

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

PG&E Data Request No.:	WilliamBAbrams_002-Q38		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q38		
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

Expert Testimony: Mr. Joseph Hemstock, 38 Year as PG&E as Supervisory Inspector, Crew Foreman, Electrical Transmission Supervisor and other lead roles plus 10 years as PG&E consultant

Testimony Date: February 9, 2022 (See Attachment B: Pre-Trial Transcript)

BACKGROUND TESTIMONY/EVIDENCE:

Pg. 297 (lines 12-95)

“Q. And my question to you, though, is when you did this work to disconnect the line from CalPine 9 and 10, or Geysers 9 and 10, excuse me, were there any wind calculations made at that time? A. Not that I'm aware of. Q. Was there any -- did your crew -- so you've told us you didn't consult with anyone outside of your crew. A. Consult with for? Q. Any engineers? A. Nope. Q. Okay. And to the best of your knowledge, did anyone in your crew consult with any engineers before doing this work? A. Not that I'm aware of.”

QUESTION 38

- a. Is engineering design now required for these types of mothballing practices?
- b. Why is this not reflected within the WMP given the wildfire risk?

ANSWER 38

The “Calpine 9 and 10, or Geysers 9 and 10” power plant referenced in the cited testimony has at all relevant times been owned by Calpine; Calpine alone made the decision to “mothball” the plant. PG&E has and had no role in Calpine’s decisions whether or how to mothball Calpine facilities.

As for removing the connection from a mothballed plant, PG&E issued new guidance after the Kincade Fire requiring that open jumpers be cut as short as practical, typically two to three feet in length. PG&E also surveyed its transmission system to identify and remediate any open jumpers that were not in compliance with the new standard. PG&E's design standards, including its open jumpers guidance, are not typically included in the WMP.