

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

PG&E Data Request No.:	WilliamBAbrams_002-Q15		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q15		
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. 131 (lines 14-17)

“We were trying to determine the use of that section of line, running from 9 to 6, and we ended up determining with our generals, CPUC generals 95 that it was a possibility that it was an abandoned power line.”

Pg. 132 (lines 19- 22)

“I was unable to determine, being that the power lines were not connected to anything. And given the current condition of the power plant, I was unable to determine a use for those power lines.”

QUESTION 15

- a. Given these failures to deal with abandoned infrastructure, how has PG&E identified the added mitigation activities since the Kincade Fire?
- b. How does PG&E now treat “abandoned” infrastructure differently within their WMP?

ANSWER 15

The power plant referenced in the cited testimony is owned by Calpine, not PG&E, and it is not abandoned. Calpine informed PG&E that the plant was “mothballed,” and Calpine continues to report that the plant is in “cold standby.”

Following the Kincade Fire, PG&E took the following measures to mitigate “idle” or abandoned transmission facilities:

- PG&E issued revised guidance regarding idle transmission facilities. The revised guidance stated that idle transmission facilities include energized spans not serving customer load. Such facilities must be de-energized. See WMP-Discovery2022_DR_WilliamBAbrams_002-Q15Atch01CONF.pdf.
- PG&E revised its inspection forms so that inspectors are required to report facilities not serving customer load.
- 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.
- PG&E also agreed with CPUC to remove certain abandoned lines.

Section 7.3.3.17.2 of PG&E's 2022 WMP provides the following regarding "idle," or permanently abandoned, transmission facilities:

Line De-energization, Grounding and Removal – PG&E follows the procedures and requirements in Utility Procedure:TD-1003P "Management of Idle Electric Transmission Line Facilities Procedure" to investigate potential idle facilities. When these facilities are identified and confirmed to be within an HFTD area with no operational needs, they are prioritized for de-energization, grounding, and/or removal. Grounding of an already de-energized line addresses residual wildfire risk of induction from nearby energized line(s), until conductor removal or repurposing of the facilities can occur. Transmission lines may also be considered for temporary or seasonal de-energization depending on the operating needs and wildfire risk of the line.

Transmission lines may be removed as part of the idle facility process, or through other work such as line re-routing or re-building. As referenced in SED-6, PG&E is preparing a 10-year plan to remove permanently abandoned transmission lines in connection with the settlement of the Kincade Fire with the CPUC's Safety and Enforcement Division. Removal of energized lines reduces overall exposure to wildfire risk.