

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans
Rulemaking 18-10-007
Data Response**

PG&E Data Request No.:	CalAdvocates_056-Q04		
PG&E File Name:	WildfireMitigationPlans_DR_CalAdvocates_056-Q04		
Request Date:	June 4, 2021	Requester DR No.:	CalAdvocates-PGE-2021WMP-22
Date Sent:	June 9, 2021	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Alan Wehrman

The following questions relate to PG&E’s 2021 Wildfire Mitigation Plan – Revised, submitted June 3, 2021.

QUESTION 04

In Attachment 2021WMP_Revision_PGE-06_Atch02, tab “2d & 2e Response,” a significant number of inspections from 2019 have short-term corrective action as “Finding has not yet been addressed, mileage does not count towards EVM miles” and/or long-term corrective action as “Finding will be addressed when this segment is scheduled for work per relevant and current risk model (currently, that’s the 2021 Wildfire Distribution Risk Model).”

- a) Please explain fully what is meant by the short-term corrective action “Finding has not yet been addressed, mileage does not count towards EVM miles.”
- b) Please explain when PG&E expects to complete all short-term actions of “Finding has not yet been addressed, mileage does not count towards EVM miles” for inspections from 2019.
- c) Please explain fully what is meant by the long-term corrective action “Finding will be addressed when this segment is scheduled for work per relevant and current risk model (currently, that’s the 2021 Wildfire Distribution Risk Model).”
- d) Please explain when PG&E expects to complete all long-term actions of “Finding will be addressed when this segment is scheduled for work per relevant and current risk model (currently, that’s the 2021 Wildfire Distribution Risk Model)” for inspections from 2019.
- e) For all 2019 inspections with either the short or long-term corrective actions stated above, please provide the total EVM mileage covered by such inspections.

ANSWER 04

- a) The short-term corrective action indicates that the pole-to-pole segment did not pass all of the work verification measures necessary for counting toward the EVM mile completion goal. Failure to meet all work verification criteria does not indicate a failure to meet regulatory or compliance standards. PG&E’s annual work plan targets the completion of EVM miles in particular areas in order to reduce the measured risk by a targeted amount in that area. Our personnel

inspects more work within the year than is expected to be able to be completed, due to the possibility of constraints not allowing for all work to be completed within the same year.

- b) The EVM program is a multi-year program that performs work each year in the areas that represent PG&E's ability to mitigate the most amount of risk according to our best available risk model. The list of segments that have a corrective action of "finding has not yet been addressed ..." does not represent a failure to meet regulatory or compliance standards. These are findings related to validating if all actions required to pass work verification of the segment have been performed.

Pole to pole segments with a short-term corrective action of "finding has not been addressed" will typically be completed either in the same year or in the following year as part of completing carry over work. A short-term corrective action will not get completed if the segment does not get worked in the same year and during the formulation of the work plan for the next year, the risk for that segment is lower than the risk of other segments that make it into the work plan. The 2021 EVM work plan was guided by a new risk model—the 2021 Wildfire Distribution Risk Model. This resulted in a shift of which CPZ's and segments should get worked. The exact timing of when the 2019 segments that have findings, but are now lower risk, will be worked is not known at this time. This is in line with the objective to focus our EVM program on working the highest risk segments driven by the most current risk model in use. However, all 2019 EVM work with short term and/or long term corrective action plans identified in these discovery requests will eventually be completed, and segments that have not been 100% validated as complete will eventually be worked.

- c) The long-term corrective action for these findings is the same as the short-term actions described herein. Our annual EVM work plan addresses the areas that represent PG&E's ability to mitigate the most amount of risk according to our best available risk model (the 2021 Wildfire Distribution Risk Model). Please see the responses to 4a and 4b above for further information.
- d) As indicated in response to 4b above, pole to pole segments with outstanding findings from 2019 were impacted by the change from the 2018 Wildfire Risk Model to the 2021 Wildfire Distribution Risk Model. This resulted in a shift of which CPZ's and segments should get worked. Of the approximately 152 miles that are marked as worked in 2019 and have the "finding will be addressed when this segment is scheduled for work per relevant and current risk model," approximately 1 mile is scheduled to be completed in 2021. The exact timing of when the remaining 2019 segments that have findings, but are now lower risk, will be worked is not known at this time. This is in line with the objective to focus our EVM program on working the highest risk segments driven by the most current risk model in use. However, all 2019 EVM work with short term and/or long term corrective action plans identified in these discovery requests will eventually be completed, and segments that have not been 100% validated as complete will eventually be worked.

- e) The total EVM mileage covered by inspections that are marked as “finding will be addressed when this segment is scheduled for work per relevant and current risk model” is 152.05 miles for 2019.