

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2022
Data Response**

PG&E Data Request No.:	WilliamBAbrams_002-Q06		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q06		
Request Date:	April 13, 2022	Requester DR No.:	Email Transmittal – 2022WMP DR-02
Date Sent:	April 25, 2022	Requesting Party:	William B. Abrams
PG&E Witness:		Requester:	Will Abrams

**SUBJECT: PG&E WMP GAP ANALYSIS GIVEN KINCADE FIRE TESTIMONY AND
SAFETY IMPLICATIONS**

Expert Testimony: Mr. Gary Uboldi, Fire Captain Specialist Peace Officer with the California Department of Forestry and Fire Protection who has investigated over 400 wildfires across his 20+ year career

Testimony Date: February 8, 2022 (See Attachment A: Pre-Trial Transcript)

BACKGROUND TESTIMONY/EVIDENCE:

Pg. 83 (lines 5-12)

“We believe once the fire progressed to the bottom of the canyon it then had the ability -- it turned and progressed upward, upslope with slope and made a hard run to the ridge line. And this was because it was shielded by the north wind. North wind would have been coming up over the top of that mountain and would be doing an eddy effect and pulling and drafting that fire all the way across.”

QUESTION 06

- a. How has PG&E modified their vegetation management practices to accommodate slope as a factor that could lead to fire spread from their infrastructure?
- b. If a pole, tower or line segment is situated on a similar “upslope” how is PG&E mitigating the increased fire risk?

ANSWER 06

There was no testimony, and there is no evidence, that PG&E did anything other than properly maintain the vegetation surrounding the equipment involved in the Kincade Fire. The witness testified that “[t]here was [a] lack of available vegetation underneath the tower” at issue. (Tr. 86:22-23.)

PG&E does not control the slope of, or vegetation on, State, Federal, or private lands owned by third parties and outside PG&E’s easements and clearance requirements.

PG&E employs a holistic, multi-factor approach when inspecting vegetation within its easements; slope is considered as part of that approach. PG&E is required by law to clear vegetation within a 10 foot radius horizontally from its non-exempt carrier poles base. Because slope distance is greater than horizontal distance, this means that the area PG&E clears on slopes is greater than the area it clears on flat lands.

Slope is also one of several attributes used to determine the risk of a tree strike to lines, a factor that feeds into PG&E's Public Safety Power Shutoff ("PSPS") scoping model. Slope is also a consideration in fire-spread modeling, which also feeds into the PSPS scoping model.