

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

PG&E Data Request No.:	CalAdvocates_005-Q03		
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_005-Q03		
Request Date:	December 23, 2021	Requester DR No.:	CalAdvocates-PGE-2022WMP-05
Date Sent:	January 10, 2022	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to the article *Humboldt County Issues Stop Work Order, PG&E Removes Contractor on EVM in Sohum After Complaints/Video by Residents*, published in Redheaded Blackbelt on December 16, 2021 (the article).¹ This article describes activities performed by a contractor allegedly performing EVM work for PG&E in Humboldt County.

QUESTION 03

The article alleges that the contractor, KDF, did not have an encroachment permit to do road work on Thomas Road in the Salmon Creek watershed.

- a) Is it accurate that KDF did not have an encroachment permit to do road work in the area described, as alleged in the article?
- b) If the answer to part (a) is yes, please explain why KDF did not secure the proper permits prior to performing the work.

ANSWER 03

- a) KDF did not have an encroachment permit to do road work. To clarify, KDF was not completing work on the road itself; rather, it was conducting vegetation management work around PG&E facilities away from the road.
- b) PG&E has directed its vendors to coordinate with Humboldt County to acquire the permitting required for our vendors to secure encroachment permits. For additional information concerning the circumstances at issue in this specific situation, please see PG&E's response to Question 4 below.

¹ <https://kymkemp.com/2021/12/16/humboldt-county-issues-stop-work-order-pge-removes-contractor-on-evm-in-sohum-after-complaints-video-by-residents/>.