

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

PG&E Data Request No.:	WilliamBAbrams_002-Q21		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q21		
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. 185 (lines 17-28)

“In your experience -- in your experience as a fire investigator, what if any similarities did you draw between the Sawmill Fire and the Kincade Fire? A. Geographical location was and positioning on the slope were very similar, in regards to that. They were both on spur ridges, which exposed the equipment to higher than normal weather conditions. Their abuse out there by the wind. Additionally, they had south-facing slopes, which also had fuel type with a lower than normal fuel moisture because it's exposed to the sun all day long, versus on the northern side, which would be in the shade.

Additionally, because of the wind we noticed there was low cycle fatigue issues with the wind beating up the equipment. In regards to low cycle fatigue, we believe the wires came loose on the Sawmill Fire and contacted that -- we believe that was due to low cycle fatigue, and also low cycle fatigue was an issue with the Kincade. Q. Did you -- how close were these locations? The location of the Sawmill Fire versus the Kincade Fire? A. Approximately three miles.”

QUESTION 21

- a. Given all these similar causes (loose wires, low-cycle fatigue, wind conditions, etc.) between the Sawmill Fire and the Kincade Fire why did PG&E still not mitigate these causes and include those mitigation tactics within their WMP?

- b. Given this failure pattern, why did PG&E state over and over again that the Kincade Fire was a “black swan?”
- c. Why did Bill Johnson, CEO dismissively state that “sometimes things just break” in reference to the Kincade Fire given this pattern and the clear failure of PG&E policies and practices?

ANSWER 21

There is no significant similarity between the cause of the Sawmill Fire and the cause of the Kincade Fire. The Sawmill fire occurred when the staples holding a small solid wire to a wooden pole came loose, and the wire, not designed or intended to withstand movement, broke and came into contact with an energized conductor. See response to Question 19. Following the Kincade Fire, the Company undertook the following mitigations:

- PG&E disconnected the three spans of the Geysers #9 line not serving customer load so that the spans were de-energized;
- PG&E reviewed its transmission lines to determine if other energized spans not serving customer load remained. In the High Fire Threat Districts, PG&E found one such span and de-energized it.
- PG&E issued revised guidance regarding idle transmission facilities. The revised guidance stated that idle transmission facilities included energized spans not serving customer load.
- PG&E revised its inspection forms so that inspectors are required to report facilities not serving customer load.
- PG&E issued guidance requiring open jumpers to be cut as short as practical.
- PG&E surveyed its transmission system to identify and remediate open jumpers that were not in compliance with the new guidance.
- PG&E removed the last three spans of the Geysers #9 line, eliminating any risk that the nearby Geysers #12 line could induce a current in the last three spans (then de-energized) of the Geysers #9 line.

Section 7.3.3.17.2 of the WMP provides a summary of PG&E’s efforts with respect to idle transmission facilities. PG&E’s design specifications, including its open jumpers guidance, are not typically included in the WMP.

PG&E’s WMP is a forward-looking document that outlines the many steps PG&E is taking in 2022 to reduce wildfire risk. In the filing, PG&E has not characterized the Kincade Fire as a “black swan.” PG&E cannot meaningfully respond to unidentified comments relating to the Kincade Fire without additional contextual information. This request, as well as the request for PG&E’s interpretation of statements attributed to Mr. Johnson, fall outside the scope of this proceeding. Finally, PG&E objects to the characterizations in this request, and providing a response should not be expressly or implicitly understood as agreement with these characterizations.