

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

|                        |   |                   |                                   |
|------------------------|---|-------------------|-----------------------------------|
| PG&E Data Request No.: | WilliamBAbrams_002-Q08                      |                   |                                   |
| PG&E File Name:        | WMP-Discovery2022_DR_WilliamBAbrams_002-Q08 |                   |                                   |
| 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. 85 (lines 9-14)

“Additionally, with this type of fire, and it was ignited by sparks, we’re not going to have one singular ignition point. We’re going to have multiples. I use an example that if you took a grinder to metal you get a shower of sparks. It’s going to be similar in nature.”

**QUESTION 08**

It is clear that the rust and neglect of the line caused a “shower of sparks.” What has PG&E done to mitigate rust and corrosion on infrastructure that causes this shower effect with multiple ignition sources?

**ANSWER 08**

The testimony cited was describing the fact that when a charged conductor fails and there is arcing from the conductor to another conducting surface, this typically produces a “shower” of sparks. There was no testimony -- and there is no evidence -- that either “rust” or “neglect of the line” caused or increased the shower of sparks producing by arcing – or that, had there been no “rust” or no “neglect,” the arcing of the line would have resulted in fewer sparks.

Arcing (and, presumably, sparks) resulted from the separation of the jumper. As discussed in the response to question 3, the risk of separation of similar jumper cables has been mitigated.