

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2023
Data Response

PG&E Data Request No.:	CalAdvocates_010-Q012		
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DRU Index #:		Requester:	Holly Wehrman

Asset Inspections and Maintenance

QUESTION 012

P. 450 of PG&E's WMP states, "Along with reducing wildfire risk related to backlog ignition risk tags in HFTD/HFRA, new (EC notifications identified after January 1st, 2023) HFTD/HFRA ignition risk tags will be completed in compliance with GO 95 rule 18 timelines, barring external factors."

- a) What external factors does PG&E anticipate may prevent it from completing HFTD/HFRA ignition risk tags in compliance with GO 95 Rule 18 timelines?
- b) For each external factor identified in part (a), what is PG&E's plan to mitigate the effect the external factor may have?
- c) During the period from 2023-2025, will PG&E complete new ignition risk tags in compliance with GO 95 rule 18 timelines for those ignition risk tags located outside the HFTD/HFRA? Please explain your answer.

ANSWER 012

- a) Please refer to page 831 of our 2023 WMP which defines external factors as follows: "External Factors represent reasonable circumstances which may impact execution against targets, objectives, other work, or performance metrics including, but not limited to, physical conditions, landholder refusals, environmental delays, customer refusals or non-contacts, permitting delays/restrictions, weather conditions, removed or destroyed assets, active wildfire, exceptions or exemptions to regulatory/statutory requirements, and other safety considerations." Specifically, each of the items identified in the definition could apply to our asset tag work and cause our work to be delayed. As an example, the severe and repeated storms in the first quarter of 2023 have caused delays in performing our asset tag work and fall under the category of external factors.
- b) Physical conditions: To mitigate the impacts of physical conditions, we work with our leadership and strategy teams to create solutions specifically tailored to the individual situation. However, despite these efforts, there are times where we must simply await the removal of the external physical condition in order to proceed with work as there is no other reasonable alternative.

Landholder refusals: To mitigate the impacts of landholder refusals, we work our local government affairs team to help resolve the refusals in the most efficient way possible so that we can proceed with work.

Environmental delays: To mitigate the impacts of environmental delays, we work with our leadership and strategy teams to create solutions specifically tailored to the individual situation. However, despite these efforts, there are times where we must simply await the removal of the external environmental conditions in order to proceed with work as there is no other reasonable alternative.

Customer refusals or non-contacts: To mitigate the impacts of customer refusals or non-contacts, we work with our local government affairs team to resolve the refusals and to proceed with the work.

Permitting delays/restrictions: To mitigate the impacts of permitting delays and restrictions, we work with our leadership and government affairs teams to have the delays or restrictions resolved as expeditiously as possible and to proceed with work.

Weather conditions: To mitigate the impacts of weather conditions, we work with our leadership, strategy, and meteorology teams to create solutions specifically tailored to the individual situation. However, despite these efforts, there are times where we must simply await the end of the weather conditions in order to proceed with work as there is no other reasonable alternative.

Removed or destroyed assets: When removed or destroyed assets are discovered, we reassess the asset condition and proceed with work.

Active wildfire: During active wildfires, we focus on emergency operations and assisting impacted customers. While we await external wildfire conditions to be removed to proceed with work, we also plan for these situations with our emergency planning and preparedness teams.

Other safety considerations: Depending on the specific type of safety consideration, we work with our leadership and strategy teams to create a specifically tailored plan to resolve the situation.

- c) As set out in our 2023 WMP, PG&E is currently prioritizing HFTD/HFRA ignition risk tags, but PG&E will complete ignition risk tags outside HFTD/HFRA as resources allow in compliance with GO 95 rule 18 timelines.