

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

**E-MAIL COMMUNICATION**

June 30, 2021

Sumeet Singh
Senior Vice President & Chief Risk Officer
Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
s1st@pge.com

Dear Mr. Singh:

Thank you for the presentation by the Pacific Gas & Electric Company (PG&E) team at the June 23, 2021 workshop on PG&E's Enhanced Oversight and Enforcement Process Corrective Action Plan.

As President Batjer, Commissioner Rechtschaffen, and Commissioner Shiroma stated during the workshop, the Commission's top concern is safety, and PG&E's demonstration of progress in using risk to prioritize its enhanced vegetation management is fundamental to its safe operations. This includes demonstrating that the risk-prioritized work is being accurately carried out by crews on the ground to mitigate risk for the 2021 wildfire season.

Attached to this letter please find the data request from the staff teams working to evaluate PG&E's Corrective Action Plan. As Wildfire Safety Division is becoming the Office of Energy Infrastructure Safety on July 1, 2021, please ensure that PG&E provides its response to the data request to Lana Tran in the Safety and Enforcement Division and Marybeth Farley in the Wildfire Safety Division as indicated in the data request.

Sincerely,

Handwritten signature of Rachel Peterson in black ink.

Rachel Peterson
Executive Director, California Public Utilities Commission

Handwritten signature of Caroline Thomas Jacobs in blue ink.

Caroline Thomas Jacobs
Director, Wildfire Safety Division

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 30, 2021

Sumeet Singh
Senior Vice President & Chief Risk Officer
Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
s1st@pge.com

Meredith Allen
Director, Regulatory Affairs
Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
MEAe@pge.com

SUBJECT: Data Request regarding Pacific Gas and Electric's (PG&E) Corrective Action Plan (CAP) to address Resolution M-4852 (Enhanced Oversight and Enforcement Step 1)

The California Public Utilities Commission (CPUC) requests that you respond to the following questions regarding PG&E's Corrective Action Plan filed May 6, 2021, to address Resolution M-4852 regarding PG&E's placement in Step 1 of Enhanced Oversight and Enforcement. Please provide us with the name of the person(s) who prepares each section of the data request response.

1. Per Element 3 of its Corrective Action Plan, PG&E is required to provide a detailed list of planned EVM work. However, what PG&E provided was a summary of total miles planned for work per a particular Circuit Protection Zones (CPZs). Please provide an Excel spreadsheet listing all work planned per segment within each CPZ.
2. Provide an Excel spreadsheet that identifies all the CPZs that will be worked on between now and August 6th when PG&E's first 90-day plan is due. Identify the number of miles per identified work segment/project within each CPZ. On a forward-going basis, please provide this information for each 90-day report (See Question 20c).
3. For the information requested in Question 2, provide the breakdown of resources and personnel types, including the following information:
 - a. How many supervisors assigned per region?
 - b. How many contractors per supervisor?
 - c. How many foremen per contracting company?
 - d. How many field employees per contracting company?
 - e. Which contracting company is assigned which CPZs?

4. How will PG&E inform and communicate its EVM goals and targets to teams and individual staff members? With regards to this issue, please respond to the following questions:
 - a. How will PG&E inform and communicate its Enhanced Vegetation Management (EVM) goals and targets to teams and individual staff members?
 - b. In its CAP, PG&E states that it will hold quarterly meetings with Vegetation Management on work progress, forecasted remaining miles, and review of approved changes. However, the first meeting will not occur until after the close of second quarter. How will PG&E communicate this information to lower-management staff, non-management staff, and contractors, given this timing conflict?
5. Please describe how PG&E communicates its Enhanced Vegetation Management (EVM) scope of work to the contractors assigned to perform such work. In answering this question, please describe the following:
 - a. How PG&E verifies that contractors understand and follow the scope of work;
 - b. Whether PG&E employs inhouse personnel to validate contractor work; In the first 90-day report, provide the methodology used to assure quality of EVM work performed by contractors (QA/QC).
6. Explain PG&E's approach to planning transmission vegetation work in 2021 based on risk. PG&E later states that the transmission model is not being developed until 2022.¹ Please explain why the modeling of transmission risk was not prioritized for 2021.
7. For each of the Circuits listed Attachment E, *2021 Enhanced Vegetation Management Scope of Work*, please provide a list of all other CPZs not included in the 2021 EVM Scope of Work that are associated with the named circuit and the remaining non-EVM circuit miles. If possible, please provide this information in the same format as the table in Attachment E.
8. Please explain in detail the effect (if any) that fires have on the risk model and rankings. How often are fire burned areas used as an input to the model to properly adjust the output, plan, and risk scores? In your response, please provide concrete examples.
9. How are risks such as peak loading capacity, reliability, wildfire spread, population density and prior Public Safety Power Shut-off (PSPS) events that were included in the 2020 Risk Value Overlay now included in the 2021 Wildfire Distribution Risk Model? Please explain your answer and provide relevant examples.
10. Explain and describe PG&E's documentation of Wildfire Risk Governance Steering Committee (WRGSC) meetings, as well as PG&E's documentation for decision-making processes by Vegetation Management or the Vegetation Management Board, which are depicted in Figure 6 on page 17 of PG&E's May 6th revised Corrective Action Plan.

¹ CAP Attachment B, p.8.

11. Provide documentation regarding the by-laws and structure of the WRGSC.
 - a. Please explain if there is a process for appeals to WRGSC recommended changes.
 - b. How will Chief Risk Officer's (CRO) involvement drive or impact decision-making by the WRGSC?
12. In its May 6th CAP, PG&E identifies three stages of work, with pre-inspection preceding tree removal work.² Please explain if the pre-inspection work will identify the conditions that would impact or prohibit planned EVM work and whether these issues will be resolved prior to work scheduling and assignment.
13. How exactly does PG&E determine EVM completion? As an example, if PG&E is not able to complete 2 miles of a 10-mile CPZ because of customer refusals or permit issues, what does PG&E receive credit for? Please explain your response.
14. How does PG&E calculate and mitigate the residual risk associated with mileage/segments of a CPZ that cannot be worked due to various constraints such as permitting issues/delays or customer refusals? Please explain your response.
15. Please explain how many miles or how much "carry-over work" from 2020 are included in the 2021 EVM goal of 1,800 miles?³ How much carry-over work in total is included in the 2021 reported progress?
16. How will PG&E increase its EVM completion rate in the second half of 2021 to reach 1,800 miles based on the limited number of completed miles reported completed at mid-year (approximately 500 miles)? Specify the factors and improvements taken by PG&E to increase its rate three-fold in the second half of 2021.
17. What are the greatest risks PG&E has identified as impediments to reaching its quarterly and annual EVM goals? In your response, please explain the following:
 - a. What is PG&E's course-correct plan if it fails to meet a weekly, monthly, or quarterly goal?
 - b. What will be the potential effect of a PSPS or Red Flag events on PG&E's targets and how will PG&E navigate or adjust the quarterly goals?
18. Describe the similarities and the differences between the EVM program and the safety requirements ordered or recommended by Judge Alsup in PG&E's federal bankruptcy case. Please explain how the new Zogg Fire PSPS shut-off criteria required by Judge Alsup affect PG&E's wildfire VM/EVM risk assessments, models, or scope of work.

² CAP, p.4.

³ CAP Element 13 and Table 1.

19. Assuming PG&E meets its 1,800-mile goal by 12/31/21, identify the steps PG&E will take to verify and close-out its 2021 EVM accounting by February 2022. Describe the steps and review process that will need to occur in the month between PG&E completing all assigned work and when the EVM accounting is to be closed out in February 2022.

Ninety (90)-Day Report Items

20. The Commission has identified the following data, information, and documents that PG&E should provide in its first 90-day report.
- a. GIS data to map out where EVM work will be performed. Provide digital GIS system maps showing the location of each of the 99 CPZs in the CAP 2021 EVM Scope of Work. Maps should include CPZ labels and show/label other CPZs which are part of the same circuit. PG&E should update this GIS data in each 90-day report to show where work has been completed.
 - b. WRGSC-recommended changes that would impact the milestones and targets in PG&E's CAP and Wildfire Mitigation Plan (WMP) (including updated targets and milestones as appropriate).
 - c. An Excel spreadsheet that identifies all the Circuit Protection Zones (CPZ) that will be worked on within the next 90 days beginning August 6th. Identify the number of miles per identified work segment/project within each CPZ.
 - d. For the next 90-day EVM work plan beginning August 6th in Question 20c, provide the breakdown of resources and personnel types, including the following information:
 - i. How many supervisors assigned per region?
 - ii. How many contractors per supervisor?
 - iii. How many foremen per contracting company?
 - iv. How many field employees per contracting company?
 - v. Which contracting company is assigned which CPZs?
 - e. The Action Plan (developed by 6/28) to address issues identified in PG&E's Internal Audit Report from May 21, 2021.

Your response should be provided in electronic format, if available, and in hard copy otherwise. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless the use of such formats is not feasible.

If you are unable or unwilling to provide the documents requested, please identify in writing what information or documents you cannot provide and the reason why the documents cannot be provided, or a best estimate of when the information can be provided. Send your response to:

Lana Tran
Regulatory Analyst
Lana.Tran@cpuc.ca.gov
California Public Utilities Commission
Safety and Enforcement Division
Electric Safety and Reliability Branch
505 Van Ness Ave.
San Francisco, CA 94102
Phone: (415) 703-5359

Marybeth Farley
Program and Project Supervisor
Marybeth.Farley@energysafety.ca.gov
Office of Energy Infrastructure Safety
Phone: (916) 936-6446