

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

PG&E Data Request No.:	WilliamBAbrams_002-Q04		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q04		
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. 67 (lines 3-5)

“We knew something was up there but we couldn’t -- it looked like a spaghetti of old wires”

**QUESTION 04**

What mitigation has PG&E done to ensure old “spaghetti” wires like those indicated are not left dangling and causing fire risk across their infrastructure?

**ANSWER 04**

The cables were not configured or shaped like spaghetti. In the cited testimony, the witness testified that he found it hard to understand the configuration of the cable when viewing the tower in the dark, but that he was able to get a “precise” understanding of the configuration when the sun came up and he had a clear view. When asked whether he could see the broken jumper cable when he arrived at Tower 001/006 late in the night of October 23, 2019—when it was already dark--the witness said, “It was difficult. With the night vision goggles we weren’t able to really fully identify it. We knew something was up there but we couldn’t—it looked like a spaghetti of old wires *when you’re in the dark. During the daytime* we were able to—when the wind calmed down *we were able to get a better, precise view of it.*” (Emphasis added.)

There are also photographs of the conductors taken the following day – as well as photographs taken of the conductors months before. All the photographs show a precise and well-ordered configuration in which three parallel bundles of conductor (three phases) come into and connect to the tower at precise parallel spacings, with the

distance between the parallel conductors maintained through the use of spacers recommended by industry standards and incorporated into PG&E specifications.

Mitigations to prevent the breaking of one jumper at the shoe (which left it hanging down and clearly visible as such in the contemporaneous photographs) have been addressed through revised standards requiring the installation of shorter jumper cables and a system survey to ensure that open jumpers conform to the new standard. See response to question 3.