

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans**  
**Rulemaking 18-10-007**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_055-Q01		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_055-Q01		
Request Date:	April 26, 2021	Requester DR No.:	2021WMP-021
Date Sent:	April 29, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

**QUESTION 01**

Between February 5, 2021 and April 12, 2021, PG&E provided four different versions of Table 5, “OSHA-reportable injuries due to utility wildfire mitigation initiatives” from its 2021 WMP. The table below summarizes the responses provided by PG&E.

	Original 2021 WMP	Errata	CalAdvocates-PGE- 2021WMP-07 Q12 Supplemental Response 2	CalAdvocates-PGE- 2021WMP-07 Q12 Supplemental Response 3
	2/5/2021	3/17/2021	3/26/2021	4/12/2021
OSHA Injury Category	Recordable	Recordable	Recordable	Reportable
2018 Employee	0	0	0	0
2018 Contractor	0	0	0	1
2018 Public	0	0	0	1
2019 Employee	0	21	21	0
2019 Contractor	53	28	71	1
2019 Public	0	0	0	0
2020 Employee	10	10	10	0
2020 Contractor	60	85	85	1
2020 Public	0	0	0	2

- a) In its most recent submission on April 12, 2021, PG&E claimed it had 3 OSHA-*reportable* injuries to members of the public during the period from 2018 through 2020. However, in all prior submissions, PG&E had claimed no OSHA-*recordable* injuries to members of the public. Please explain this discrepancy.
- b) In its most recent submission on April 12, 2021, PG&E claimed it had 1 OSHA-*reportable* injury to a contractor in 2018. However, in all prior submissions, PG&E had claimed no OSHA-*recordable* injuries to contractors in 2018. Please explain this discrepancy.
- c) The number of injures for 2018 and 2019 reported in PG&E’s 2020 WMP matched PG&E’s original 2021 WMP submission on February 5, 2021. PG&E subsequently revised these counts in its errata and data request responses in March and April 2021. Please explain why PG&E took over a year to identify and correct the errors in its injury counts.

- d) Please describe all causes that contributed to the change in injury counts from PG&E's original 2021 WMP submission on February 5, 2021 to the errata submitted on March 17, 2021.
- e) Please describe all causes that contributed to the change in injury counts from PG&E's errata submitted on March 17, 2021 to PG&E's second supplemental response to Data Request CalAdvocates-PGE-2021WMP-07, Question 12, submitted on March 26, 2021.
- f) Please explain any and all steps PG&E has taken or plans to take to eliminate such errors in injury reporting for its 2022 WMP.

## **ANSWER 01**

- a) On March 9, 2021, Cal Advocates issued a data request to PG&E asking for detailed information regarding injuries we identified in Table 5 of the 2021 WMP. In response to the request, we reviewed the limited information we have regarding injuries to members of the public, and any related medical treatment, during wildfire mitigation initiatives. The information is limited because we are not responsible for reporting the injuries to OSHA. During our review, we determined that we had inadvertently not reported any injuries to members of the public in Table 5 because the person who provided the data was reporting figures for injuries involving third-party claims rather than third-party injuries that might be OSHA recordable or reportable. The information provided on April 12, 2021 corrected this error. As indicated in the revised Table 5, the figures relating to OSHA-reportable injuries to contractors and members of the public due to wildfire mitigation initiatives are based on our best available data for injuries that, given their severity, would have likely been reported to OSHA by PG&E had the injuries occurred to a PG&E employee.
- b) As stated previously, PG&E did not track OSHA-recordable contractor injuries prior to the end of 2019 and early 2020, which is why 0 was reported in the 2020 WMP. The 0 figure for 2018 contractor injuries was repeated in the 2021 WMP. In response to the March 9, 2021 Cal Advocates data request asking for detailed information regarding injuries in Table 5 of the 2021 WMP, we reviewed our records and located a 2018 injury to a contractor that we determined was properly classified as "reportable" and supplemented Table 5 accordingly on April 12, 2021.
- c) As indicated in response to subsections (d) and (e) below, PG&E identified the need to amend the reported injury figures based on a review related to the detailed questions by Cal Advocates relating to the injuries reported in Table 5. PG&E is striving to make corrections when we identify potential errors in previously submitted data in response to data requests or as we review records in connection with WMP updates.
- d) On March 9, 2021, Cal Advocates issued a data request to PG&E asking for detailed information regarding injuries we identified to contractors and full-time employees in Table 5 of the 2021 WMP. As indicated in the March 17, 2021 errata, during our review of the request, we located updated injury information from 2020 and also determined that some OSHA-recordable injuries that occurred during vegetation management activities outside of the Routine VM and EVM programs were not originally included in Table 5. Accordingly, we updated Table 5 in the March 17,

2021 errata and noted this in the response to Cal Advocates Data Request 51, Question 2. As indicated previously, PG&E has limited information regarding injuries to contractors and members of the public, and any related medical treatment, during wildfire mitigation initiatives because PG&E is not responsible for reporting those injuries to OSHA.

- e) On March 9, 2021, Cal Advocates issued a data request to PG&E asking for detailed information regarding injuries we identified to contractors and full-time employees in Table 5 of the 2021 WMP. As indicated in our March 26, 2021 supplemental response to Cal Advocates Data Request 51, Question 2, during our review of the request, we determined that the 2019 contractor injury information needed to be corrected. As stated previously, PG&E did not track OSHA-recordable contractor injuries prior to the end of 2019 and early 2020. We used the ISNetworld Database to identify the number of injuries to contractors in 2019. In cross-checking the data, we determined that the number of injuries to contractors performing VM work needed to be updated. Therefore, we supplemented our response as set forth herein. As indicated previously, PG&E has limited information regarding injuries to contractors and members of the public, and any related medical treatment, during wildfire mitigation initiatives because PG&E is not responsible for reporting those injuries to OSHA.
- f) Members of the Electric Operations Safety Data & Human Performance, OSHA Programs, and Field Safety Operations teams have met to discuss the WMP reporting criteria for OSHA-reportable injuries in order to ensure alignment for the 2022 WMP.