage or hazard to people and property.

Finally, in the future, PG&E is interested in providing access for appropriate first responder audiences to additional real-time situational awareness tools and information. However, the interface and tools necessary for such data sharing have not yet been scoped or defined. Therefore, significantly more development is necessary to determine the most effective way to share this information. In particular, PG&E believes there would be value in sharing with agency and first responder partners:

- **Aircraft and satellite data:** This includes the latest satellite fire detection technology PG&E is leveraging in partnership with the Space Science and Engineering Center (fed by the GOES 16 & 17, Aqualis-Modis, Terra-Modis and SuomiNPP-VIIRS satellites). Real-time information on potential fire ignitions obviously has immense benefit to first responders and fire agencies. However, the full capabilities and limitations of these tools must be adequately understood by both PG&E and any partner agencies or first responders, including the risk of improper resource deployment due to "false positives."
- **Non-wildfire information:** Historic data on burn scar areas, landslides or slope stability information, and earthquake maps may be useful in the appropriate context.

- **Fire Spread Modeling:** A new tool under development, Fire Spread Modeling can have considerable benefits in terms of understanding potential impact areas for an existing or hypothetical fire ignition. For example, during real-time emergency events (like existing wildfires) jurisdictions with a need to know (namely the AHJ with decision making authority) could be provided information on fire spread modeling outputs during scheduled conference calls. However, like all tools, this resource has limitations that must be fully understood to be safely and appropriately leveraged. For example, existing or likely fire containment is not modeled in this tool which may result in substantial differences between model outputs and true-to-life experiences. Therefore, this tool should only be deployed to true fire modeling experts who are well acquainted with its capabilities and limitations. Further, serious consideration must be given to downside risks of sharing this tool, including the risk that this tool becomes available to a bad actor who is then able to identify fire ignition locations and/or conditions with catastrophic consequences.

Overall, while one of the most exciting tools PG&E is developing, Fire Spread Modeling is also one of the most complex and complicated. PG&E has only begun developing this tool in the last several months and needs to mature the tool and its understanding further, including fully calibrating and validating the tool inputs and outputs. In the long run, PG&E anticipates it may be willing to share this tool on a request basis, with the appropriate, well-qualified fire behavior experts.

3. PG&E's Process for Communicating WSOC Tools and Information

PG&E plans to execute on the following process and general timeline (pending emergency response activities and operational constraints) to partner with first responders in evaluating what tools to share and how to best share them. As noted above, several of these tools are new or still evolving, as are several aspects of the wildfire conditions and response plans for PG&E and others. As a result, PG&E must be realistic about the number of partners it can engage with during the remainder of 2019, which includes the traditional peak of wildfire season, and the expected outcomes of such an engagement. PG&E proposes the following actions to assess and develop a framework and/or tools for how to share PG&E's situational intelligence information:

- Approximately during Q3 2019¹, PG&E proposes to conduct meetings with key representatives from:
 - CAL FIRE

¹ Q3 historically coincides with the peak of wildfire season, depending on the severity, duration and resource requirements associated with this year's wildfire season, it may not be possible to complete this level of engagement during Q3.

- CalOES (including the State Warning Center)
- United States Forest Service (USFS)
- CPUC (if the Commission is interested in participating)
- These meetings would include:
 - PG&E's WSOC and Meteorology teams sharing information and performing demos of PG&E's existing tools;
 - External agencies sharing what their information needs are;
 - External agencies sharing sources of intelligence they leverage that may be useful to PG&E; and,
 - PG&E and external agencies discussing a process and/or interface that would be mutually beneficial for sharing information for planning and real-time purposes
- Based on these inputs, starting in Q4 2019 and beyond, PG&E would:
 - Develop, with input and engagement from agency partners, the long-term sharing processes;
 - Communicate policies and procedures to key agency partners prior to any data sharing process or tool implementation; and,
 - Explore and/or begin technology development, as applicable, using agile development methodology

As PG&E's processes mature and initial partnerships with state-wide agencies evolve, PG&E is very interested in expanding engagement to Local Fire Departments, as well. Given time and resource constraints, including the realistic likelihood that some wildfire response activities will consume the focus of resources for all parties, PG&E does not expect to be able to meaningfully engage Local Fire Departments in the first phase of outreach discussed above.

In addition, PG&E is aware of, and will evaluate as appropriate, near-term solutions that may be available to fast-track some or all of the above discussed data sharing. For example, PG&E is aware of and has discussed at length CalOES' "SCOUT" tool that is currently leveraged to share information across agencies. PG&E does not currently have access to this tool to completely understand and evaluate it. If access can be granted, the SCOUT tool may provide a near-term, or even long-term, solution for some or all of the scope of data sharing being considered.

4. Additional Communications and Data Sharing during Emergency Situations

As outlined in its Company Emergency Response Procedure (CERP), PG&E may activate its Emergency Operations Center (EOC) for several reasons that could include an outage affecting a large number of customers, wildfires, earthquakes, or newsworthy, large-scale and/or dual-commodity incidents. PG&E's EP&R Director, in consultation with the Line(s) of Business affected as a result an emergency, makes the decision to open the EOC to support an incident. Upon activation of the EOC the EP&R team makes notifications to the CalOES Warning Center and the CPUC.

If PG&E's EOC is activated, there are the additional communication processes to share real-time data during emergencies. For example, during a potential PSPS event, PG&E's meteorology department holds regular calls with the NWS and Predictive Services to discuss current weather conditions and their potential impacts. In addition, during potential PSPS events, PG&E holds daily calls with state agencies including the CPUC, CAL FIRE, CalOES, and the Governor's office, as well as calls with regional agencies of the potentially affected areas, to keep them informed regarding the potential event and PG&E's current forecasts and outlook. While weather forecasts are generally discussed at a high level, these conversations are more focused on data related to the scope, timing and impacts of the potential PSPS event underway.

During a PSPS event, PG&E has coordinated with CalOES and other utilities to utilize a PSPS notification form that allows CalOES to best track the status of a PSPS event, and quickly share updates with CalOES Senior Leadership, the Governor, and local OES organizations. This form will be completed at various milestones of a PSPS (e.g. EOC activation for PSPS, decision to de-energize, etc.).

In the case of a PG&E EOC activation or a State Operations Center (SOC) activation, PG&E will staff the SOC/UOC with an additional person, the "SOC Liaison" to allow the "Sitcell" (PG&E's full-time support with the CalOES State Warning Center) for advanced planning and to act as the primary point of coordination between PG&E and all state agencies during emergencies. PG&E's SOC Liaison facilitates communication of emergency information between the PG&E EOC and the SOC and works with the SOC to request federal resources from FEMA and other federal agencies. PG&E's SOC Liaison reports to the EOC Chief of Staff within the PG&E EOC structure and works among other members of the CUEA in the Utilities Operations Center (UOC) in Mather, California.

Protests

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than July 25, 2019, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Erik Jacobson
Director, Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-3582
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

Pursuant to Ordering Paragraph 11 of D. 19-05-037, PG&E requests that this Tier 1 advice submittal become effective upon date of submittal, which is July 5, 2019.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service list for R.18-10-007. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to

any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Erik Jacobson
Director, Regulatory Relations

cc: Service List for R.18-10-007



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39M)

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person: Yvonne Yang

Phone #: (415)973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: Yvonne.Yang@pge.com

EXPLANATION OF UTILITY TYPE
ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4117-G/5582-E

Tier Designation: 1

Subject of AL: Plan for the Communication of Fire and Weather Data And Modeling Information As Required by Decision 19-05-037, Ordering Paragraph 11

Keywords (choose from CPUC listing): Compliance

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.19-05-037

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information: See attached Confidentiality Declaration and Matrix
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: N/A

Resolution required? Yes No

Requested effective date: 7/5/19

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco, CA 94177
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	
	Energy Management Service	
Alta Power Group, LLC	Engineers and Scientists of California	Redwood Coast Energy Authority
Anderson & Poole	Evaluation + Strategy for Social Innovation	Regulatory & Cogeneration Service, Inc.
	GenOn Energy, Inc.	SCD Energy Solutions
Atlas ReFuel	Goodin, MacBride, Squeri, Schlotz & Ritchie	
BART	Green Charge Networks	SCE
	Green Power Institute	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Hanna & Morton	
P.C. CalCom Solar	ICF	SPURR
California Cotton Ginners & Growers Assn	International Power Technology	San Francisco Water Power and Sewer
California Energy Commission	Intestate Gas Services, Inc.	Seattle City Light
California Public Utilities Commission	Kelly Group	Sempra Utilities
California State Association of Counties	Ken Bohn Consulting	Southern California Edison Company
Calpine	Keyes & Fox LLP	Southern California Gas Company
	Leviton Manufacturing Co., Inc. Linde	Spark Energy
Cameron-Daniel, P.C.	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
Casner, Steve	Los Angeles Dept of Water & Power	Sunshine Design
Cenergy Power	MRW & Associates	Tecogen, Inc.
Center for Biological Diversity	Manatt Phelps Phillips	TerraVerde Renewable Partners
City of Palo Alto	Marin Energy Authority	Tiger Natural Gas, Inc.
	McKenzie & Associates	
City of San Jose	Modesto Irrigation District	TransCanada
Clean Power Research	Morgan Stanley	Troutman Sanders LLP
Coast Economic Consulting	NLine Energy, Inc.	Utility Cost Management
Commercial Energy	NRG Solar	Utility Power Solutions
County of Tehama - Department of Public Works		Utility Specialists
Crossborder Energy	Office of Ratepayer Advocates	
Crown Road Energy, LLC	OnGrid Solar	Verizon
Davis Wright Tremaine LLP	Pacific Gas and Electric Company	Water and Energy Consulting Wellhead Electric Company
Day Carter Murphy	Peninsula Clean Energy	Western Manufactured Housing Communities Association (WMA)
		Yep Energy
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		