

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

PG&E Data Request No.:	WilliamBAbrams_002-Q33		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q33		
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. 270 (lines 15-27)

“Q. And then the solution you came up with was to replace the insulators? A. Yes. One of the things we were looking to do was replace all the insulators there with a polymer insulator, which is not a ceramic insulator. The insulators that are up there right now in that picture are all ceramic. We were looking at polymers, because essentially a polymer absorbs the contamination. And the problem with polymers is they didn't have in those days a good track record, and we weren't going to take the chance of losing that circuit or any circuit due to insulator failure, which is -- you don't want to have that.”

QUESTION 33

- a. Has PG&E standardized around polymer insulators as part of their wildfire mitigation activities?
- b. What percentage of PG&E insulators are still the old ceramic type?
- c. Why is this not mentioned within the WMP when it was a leading cause or contributing factor of catastrophic wildfires?

ANSWER 33

There is no testimony or evidence that the type of insulator used on Tower 001/006 contributed to the cause of the Kincade Fire. Further, the cited testimony does not suggest that polymer insulators are a “standardized” method for wildfire mitigation. To the contrary, the testimony suggests that, while polymer insulators could “absorb[]” contamination, they did not have a “good track record” in terms of failures. There was no testimony or evidence that ceramic (glass) insulators should be replaced with polymer insulators to reduce wildfire risk.

Under PG&E’s design standards, ceramic (glass) insulators are PG&E’s approved insulator material. Polymer insulators are permitted under limited circumstances. Ceramic (porcelain) insulators are not used for new construction. PG&E’s specific design standards, including standards as to which types of insulators to install, are not typically included in the WMP, which primarily addresses wildfire mitigation work at the programmatic level.

In the limited time available to respond to this request, PG&E cannot compile information on what percentage of the insulators in its system are ceramic (glass), what percentage are ceramic (porcelain), and what percentage are polymer. Neither insulators nor insulator type are a “leading cause or contributing factor of catastrophic wildfires.”