

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Regulation of Physical Security for the Electric Supply Facilities of Electrical Corporations Consistent with Public Utilities Code Section 364 and to Establish Standards for Disaster and Emergency Preparedness Plans for Electrical Corporations and Regulated Water Companies Pursuant to Public Utilities Code Section 768.6.

R.15-06-009
(Filed June 11, 2015)

**PACIFIC GAS AND ELECTRIC COMPANY (U 39E) ANNUAL REPORT IN
COMPLIANCE WITH DECISION 19-01-018, ORDERING PARAGRAPH 31**

COMPLIANCE PERIOD: APRIL 1, 2020 - MARCH 31, 2021

PUBLIC VERSION

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Dated: March 31, 2021

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PUBLIC VERSION

Pursuant to the California Public Utility Commission's (CPUC's) D.19-01-018, Ordering Paragraph 31, relating to Physical Security for Electric Supply Facilities, PG&E hereby submits this annual report on Physical Security Incidents. This report documents physical security incidents which occurred during the compliance period April 1, 2020 through March 31, 2021. However, the information reported between March 15, 2021 and March 31, 2021, is provisional, based on information known to PG&E by the date of this report. Incidents may have occurred during this period. PG&E will submit an updated report only if there is any new information to report during the reporting period from March 15, 2021 to March 31, 2021

PG&E is providing this redacted version of the report for the public to be posted on the Commission's web site. The confidential portion of this report will be made available to the appropriate staff at the Commission and will be further detailed with an in-person meeting to ensure compliance with the Phase I Decision mandates.

I. EXECUTIVE SUMMARY

The Discussion section of this report is comprised of three sections which address the

reporting requirements described in the CPUC's D.19-01-018, Ordering Paragraph 31. Section A provides a short summary of what the OE-417 report is and how many were submitted to the U.S. Department of Energy during the reporting period described in this report. To support the third section of the report, PG&E is submitting one confidential attachment which contains all twenty (20) of the OE-417 reports submitted to the Commission between April 1, 2020 through March 31, 2021, and subject to the qualifier referenced earlier. Section B consists of a description of any physical security incidents resulting in a utility insurance claim, providing a description of the incident including location, impact on infrastructure, and amount of claim. The physical security incidents that occurred in the compliance period did not exceed the large self-insurance retentions that PG&E maintains. Section 3 includes significant changes to the Security Plan Reports, including any new facilities that are covered by the plan, or any major upgrades made to previously identified facilities. Since the Security Plan Report is not yet due, PG&E has no significant changes to report.

II. BACKGROUND

As a result of the April 2013 rifle attack combined with the August 2014 burglary taking place in PG&E's Metcalf Substation, which is located south of San Jose, the CPUC made changes to the Public Utility Code § 364(a) addressing the vulnerability of electrical supply facilities to physical security threats. Since the approval of Senate Bill (SB) 699 in September 2014 the Commission issued an Order Instituting a Rulemaking to establish policies, procedures and rules for the regulation of physical security risks to the electric supply facilities of electric utilities consistent with the Public Utility Code § 364 (Phase I). SB 699 amended Public Utility Code § 364 and required the Commission to develop rules for addressing physical security risks to the distribution systems of electrical corporations. As a result, SB 699 language amended the Public Utility Code § 364 with new and pertinent codes.

The Commission held its initial prehearing conference on October 2015 which through Commission rulings, workshops and other regulatory considerations culminated into the Phase I Physical Security Decision in D.19-01-018 dated January 10, 2019 ("Decision").

Among other things, the Decision ordered the utilities to provide to the Director of the Safety and Enforcement Division and the Director of the Energy Division copies of all OE-417 reports submitted to the U.S. Department of Energy (DOE) within two weeks of filing with the U.S. DOE. Pursuant to Ordering Paragraph 31, the Decision ordered all CPUC jurisdictional utilities to submit an annual report by March 31 each year, starting on March 31, 2020.

III. DISCUSSION

The Discussion section of this report includes three subsections which address the report requirements set forth in D.19-01-018.

A. OE-417 Reports Submitted With This Annual Report.

According to the DOE – Office of Electricity, the Electric Emergency Incident Disturbance Report (Form OE-417) provides the DOE information on electric incidents and emergencies on electric power system. The Form OE-417 is a mandatory emergency form which is completed by entities within the electric power industry. The DOE uses the data to fulfill its overall national security and other energy management responsibilities, and for analytical purposes. In addition, the filing of the Form OE-417 allows the DOE to quickly respond to energy emergencies. PG&E submitted twenty (20) OE-417 reports to the Commission during the compliance period between April 1, 2020 through March 31, 2021 and subject to the qualifier referenced earlier.

There are the alert types on Form OE-417:

1. Emergency Alert – File within 1-hour
2. Normal Report – File within 6-hours
3. System Report – File within 1-Business days

There are various criteria that fall under each of the alerts above, for example, one of the criteria for Emergency Alert is Cyber event that causes interruptions of electrical system operations. Depending on the criteria, additional information needs to be provided by the entity completing the form such as:

- Incident and Disturbance Data
 - Geographic Area Affected
 - Date/Time of Incident Began and Ended
 - Estimate of Amount of Demand Involved
 - Estimate of Number of Customers Affected
- Type of Emergency
 - Cause
 - Impact
 - Action Taken
- Narrative Description
 - Name of Official to be Contacted
 - Description of the incident
 - Name of Assets Impacted

A final report is submitted within 72-hours of the incident. In the event of an incident or disturbance that meets any of the criteria for alerts, no exclusions for electric utilities are allowed and all items on Form OE-417 must be completed.

The OE-417 reports in this report are based on the final documents submitted to the CPUC and DOE.

B. Utility Insurance Information

PG&E maintains first-party property insurance to limit financial exposure for unforeseeable losses of its assets due to catastrophes such as fires, earthquakes, floods, or catastrophic operational losses. The Company also maintains liability insurance to protect against third-party claims. PG&E maintains large self-insured retentions under many of its insurance programs. The Company's current self-insured retentions for liability insurance are \$10 million (non-wildfire) and \$60 million (wildfire). PG&E's current self-insured retentions for property insurance are \$250K for losses at the General Office Complex, and \$50 million

for losses at all other locations (except for loss caused by equipment breakdown which is subject to a \$10 million self-insured retention).

During the compliance period of April 1, 2020 through March 31, 2021, PG&E did not experience any physical security incidents that resulted in a submission of an insurance claim to PG&E's insurers. The physical security incidents that occurred in the compliance period did not exceed the large self-insurance retentions that PG&E maintains.

C. Changes to Security Plan Reports

To meet the reporting requirement introduced in SB 699 in Public Utility Code § 590, these annual reports are required to include any significant changes to the Security Plan Reports (including new facilities covered by the Plan or major mitigation upgrades at previously identified facilities). In recognition that the first Security Assessment Plan Report is due on July 10, 2021, PG&E does not have an update to provide in this annual report.

Respectfully submitted,

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March 31, 2021

**PACIFIC GAS AND ELECTRIC COMPANY
ATTACHMENT A
TO PACIFIC GAS AND ELECTRIC COMPANY'S
ANNUAL REPORT IN COMPLIANCE WITH DECISION
D.19-01-018, ORDERING PARAGRAPH 31**

| Item No. | Report Name | Date of Incident Began | Time of Incident Began | Date of Incident Ended | Time of Incident Ended | County/Geographic Area | Cause | Impact | Action Taken | Incident Description | Estimate of Number of Customers Affected | Comments | Insurance Claims (Y/N) | Monetary Value of Claim | Date OE-417 Report Submitted | Report Receiver |
|----------|--|------------------------|------------------------|------------------------|------------------------|------------------------------------|---|---|---|---|--|---|------------------------|-------------------------|------------------------------|--------------------------------|
| 1 | OE417_Form_PGAE_Island Event Final_04_05_20_Final | 4/5/2020 | 15:46 | 4/9/2020 | 17:35 | Stanislaus County | Weather or natural disaster | Electrical system separation (islanding) | Repaired or restored | Rain and lightning were reported in the vicinity of PG&E facilities. Substation serving 6814 distribution customers islanded. All lines were returned to normal by 17:35, returning system to normal and ending the island condition. | 6814 | | N | N/A | 4/9/2020 | Peterson, Randolph, and Bout |
| 2 | OE417_Form_PGAE_Island Event Final_04_24_20 | 4/24/2020 | 21:00 | 4/24/2020 | 21:33 | Placer and Nevada Counties | Operator action(s) | Electrical system separation (islanding) | Repaired or restored | While performing the transmission switching transformer banks were de-energized and created an island due to work procedure error. The island rapidly became unstable and collapsed, thereby ending the island condition. All customers were restored by 0:13 on April 25th. | 945 | | N | N/A | 4/30/2020 | Peterson, Randolph, and Palmer |
| 3 | OE417_Form_PGAE_Loss_Monitor_Control_071420_Final | 7/14/2020 | 14:16 | 7/14/2020 | 14:53 | PG&E System Wide | Other | Loss or degradation of control center monitoring or communication systems | Other | During a scheduled clearance on PG&E's data network data was interrupted due to complex factors. PG&E's GCC monitoring and control of the transmission grid capabilities were restored at 1453. | - | | N | N/A | 7/23/2020 | Peterson, Randolph, and Palmer |
| 4 | OE417_Form_PGAE_Firm_Load_Shed_081420_Final_Corrected | 8/14/2020 | 18:36 | 8/14/2020 | 20:42 | Various counties in California | RC West issued an EEA3 per the CAISO request | Loss of electric service to more than 50,000 for 1 hour or more | Shed Firm Load: Load shedding of 100 MW or more implemented under emergency operational policy (manually or automatically via UPLS or remedial action scheme) | At 1836 and 1850, the CAISO issued an Operating Instruction for PG&E to shed firm load due to operating reserve deficiency for CAISO in the Western Interconnection. RC West had issued an Energy Emergency Activation Level 3 (EEA3). PG&E shed approximately 588 MW of firm load. At 1915, PG&E initiated its Energy Emergency Plan for rotating outages on distribution circuits throughout the service territory. At 1952, PG&E is informed by the CAISO, no additional firm load will be required and PG&E begins restorations all firm load that has been de-energized. At 2038, CAISO terminated the Stage 3 System Emergency Notice effective. PG&E restored system load at 2042. Prior to the EEA3 activation, PG&E's demand response program issued a Base Interruptible Program (BIP) Event | 220,000 | | N | N/A | 8/19/2020 | Peterson, Randolph, and Palmer |
| 5 | OE417_Form_PGAE_Firm_Load_Shed_081520_Final (Corrected) | 8/15/2020 | 18:25 | 8/15/2020 | 19:44 | Various counties in California | RC West issued an EEA3 per the CAISO request | Loss of electric service to more than 50,000 for 1 hour or more | Shed Firm Load: Load shedding of 100 MW or more implemented under emergency operational policy (manually or automatically via UPLS or remedial action scheme) | At 1825, the CAISO issued an Operating Instruction for PG&E to shed firm load due to operating reserve deficiency for CAISO in the Western Interconnection. RC West had issued an Energy Emergency Activation Level 3 (EEA3). At 1827, PG&E shed approximately 459 MW of firm load. At 1843, CAISO provided approval to PG&E to begin restoration all firm load that has been de-energized. At 1848, CAISO terminated the Stage 3 System Emergency Notice effective. At 1944, PG&E's Grid Control Center re-energized all impacted substation. Prior to the EEA3 activation, PG&E's demand response program issued a Base Interruptible Program (BIP) Event | 220,000 | | N | N/A | 8/24/2020 | Peterson, Randolph, and Palmer |
| 6 | OE417_Form_PGAE_Loss of Electric Service_8_16_2020_Final | 8/16/2020 | 3:44 | 8/17/2020 | 14:18 | Across PG&E Territory (California) | Weather or natural disaster | Loss of electric service to more than 50,000 for 1 hour or more | Repaired or restored | Beginning August 16, 2020, there were lightning events system-wide, resulting in the loss of more than 50,000 customers for more than 1 hour starting at approximately 03:44 PST. There were numerous instances during this lightning event, when the number of customers without electric service exceeded 50,000 for more than 1 hour. August 16, 2020: 03:44 PST - 14:27 PST August 16, 2020: 14:47 PST - 16:04 PST August 16, 2020: 17:42 PST - 20:17 PST August 17, 2020: 08:13 PST - 14:18 PST The peak number of customers without electric service was approximately 124,266. Restoration in progress. | 124,266 | Weather or natural disaster was lightning storm. Restoration in progress. | N | N/A | 8/24/2020 | Peterson, Randolph, and Palmer |
| 7 | OE417_Form_PGAE_Island_08_17_2020_Final | 8/17/2020 | 8:21 | 8/17/2020 | 9:01 | Yuba County | Weather or natural disaster | Electrical system separation (islanding) | Other | At 0821 on August 17, 2020 a transmission line islanded. At 09:01 on August 17, 2020, the transmission line was de-energized, thereby terminating the island. Please note that the island formed involved only generators and their auxiliary loads. There was no customer load impacted by this island. On September 7, 2020 at 21:26, the process to de-energize multiple transmission lines began for a Public Safety Power Shutoff (PSPS) event due to high fire danger. These interruptions resulted in the loss of more than 50,000 customers for more than 1 hour starting at approximately 22:40 on September 7th. The number of customers without electric service dropped below 50,000 at approximately 17:24 on September 9th. As of September 10th, four transmission remain out of services due to North Complex (Plumas National Forest) fire related access issues. | 2 (Generator Auxiliary) | Caused by lightning. Terminated the island. | N | N/A | 8/24/2020 | Peterson, Randolph, and Palmer |
| 8 | OE417_Form_PGAE_Loss of Electric Service_PSPS_09_07_20_Final | 9/7/2020 | 22:40 | 9/9/2020 | 17:24 | Various counties in California | Public Safety Power Shutoff | Loss of electric service to more than 50,000 for 1 hour or more | Other | At 15:37 on September 15, 2020, a circuit breaker tripped creating an island condition. The island consisted of a generator serving customer load. At 15:53 on September 15, 2020, the generator was forced offline, thereby de-energizing the transmission lines, terminating the island. At 15:54 on September 15, 2020, the transmission lines were re-energized, thereby restoring all the customers. | 172,000 | de-energized transmission lines and transmission level substations | N | N/A | 9/15/2020 | Peterson, Randolph, and Palmer |
| 9 | OE417_Form_PGAE_Island_09_15_20_Final | 9/15/2020 | 15:37 | 9/15/2020 | 15:53 | Caribou | Transmission equipment failure (not including substation or switchyard) | Electrical system separation (islanding) | Other | At 15:37 on September 15, 2020, a circuit breaker tripped creating an island condition. The island consisted of a generator serving customer load. At 15:53 on September 15, 2020, the generator was forced offline, thereby de-energizing the transmission lines, terminating the island. At 15:54 on September 15, 2020, the transmission lines were re-energized, thereby restoring all the customers. | 4350 | Electrical island terminated | N | N/A | 9/23/2020 | Peterson, Randolph, and Palmer |

| Item No. | Report Name | Date of Incident | Time of Incident | Date of Incident | Time of Incident | County/Geographic Area | Cause | Impact | Action Taken | Incident Description | Estimate of Number of Customers Affected | Comments | Insurance Claims (Y/N) | Monetary Value of Claim | Date CE-417 Report Submitted | Report Receiver |
|----------|--|------------------|------------------|------------------|------------------|-------------------------------------|--|---|---|---|--|--|------------------------|-------------------------|------------------------------|--------------------------------|
| | | Began | Ended | Began | Ended | | | | | | | | | | | |
| 10 | OE417_Form_PGAE_Island_09_22_20_Final | 9/22/2020 | 10:02 | 9/22/2020 | 12:57 | Caribou | Failure at high voltage substation or switchyard | Electrical system separation (islanding) | Other | At 10:02 on September 22, 2020, two circuit breakers tripped creating 2 separate islands. 1st Island: September 22, 2020 10:02 - September 22, 2020 10:29 The island consisted of a generator serving customer load. There were 2 transmission lines as part of the island. The circuit breaker was brought back into service, then the generator was paralleled to the grid ending the island. 2nd Island: September 22, 2020 10:02 - September 22, 2020 12:57 The island consisted of a generator serving customer load. There were 2 transmission lines as part of the island. The circuit breaker was brought back into service, then the generator was paralleled to the grid ending the island. | 11,011 | Electrical island terminated. 1st island affected 4350 customers. 2nd island 6661 customers. | N | N/A | 9/29/2020 | Peterson, Randolph, and Palmer |
| 11 | OE417_Form_PGAE_Loss_of_Electric_Service_PSPS_09_27_20_Final_2 | 9/27/2020 | 18:27 | 9/28/2020 | 15:17 | Various counties in California | Public Safety Power Shutoff | Loss of electric service to more than 50,000 for 1 hour or more | Repaired or restored | On September 27, 2020 at 04:05, the process to de-energize multiple transmission lines began for PG&E's Public Safety Power Shutoffs (PSPS) event due to high fire danger. These interruptions resulted in the loss of electric service to more than 50,000 customers for more than 1 hour starting at approximately 18:27 on September 27th. Overall, the system-wide number of customers impacted by the PSPS events and other system outages (this includes transmission assets impacted by fire events) was approximately 102,267 customers. The number of customers without electric service dropped below 50,000 at approximately 15:17 on September 28th. | 102,267 | Local Fire - Glass Fire/Calistoga, Napa/Sonoma Counties; Transmission lines may have access issues due to fire | N | N/A | 10/7/2020 | Peterson, Randolph, and Palmer |
| 12 | OE417_Form_PGAE_PSPS_10_15_2020_Final | 10/15/2020 | 15:06 | 10/15/2020 | 15:40 | Northern California | Public Safety Power Shutoff | The number of customers out of service fell below 50,000 in 35 minutes. | Repaired or restored | On October 15th, at 15:37, more than 50,000 customers lost power due to weather and implementation of PG&E's Public Safety Power Shutoff. Customers out of power dropped below 50,000 within one hour. This initial report was submitted but did not meet the 1 hour threshold. | 51,569 | | N | N/A | 10/26/2020 | Peterson, Randolph, and Palmer |
| 13 | OE417_Form_PGAE_10_25_2020_PSPS_Final | 10/25/2020 | 14:32 | 10/27/2020 | 18:00 | Various counties in California | Public Safety Power Shutoff | Loss of electric service to more than 50,000 for 1 hour or more | Lines returned to service after fire risks subsided | On October 25, 2020 at 10:20, the process to de-energize multiple transmission lines began for PG&E's Public Safety Power Shutoffs (PSPS) event due to high fire danger. These interruptions resulted in the loss of electric service to more than 1 hour starting at approximately 14:32 on October 25th. Overall, the system-wide number of customers impacted by the PSPS events and other system outages (this includes transmission assets impacted by fire events) was approximately 370,000 customers. The number of customers without electric service dropped below 50,000 at approximately 18:00 on October 27th. | 370,000 | | N | N/A | 10/30/2020 | Peterson, Randolph, and Palmer |
| 14 | OE417_Form_PGAE_Island_12_17_20_Final | 12/17/2020 | 8:07 | 12/17/2020 | 8:32 | Yuba City area, Northern California | Weather or natural disaster | Electrical system separation (islanding) | Repaired or restored | At 08:07 on December 17, 2020, a transmission line but remained open-ended creating an island consisting of a generator serving customer load. At 08:32, the generator separated, thereby terminating the island. At 08:49, the transmission service was restored. | 17,000 | Cause under investigation; island was terminated | N | N/A | 12/24/2020 | Peterson, Randolph, and Bout |
| 15 | OE417_Form_PGAE_Event_12_25_2020_Final | 12/25/2020 | 3:51 | 12/25/2020 | 3:51 | Northern California | Theft | None | None | At 0351 on December 25th, following loss of potential indication on a transmission line, the operator sent a T-Lineman to investigate. T-Line reported secondary and communication wires had been cut. The switch will be manually operated until repairs can be made. Findings from Corporate Security: Corporate Security interviewed the T-lineman that who was sent to Harris St substation. The T-lineman believes that the damage was most likely attempted copper theft. Based on the physical evidence, the T-lineman believes that once the suspect accessed the box, the suspect realized the 'copper' was actually an alloy material not as valuable as regular copper. The suspect likely abandoned his efforts. No evidence of greater attempt to do damage as another box containing a switch was left untouched approximately 75 feet away. The T-lineman noted the cut was probably made with bolt cutter or a Klein tool as the damage is consistent with those type of tools, not a saw. T-lineman confirmed no customers were impacted. T-lineman spent approximately one hour making it safe and future repairs will be scheduled. There were no flashmarks observed at the scene by the T-lineman. Corporate Security concurs with the T-lineman's opinion and concludes this was likely an isolated incident involving attempted copper theft based upon the totality of evidence. | - | Probable attempted copper theft | N | N/A | 1/6/2021 | Peterson, Randolph, and Palmer |
| 16 | OE417_Form_PGAE_01_01_2021_Tesla_Vandalism_Event_Final | 1/1/2021 | 7:04 | 1/1/2021 | 7:04 | Alameda County | Vandalism | Damage or destruction of a facility | Mitigation implemented. | At 0704, on January 1, 2021, PG&E Corporate Security notified the Grid Control Center that an unknown person broke into a substation by digging under the fence near the warehouse located at the substation. The perpetrator then drove around the substation yard and broke through the three gates with a PG&E truck subsequently stealing a rental car/truck. No damage to substation operating equipment reported. Initial information suggests vehicle theft was the likely motive of the suspect. | - | Damage to Substation parameter fence and vehicle; Additional security personnel posted at Substation. | N | N/A | 1/7/2021 | Peterson, Randolph, and Bout |
| 17 | OE417_Form_PGAE_Island_01_02_21_Final | 1/2/2021 | 10:28 | 1/2/2021 | 10:51 | Butte County | Other | Electrical system separation (islanding) | Repaired or restored | At 10:28 on January 2, 2021, a transformer bank relayed and tested OK, but remained open-ended on the low side resulting in an island of a generator serving customer load. A substation tripped due to over frequency, terminating the island. The transmission line was restored. The faulted transformer bank will be inspected by Substation Maintenance (visual and oil sample test). | 5,803 | Transformer bank fault. Island was terminated and transformer bank will be inspected. | N | N/A | 1/11/2021 | Peterson, Randolph, and Bout |
| 18 | OE417_Form_PGAE_Wind_Event_01_19_21_Final | 1/19/2021 | 2:48 | 1/20/2021 | 11:41 | Various counties in California | Weather or natural disaster | Loss of electric service to more than 50,000 for 1 hour or more | Repaired or restored | On January 19, 2021, high winds struck PG&E's service territory, leading to multiple transmission and distribution outages and thereby resulting in the loss of more than 50,000 customers for more than 1 hour starting at approximately 02:48 PST. The peak number of customers without electric service was approximately 124,888. The number of customers without electric service dropped below 50,000 at approximately 11:41 PST on January 20th. The majority of transmission assets have been returned to service. | 124,888 | The majority of transmission assets have been returned to service. | N | N/A | 1/26/2021 | Peterson, Randolph, and Bout |
| 19 | OE417_Form_PGAE_Wind_Event_01_26_21_Final | 1/26/2021 | 20:49 | 1/28/2021 | 21:14 | Various counties in California | Weather or natural disaster | Loss of electric service to more than 50,000 for 1 hour or more | Repaired or restored | On January 26th, an atmospheric river arrived in PG&E's service territory, leading to multiple transmission and distribution outages and thereby resulting in the loss of more than 50,000 customers for more than one hour starting at approximately 20:49 PST. The peak number of customers without electric service was approximately 255,715. The number of customers without electric service dropped below 50,000 at approximately 21:14 PST on January 28th. The majority of transmission assets have been returned to service. | 255,715 | Atmospheric River (snow and rain). The majority of transmission assets have been returned to service. | N | N/A | 2/3/2021 | Peterson, Randolph, and Bout |
| 20 | OE417_Form_PGAE_Island_03-06-2021_Final | 3/6/2021 | 3:21 | 3/6/2021 | 4:07 | Tuolumne County, California | Weather or natural disaster | Electrical system separation (islanding) | Repaired or restored | On March 6, 2021 at 03:21, a transmission line tested okay, but the line remained open creating two islands. The first island consisted of a generator serving its own load. The second island consisted of generators serving the load at two substations. This second island also included off-line generators. The generator paralleled to the PG&E system ending the first island condition. Separation of the generators terminated the second island. | 24000 | | N | N/A | 3/16/2021 | Peterson, Randolph, and Bout |