

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Wildfire Mitigation Plans Discovery 2023-2025**  
**Data Response**

PG&E Data Request No.:	CalAdvocates_042-Q005		
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Request Date:	April 9, 2024	Requester DR No.:	CalAdvocates-PGE-2025WMP-06
Date Sent:	April 12, 2024	Requesting Party:	Public Advocates Office
PG&E Witness:		Requester:	Holly Wehrman

**QUESTION 005**

Page 16 of PG&E's 2025 WMP Update states,

“in the WTRM v2 update, we corrected this overly conservative estimate by applying a remaining strength of 92% (equivalent to Condition Code 2) to reinforced poles, in order to provide more accurate results.”

State the basis for applying a remaining strength of 92% to reinforced poles.

**ANSWER 005**

The WTRM uses condition codes assigned by an inspector based on ground and visual inspections of the pole. The condition codes range from 1 = no visible damage, to 3 = moderate damage, to 5 = immediate safety concern. The framework estimates the remaining strength from the condition codes using a simple linear relationship between condition codes and remaining strength. The translation line is anchored at two points, condition code = 1 is translated to remaining strength = 100% (no damage) while a condition code = 3 is translated to remaining strength = 67% or 2/3<sup>rd</sup>. The strength ratio of 2/3<sup>rd</sup> is based on California General Order 95 which is a threshold for repair or replacement of a component. The two anchor points define the translation and other condition codes are translated either by linear interpolation or linear extrapolation. Based on input from SME workshops, the strength degradation associated with a condition code of 2 has been reduced by half from 1/6<sup>th</sup> to 1/12<sup>th</sup>. The consensus feedback from the workshops was that a 1/6 strength reduction was unrealistically conservative for elements that exhibit only cosmetic damage (e.g. light surface corrosion).

Condition Code	Remaining Strength (%)
1	100
2	92
3	67
4	50
5	33

As noted in the question, the 92% remaining strength was intended to be consistent with a condition code of 2, which is typically used for a less than perfect condition that does not require repair. This was considered slightly conservative for a reinforcement that is as strong as the pole, which was Asset Strategy's understanding of the intent of pole reinforcements by their vendor. PG&E continues to evaluate this assessment.