

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

PG&E Data Request No.:	CalAdvocates_015-Q004		
PG&E File Name:	WMP-Discovery2023_DR_CalAdvocates_015-Q004		
Request Date:	April 11, 2023	Requester DR No.:	CalAdvocates-PGE-2023WMP-15
Date Sent:	April 14, 2023	Requesting Party:	Public Advocates Office
DRU Index #:		Requester:	Miles Gordon

The following questions relate to your 2023-2025 WMP submission and your response to data request CalAdvocates-PGE-2023WMP-08.

**QUESTION 004**

PG&E states in its response to Question 1 (c)(iii) of CalAdvocates-PGE-2023WMP-08 that it will decide desired clearance distances

“Based on analysis of outage data and trends by AOC. Additionally, any tree which is within MDR, will be within the MDR before next work completion cycle or is showing signs of imminent failure before next work completion cycle.”

- a) Please provide **how** PG&E will determine desired clearance distances using analysis of outage data and trends by AOC.
- b) Does “MDR” stand for “Minimum Distance Requirement” in this instance? Please define if not.
- c) If yes, is the “Minimum Distance Requirement” referred to here from General Order 95, or from PG&E’s internal procedures?
- d) If the latter, please reference which procedure PG&E is utilizing.

**ANSWER 004**

- a) As a program being performed in addition to Routine VM, the objective of FTI is not based on a uniform or regional clearance specification or a “desired clearance”. Outage analysis and data is intended to help inform the Vegetation Management Inspector (VMI) to identify which species and failure types are increasing localized outage trends. For example, this information can help determine if overhanging branch failure is a problematic local trend. In that situation, overhang reduction would be considered based on site and tree response characteristics. To the contrary, if overhanging branch failure is not a localized failure trend, targeting overhang elimination or reduction may not yield as effective results as other forms of vegetation work. The completion of regional pilots is intended to help address “how” PG&E will guide the program moving forward.
- b) Yes, that is correct.

- c) MDR is tied to all conductor clearance based on regulations in California. Including GO 95 Rule 35 and PRC 4293.
- d) N/A