

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

PG&E Data Request No.:	WilliamBAbrams_002-Q19		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q19		
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. 142 (lines 17-22)

“And specifically back on September 25 of 2016, did you respond to a vegetation fire in the vicinity of Geysers unit 5 and 6? A. Yes, I did.  
Q. And did that fire later become known as the Saw Mill Fire?”

Pg. 145 (lines 14-19)

“And you were able to see a V-shape pattern with respect to Saw Mill?  
A. Yes. Q. Were you also able to see a V-shape pattern with Kincade?  
A. Yes.”

**QUESTION 19**

Given that the Saw Mill Fire pointed to the same or very similar infrastructure failures and mismanagement patterns as the Kincade Fire has PG&E finally included mitigation activities for these issues within their WMP?

**ANSWER 19**

The cause of the Sawmill Fire bears no significant similarity to the Kincade Fire. As the witness explained, the “V-shape pattern” referenced in the cited testimony is a generic method for “determin[ing] where the fire originated from.” (Tr. 145:13.) Specifically: “With a V pattern, if I was to take a slope and light a fire at the bottom of the slope, as it progresses it’s going to want to burn uphill. As it burns uphill, it will start forming a V as it crests up the slope.” (Tr:1-5.) The presence of the “V” pattern does not make the Kincade and Sawmill Fires similar.

The witness later explained that, in his opinion, the Sawmill Fire was caused by a bond wire—a small single-strand wire that is attached to wood poles with staples and, unlike stranded conductor, is not designed or intended to move, sway or be flexible. The staples holding the bond wire to the wood pole came out, and the wire made contact with energized conductor.

By contrast, the equipment involved in the Kincade Fire was a heavy, multi-strand jumper cable on a transmission tower, not a small, solid wire stapled to a wood pole. As the witness affirmed, the jumper cable at issue in the Kincade Fire was “much thicker” and “much heavier” than the Sawmill Fire bond wire, served a “different purpose[]” than the bond wire, and could not have been “staple[d] . . . to a wood pole.” (Tr 224:4-21.) The witness also testified that the staples that had ultimately caused the bond wire to come loose and make contact with the conductor “do not move in the wind” and would have instead “back[ed] themselves out” of the wood pole “over time.” (Tr. 227:16-17, 20-21.)

With respect to the Kincade Fire specifically, the Company took several actions following the fire:

- i. PG&E disconnected the three spans of the Geysers #9 line not serving customer load so that the spans were de-energized;
- ii. PG&E reviewed its transmission lines to determine if other energized spans not serving customer load remained. In the High Fire Threat Districts, PG&E found one such span and de-energized it.
- iii. PG&E issued revised guidance regarding idle transmission facilities. The revised guidance stated that idle transmission facilities included energized spans not serving customer load.
- iv. PG&E revised its inspection forms so that inspectors are required to report facilities not serving customer load.
- v. PG&E issued guidance requiring open jumpers to be cut as short as practical.
- vi. PG&E surveyed its transmission system to identify and remediate open jumpers that were not in compliance with the new guidance.
- vii. PG&E removed the last three spans of the Geysers #9 line, eliminating any risk that the nearby Geysers #12 line could induce a current in the last three spans (then de-energized) of the Geysers #9 line.

Section 7.3.3.17.2 of the WMP provides a summary of PG&E’s efforts with respect to idle transmission facilities. PG&E’s design standards, like its open jumpers guidance, are not typically included in the WMP.