Pacific Gas and Electric Company ™

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March 2, 2020 **VIA EMAIL**

Caroline Thomas Jacobs
Director of the Wildfire Safety Division
Wildfire Safety Division
505 Van Ness Avenue
San Francisco, CA 94102
WildfireSafetyDivision@cpuc.ca.gov

Re: **R.18-10-007, Wildfire Mitigation Plan, Request for Extension of Responses to Wildfire Safety Division, Data Request Set 1**

Dear Ms. Jacobs:

Pacific Gas and Electric Company ("PG&E") respectfully requests an extension to respond to specific items in the Wildfire Safety Division's ("WSD") Data Request Set #1. This request is being made consistent with Resolution WSD-001 and your March 2, 2020 letter to the service list ("March 2nd Letter").

PG&E's Wildfire Mitigation Plan ("WMP") team has been working throughout the weekend to prepare the responses to WSD's requests and to prepare an extension letter for the items that cannot be provided on March 2, 2020. However, the March 2nd Letter, which we received close to noon today, required our team to make modifications to a significant number of responses. We are revising as many responses as possible and hope to send them out on March 2 by 11:59 p.m. For the remaining responses, we will try to get them out as soon as possible, hopefully by March 3, 2020.

Below we are including our extension request for specific data requests where we know the response will not be available. PG&E provides a strong showing of the specific reason for the delay for specific items in WSD's Data Request Set #1, including the Item Index reference and the reason the data request could not be completed by the March 2nd deadline.

PG&E will also be meeting with WSD Staff on Wednesday, March 4 to discuss some of the items identified below, including the specific information being requested by WSD and the timing for providing this information.

PG&E No.	Item Index	Reason for Extension
(3)	PGE-43879-B-95	Request: Provide additional rows for Tables 5 & 6 with data for years 2015-2019 for "fatalities caused by activities beyond these categories." Reason for Extension: Obtaining information regarding fatalities and OSHA recordables for years 2015-2019 beyond the information already provided in Tables 5 and 6 requires a review of substantial data sources such that a response cannot be provided by March 2nd.
(7)	PGE-43879-C-101	Request: DR1: In Section 4.2.1 on page 4-13, provide any current supporting documentation and procedures for the "first phase" of the HFTD evaluation process. DR2: Include any developed models, sources of local expertise, and data. DR3: When does PG&E anticipate completion of the first phase? Reason for Extension: This request encompasses a broad set of data that spans a diverse set of stakeholders (e.g., local stakeholders, distribution engineers, internal leadership). Further, delivery of the supporting tools and models needs to be catalogued against what has already been provided.
(8)	PGE-43879-D-102	Request: Supplement Table 10 with the TBD data, expected to be available late Q2 2020 with data available today. Reason for Extension: PG&E Meteorology is unable to provide the 2019 data listed as "TBD" at this time. The vendor responsible for this data is currently working to add 2019 to the 30-year 3 km resolution climatology, with as estimated completion date by the end of April 2020.
(14)	PGE-43879-J-108	Request: Provide a table that includes the actual or estimated number of workers that will be engaged in electricity restoration activities based upon projected need under different scenarios, including post PSPS and post-wildfire restoration. If PG&E relies on external parties, estimate what type and number of additional workers are required. Reason for Extension: This response requires additional time because it will likely address a variety of scenarios of PSPS events and wildfire responses. Restoration staffing after a PSPS or wildfire is extremely event-specific, and such events are variable in nature. To provide the table as requested PG&E would have to 1) define a set of scenarios for which staffing estimates should be estimated; 2) document assumptions made while defining each scenario or estimate (e.g., mutual aid response rate); 3) estimate staffing levels for each scenario. This is not something that can be done thoughtfully or robustly in the required timeframe.
(15)	PGE-43879-G-109	Request: Provide data and information for all fields in Table 17 or explain why planned upgrades are not applicable or not available. Reason for Extension: PG&E's subject matter experts are reviewing the information requested for Table 17, including why planned upgrades are not available or applicable, but will need an extension to complete their response.

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(19)	PGE-43879-Z - 113	Request: Identical GIS data layers for the below categories were submitted in both the "Attachment 6 - GIS Files_CONF" folder and the "Attachment 6 - GIS Files_PUBLIC" folder. Which data are intended to be confidential and which are not? - Service territories - Substations - Transmission lines - Distribution lines - Weather stations - Red flag days - Ignitions - PSPS areas - Population density Reason for Extension: PG&E is engaged with WSD Staff in discussions on this request and will develop a response consistent with those discussions.
(20)	PGE-43879-Z - 114	Request: Submit 2015-2019 point layers for post-PSPS utility infrastructure damage location points with at least two photos for each point (one showing damage and one showing environment around base of pole or tower with damage). Submit shapefiles or feature classes pre-linked or capable of being linked to photos. At a minimum, include the following damage-related attributes (or similar equivalents): - Was the damage likely to have caused arcing? This shall be collected in one field with potential values of "Yes," "No," or "Unknown." - Description of the damage (e.g. broken tie wire, tree branch on line, broken conductor, etc.). This shall include a dropdown menu of common damage description categories but could also include a customizable comments field that enables the documentation of uncommon damage types. - Description of the type of terrain likely to be impacted by the damage with a corresponding photo. This could also be accomplished with dropdown menus and a customizable field. This terrain may be the most likely location of an on-the-ground ignition and could be the destination/landing area for burning debris or sparks. - Best estimate of damage time frame (could involve fields for Date and Approximate Time of Day). Include a field for the date and a field for the approximate time of day. This will help link the most accurate weather data to the damage point. Reason for Extension: Sourcing and organizing all of the requested photos and linking GIS point features with the photos is a manual process that cannot be completed in the requested time frame. If the GIS team could readily source all the features needed for this view, which is not always the case, PG&E could generate a view of the damage-

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		related attributes listed within 8 business hours (time may vary based on quantity of data). Even so, given the number of GIS-related requests in this single request, the level of effort required to source all the features needed for requests, and the limited number of GIS resources available, completing this request by March 2nd was not possible.
(21)	PGE-43879-Z - 115	Request: Submit 2015-2019 point layers for utility infrastructure damage locations with photos. Use guidance described above. Reason for Extension: Sourcing and organizing all of the requested photos and linking GIS point features with the photos is a manual process that cannot be completed in the requested time frame. If the GIS team could readily source all the features needed for this view, which is not always the case, PG&E could generate a view of the damage-related attributes listed within 8 business hours (time may vary based on quantity of data. Even so, given the number of GIS-related requests in this single request, the level of effort required to source all the features needed for requests, and the limited number of GIS resources available, completing this request by March 2nd was not possible.
(22)	PGE-43879-Z - 116	Request: Submit applicable equipment data that includes an "Exemption_Status" field in the data attribute tables with exemption status per PRC 4292. The values for the "Exemption_Status" field shall be: "Non-Exempt," "Temporarily Exempt," or "Permanently Exempt." While PRC 4292 is only applicable in the CAL FIRE State Responsibility Area (SRA), provide exemption status information for all applicable equipment in all locations in PG&E's service territory. Reason for Extension: PG&E is continuing to investigate the exempt and non-exempt equipment status information available to provide in response to this data request.
(23)	PGE-43879-Z - 117	Request: Submit age information for all lines and equipment, including age information for poles and towers, along with location and other applicable attributes. Include a field to record pole or tower exempt equipment information. In the field, include the exemption status of the equipment on the pole or tower. Age information can be recorded by installation year. Also include a field to record the type of material that makes up a pole or tower (e.g., metal, wood, fiberglass, wood wrapped with fire-resistant material, etc.). You may be able to connect age, material, and exemption information to pole or tower GIS data by using ID values to join the GIS data to other databases. Reason for Extension: PG&E believes that it already provided this information in Attachment 6 to the WMP and is working to verify this understanding. If not, PG&E will work to provide this information.
(24)	PGE-43879-Z - 118	Request: Submit geospatial layers for 2015-2019 data from the following databases maintained by PG&E: - Outage producing winds

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		- Egress - LiDAR - VM outage - Distribution outage data - Incident Logging and Information System All these databases included latitude/longitude coordinates, which means they can be converted to point layers in ArcGIS software. Reason for Extension: PG&E's GIS team is working to determine if it can readily source all the features needed for this view, which is not always the case, and, if so, PG&E could generate the view requested within 8 business hours (time may vary based on quantity of data). Even so, given the number of GIS-related requests in this single request, the level of effort required to source all the features needed for requests, and the limited number of GIS resources available, completing this request by March 2nd is not feasible.
(25)	PGE-43879-Z - 119	Request: Submit applicable equipment data with condition information (e.g., good, poor, needs repair, etc.). If some sort of equipment condition/health/status or similar index is used, include it in GIS data, and explain it in metadata. Provide condition information for all applicable equipment, including transmission lines, distribution lines, substations, and various items mounted on poles or towers. Reason for Extension: PG&E is unable to produce this data on a GIS map due to the significant quantify of data points, however, we are working to produce an excel version of the equipment tagged for repairs.
(26)	PGE-43879-Z - 120	Request: Submit GIS data for Level 1-3 findings. Data shall include key information like date, level of finding, equipment affected, custom comments, etc. Below are definitions of the finding levels as taken from a 2020 WMP: Level 1 finding: In accordance with GO 95, an immediate safety and/or reliability risk with high probability for significant impact. Level 2 finding: In accordance with GO 95, a variable (non-immediate high to low) safety and/or reliability risk. Level 3 finding: In accordance with GO 95, an acceptable safety and/or reliability risk. Reason for Extension: PG&E is unable to produce this data on a GIS map due to the significant quantify of data points, however, we are working to produce an excel version of the equipment tagged for repairs.
(27)	PGE-43879-Z - 121	Request: Submit point data showing the locations of private power line/IOU power line connection points.

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		Reason for Extension: PG&E is unable to identify the data source at this time but will continue to search.
(28)	PGE-43879-Z - 122	Request: Clarify the CEC/PG&E service territory polygon discrepancies and confirm what service territory polygon is currently the most up to date and precise. If not already submitted, submit PG&E's latest service area boundary data. Also include any divisions or subdivisions within the service territory. Reason for Extension: While PG&E could provide a FGDB of divisions within the service territory, the utility does not have insight into the CEC map or how it is being maintained. PG&E can attempt to source the CEC version of the shapefile, but it may not be able to do so by March 2nd.
(29)	PGE-43879-Z - 123	Request: Submit data for the locations of activities covered in the WMP. Data could include points, lines, or polygons depending on the type of activity being planned (e.g., covering conductor lines, clearing vegetation from an area, or installing equipment at specific pole locations). Reason for Extension: This information is partially included in the Supplemental Data Request and PG&E is reviewing what remining information need to be provided.
(30)	PGE-43879-Z - 124	Request: If additions/removals will happen for the following items, submit the data for them. - Circuit miles of overhead transmission lines - Circuit miles of overhead distribution lines - Substation locations Reason for Extension: PG&E believes that it already provided this information in Attachment 6 to the WMP and is working to verify this understanding. If not, PG&E will work to provide this information.
(31)	PGE-43879-Z - 125	Request: Submit all additional utility asset GIS data (beyond transmission lines, distribution lines, and substations) that are available and if possible, ensure they cover utility assets by asset age, model, and asset type. Other IOUs submitted location/specification data for pieces of equipment like switches, transformer devices, lightning arrestors, etc. Reason for Extension: PG&E believes that it already provided this information in Attachment 6 to the WMP and is working to verify this understanding. If not, PG&E will work to provide this information.
(32)	PGE-43879-Z - 126	Request: Resubmit all transmission line, distribution line, and substation GIS data with age information (e.g., a field for year of installation would suffice). Installation years could be found in other databases and linked to the GIS data via unique ID values.

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		Reason for Extension: PG&E believes that it already provided this information in Attachment 6 to the WMP and is working to verify this understanding. If not, PG&E will work to provide this information.
(33)	PGE-43879-Z - 127	Request: Useful GIS data layers were submitted for transmission and distribution lines, but 27 GB of what are presumably distribution and transmission Oracle databases were included in the data submission separate from the feature class layers. Submit these in file formats that are compatible with Microsoft Excel and/or Access or better yet: submit the relevant database information as part of applicable shapefile or feature class GIS data after running joins. We are very interested in these data and in investigating the potential to link them up with their corresponding GIS layers. The following instructions were provided with the data, but they do not appear helpful for somebody who is not familiar with Oracle databases. Instructions to import GIS files: i) Required Oracle 11g database. ii) Import dumps into that database(schemas=sde,edgis,process,edgisbo,CEDSADATA,PGEDATA,CUSTOMER iii) Post Import activity like Compress,Rebuildindex and Gatherstat. Reason for Extension: PG&E is working to address the transfer issues given the size of the files.
(35)	PGE-43879-Z - 129	Request: Submit the number and location of critical facilities in a GIS data layer featuring point locations. There is no need to create a grid with square-mile pieces. Reason for Extension: PG&E requires additional time to provide the medical baseline and critical facility information requested given the amount of work necessary to pull this information. This information is a restricted data set that is not available to others (even with an NDA).
(36)	PGE-43879-Z - 130	Request: Do the necessary GIS data processing and submit a layer for the non-HFTD polygons in the PG&E service territory. This could be accomplished with the Union tool in ArcGIS. Reason for Extension: To complete this request, PG&E's GIS team would have to start with a shapefile of the utility service territory, overlay this file with the HFTD, determine the overlap between the HFTD Tiers 2/3 and the service territory, and then take the complement of this overlap. GIS estimates that this would take roughly one month to complete.
(37)	PGE-43879-Z - 131	Request: Submit all PSPS event areas as geospatial data (including the 8 events submitted as non-geospatial tables). As part of this effort, submit all the overall polygon data in one large feature class with consistent schema and all the line buffer

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		polygons in one large feature class with consistent schema. Also provide clear information on customer hours and event durations. Reason for Extension: To meet this request, the GIS team would need to collaborate with various groups involved with PSPS to source the 'final' polygon and outage data for each event. Assuming the GIS team could readily source all the features needed for this view, which is not always the case, PG&E could generate the view requested within 8 business hours (time may vary based on quantity of data. Even so, given the number of GIS-related requests in this single request, the level of effort required to source all the features needed for requests, and the limited number of GIS resources available, completing this request by March 2nd.
(38)	PGE-43879-Z - 132	Request: Submit shapefile or feature class data (not just raster images) showing the average 95th and 99th percentile wind speed and prevailing direction in the service territory from 2015-2019. The data should be in shapefile or feature class points or polygons that provide wind information. Despite the submission requirements mentioning at least "square mile resolution," do not force all data into a grid with square-mile pieces. Reason for Extension: PG&E's subject matter experts are in the process of preparing this data, however, given the volume of material needed, it will not be ready by March 2nd.
(40)	PGE-43879-Z - 134	Request: Submit GIS line data for circuits turned off during 2015-2019 PSPS events. In the data's attributes, at a minimum, identify the event with which the data are associated and the voltage of the lines. Reason for Extension: If the GIS team could readily source all the features needed for this view, which is not always the case, PG&E could generate the view requested within 8 business hours (time may vary based on quantity of data. Even so, given the number of GIS-related requests in this single request, the level of effort required to source all the features needed for requests, and the limited number of GIS resources available, completing this request by Monday is not feasible.
(41)	PGE-43879-F - 135	Request: Section 5.2 of the WMP describes requirements for Plan Implementation, including elements required by statute (8386) 19 (c) “Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, carried out under the plan and other applicable statutes and commission rules.” Your plan at Sec. 5.2.C (page 5-30) is vague as to this element, particularly with regards to oversight of contractors. Please provide additional detail of the monitoring and quality assurance program for line/equipment inspections, and the utility’s program for oversight of inspections performed by non-utility contractors.

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		Reason for Extension: PG&E is working internally to prepare the requested information but was not able to fully develop a complete response by March 2nd.

By this letter, PG&E is also requesting two additional extensions in addition to the specific items identified above:

1. **Updated WMP:** PG&E submitted an updated WMP on Friday, February 28. In response to the WSD Data Request Set #1, there may be some additional, very limited updates. The March 2nd Letter requested that these amendments be made by March 2 (*see* Item 2.c). Since PG&E provided an updated WMP on Friday and is requesting an extension on some of the items above, we would request an extension to submit any additional WMP updates from March 2 to March 6.

2. **Updated Tables:** PG&E submitted an updated WMP, including updates Tables, on Friday, February 28. In response to the WSD Data Request Set #1, there may be some additional, very limited updates. The March 2nd Letter requested that updates to the Tables be made by March 2 (*see* Item 2.d). Since PG&E provided an updated WMP on Friday and is requesting an extension on some of the items above, we would request an extension to submit any additional WMP Table updates from March 2 to March 6.

We look forward to working constructively with the WSD to provide all of the needed and available information and appreciate your consideration of our requested extension.

Sincerely,

Jessica Basilio