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

PG&E Data Request No.:	CalAdvocates_030-Q03					
PG&E File Name:	WMP-Discovery2022_DR_CalAdvocates_030-Q03					
Request Date:	August 12, 2022	Requester DR No.:	CalAdvocates-PGE-2022WMP-30			
Date Sent:	August 26, 2022	Requesting Party:	Public Advocates Office			
PG&E Witness:		Requester:	Holly Wehrman			

For questions 2 and 3, please refer to the definitions of HFTD areas above. If you have any questions about these definitions, contact the originators of this data request. Note that the areas in the first column of the tables below are defined to be both mutually exclusive and exhaustive. Therefore, in the tables below, the systemwide total for each time period should equal the sum of the cells in that column.

QUESTION 03

a) Please complete Table 3a below, stating the total circuit-miles of overhead <u>covered</u> <u>conductor</u> distribution lines that existed on your system on the first day of each time period (e.g., January 1, 2015 for the 2015 column).

TABLE 3A
TOTAL CIRCUIT-MILES OF OVERHEAD COVERED CONDUCTOR
DISTRIBUTION LINES IN PG&E'S SYSTEM

	2015	2016	2017	2018	2019	2020	2021	2022
HFTD Tier 3								
HFTD Tier 2								
Other HFTD								
Non-HFTD								

b) Please complete Table 3b below, stating the total circuit-miles of overhead bare conductor distribution lines that existed on your system on the first day of each time period (e.g., January 1, 2015 for the 2015 column).

TABLE 3B
TOTAL CIRCUIT-MILES OF OVERHEAD BARE DISTRIBUTION LINES IN PG&E'S SYSTEM

	2015	2016	2017	2018	2019	2020	2021	2022 (January-July)
HFTD Tier 3								
HFTD Tier 2								
Other HFTD								
Non-HFTD								

ANSWER 03

PG&E objects to this request on the grounds that it is over broad and unduly burdensome. Subject to and without waiving these objections, PG&E responds as follows:

On February 10, 2022, PG&E provided a spreadsheet "WMP-Discovery2022_DR_CalAdvocates_003-Q01Atch01CONF" showing the amount of covered conductor installed, by circuit, each year from 2018-2021 in response to WMP-Discovery2022_DR_CalAdvocates_003-Q01. The spreadsheet included HTFD Tier, Other HFTD, and non-HFTD information. In general, covered conductor installed in any given year would be in place on January 1st of the following year. In addition, 2018 was the first year we began to install covered conductor that meets our hardening standard.