

September 9, 2020

VIA E-MAIL
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Caroline Thomas Jacobs, Director
Wildfire Safety Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Pacific Gas and Electric Company's Submission in response to Draft Wildfire Safety Division (WSD) Geographic Information System (GIS) Data Reporting Requirements and Schema for California Electrical Corporations

Dear Ms. Jacobs:

Pacific Gas and Electric Company (PG&E) submits today an attached Status Report and multiple GIS data files in response to the direction provided by the Wildfire Safety Division (WSD) at the Workshop on August 12, 2020 and in alignment with the *Draft Wildfire Safety Division Geographic Information System Data Reporting Requirements and Schema for California Electrical Corporations* ("Draft GIS Standard") issued on August 5, 2020. During that Workshop, the WSD specified that utilities should seek to provide all data fields defined in the Draft GIS Standard by September 9th (collectively referred to as PG&E's "Data Submission"). Additionally, in the Workshop, the WSD further outlined the Status Report on all data fields as was mentioned in the Draft GIS Standard on August 5th¹ and provided on August 21st (labeled WSD_GIS_DataSchema_StatusReport_20200909.xlsx in the WSD's transmission and herein referred to as the "Status Report".)

PG&E's submissions today of the requested Status Report and Data Submission are not fully complete as we do not have all the data requested or in the form requested. This is consistent with what the WSD noted on page 5, section 2.8 of the DRAFT GIS Standard:

Realistically, the WSD understands that electrical corporations are at different stages of their data journeys and employ differing business practices, which may impact certain electrical corporations' abilities to fully comply with the requirements in this document. The WSD looks forward to working collaboratively with electrical corporations and other stakeholders to determine appropriate and feasible submission schedules for regular reporting of GIS data.

¹ Draft GIS Standard at page 5

PG&E also looks forward to working collaboratively with the WSD and other stakeholders to determine feasible submission schedules.

PG&E identified 38 Feature Classes and 15 Related Tables in the Draft GIS Standard. PG&E's Data Submission today includes data in file geodatabase (FGDB) format for 15 of those 38 Feature Classes and 4 of the 15 Related Tables. Data for another 4 Feature Classes and 2 Related Tables has been gathered in a tabular format and is being provided for reference in its existing format as it could not be converted to FGDB format in time for this submission. PG&E is continuing to work on assessing and gathering the data for the remaining feature classes and related tables.

Additionally, given the time allotted to complete these deliverables, PG&E's submissions today represent early drafts and estimates. A full quality validation of all of the data being provided in the data submissions was not possible and there may be incorrect data in some of the datasets. Secondly, some of the data characteristics are preliminary estimates. For example, the Status Report template asks for "Estimated Delivery Timeframe", when data that is not available now will be available in the future. PG&E's responses to this question, among others, represent approximate timeframes. PG&E has not had time to complete a comprehensive analysis of all requirements, what they will entail in terms of process or system changes and cross-prioritize to truly determine, based on resource limitations, what we can confidently complete by specified dates. This is, again, aligned with WSD's statement about "electrical corporations [being] at different stages of their data journeys." PG&E's self-assessed data management maturity level is low and we have discussed directly with WSD staff and in our comments on the Draft GIS Standards how we are still developing our data management processes and tools.

As was noted in PG&E's Comments on WSD Staff Proposals and Workshops, PG&E is starting from a low level of maturity with regard to data management and technology, related business processes, and subject matter expertise in this space. Those limitations directly impact our ability to compile all data fields in the approximately one month since the draft standard was provided. As a result, PG&E was not able to provide metadata in the FGDB files as the Status Report of PG&E's data in relationship to the draft GIS standard was being developed at the same time as the data was being gathered for this submission. Therefore, the Status Report contains some of the metadata related to the GIS fields and PG&E will incorporate this data into metadata in the FGDB files themselves, in subsequent submissions.

The format of the Data Submission, which was requested in large, combined FGDB files, and the timeframe involved in this submission, prevented PG&E from being able to segregate out confidential information from publicly available information. Therefore, at this time PG&E has provided a single, confidential Data Submission. There are several confidential components within this data submission, as characterized in the Status Report on each field of the GIS Data Standard.

PG&E's existing data and system architecture were built with an operational focus and differs from the data schemas provided through WSD's Data Standards. The various data requested exist across separate systems and in the current state would require significant time and resources to manually pull and align data sets to WSD's data standard. Many of these same resources are currently involved in core operations work, including wildfire response and PSPS readiness and activation. Particularly in the midst of wildfire season, there was insufficient time and resource availability to perform a quality check of data and the associated Status Report included in this submission.

In summary, PG&E's submits our Status Report and Data Submissions today as a first step in an important, long and multi-step process to continually increase the standardization of the GIS and related data. PG&E looks forward to continued conversation and collaboration with the WSD and other stakeholders on GIS data as part of our collective wildfire risk mitigation efforts as we all work towards the shared goal of eliminating catastrophic wildfires associated with utility equipment.

Sincerely,



Matthew Pender

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