

PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2022
Data Response

PG&E Data Request No.:	WilliamBAbrams_002-Q16		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q16		
Request Date:	April 13, 2022	Requester DR No.:	Email Transmittal – 2022WMP DR-02
Date Sent:	April 25, 2022	Requesting Party:	William B. Abrams
PG&E Witness:		Requester:	Will Abrams

SUBJECT: PG&E WMP GAP ANALYSIS GIVEN KINCADE FIRE TESTIMONY AND SAFETY IMPLICATIONS

Expert Testimony: Mr. Gary Uboldi, Fire Captain Specialist Peace Officer with the California Department of Forestry and Fire Protection who has investigated over 400 wildfires across his 20+ year career

Testimony Date: February 8, 2022 (See Attachment A: Pre-Trial Transcript)

BACKGROUND TESTIMONY/EVIDENCE:

Pg. 133-134 (lines 1-2)

“There’s holes in the fence in varies areas. Appeared to be from various stages of construction or demolition going on.”

QUESTION 16

- a. What has PG&E done to ensure security fencing around their infrastructure is inspected and maintained given these findings?
- b. How does PG&E mitigate the security dangers of poorly maintained fencing?

ANSWER 16

There were no “findings” regarding PG&E’s inspection and maintenance of security fencing. The fence referenced in the cited testimony is owned by Calpine, not PG&E. The fence in question surrounds Calpine’s equipment, and its maintenance is the responsibility of Calpine.