

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

PG&E Data Request No.:	WilliamBAbrams_002-Q09		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q09		
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

Testimony Date: February 8, 2022 (See Attachment A: Pre-Trial Transcript)

BACKGROUND TESTIMONY/EVIDENCE:

Pg. 86 (lines 20-29)

“Because the lack of fuel arrangement underneath the tower wasn’t susceptible to fire. It wasn’t support ignition. There was lack of available vegetation underneath the tower. Additionally, with the predominant wind coming out of the north and the height of the tower, when the embers were emitted from the top of the tower they were going to drift. They’re extremely light, so they’re going to want to carry in the wind. They’re not going to drop directly to the ground underneath.”

QUESTION 09

- a. Given this evidence that ember cast from transmission towers are “going to drift”, what has PG&E done to alter their vegetation management practices around transmission towers?
- b. Where is this within their WMP?

ANSWER 09

PG&E clears vegetation to the extent of its right to do so. This is reflected in the cited testimony, in which the witness admitted that there was a “lack of available vegetation underneath the tower” – meaning that the land under and around the base of the tower was devoid of vegetation. (Tr. 86:22-23.) Where PG&E does have land rights, it faces liability for entering private, State, or Federal land to clear vegetation without prior approval.

As summarized in Section 7.3.5.3 of the 2022 WMP, PG&E has an ongoing Transmission Right of Way (or “ROW”) Expansion program that began in 2017. The

program's focus is on reliability, not directly on wildfire mitigation, but "to the extent ROWs are being expanded, there will be incremental wildfire mitigation benefits resulting from decreased vegetation around [PG&E's] transmission lines."

